



**Testimony of Geoff Cooper
President and CEO, Renewable Fuels Association**

**U.S. Environmental Protection Agency
Public Hearing**

**RE: Proposed Rule: Revised 2023 and Later Model Year Light-Duty Vehicle Greenhouse Gas
Emissions Standards (Docket No. EPA-HQ-OAR-2021-0208)**

August 25, 2021

My name is Geoff Cooper and I am President and CEO of the Renewable Fuels Association. RFA is the leading voice for America's ethanol industry and our mission is to advance the development, production, and use of low-carbon renewable fuels like ethanol.

We appreciate the opportunity to share our thoughts on EPA's "Proposed Rule to Revise Existing National GHG Emissions Standards for Passenger Cars and Light Trucks Through Model Year 2026," and we will be submitting more detailed comments in writing. We also endorse the remarks delivered earlier today by Senator Tom Daschle, chairman of the High Octane Low Carbon Alliance, of which RFA is a founding member.

RFA believes well-designed fuel economy and greenhouse gas standards can work in tandem with programs like the Renewable Fuel Standard (RFS) to significantly reduce fossil fuel consumption, improve public health, and combat climate change. If our nation is to reach its goal of net-zero GHG emissions by mid-century, we'll need both cleaner, more efficient cars *and* cleaner, more efficient fuels. That's why RFA's member companies recently committed to achieving a net-zero carbon footprint by 2050 or sooner.¹

Unfortunately, EPA's proposal fails to recognize that the fuels we put into our engines can have as much—or more—impact on fuel economy and GHG emissions as the engine technologies themselves. We believe the proposal missed a critical opportunity to solicit public comment on potential regulatory pathways for adopting high-octane, low-carbon liquid fuels as a means of improving fuel economy and reducing emissions from the light-duty vehicle fleet.

Recent studies and analyses, including the Department of Energy's comprehensive Co-Optima research program, clearly show that ethanol-based high-octane, low-carbon fuels can increase fuel efficiency by 5-9 percent and reduce lifecycle GHG emissions per mile by 9 percent or more when paired with the right engine technologies. Why would we leave those low-cost efficiency gains and emissions reductions on the table, especially when we know liquid fuels and internal combustion engines will continue to dominate light duty transportation for decades to come?

¹ Letter from RFA Member Companies to President Joe Biden. July 27, 2021. <https://ethanolrfa.org/wp-content/uploads/2021/07/RFA-Net-Zero-Commitment-Letter-to-President-Biden-.pdf>

We also note that EPA's technical assessment of the proposed CO2 standards assumes "broader availability" of high-compression ratio technologies will be necessary to achieve the 2023-2026 fuel economy requirements. EPA's proposal notes that an engine with high-compression, natural-aspiration, and direct injection is "a very cost-effective internal combustion engine technology that is in use today and ready for broader application."²

But what the proposal fails to mention is that engines utilizing high-compression ratio technology will require higher-octane fuels to prevent premature fuel ignition. In other words, the proposed rule counts on broad deployment of high-compression ratio engines that will require high-octane fuel, but does nothing to ensure those high-octane fuels will actually be produced and available in the marketplace.

Because EPA is relying on these engine technologies to deliver the fuel efficiency gains and emissions reductions necessary to meet future standards, we believe discussion of the high-octane fuels that enable these technologies is well within the scope of this rulemaking process.

Thus, we urge EPA to treat any written comments received regarding the role of high-octane, low carbon fuels as germane to this rulemaking. We also ask that the final rule include a statement expressing the agency's intent to consider adoption of a high octane (98-100 RON) fuel standard as part of a future rulemaking to establish standards for 2027 and beyond.

Action by the EPA will be necessary to catalyze the development and introduction of cleaner, more efficient fuels into the marketplace, just as EPA action was required to eliminate lead, limit benzene, and reduce the sulfur content of our gasoline and diesel fuel. We respectfully ask that EPA use the current rulemaking process and future rulemakings to establish the roadmap for increasing the required minimum octane rating of our nation's light-duty vehicle fuel.

Thank you.

² 86 Fed. Reg. 43770 (Aug. 10, 2021)