

September 14, 2026

DELIVERED ELECTRONICALLY TO

Clerk of the Board
Air Resources Board
1001 I Street
Sacramento, CA 95814

Subject: Proposed Amendments to the California Reformulated Gasoline Regulations

The Alliance for Automotive Innovation (“Auto Innovators”)¹ appreciates the opportunity to provide feedback to California Air Resources Board (“CARB”) on the proposed amendments to the California Reformulated Gasoline Regulations.²

The auto industry has long supported low-carbon liquid fuels as a meaningful opportunity to reduce vehicle emissions; E15 is one of those pathways, and we applaud California’s work to expand low carbon liquid fuel options for customers. Our comments below address some implementation concerns that we want to make sure that CARB is considering.

E15 Compatibility

When EPA permitted use of E15 in 2001 model year and newer vehicles, it did so arbitrarily. The model year was not picked based on OEM recommendations, but instead, EPA determined the year on their own. There is no bright line of compatibility starting in 2001 and there is real possibility that vehicles manufactured after this date are incompatible with E15. Vehicle owners should check their owner’s manuals for compatibility with E15, and CARB should make clear to drivers that they should do so prior to filling with E15 fuel.

While vehicle manufacturers do not manufacture fuel dispensing and storage equipment, we request that CARB thoroughly understand the various materials and hardware certifications with respect to the use of E15. We want to make sure that our drivers do not

¹ The Alliance for Automotive Innovation is an association of automakers, equipment manufacturers, and auto-related technology and aftermarket-part suppliers that represents the producers of nearly 95% of new cars and light trucks sold in the United States. AAI’s membership spans the full scope of the auto industry, including companies of all sizes in the automotive and downstream consumer- and commercial-product supply chain. Our mission is to work with policymakers to realize a cleaner, safer, and smarter transportation future and to ensure a healthy and competitive auto industry that supports U.S. economic and national security. Representing approximately 5 percent of the country’s GDP, responsible for supporting nearly 10 million jobs, and driving \$1 trillion in annual economic activity, the automotive industry is the nation’s largest manufacturing sector. www.autosinnovate.org.

² https://ww2.arb.ca.gov/rulemaking/2026/california-reformulated-gasoline-regulations?utm_medium=email&utm_source=govdelivery

have refueling issues due to unintended consequences of using E15 in equipment only rated for an E10 maximum.

E10 Availability

As noted in your scoping workshop last year,³ even using model year 2001 as a delineator for light duty vehicles, replacing E10 with E15 would likely strand nearly 2.3 million vehicles with no allowable fuel in the market and no alternative but to mis-fuel. It is for that reason that we urge CARB to not entirely replace E10 with E15. Additionally, drivers should be reminded to check their respective vehicle product documentation for proper fuel compatibility.

The majority of new vehicles are designed to run on E15 today and capture the benefits of the fuel's lower carbon properties. Any remaining compatibility issues are expected to fade over time as the fueling infrastructure and vehicle fleet continue to evolve. To ensure that legacy vehicles have access to necessary fuel, we recommend that E10 remains available indefinitely.

E15 Labeling

Labeling of E15 fuel dispensers is inconsistent across the U.S. Through a Coordinating Research Council ("CRC") project⁴ of the Alliance for Automotive Innovation North American Fuel Survey,⁵ it became apparent that the location and details of E15 pumps can cause confusion for consumers. For instance, fuel descriptions identified in the CRC study varied: *Unleaded 88, E15, Unleaded E15, eblend, E-15, Plus, and Unleaded Plus*. In addition to the various descriptions observed, the mandatory E15 label placement was also inconsistent from near or on the dispenser actuator button, to near the dispenser handle. To the extent that CARB, or another state agency, is authorized, we urge California to require consistent labeling for E15 dispensers.

E15 Certification Fuel

We understand that CARB is considering the inclusion of E15 in its Drive Forward regulations. Should CARB pursue this approach, we encourage the agency to develop a dedicated E15 certification test fuel specification. Such a specification would need to provide greater detail and tighter controls than those contained in commercial fuel

³ https://ww2.arb.ca.gov/sites/default/files/2025-10/Scoping_Workshop_on_E15_Use_in_California_Presentation_10-14-25.pdf

⁴ <https://crcao.org/wp-content/uploads/2020/04/CRC-Report-No.-674.pdf>

⁵ <https://www.autosinnovate.org/initiatives/energy-and-environment/fuel-publications>

specifications to ensure consistent and repeatable certification testing. We look forward to working with CARB on the test fuel development.

We appreciate the ability to provide these comments and would welcome any follow-up conversations.

Respectfully,



Dan Bowerson
Vice President of Energy & Environment Policy