



April 4, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave. NW
Washington, DC 20460

Dear Administrator Regan:

As the summer driving season approaches, we urge the Environmental Protection Agency (EPA) to ensure continued availability of low-cost, low-emission E15, often sold as Unleaded 88, in the fuel marketplace. Specifically, we ask EPA to use its authority pursuant to Section 211(c)(4)(C)(ii) of the Clean Air Act from June 1 through September 15, which the agency used successfully last summer to increase the fuel supply, maintain access to lower cost fuel and reduce emissions.

After bipartisan efforts to remove outdated barriers to E15 have hit roadblocks, and since EPA proposed a one-year delay in implementation of a plan from eight Midwest governors to maintain E15 market access, consumer access to this safe, affordable and cleaner fuel is once again in question for summer 2023, absent action from EPA.

At a time when fuel supplies remain constrained and prices remain high, consumers and retailers need all fuel choices available, especially as seasonal demand increases during the summer. Fuel market conditions that warranted EPA's actions last summer are expected to continue this summer, and Russia's war in Ukraine continues to disrupt global energy markets. According to U.S. Energy Information Administration (EIA) data released March 29, gasoline stocks stand at 226.7 million barrels, a decline in stocks from the prior week and 5.1 percent below corresponding levels from a year ago.¹ Additionally, combined stocks of crude oil and petroleum products are similarly down from a year ago, at 5.7 percent below last year's combined stocks, a 19-year low. Most recently, OPEC producers on April 2 announced a further 1.16 million barrels per day output cut, which will begin in May and continue through the end of the year.

EPA's use of existing authority last summer increased the fuel supply by keeping the higher ethanol blend in the marketplace, which reduced fuel prices. For example, the Minnesota Department of Commerce tracks sales and prices of higher ethanol blends in the state. Between June and August of 2022, E15 sales were 4.1 million gallons greater than in 2021, and Minnesota drivers saved an average of

¹ U.S. Energy Information Administration, "This Week in Petroleum," March 29, 2023 at <https://www.eia.gov/petroleum/weekly/gasoline.php>

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17 cents per gallon with E15 compared to regular unleaded, a 10 percent ethanol blend.² Nationwide, drivers with access to E15 saved an average of 16 cents per gallon between June and September 2022, when fuel prices were at their highest, with drivers in some areas saving up to \$1 per gallon.³ In total, drivers saved \$57 million during that three-month span.⁴

With ethanol currently priced around 50 cents less per gallon than unblended gasoline at wholesale, drivers are continuing to save up to 15 cents or more per gallon, including in states outside the Midwest such as Pennsylvania and North Carolina. As the number of retailers offering drivers this low-cost, low-emission choice increases, the economic benefits also expand.

In addition to increasing the fuel supply and lowering prices for drivers, higher ethanol blends like E15 reduce emissions. E15 has a lower RVP than E10 and, therefore, results in lower evaporative emissions, which is the goal of RVP regulation. Ethanol results in nearly 50 percent fewer GHG emissions than gasoline, so increasing ethanol blending from 10 to 15 percent further cuts GHG emissions. Finally, blending more ethanol to make E15 displaces the most toxic aromatic hydrocarbon components in gasoline, reducing exhaust emissions for cleaner air.

American farmers stand ready to help lower costs at the pump, decarbonize liquid fuels and support the U.S. economy with clean energy, all while continuing to meet demands for food, feed, and exports, due to our increased productivity and sustainability. When it comes to cost, blending more ethanol is an immediate step to help lower fuel prices. Ethanol adds billions of gallons to our fuel supply every year, lowering demand for high-cost oil while increasing total fuel available to consumers. Using more homegrown ethanol reduces the impact of global energy disruptions.

We urge EPA to again use the agency's existing authority to ensure E15 remains available to drivers this summer and to continue to work with us on a permanent solution to keep low-cost and low-carbon higher ethanol blends available to consumers, without unnecessary regulatory disruptions in the marketplace.

Thank you for your consideration,

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² Minnesota Department of Commerce, Division of Energy Resources, "2022 Minnesota E85 + Mid-Blend Station Report," at <https://mn.gov/commerce/business/weights-measures/fuel/biodiesel/clean-energy.jsp>

³ ABF Economics, "Consumer Savings from Year-Round Nationwide E15 Use," October 13, 2022 at <https://growthenergy.org/2022/10/17/study-access-to-e15-fuel-would-save-drivers-over-20-billion-in-annual-fuel-costs/>

⁴Renewable Fuels Association, "E15 Extended Gasoline Supplies at a Critical Time This Summer and Saved Americans Millions at the Pump," at <https://ethanolrfa.org/media-and-news/category/blog/article/2022/10/e15-extended-gasoline-supplies-at-a-critical-time-this-summer-and-saved-americans-millions-at-the-pump>

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CC:

The Honorable Thomas Vilsack, Secretary, U.S. Department of Agriculture

The Honorable Jennifer Granholm, Secretary, U.S. Department of Energy