



Testimony of Brian Jennings
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EPA Zoom Hearing on the Proposal to Revise the 2023 and Later Model Year Light-Duty Vehicle GHG
Emission Standards

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- Thank you for the opportunity to testify on EPA's proposal to revise the 2023 and later model year light-duty vehicle GHG emission standards.
- My name is Brian Jennings, and I am the CEO of the American Coalition for Ethanol.
- Since nearly all of the 270 million light-duty vehicles on U.S. roads today run on liquid fuel, it would seem reasonable that in order to significantly cut CO₂ emissions from their tailpipes, consideration must be given to the fuel powering the engines, including steps to replace fossil fuel with a lower carbon and higher octane fuel, such as ethanol.
- Unfortunately, and unbelievably, EPA's proposal fails to adequately address these important issues.
- Instead, EPA impractically suggests vehicle greenhouse gas (GHG) emissions can be reduced merely by plugging more cars into the grid, without much attention to how the electricity powering those cars is generated.
- I will be the first to admit that when electric vehicles (EVs) are *actually* charged by low carbon power sources, they could play a role in reducing GHG emissions, but EVs comprise just 2% of all light-duty vehicles on the road today, and most of them are hybrid models that also operate on liquid fuels.
- In other words, even as EV sales increase, Americans will continue to rely on billions upon billions of gallons of liquid fuels for decades to come. Therefore, this proposal must place much greater emphasis on improving the quality of liquid fuel and the role low carbon, high octane ethanol can play in making significant GHG reductions in the near-term.
- Don't just take my word for it, in January, the Rhodium Group released a compelling [report](#) indicating even under the most aggressive sales projections, EVs alone will not achieve net-zero transportation emissions by 2050.¹ Rhodium explained meeting this goal also depends upon decarbonizing liquid fuels and more stringent CAFE-GHG standards. This was followed

¹ <https://www.rhg.com/research/closing-the-transportation-emissions-gap-with-clean-fuels/>

by an equally compelling [report](#) by Harvard, indicating *average* corn ethanol GHG emissions are 50% cleaner than gasoline.²

- Truth be told, many ethanol producers are on a trajectory to both net-zero and net-negative lifecycle emissions in the not-too-distant future.

- If the overarching goal is net-zero emissions by mid-century, let's start making progress *right now* by taking full advantage of the 15 billion gallons of domestically produced ethanol available today as an affordable way to boost octane and meaningfully reduce GHG emissions from gasoline powered engines.

- While ACE will submit written comments on this proposal, please allow me to conclude by highlighting three recommendations for EPA's consideration in the final rule:
 1. Establish a minimum Research Octane Number (RON) rating for fuel in the range of 98 to 100 RON with 25 to 30 percent ethanol and provide automakers with a corresponding cert fuel for engine testing purposes.

 2. Adopt the latest Department of Energy GREET model with respect to the lifecycle GHG emissions of ethanol and other transportation fuels.

 3. Instead of putting your thumb on the scale to favor electric vehicles through multipliers and compliance credits, establish a technology-neutral approach that also provides automakers with incentives to produce flexible fuel vehicles (FFVs) and vehicles designed to achieve optimal efficiency and reduced emissions on high octane ethanol blends.

Thank you.

² <https://iopscience.iop.org/article/10.1088/1748-9326/abde08/pdf>