MinnesotaCorn GROWERS ASSOCIATION

December 6, 2019

Ms. Sheena Denny
Office of Administrative Hearings
600 North Robert Street
PO BOX 64620
St. Paul, MN 55164-0620

RE: Request for Comments on Planned New Rules Governing Passenger Vehicle Greenhouse Gas Emissions, Minnesota Rules, chapter 7023; Revisor's ID number 04626

Dear Ms. Denny,

The Minnesota Corn Growers Association (MCGA) appreciates the opportunity to provide comments on behalf of nearly 6,700 farmer members on planned new rules governing passenger vehicle greenhouse gas emissions (GHG), also referred to as Minnesota Clean Car Standards.

MCGA submits the following comments as input to consider as the Minnesota Pollution Control Agency (MPCA) undertakes its analysis as a part of the rulemaking process.

MCGA understands that the proposed Clean Car Standards focus on tailpipe emissions and are not a fuel driven policy and have publically been described as fuel agnostic. However, there are important differences between Minnesota and the 14 Low Emission Vehicle (LEV) or 11 Zero Emission Vehicle (ZEV) states that have adopted these standards, and MCGA strongly urges the MPCA to consider state-specific qualities in the costs and benefits analysis as a part of the proposed rulemaking.

As a Midwestern state with a strong agricultural production sector, diverse economy and transportation system, Minnesota is not directly comparable to the other 14 LEV states and merits careful consideration in the regulatory analysis. Second, and most important to the state's corn growers, is consideration of the impact to Minnesota's ethanol production and use. None of the other LEV or ZEV states are comparable to Minnesota when it comes to production and use of ethanol, as shown in table one. Therefore, MCGA strongly urges the MPCA to consider the impact on Minnesota's ethanol production and use in the costs and benefits analysis as a part of proposed rulemaking.

As stated in the request for comments notice, the main focus of the Minnesota Clean Cars rulemaking is to reduce GHG emissions and other harmful air pollutants from passenger vehicles. The State of Minnesota, our corn farmers and the biofuels industry have been national leaders in the production and blending of ethanol into our fuel supply for improved air quality, in addition to other economic and environmental benefits. According to the most recent data, GHG emissions from corn ethanol are 39-43 percent lower than gasoline on an energy equivalent basis.[1] Additional efficiency gains in feedstock or production process could result in emissions that are 47-70 percent lower than gasoline.

[1] Biofuels Journal. August 2019. The Greenhouse Gas Benefits of Corn Ethanol – Assessing Recent Evidence. https://www.tandfonline.com/doi/full/10.1080/17597269.2018.1546488?scroll=top&needAccess=true

In August of 2019, the Minnesota Department of Transportation published the Pathways to Decarbonizing Transportation in Minnesota report, which included recommendations around electric vehicle (EV) adoption, Clean Cars standards and increasing biofuel blending and infrastructure.[2] The report clearly articulates that biofuels are an integral part of Minnesota's strategy to decarbonize surface transportation, and the data source used for the project modeling analysis correctly recognized and attributed the GHG reduction potential from increased biofuel use in Minnesota.[3] Further, since EVs and biofuels are essential strategies to meet Minnesota's GHG reduction goals, the MPCA regulatory analysis for the Clean Car Standards rulemaking must consider the impact on ethanol production and use in the costs and benefits analysis.

