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GrowthEnergy.org

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The Honorable David Koehler
Assistant Majority Leader
Illinois State Senate
323B Capitol Building
Springfield, IL 62706

Senator Koehler:

Thank you for the opportunity to comment on SB 1556, the Clean Transportation Standard proposal. Growth Energy is the world's largest association of biofuel producers, representing 93 U.S. plants that each year produce more than 9 billion gallons of renewable fuel; 114 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

According to recent data from Environmental Health and Engineering, today's bioethanol reduces greenhouse gas emissions (GHG) by nearly 50 percent compared to gasoline and can provide even further GHG reductions with additional readily available technologies.¹ Ethanol has a proven history of contributing to GHG reductions in an existing low carbon fuel standard (LCFS): according to the Transportation Energy Institute, ethanol is responsible for 31% of GHG reductions in California's LCFS, the largest percentage among fuel sources.² The potential for fuels with higher blends of ethanol to reduce GHGs are further illustrated in a national analysis showing more than 634,000 tons in GHG reduction in Illinois alone if E10 gasoline was replaced with E15. This is the GHG reduction equivalent of removing nearly 140,000 vehicles from Illinois' fleet just by using a higher ethanol-blend fuel.³ These emissions reductions come with meaningful consumer cost-savings. During the summer of 2022, E15 was sold at 16 less per gallon where available on average. In some locations, we saw E15 selling consistently for as much as \$1 less per gallon than regular gasoline.

¹ <https://iopscience.iop.org/article/10.1088/1748-9326/abde08/pdf>

² https://www.transportationenergy.org/wp-content/uploads/2023/07/Decarbonizing-Combustion-Vehicles_FINAL.pdf

³ <http://www.airimprovement.com/reports/national-e15-analysis-final.pdf>

Regarding SB 1556, we recommend clarifying the definition of “provider” in section (b) to ensure the appropriate parties are obligated under the standard. Other similar programs in California and Oregon have focused on petroleum importers, refiners, and wholesalers as the regulated parties to ensure that the finished fuel achieves the goal of the program.

Additionally, clarity on the baseline from which the 20% reduction by 2038 is calculated in section (c) is needed. We recommend the legislation determine levels for carbon intensity from which to base a 20% reduction rather than leaving it up to Agency discretion. Providing the baseline number in the legislation will ensure clarity for fuel providers and producers of fuel feedstocks.

We appreciate the direction to use the Argonne National Laboratory’s GREET model for calculating the life cycle carbon intensity. Additionally, we are encouraged by both the inclusion of using the entire life cycle in calculating a fuel’s carbon intensity and the commitment to an approach that is technology and feedstock neutral.

We again thank you for the opportunity to provide feedback on SB 1556, and are available to answer any questions you have as you continue to develop Illinois’ Clean Transportation Standard.

Sincerely,



Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy