

July 24, 2014

Mr. David Danielson
Assistant Secretary for Energy Efficiency & Renewable Energy
Department of Energy
Forrestal Building, Mail Stop EE-1
1000 Independence Avenue, SW
Washington, DC 20585

Dear Assistant Secretary Danielson,

We are writing today to make you aware of important omissions in the Office of Energy Efficiency & Renewable Energy's (EERE) database of E85 fueling station locations, and to request that these deficiencies are corrected as soon as possible.¹ Specifically, the EERE Alternative Fuels Data Center (AFDC) database excludes hundreds of stations that are in fact offering E85 for sale today. We respectfully ask your assistance in ensuring the AFDC database is expeditiously updated to reflect the actual availability of E85 at retail fueling stations nationwide.

As you know, the AFDC E85 station database has taken on increasing importance in recent months, as the debate over implementation of the Renewable Fuel Standard (RFS) has intensified. The Environmental Protection Agency (EPA) and Administration have relied heavily upon the AFDC database in deliberations on RFS implementation. In considering the capability of existing infrastructure to distribute volumes of ethanol above the so-called E10 "blend wall," EPA has depended primarily on the AFDC data. Indeed, EPA's mistaken belief that existing E85 refueling infrastructure is insufficient to distribute the 2014 RFS volumes specified in the statute is based in large part on information from the AFDC. As a result, the Agency wrongly proposed to reduce required renewable fuel blending volumes in 2014. The final rule for 2014 blending requirements is pending.

Further, our association referenced the AFDC E85 station data in a recent report examining the proclivity of oil company-branded and independent-branded retail stations to offer E85 and E15.² Upon publication of the report, we were contacted immediately by some leading companies in the E85 retail market who were concerned that the AFDC data badly misrepresented their retail operations.

As of July 22, 2014, the AFDC database listed just 2,391 retail locations selling E85 nationwide. On the same date, the popular "crowd-sourced" web site E85prices.com listed 3,349 retail locations offering E85—40% more than AFDC. In other words, nearly 1,000 stations appearing on the E85prices.com list are absent from the AFDC database.³ Notably, stations listed on E85prices.com are reported by drivers

¹ Alternative Fuels Data Center. Ethanol Fueling Station Locations. http://www.afdc.energy.gov/fuels/ethanol_locations.html

² RFA. "Protecting the Monopoly: How Big Oil Covertly Blocks the Sale of Renewable Fuels." July 2014. <http://www.ethanolrfa.org/page/-/Protecting%20the%20Monopoly.pdf?nocdn=1>

³ E85prices.com. <http://www.e85prices.com/>

who actually fill up with E85 at the listed locations, meaning there should be little doubt as to the accuracy of the information. To illustrate the problems with the AFDC data, we offer the following specific examples of major discrepancies between the AFDC database (downloaded June 16, 2014) and information provided from sources in the E85 marketplace.

- The AFDC database listed just 154 Speedway stations selling E85. Yet, information provided by Speedway itself shows 203 retail stations selling E85, meaning the AFDC data for Speedway is off by nearly one-third.
- Similarly, the AFDC database suggested E85 is available at just 29 stations affiliated with the Fast Stop brand. Information available on the company's web site shows that E85 is sold at 40 Fast Stop stations, 38% more than listed by AFDC.⁴
- Finally, the AFDC data showed E85 being sold at just 136 stations affiliated with the Cenex (CHS) brand (and only 93 of these locations were clearly identified by AFDC as being affiliated with Cenex). However, information provided by the company itself shows E85 is being sold at 225 Cenex-branded locations. Thus, AFDC understates the number of Cenex locations offering E85 by nearly 40%.

These are just three prominent examples of significant mismatches between the AFDC database and the real world. Out of the 468 total E85 stations operating under the Speedway, Fast Stop, and Cenex brands, only 319 (68%) appeared in the AFDC database. Based on the wide discrepancy between the AFDC list and the E85prices.com list, we expect the examples above are the rule rather than the exception. Attached to this letter is a list of the Speedway, Fast Stop, and Cenex stations that are offering E85 today but do not appear in the AFDC database.