Table 1: Minnesota Ethanol Production, Use and Infrastructure Compared to LEV and ZEV states

State	LEV	ZEV	Ethanol Production Capacity (Millions Gallons per Year)[4]	Ethanol (gasoline blend rate)[5]	E85 Stations[6]	Unleaded 88 Stations
Minnesota			**1,284**	**12.5%**	**422**	**341**
California	X	X	223	10.4%	176	0
Colorado	X	X	0	10.4%	77	23
Connecticut	X	X	0	10.4%	3	0
Delaware	X		0	10.4%	0	0
Maine	X	X	0	10.1%	0	0
Massachusetts	X	X	0	10.4%	6	0
New Jersey	X	X	0	10.4%	4	1
New York	X	X	0	10.1%	63	0
Oregon	X	X	162	10.4%	5	0
Pennsylvania	X		110	9.9%	123	60
Rhode Island	X	X	0	10.4%	0	0
Vermont	X	X	0	9.7%	0	0
Washington	X		0	10.4%	3	0
District of Columbia	X		0	10.4%	1	0

In addition to the detailed current ethanol production and use rates in table one, we also compare Minnesota to LEV and ZEV states on biofuels infrastructure. MCGA is proud of the work we have done with Minnesota partners to have one of the highest ethanol blend rates in the nation. But as documented in the MN DOT Pathways report, there is more we can and should be doing, and MCGA is ready to work with the State of Minnesota to implement biofuels recommendations included in the MN DOT Pathways report.

[2] Minnesota Department of Transportation. August 2019. Pathways to Decarbonizing Transportation in Minnesota. https://www.dot.state.mn.us/sustainability/pathways.html

[3] ICF/USDA. January 2017. A Life-Cycle Analysis of the Greenhouse Gas Emissions of Corn-Based Ethanol. https://www.usda.gov/oce/climate_change/mitigation_technologies/USDAEthanolReport_20170107.pdf

[4] Data supplied by Renewable Fuels Association and available upon request

[5] U.S. Energy Information Administration

[6] Department of Energy, Alternative Fuels Data Center. https://afdc.energy.gov/fuels/ethanol_locations.html#/analyze?fuel=E85

One strategy that will help meet GHG reduction goals is the move to higher ethanol blends in our gasoline supply and MCGA has invested in research that demonstrates future vehicle technologies, including high compression engines, need the octane supplied by ethanol to increase vehicle efficiency.[7] As a part of MPCA's regulatory analysis, MCGA encourages you to examine the possibility of these types of vehicles with higher blends of ethanol to meet the LEV standard. This could also be considered as a part of the costs and benefits analysis.

With respect to the ZEV standard, it is our understanding that only the electric part of a hybrid vehicle would be eligible for credits under ZEV. There are currently three vehicle models that pair hybrid vehicles and flex fuel technology: the Toyota flex fuel hybrid, the Nissan ethanol electric and Toyota's Brazilian Corolla should each be considered in the regulatory analysis for the potential availability in Minnesota as a part of the proposed rulemaking.

Finally, MCGA would like to share three specific concerns or suggestions from our members that we would like the MPCA to consider during the Clean Car Standards rulemaking process:

1. Develop infrastructure to support both electric vehicles and biofuels. As a part of the build out for the EV charging corridor, consider opportunities to co-locate EV charging stations with fuel stations offering mid-level and flex-fuel blends to increase consumer access to low carbon transportation options.

2. Since biofuels, like ethanol, not only reduce carbon emissions but offer an air quality benefit in reduced particulate emissions. MCGA encourages MPCA to attribute improvements to air quality from the increased use of biofuels in passenger vehicles.

3. Corn farmers do have a concern about vehicle ability and being able to access the vehicles needed to grow a crop and bring it to market. MCGA requests that MPCA addresses the concern around truck model availability in the analysis, particularly in future years when more stringent requirements could make certain currently available models no longer accessible in Minnesota.

MCGA appreciates the opportunity to provide input to MPCA as a part of the regulatory analysis for the proposed Minnesota Clean Car Standards and looks forward to continuing to participate in the process as the rulemaking moves forward.

Sincerely,

Les Anderson
President
Minnesota Corn Growers Association

[7] Oak Ridge National Laboratory. September 2018. Effects of High-Octane E25 on Two Vehicles Equipped with Turbocharged, Direct-Injection Engines. https://info.ornl.gov/sites/publications/Files/Pub109556.pdf