



Growth Energy™
Expanding America's Bioeconomy

September 22, 2025

Mr. John Cabaniss
Office of Energy Efficiency and Renewable Energy
U.S. Department of Energy
1000 Independence Ave., S.W.
Washington, DC 20585

Re: Notice of Intent to Publish the 45Z Emissions Value Request Process

Mr. Cabaniss:

Thank you for the opportunity to provide input on the Department's Notice of Intent to Publish the 45Z Emissions Value Request Process. As you may know, Growth Energy is the nation's largest association of biofuel producers, representing 97 U.S. plants that each year produce more than 9.5 billion gallons of low carbon, renewable fuel; 131 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Our members are critical to the supply of biofuel in the United States and have substantial interests in ensuring the effective, efficient, and science-based implementation of the Section 45Z Clean Fuel Production Credit. Our industry is poised to assist the administration's energy goals by providing low-cost, innovative, and American-made fuel as we remain committed to helping our country diversify its energy portfolio and provide consumers with better and more affordable choices at the fuel pump.

Growth Energy and its members have been and continue to be actively engaged in the implementation of the 45Z Clean Fuel Production Credit. As such, we recently submitted a detailed letter to Secretary Bessent as well as Secretary Wright outlining our specific views on a number of important implementation issues such as addressing indirect land use change (ILUC), updates to the user manual for the 45Z CF GREET Model, increased accounting for agriculture practices, along with prompt finalization of the provisional emissions rate (PER) process. We encourage you to review our letter (attached and available [here](#)) as well as our previous comments (also attached and available [here](#)). It is critical that the Department, in conjunction with the Internal Revenue Service (IRS), provide biofuel producers as much certainty as possible with respect to applicable rules and guidance for credit eligibility.

Accordingly, we urge the Department to work with IRS to move forward as expeditiously as possible by finalizing the Section 45Z implementing regulations consistent with the suggestions we offer here and in our previous comments. Thank you for your consideration and please contact me if you have any additional questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Chris Bliley". The signature is stylized with a large, looped "B" and "L".

Chris Bliley
Senior Vice President of Regulatory Affairs
Growth Energy
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