

**Statement of Chris Bliley, Senior Vice President of Regulatory Affairs, Growth Energy  
on the Department of Treasury's Hearing on the proposed rule for 45Z, the Clean Fuel  
Production Credit**

**May 29, 2026**

Good morning and thank you for the opportunity to appear today. My name is Chris Bliley, and I am Senior Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the nation's largest association of ethanol producers, representing more than half of our country's total ethanol production.

American energy dominance runs through our nation's heartland. A strong, well-implemented 45Z credit can unleash lower-cost fuels, rebuild farm income, and open long-term market opportunities for American manufacturing. We applaud the Department (of Treasury) and the Trump administration for working to advance this important rulemaking to chart a clear path for billions of dollars in new investments in U.S. energy leadership.

The proposed rule provides much-needed clarity around key issues, including how credits are calculated and who is eligible, and we are encouraged that the proposal reflects our comments regarding the need to offer greater flexibility to producers around the definition of "qualified sale", production of undenatured ethanol to maintain our global export leadership, and implementation of provisions from the One, Big, Beautiful Bill – most notably, the removal of indirect land use change.

However, some key questions remain unresolved and industry needs additional certainty, so that the value from the credit can be shared through the value chain, most notably with our nation's farmers.

Growth Energy has provided several detailed comments to the Department, most recently on April 6<sup>th</sup>, outlining our specific recommendations on the proposal; however, I will highlight several priority items:

First, while we greatly appreciate that the proposal outlines a process moving forward to include on-farm practices in the calculation of the credit, it is important that the Department move in conjunction with USDA and the Department of Energy to implement these changes as quickly as possible. Most notably, the Department should work with USDA to quickly finalize their pending rule on "Technical Guidelines for the Production of Regenerative Agricultural Biofuel Feedstocks", work with DOE to then include USDA's rule as a FD-CIC module within the 45ZCF-GREET model, and finally enable the taxpayers to use the updated model inclusive of the new USDA FD-CIC module.

Related, the Department should also work with DOE to swiftly release targeted updates to the 45ZCF-GREET model and user manual. Specifically, the agencies should clarify that taxpayers may calculate emissions rates without inclusion of indirect land use change (ILUC) as addressed in the One, Big Beautiful bill. The model and user manual should also be expanded to recognize the use of additional process energies and feedstocks in use throughout the ethanol industry.

As further innovation and investment is taking place across the industry, there is a need for greater flexibility and efficiency in the credit's provisional emissions rate process. The PER process is intended to be a swift and efficient process to provide certainty and investability to innovative producers reliant upon the 45Z credit. While we appreciate that there has been some additional clarity, it is still overly burdensome and restricts potential access to the credit, ironically for some of the most innovative facilities. We believe that by making a few adjustments to the PER process as detailed in our written comments, the Department can make the process more straightforward to drive further investment.

We hope that you will further consider other issues raised in our written comments such as additional flexibility in prevailing wage criteria and work quickly with USDA and DOE to quickly implement and finalize these important rules and models.

The President and the administration know that American farmers and ethanol producers are ready to put more American-made fuel into the marketplace, hold down energy costs, and secure American energy leadership. Your work to implement this credit and finalize this proposal are critical steps to making that vision a reality.