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Growth Energy's Comments (AS PREPARED)

CARB's Proposed Amendments to the California Reformulated Gasoline Regulations

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Chair Sanchez and members of the Board, thank you for the opportunity to speak today.

My name is Dallas Gerber with Growth Energy, the nation's largest trade association representing ethanol producers. As you know, Growth Energy partnered with CARB on this endeavor, beginning seven years ago, leading up to today. We strongly support the proposed amendments to the California Reformulated Gasoline regulations.

The proposal is a practical, commonsense step that gives California a clear path to E15 while aligning the state with federal E15 regulations and the many other states where E15 is already available to drivers.

Among the most important parts of the rule is that CARB treats E15 as gasoline rather than an alternative fuel, under the existing [Cal RFG] program, as it is treated federally and in all other states. This approach provides regulatory certainty, avoids unnecessary delay, and gives fuel suppliers, retailers, and consumers greater confidence as E15 becomes available in the state.

CARB also deserves credit for recognizing the different methods in which E15 is dispensed across the country. By allowing downstream blending and avoiding unnecessary California-specific labeling requirements, the proposal gives retailers flexibility, utilizing existing practices and federal consumer protections, and helps reduce costs that could otherwise slow consumer access.

In jurisdictions where it is already available, the economic and environmental benefits of E15 are readily apparent and meaningful. E15 can reduce greenhouse gas emissions, improve air quality, and give drivers lower-cost fuel options at the pump. In other states, consumers have already seen real savings from E15, anywhere from 10 to 30 cents per gallon on average.

We would also note that the regulation is NOT a mandate and does not require retailers to sell E15; it simply creates the regulatory framework needed to implement what the Legislature has already authorized, while relying on the state's prior evaluation showing no significant adverse impact to public health or the environment.

In short, this proposal is an important step forward. It provides certainty, supports cleaner and more affordable fuel choices, protects consumers, and creates a workable path for E15 in California. Growth Energy urges CARB to finalize the amendments and ensure the final analysis fully reflects the consumer savings and infrastructure readiness that make E15 such a strong opportunity for California. Thank you.