In closing, we again request your help in ensuring the E85 station data provided to the public by AFDC is accurate and comprehensive. The correctness and completeness of the database has never been more important, as crucial policy and regulatory decisions are being informed by the information. Inadequate data leads to ill-informed policy decisions, which can have significant consequences for affected industries. We greatly appreciate your attention to this matter. Should you or your staff have any questions or additional information requests, please contact Geoff Cooper at 636.594.2284 or Robert White at 402.391.1930.

Sincerely,



Bob Dinneen
President & CEO

⁴ Fast Stop Store Directory. <https://www.growmark.com/OurBrands/Documents/FASTSTOPdirectory2.pdf>

Cc:

The Honorable John Podesta, Counselor to the President

Dan Utech, Special Assistant to the President for Energy and Climate Change

Chris Grundler, Director, Office of Transportation and Air Quality, Environmental Protection Agency

John Conti, Assistant Administrator for Energy Analysis, Energy Information Administration

Fast Stop, Speedway, and Cenex Stations selling E85 that *do not* appear in AFDC database

(based on June 16, 2014 AFDC download)

Fast Stop

| | <u>Station Name/Store #</u> | <u>Address</u> | <u>City</u> | <u>State</u> |
|----|-----------------------------|----------------------|--------------|--------------|
| 1 | Blue Jay Junction | 204. S. Bluff | Bluffs | IL |
| 2 | Fast Stop Express | 500 W. Jasper | Paris | IL |
| 3 | Roseville Fuel 24 | 764 90th St. | Roseville | IL |
| 4 | Suzy Q Convenience | 320 N. Congress | Rushville | IL |
| 5 | Sparta Fuel 24 | 617 S. St. Louis St. | Sparta | IL |
| 6 | ICC Fast Stop | 402 Carlock | Washington | IL |
| 7 | Elkander Fuel 24 | Highway 13 N. | Elkander | IA |
| 8 | Exira Fuel 24 | 603 West Washington | Exira | IA |
| 9 | Farnhamville Fuel 24 | 105 Garfield Ave. | Farnhamville | IA |
| 10 | Star Energy | 1207 Main Street | Roelyn | IA |
| 11 | Fast Stop Express | 217 E Puerner Street | Jefferson | WI |

Speedway

| | <u>Station Name/Store #</u> | <u>Address</u> | <u>City</u> | <u>State</u> |
|----|-----------------------------|------------------------|------------------|--------------|
| 1 | 1016 | 13555 E 14 Mile Rd | Sterling Heights | MI |
| 2 | 1412 | 19730 S. Harlem Ave | Frankfort | IL |
| 3 | 1413 | 18460 80th Ave | Tinley Park | IL |
| 4 | 1414 | 19855 S. LaGrange Rd | Mokena | IL |
| 5 | 1415 | 2925 Riverstone Pkwy | Kankakee | IL |
| 6 | 1416 | 11151 W. Lincoln Hwy | Frankfort | IL |
| 7 | 1418 | 12505 West 143rd | Homer Glen | IL |
| 8 | 1420 | 15551 W. 143rd St | Homer Glen | IL |
| 9 | 1421 | 22310 S. LaGrange Rd | Frankfort | IL |
| 10 | 1422 | 900 Brookforest Dr | Shorewood | IL |
| 11 | 1423 | 570 Laraway Rd | New Lenox | IL |
| 12 | 1424 | 18701 S. Wolf Rd | Mokena | IL |
| 13 | 1425 | 10250 Lemont Rd | Darien | IL |
| 14 | 1426 | 6325 E. US30 | Hobart | IN |
| 15 | 1427 | 10061 Sheffield | Dyer | IN |
| 16 | 1428 | 3004 Reflection Dr | Naperville | IL |
| 17 | 1429 | 38405 Route 59 | Warrenville | IL |
| 18 | 1430 | 855 S. Center Rd | Frankfort | IL |
| 19 | 1431 | 939 S. Cedar Rd | New Lenox | IL |
| 20 | 1432 | 8424 Willow Springs | Willow Springs | IL |
| 21 | 1433 | 7405 Calumet Ave | Hammond | IN |
| 22 | 2902 | 4420 Browns Hill Rd | Pittsburgh | PA |
| 23 | 3407 | 548 S Mecca St | Cortland | OH |
| 24 | 4533 | 2500 Royal Ave | Monona | WI |
| 25 | 5215 | 213 N Urbana St | South Vienna | OH |
| 26 | 5332 | 2254 N Fairfield Rd | Beavercreek | OH |
| 27 | 6395 | 8645 Waterville-S | Waterville | OH |
| 28 | 7137 | 635 W Main St | Algood | TN |
| 29 | 7330 | 2227 Campbell St | Sandusky | OH |
| 30 | 7382 | 21 W 400 North Ave | Lombard | IL |
| 31 | 7524 | 796 N SR-149 | Valparaiso | IN |
| 32 | 7611 | 11584 Allen Rd NW | Octa | OH |
| 33 | 8027 | 809 E Maumee St | Angola | IN |
| 34 | 8031 | 211 South SR | Bargersville | IN |
| 35 | 8046 | 2242 North SR 9 | Greenfield | IN |
| 36 | 8051 | 5061 W Smith Valley Rd | Greenwood | IN |
| 37 | 8071 | 2290 Greenfield Ave | Noblesville | IN |
| 38 | 8072 | SR 67 & SR 9 | Pendleton | IN |
| 39 | 8093 | 720 South Van Buren St | Shipshewana | IN |
| 40 | 8401 | 117 N Main St | Almont | MI |
| 41 | 8540 | 32123 Van Dyke Rd | Warren | MI |
| 42 | 8772 | 1988 S Cedar | Imlay City | MI |
| 43 | 9222 | 400 MacCorkle Ave SW | South Charleston | WV |

