



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

EPA Public Virtual Hearing: Proposed Rulemaking, RFS Program, “Set 2,” Standards for 2026 and 2027

July 8, 2025

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 welcome EPA’s “Set 2” proposal to expand ethanol use, support U.S. farmers, strengthen energy security, and lower pump prices. Among the Set 2 provisions we find encouraging include the following:

- Setting multi-year blending obligations, and, striving to get the RFS implementation schedule back on track, particularly for 2027
- Ensuring blending obligations will remain whole for 2026 and 2027, even if the Agency permits any Small Refinery Exemptions (SREs) for those compliance years...
- Proposing the new “import RIN reduction” to support America’s farmers and rural communities
- And finally, setting strong RVOs

As you know, ACE has urged EPA to consider utilizing its statutory authority to set volumes so conventional biofuel exceeds 15 billion gallons. We continue to encourage EPA to consider this for a couple of reasons:

- First, potential export market losses borne by America’s farmers and ethanol producers can be offset by increasing domestic ethanol blending through the RFS
- Second, EPA previously set inadequate advanced biofuel RVOs which caused surplus biomass-based diesel RINs to displace corn ethanol use in conventional biofuel

Therefore, EPA can provide an economic boost for U.S. farmers and rural communities if the final rule includes the Agency’s higher volume scenario with respect to the biomass-based diesel (D4) category.

Finally, we welcome EPA’s request for comments on the link between low carbon farming practices and new markets for ethanol.

In partnership with USDA, DoE, 13 ethanol companies, and hundreds of farmers, ACE is currently leading a project to unlock new markets and tax credits, such as 45Z, based on low carbon farming.



Once farmers participating in our project have adopted USDA-approved low carbon practices, we will collect soil samples and other field-level data to fine-tune models and generate more reliable CI scores—essentially solving for ‘information gaps’ currently preventing farmers and ethanol producers from monetizing ag practices through fuel markets and tax credits.

We will share more on this project, and other topics covered in EPA’s proposal, in our written comments.

Thank you for the opportunity to testify.