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Additional submitted attachment is included below.

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October 5, 2026

California Energy Commission
Independent Consumer Fuels Advisory Committee
715 P Street
Sacramento, CA 95814
Submitted electronically

RE: POET COMMENTS ON THE CEC INDEPENDENT CONSUMER FUELS ADVISORY COMMITTEE'S SEPTEMBER 21, 2026 MEETING ON THE 2027 TRANSPORTATION FUELS ASSESSMENT

Dear Commissioners and Committee Members:

POET appreciates the opportunity to provide comments on the California Energy Commission's ("CEC") development of the 2027 Transportation Fuels Assessment ("TFA"). The CEC is evaluating how California can maintain reliable and affordable transportation fuel supplies as the state's petroleum system transitions, including through analysis of supply and infrastructure readiness, markets and pricing, and potential policy responses to supply disruptions. As part of this work, POET encourages the CEC to consider the role E15 can play in supporting California's fuel reliability and affordability goals.

E15 is a renewable fuel blend containing 15% bioethanol. On September 24, 2026, the California Air Resources Board ("CARB") unanimously approved amendments to the California Reformulated Gasoline ("CaRFG") Regulations establishing fuel specifications for E15 and supporting its continued voluntary sale in California.[1] E15 sales had previously been authorized by Assembly Bill ("AB") 30, which took effect in October 2025. CARB's Initial Statement of Reasons ("ISOR") explains that AB 30 and the regulatory amendments assist in ensuring a safe, affordable, and reliable supply of gasoline to meet consumer demand in California.[2] With the regulatory framework for E15 now established, the CEC should consider E15's potential contribution to California's fuel supply and opportunities to support broader deployment.

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[1] California Air Resources Board, *Public Hearing to Consider Proposed Amendments to the California Reformulated Gasoline Regulations* (Sept. 24, 2026), https://cal-span.org/meeting/carb_20260924/.

[2] California Air Resources Board, *Proposed Amendments to the California Reformulated Gasoline Regulations, Staff Report: Initial Statement of Reasons* at pp. ES-1–ES-2 (July 28, 2026), https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/e15%20Reform%20Fuel/E15_ISOR%20w%20updated%20TOC.pdf.

I. About POET

POET is committed to reducing emissions from the transportation sector and developing cleaner, affordable alternatives to fossil fuels in California and across the United States. POET is the world's largest biofuels producer, operating 35 bioprocessing facilities across nine states and employing more than 2,600 team members. POET continuously innovates to reduce bioethanol's lifecycle emissions through technological innovation, investments in carbon capture and renewable energy, and programs to reduce on-farm emissions. With appropriate regulatory signals, POET is well-positioned to produce net-zero carbon bioethanol to decarbonize on-road transportation and serve as a feedstock for the next-generation fuels that will power maritime transportation and the aviation industry. POET is also a leading advocate for nationwide access to E15.

II. E15 Can Support California's Fuel Reliability and Affordability Goals

Fuel reliability and affordability are central to the CEC's development of the 2027 TFA. CEC staff reported that California's gasoline refining capacity has declined by approximately 22%, while gasoline demand has declined by approximately 3% and imports have increased by approximately 77%. As a result, marine imports are playing a larger role in meeting the state's remaining fuel demand.[3]

E15 should be considered as part of California's strategy for maintaining a reliable and affordable fuel supply. Increasing the ethanol content of gasoline from 10% to 15% increases the share of renewable bioethanol in each gallon and correspondingly displaces petroleum-based gasoline components. CARB has identified increased E15 blending as a Fossil Demand Reduction Strategy, and its analysis of broader E15 deployment identifies increased displacement of petroleum-based fuel components and increased transportation fuel supply as potential benefits.[4]

E15 can also support fuel affordability. CARB's ISOR expressly recognizes that AB 30 and the E15 regulatory amendments assist in ensuring a "safe, affordable, and reliable supply of gasoline to meet consumer demand in California."[5] As the CEC evaluates options for maintaining fuel supply amid changes in California's refining sector, E15 provides an additional fuel option that can reduce the petroleum content of gasoline sold in the state.

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[3] California Energy Commission, *Presentation for the Independent Consumer Fuels Advisory Committee Meeting - Transportation Fuels Assessment* at slide 10 (Sept. 18, 2026), https://efiling.energy.ca.gov/GetDocument.aspx?tn=272861&DocumentContentId=120602.

[4] California Air Resources Board, *Proposed Amendments to the California Reformulated Gasoline Regulations, Staff Report: Initial Statement of Reasons* at pp. 4–5, 31–32 (July 28, 2026), https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/e15%20Reform%20Fuel/E15_ISOR%20w%20updated%20TOC.pdf.

[5] *Id.* at p. ES-2.

These benefits complement California's environmental objectives. CARB recognizes that ethanol has a lower carbon intensity than petroleum-derived gasoline and that blending ethanol into gasoline displaces petroleum-based components and reduces lifecycle greenhouse gas emissions.[6] Research conducted by the University of California, Riverside found that E15 reduced carbon monoxide, particulate matter, volatile organic compounds, and greenhouse gas emissions, with no increase in nitrogen oxide emissions.[7] POET has previously cited this research in comments to CARB in support of E15's emissions benefits. E15 can therefore provide near-term benefits from California's existing vehicle fleet while complementing the State's longer-term transition to zero-emission transportation.

III. California Should Support Broad E15 Adoption to Fully Realize These Benefits

CARB's adoption of E15 fuel specifications represents an important step toward broader E15 deployment in California, but regulatory certainty alone will not ensure widespread consumer access. CARB has recognized that E15 adoption may be affected by retailer or consumer hesitancy, costs associated with necessary equipment upgrades or insurance requirements, and vehicle and equipment compatibility considerations.[8] Retail outlets choosing to offer E15 must ensure that hoses, pumps, dispensing equipment, and other equipment are compatible with E15 and may need to add or replace equipment or storage tanks. Fuel distribution terminals may also need additional loading infrastructure to accommodate E15 sales.[9]

POET therefore encourages the CEC, in coordination with CARB and other state agencies, to identify incentives that can reduce these barriers and accelerate E15 deployment throughout California. Incentives supporting necessary infrastructure and market investments can help translate the State's E15 regulatory framework into greater availability at the pump and allow E15 to contribute more fully to California's fuel reliability and affordability goals.

IV. Conclusion

POET appreciates the CEC and ICFAC's work to develop the 2027 Transportation Fuels Assessment. With E15 now authorized for sale in California and CARB having adopted fuel specifications to support its continued voluntary sale, California has an opportunity to expand access to a fuel that can diversify transportation fuel supply, displace petroleum, and provide emissions benefits. POET encourages the CEC to recognize E15 as one tool for supporting

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[6] *Id.* at p. 6.

[7] University of California, Riverside, *Comparison of Exhaust Emissions Between E10 CaRFG and Splash Blended E15* (June 2022), https://ww2.arb.ca.gov/sites/default/files/2022-07/E15_Final_Report_7-14-22_0.pdf.

[8] California Air Resources Board, *Proposed Amendments to the California Reformulated Gasoline Regulations, Staff Report: Initial Statement of Reasons* at p. 5 (July 28, 2026), https://ww2.arb.ca.gov/sites/default/files/barcu/regact/2026/e15%20Reform%20Fuel/E15_ISOR%20w%20updated%20TOC.pdf.

[9] *Id.* at pp. 21-22.

California's fuel reliability and affordability goals and to consider incentives that can help overcome barriers to broader deployment.

Sincerely,



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POET