| | | | | |
|----|------|---------------------|-------------|----|
| 44 | 9265 | 2567 Walcutt Rd | Hilliard | OH |
| 45 | 9381 | 417 Division St | Parkersburg | WV |
| 46 | 9561 | 3451 Charleston Rd | Ripley | WV |
| 47 | 9611 | 1401 US Highway 127 | Frankfort | KY |
| 48 | 9616 | 830 E National Rd | Vandalia | OH |
| 49 | 9645 | 7400 Old Third St | Louisville | KY |

| Cenex | | | | |
|-------|--|--|----------------|--------------|
| | <u>Station</u> | | <u>City</u> | <u>State</u> |
| 1 | Key Cooperative | | Gilbert | IA |
| 2 | Key Cooperative | | Nevada | IA |
| 3 | Key Cooperative | | Story City | IA |
| 4 | K. and H. Cooperative Oil Company | | Mason City | IA |
| 5 | Farmers Co-op Associaton | | Forest City | IA |
| 6 | Hancock County Co-op | | Garner | IA |
| 7 | Wessels Oil Company, Inc Crossroads | | Hampton | IA |
| 8 | W & H Co-op | | Fort Dodge | IA |
| 9 | K. and H. Cooperative Oil Company | | Algona | IA |
| 10 | W & H Co-op | | Eagle Grove | IA |
| 11 | W & H Co-op | | Humboldt | IA |
| 12 | Rolfe Heartland | | Rolfe | IA |
| 13 | Five Star Cooperative | | New Hampton | IA |
| 14 | United Farmers Mercantile Cooperative | | Corning | IA |
| 15 | Farmers Cooperative Company | | Hinton | IA |
| 16 | First Cooperative Association | | Holstein | IA |
| 17 | Hull Cooperative Association | | Hull | IA |
| 18 | Cooperative Energy Company | | Hartley | IA |
| 19 | Coopertaive Elevator Association | | Lake Park | IA |
| 20 | Farmers Cooperative Elevator Co. | | Arcadia | IA |
| 21 | E & J of Milton, LLC | | Milton | WI |
| 22 | Landmark Services Cooperative | | Markesan | WI |
| 23 | Countryside Cooperative | | Baldwin | WI |
| 24 | Cedar Country Cooperative | | Menomonie | WI |
| 25 | Best Oil Co. | | Duluth | MN |
| 26 | Genesis | | Belle Plaine | MN |
| 27 | Watonwan Farmers Service Co. | | Blue Earth | MN |
| 28 | Eastern Farmers Coop | | Luverne | MN |
| 29 | Prairie Pride Cooperative | | Slayton | MN |
| 30 | Tri-County Cooperative Oil Association | | Graceville | MN |
| 31 | Prairie Pride Cooperative | | Marshall | MN |
| 32 | Farmers Co-operative Association | | Minneota | MN |
| 33 | Farmers Union Oil Company of Montevideo | | Montevideo | MN |
| 34 | Farmers Union Oil Company of Montevideo | | Montevideo | MN |
| 35 | Morris Cooperative Association | | Morris | MN |
| 36 | Farmers Co-operative Oil Company of Renville, Minn | | Olivia | MN |
| 37 | Prinsburg Farmers Co-op | | Raymond | MN |
| 38 | Farmers Co-operative Oil Company of Renville, Minn | | Redwood Falls | MN |
| 39 | Farmers Union Oil Company of Alexandria, Minnesota | | Alexandria | MN |
| 40 | Northern Star Cooperative Services | | Long Prairie | MN |
| 41 | Community Co-ops of Lake Park, Minnesota | | Detroit Lakes | MN |
| 42 | Farmers Cooperative Oil Company, Barnesville, Minn | | Barnesville | MN |
| 43 | Lakes Area Cooperative | | Battle Lake | MN |
| 44 | Ottertail Oasis | | Ottertail | MN |
| 45 | West Central Ag Services - Ulen | | Ulen | MN |
| 46 | Lakes Area Cooperative | | Vergas | MN |
| 47 | Bemidji Cooperative Association | | Bemidji | MN |
| 48 | Bemidji Cooperative Association | | Bemidji | MN |
| 49 | Farmers Coop Fuel and Hardware Co | | Fisher | MN |
| 50 | Farmers Union Oil Company Grygla | | Grygla | MN |
| 51 | Red Lake County Cooperative | | Oklee | MN |
| 52 | Red Lake County Coop | | Red Lake Falls | MN |

