Testimony of Brian Jennings on behalf of the
American Coalition for Ethanol (ACE)

EPA Public Virtual Hearing
Proposed Reallocation of Additional 2025 Small Refinery Exemptions

November 4, 2026

Thank you for the opportunity to testify. My name is Brian Jennings, and I am the CEO of the American Coalition for Ethanol (ACE).

We strongly support EPA's proposal to reallocate the 770 million RINs resulting from the actual 2025 exempted Renewable Volume Obligation (RVO).

These RINs represent renewable fuel produced and used in 2025 that exempt refineries no longer need to retire for compliance, and, as the Agency itself has cautioned, if not reallocated, obligated parties could use the additional RINs to satisfy the 2026 and 2027 RVOs rather than blending physical gallons of ethanol and other renewable fuel.

This could lead to lost demand for American ethanol, lost value for U.S. farmers, and a missed opportunity to lower fuel costs for consumers.

ACE urges EPA to finalize the approach which would reallocate all 770 million RINs to 2027.

This approach will ensure reallocated volumes from 2025 small refinery exemptions (SREs) go into the same compliance year and provide greater certainty to market participants.

Reallocating all the RINs in 2027 will also support the statutory purpose of the Renewable Fuel Standard (RFS) to increase blending year-over-year and help drive demand for E15 and E85.

Let's be clear. It is not a hardship for refiners, who are posting record profit margins, to blend low-cost renewable fuel into their expensive petroleum products.

By contrast, American farmers have struggled to make ends meet for the last five years and are experiencing hardship. Until this reallocation is final and complete, exempted RVOs represent an economic drain on U.S. farmers.

We urge swift action to reallocate the RINs in 2027.

Thank you.