Dallas Gerber

Please see the attached comments from Growth Energy's Senior Vice President of Regulatory Affairs, Chris Bliley

Growth Energy™
Expanding America's Bioeconomy

September 27, 2024

Stephanie Potts
Washington Department of Ecology
P. O. Box 47600
Olympia, WA 98504
Via online submission

RE: Comments on Cap-and-Invest Linkage and Biofuels

Dear Ms. Potts:

Thank you for the opportunity to comment on the Department of Ecology's discussions to link the state's Cap-and-Invest program with those programs in existence in California and Quebec. Growth Energy is the world's largest association of biofuel producers, representing 97 U.S. plants that each year produce more than 9.5 billion gallons of renewable fuel; 121 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio, growing more green energy jobs, decarbonizing our nation's energy mix, sustaining family farms, and driving down the costs of transportation fuels for consumers. We appreciate the Department's effort to reduce Washington's greenhouse gas (GHG) emissions. Our industry represents the largest volume of accessible, low-carbon biofuels meant to achieve the objectives of the Department and the State of Washington.

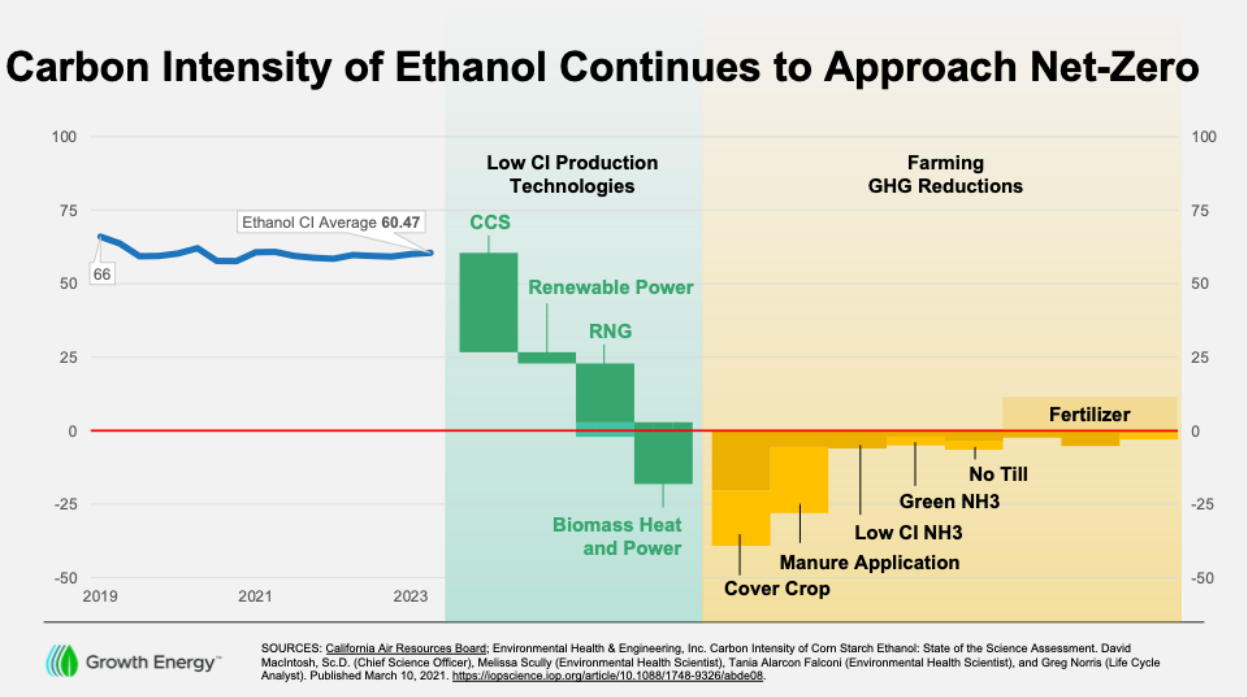
Reduction of Exemption Threshold for Biofuels

As indicated in the proposed changes, the threshold at which biofuels will be exempted from Cap-and-Invest compliance will be reduced from "40 percent lower lifecycle emissions based on a full life-cycle analysis when compared to petroleum fuels for which biofuels are capable as serving as a substitute" to 30 percent "or to align with a linked jurisdiction." We encourage the Department to enact biofuels exemptions matching the other markets' automatic and full exemption, as allowed by statute. By fully aligning with California and Quebec, the Department can provide certainty and clarity, allowing biofuels producers the opportunity to be key partners in Washington's GHG reduction programs.

Nevertheless, we applaud the Department and Legislature for this change, as biofuels are exempt in both California's and Quebec's carbon markets. As a result of this exemption, bioethanol and other exempt biofuels such as renewable diesel and biodiesel are cumulatively responsible for 74% of California's reductions since the implementation of their Low Carbon Fuel Standard.[1]

As shown in the graph below, the average carbon intensity (CI) score for bioethanol production is around 60 gCO2e/MJ. Off the shelf technologies and processes continue to drive that score down. By fully utilizing a wide variety of technologies at the production plant and carbon-reduction practices on the farm, bioethanol continues its approach to be a carbon net-zero fuel.

[1] https://www.transportationenergy.org/wp-content/uploads/2023/07/Decarbonizing-Combustion-Vehicles_FINAL.pdf



Expanding Access to E15, Higher Blends

While Washington has approved the sale of E15 in the state, it is currently not available at any fuel retail sites. Washington can take significant steps in GHG reductions down within the road transportation sector by encouraging the sale and use of E15, a fuel containing up to 15 percent ethanol which can be used in more than 96% of the vehicles on the road today. Consumers have embraced E15's reputation as a more environmentally beneficial, more affordable fuel. Since the US EPA approved E15 in 2011, at which time there were *zero* retailers offering it, its availability rapidly expanded to now 3,400 retail sites in 33 states. Since then, drivers in America have relied on E15 to drive 100 billion miles.[2]

According to recent data from Environmental Health and Engineering, today's bioethanol reduces GHG by nearly 50 percent compared to gasoline and can provide even further GHG reductions with additional readily available technologies.[3] The potential for fuels with higher blends of ethanol to reduce GHGs are further illustrated in a national analysis showing more than 334,000 tons in GHG reduction in Washington alone if E10 gasoline was replaced with E15.[4] This is the GHG reduction equivalent of removing 73,000 vehicles from Washington's fleet just by using a higher ethanol-blend fuel.

[2] https://growthenergy.org/2024/01/29/100-billion-miles-e15-growth-energy/
[3] https://iopscience.iop.org/article/10.1088/1748-9326/abde08/pdf
[4] http://www.airimprovement.com/reports/national-e15-analysis-final.pdf

Thank you for the opportunity to provide input on the proposed amendments to Washington's Cap-and-Invest program. It is a critical took to addressing climate change, and we look forward to working with the Department to ensure the role of biofuels in Washington's carbon reduction goals.

Sincerely,

Christopher P. Bliley
Senior Vice President of Regulatory Affairs
Growth Energy