

June 9, 2022

## **Testimony of Chris Bliley, Senior Vice President of Regulatory Affairs, on California's Advanced Clean Cars II Regulation**

Chairman Randolph and Members of the Board:

Thank you for the opportunity to comment on the Board's proposed Advanced Clean Cars II Regulation. Growth Energy is the world's largest association of biofuel producers, related businesses, and supporters.

We appreciate the Board's work to reshape California's transportation mix to make it more sustainable. This objective is a central driver for our industry as well. Specifically, liquid fuels will continue to play an important role in the transportation sector for decades to come, even as alternative technologies flourish.<sup>1,2</sup> As such, it is imperative to consider the vital role that environmentally sustainable fuel options such as bioethanol will play in reducing consumer costs as well as greenhouse gas and air toxic emissions from the current and future California vehicle fleet.

In the existing light duty fleet, higher bioethanol blends like E15 and E85 can be immediately deployed to achieve immediate GHG reductions, reduce harmful air toxics, and reduce consumer costs at the pump.

The use of more bioethanol-blended fuel also further improves air quality by reducing harmful air toxics such as carbon monoxide, benzene, and particulates.<sup>3</sup> This improvement in air quality in turn helps to improve public health – particularly in urban, high traffic density populations.

### **E15 and the Current Light-Duty Fleet**

E15, a 15% bioethanol blend has already been approved for use by the U.S. EPA in all 2001 and newer light-duty vehicles and is now available in 31 states.

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<sup>1</sup> <https://calepa.ca.gov/climate/carbon-neutrality-studies/>

<sup>2</sup> <https://ww2.arb.ca.gov/sites/default/files/2022-05/2022-draft-sp.pdf>

<sup>3</sup> University of California Riverside: <https://fixourfuel.com/wp-content/uploads/2018/04/UC-Riverside-Study.pdf>;  
University of Illinois at Chicago: <https://grains.org/wp-content/uploads/2018/11/Complete-Study-Summary.pdf>

With consumers facing record gas prices, E15 has consistently been less expensive than regular gasoline and has been available for up to 50 cents less per gallon at some locations in recent weeks.

It is critical that California's multi-media working group complete its evaluation of E15, so that it can be approved and made available to California drivers to further help the state achieve its carbon neutrality goals and immediately reduce consumer costs.

### **E85 and Flex-fuel Vehicles**

Additionally, greater use of E85 will promote even further reductions in GHG and air toxic emissions, as well as lower consumer costs (today we're seeing E85 sell at nearly \$2 less per gallon).

The Board should strongly encourage, incentivize, or even require the production and use of flex-fuel vehicles in conjunction with higher bioethanol blends for the remaining ICE fleet, as well as invest in infrastructure for expanded access to higher bioethanol blends.

More broadly, we look forward to working with you to help the state achieve its climate goals through the expanded use of bioethanol.

Thank you in advance for your consideration.