



October 17, 2022

The Honorable Tim Walz
Governor of Minnesota
130 State Capitol
75 Rev Dr. Martin Luther King Jr. Blvd.
St. Paul, MN 55155

Dear Governor Walz:

As organizations representing Minnesota's farmers and biofuel producers, we are writing to thank you for your commitment to providing year-round consumer access to lower-cost, lower-carbon E15 fuel blends. We urge you to remain committed to the regulatory solution put forward in the petition you sent along with seven other Midwest Governors to the U.S. Environmental Protection Agency (EPA) in April 2022.

When fully implemented, this regulatory solution will ensure that Minnesota drivers are able to enjoy the economic and environmental benefits of E15 all year long. It will also create new markets and opportunities for farmers and renewable fuel producers in our state.

We are pushing EPA to approve your petition before the 2023 driving season but, in the meantime, we know that some crude oil refiners and pipeline companies are voicing their strong opposition because they fear the competition that would result from the removal of the antiquated summertime E15 barrier. Some of these companies falsely claim that the regulatory action you requested could cause fuel supply disruptions or raise prices at the pump.

We want to clear the record because the facts on the ground and two recent studies demonstrate that these oil company claims are exaggerated and overblown. When the likely response of the Midwest fuel supply chain to the regulatory action requested in your petition was examined in a new study by ICF, it found that "...maintaining supply in this market is expected to be manageable for refiners and pipeline operators..." and "...most refineries, pipelines, and distribution terminals within the region should be able to fully switch over to the new lower-RVP gasoline specifications with minimal changes."¹

Additional analysis by an oil industry consulting firm called MathPro, Inc., found that the action requested in your petition would result in additional refining and infrastructure costs of no more than 2 cents per gallon of gasoline². Consumer savings resulting from increased sales of E15, which typically sells for 10 – 40 cents per gallon less than standard gasoline (i.e., E10) at the pump, far outweigh this modest cost.

¹ ICF, LLC, "Impact of Potential 8-State RVP Waiver Exclusion on Midwest Gasoline Markets."

² MathPro Inc., "Assessment of a 1 PSI Reduction in the RVP of Conventional Gasoline Blendstock (CBOB) in the Summer Gasoline Season."



Farmers, ethanol producers, and consumers in Minnesota applaud your proactive willingness to cooperate with other Midwest Governors to pursue a commonsense solution allowing year-round access to cleaner, more affordable fuels. We urge you to remain committed to this regulatory solution, especially in the face of oil company opposition. Please know that we stand ready to assist you and your administration in any way necessary to secure final implementation of this regulatory fix.

Sincerely,

Minnesota Bio-Fuels Association

Minnesota Farm Bureau Federation

Minnesota Corn Growers Association

Minnesota Farmers Union

POET, LLC

Green Plains, Inc

CC: Thom Peterson, Commissioner, Minnesota Department of Agriculture