RPMG™
1157 Valley Park Drive, Ste. 100
Shakopee, MN 55379

September 11, 2026

Rajinder Sahota
Deputy Executive Officer
California Air Resource Board

Re: Initial Statement of Reason for the Proposed Amendments to the California Reformulated Gasoline (RFG) Regulations released on July 28, 2026.

Submitted via electronic docket.

Ms. Sahota and RFG Regulation Team,
RPMG Inc. (RPMG) appreciates the opportunity to provide comments on the Proposed Amendments to the California Reformulated Gasoline Regulations. RPMG strongly supports the intent of these regulations—updating the State's Reformulated Gasoline regulatory framework to explicitly allow for E-15 sales in California. These amendments are consistent with the passage last year of AB 30[1].

RPMG is a biofuel marketing company representing our owner and marketing partner ethanol facilities located throughout the Midwest dedicated to fostering innovation while maintaining the highest level of regulatory compliance. RPMG member facilities provide ethanol as an essential input to California's gasoline liquid fuel market in material quantities. Though there are numerous issues being updated in this amendment package, our comments are focused on the ethanol aspects of this regulation.

The key to overcoming commercial barriers to the use of E15 is one of clarity of regulation. It is important that before being finalized this regulation establish a clear mechanism for fuel suppliers to certify California-compliant E15 for sale in the state. This clarity includes aligning with federal oxygenate blending norms that have been historically used across the country, including a range of oxygenates allowed for both E10 and E15.

Additionally, RPMG submitted comments to the recently updated Mandatory Reporting Regulation (MRR) docket[2]. One concern raised, which we appreciate that CARB addressed, related to updating the referenced ASTM standards. The MRR now references ASTM D-4806-21 for 'Fuel Ethanol', whereas the proposed RFG regulation still references ASTM D-4806-99. There are other older ASTM references in the proposal as well which could be updated. Inter-regulatory consistency is an important compliance assistance tool. RPMG suggests updating these reference test methods where applicable.

[1] https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202520260AB30
[2] https://scs-public.s3-us-gov-west-1.amazonaws.com/env_production/oid377/did200184/pid_213313/assets/attachments/94298/2v07ii7dqkn_document.pdf?v=14405

We are appreciative of this rulemaking and its recognition of ethanol's value, both as a feedstock and as a GHG reduction measure. RPMG would like to thank CARB for the opportunity to contribute toward the improvement of this regulatory proposal. Please contact me with any questions or comments at jwhoffmann@rpmgllc.com.

Thank you,

/s/

Jessica Hoffmann
Regulatory and Compliance Manager
RPMG Inc.

cc: Chair Randolph and CARB Board Members