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GrowthEnergy.org

Growth Energy Testimony **Vice President of Regulatory Affairs Chris Bliley**

Environmental Protection Agency Evaluation of Light-Duty Vehicle Greenhouse Gas Emissions Standards for Model Years 2022-2025

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Thank you for the opportunity to appear today to discuss the reconsideration of the mid-term evaluation of the greenhouse gas emissions standards for model year 2022-2025 light duty vehicles. My name is Chris Bliley, and I am the Vice President of Regulatory Affairs for Growth Energy. Growth Energy is the leading association of the ethanol industry, and we are proud to represent 88 producers, 82 companies involved in the supply chain associated with the production of ethanol, and tens of thousands of ethanol supporters. Our members supply the renewable fuels that are a critical part of our nation's energy independence and security efforts.

It has long been recognized that vehicles and fuels operate as a system, and we appreciate Administrator Pruitt and the agency recognizing this important issue by specifically taking comment on advanced fuels technology and specifically on higher octane blends.

Ethanol is a proven high-octane fuel that has many other benefits that assist in combustion to increase engine efficiency and reduce both tailpipe greenhouse gas and criteria pollutant emissions. Study after study from the scientific community has shown that a high-octane, midlevel ethanol blend, when paired with various higher compression ratio engines, can yield greenhouse gas emission reductions of at least 5 percent. And, just recently, USDA confirmed that corn starch ethanol reduces greenhouse gas emissions by 43 percent when compared to gasoline, and this will only continue to improve with time.

Auto manufacturers, too, have acknowledged the importance of affordable, high-octane fuels as critical to attaining regulatory compliance and improving vehicle performance in the most economical manner possible. Again, we are encouraged that the agency is taking these comments from the automakers and is closely examining the benefits of using higher octane fuels, such as a midlevel ethanol blend.

Since 2012, Growth Energy and numerous others have been providing a wealth of information in support of the use of high-octane, midlevel ethanol blends to the agency as part of the original GHG rulemaking, the Tier 3 fuel standards, and the mid-term evaluation process last year.

We are hopeful that the agency will take this data to heart as they reconsider the standards for 2022 and beyond. By moving our country forward with higher octane, better quality fuels, we can give automakers the tools they need to improve engine efficiency. Doing so will not only improve our nation's air quality, it will provide cost savings to consumers, energy security to our country, and improvements to our rural economy.

Thank you again for the opportunity to appear today. We will be filing more detailed comments ahead of the October 5th deadline.