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GrowthEnergy.org

August 30, 2023

Dr. Cheryl Laskowski  
Branch Chief, Transportation Fuels  
California Air Resources Board  
P.O. Box 2815  
Sacramento, CA 95812  
Via electronic mail

RE: Comments in Response to the August 16, 2023 Low Carbon Fuel Standard Workshop

Dear Dr. Laskowski:

Thank you for the opportunity to provide feedback on the latest updates to the Low Carbon Fuel Standard's (LCFS) California Transportation Supply (CATS) modeling. Growth Energy is the world's largest association of biofuel producers, representing 93 U.S. plants that produce more than 9 billion gallons of renewable fuel, 112 businesses associated with the production process, and tens of thousands of biofuels 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.

Growth Energy has previously submitted extensive comments demonstrating the vital role low carbon biofuels and higher biofuel blends can play in meeting California's ambitious climate goals. As we have previously noted, biofuels have been among the largest contributors to the success of the LCFS program to date and are poised to continue to do so with appropriate updates to the program.<sup>1</sup>

As noted in the workshop presentation, one of the updates to the CATS model was updating the pathway carbon intensity for E85 to reflect the use of Carbon Capture, Utilization, and Sequestration (CCUS) technologies, with the assumption that CCUS will reduce the carbon intensity of ethanol from 66 gCO<sub>2</sub>e/MJ to 35 gCO<sub>2</sub>e/MJ.<sup>2</sup>

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<sup>1</sup> [https://www.transportationenergy.org/wp-content/uploads/2023/07/Decarbonizing-Combustion-Vehicles\\_FINAL.pdf](https://www.transportationenergy.org/wp-content/uploads/2023/07/Decarbonizing-Combustion-Vehicles_FINAL.pdf)

<sup>2</sup> [https://ww2.arb.ca.gov/sites/default/files/2023-08/CATS%20Technical\\_1.pdf](https://ww2.arb.ca.gov/sites/default/files/2023-08/CATS%20Technical_1.pdf)

As a result of provisions in The Inflation Reduction Act of 2022, ethanol producers will be incentivized to adopt CCUS technologies, expanding the amount of ethanol with lower carbon intensity scores. While CARB's change to the CATS model reflecting CCUS technologies for ethanol is a welcome change, its positive impact on California's emissions reduction goals cannot be fully realized without the inclusion of higher ethanol blends of fuel, such as E15, in California's energy mix.

To illustrate the impact on LCFS credit prices and the use of other fuels, Growth Energy commissioned a study, conducted by Trinity Consultants, to simulate the CATS model based on the assumed approval of E15. In the memo, included with this comment submission, LCFS credit prices are lower in the E15 case compared to the E10 case through 2039, then equal to E10 thereafter.

The same study showed "no impact of E15 on the assumed volumes of biodiesel, hydrogen, electricity, or natural gas across the entire study period" while decreasing the use of conventional jet fuel and increasing the use of alternative jet fuel. This modeling suggests no long-term impact of E15 approval on LCFS credit prices, while E15 would also provide the environmental and consumer cost benefits we have shown in previously submitted comments.

The subject of the workshop was primarily for discussion of adjustments to the CATS modeling. As CARB considered the positive impact of CCUS on the carbon intensity of ethanol, we strongly encourage the Board to consider the approval of higher ethanol blend fuels with a carbon intensity score reflecting the same CCUS technologies considered for E85, especially in light of the conclusions in Trinity Consultants' study on LCFS credit prices.

We look forward to continuing to work with CARB on revisions to the LCFS program and to ensure biofuels' role in making California's fuel mix more sustainable and helping the state achieve its climate goals through the expanded use of bioethanol.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley".

Chris Bliley  
Senior Vice President of Regulatory Affairs  
Growth Energy