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|----|---|---------------|----|
| 53 | Deuel County Farmers Union Oil Company | Clear Lake | SD |
| 54 | TD & C Inc. dba Cenex - Milbank | Milbank | SD |
| 55 | Dakota Connection | Sisseton | SD |
| 56 | Sioux Valley Cooperative | Webster | SD |
| 57 | Alan Lanphere Bath Quick Stop | Bath | SD |
| 58 | Full Circle Ag | Britton | SD |
| 59 | AMC Faulkton Co., Inc. dba Onestop | Faulkton | SD |
| 60 | North Central Farmers Elevator | Ipswich | SD |
| 61 | CBH Cooperative | Belle Fourche | SD |
| 62 | Farmers Union Oil Company | Hope | ND |
| 63 | Dakota Plains Cooperative | Valley City | ND |
| 64 | Zip Trip #62 | Fargo | ND |
| 65 | Zip Trip #61 | Grafton | ND |
| 66 | Hatton Coop Oil Company | Hatton | ND |
| 67 | Cenex Convenience Store | Mayville | ND |
| 68 | Farmers Union Co-op Oil Company of Minto | Minto | ND |
| 69 | North Star Coop | Park River | ND |
| 70 | Farmers Union Oil Company of Portland | Portland | ND |
| 71 | Cenex Convenience Store | Devils Lake | ND |
| 72 | Cenex One Stop | Devils Lake | ND |
| 73 | Cenex Convenience Store | Lakota | ND |
| 74 | Farmers Union Oil Company of Rugby | Leeds | ND |
| 75 | Farmers Union Oil Company | Ellendale | ND |
| 76 | Farmers Union Oil Company of Bismarck / Mandan | Bismarck | ND |
| 77 | Clair's C-Market | Ash Grove | MO |
| 78 | Producers Agricultural Marketing Association, Inc | Kensington | KS |
| 79 | Dodge City Cooperative Exchange | Dodge City | KS |
| 80 | Sublette Cooperative, Inc. | Sublette | KS |
| 81 | Urwiler Oil & Fertilizer Inc. | Laurel | NE |
| 82 | All Points Cooperative | Lexington | NE |
| 83 | Country Partners | Ord | NE |
| 84 | Farmers Cooperative Association | Ogallala | NE |
| 85 | Farmers/Ranchers Cooperative Assoc. of Ainsworth | Ainsworth | NE |
| 86 | West Shore Automotive | Loveland | CO |
| 87 | Agfinity, Inc. | Greeley | CO |
| 88 | Agfinity, Inc. | Greeley | CO |
| 89 | Roggen Farmers Elevator Association | Keensburg | CO |