

| <b>DOCKETED</b>         |   |
|-------------------------|---|
| <b>Docket Number:</b>   | 23-SB-02  |
| <b>Project Title:</b>   | SB X1-2 Implementation  |
| <b>TN #:</b>            | 256445  |
| <b>Document Title:</b>  | POET Comments on California Energy Commission's<br>Transportation Fuel Assessment |
| <b>Description:</b>     | N/A   |
| <b>Filer:</b>           | System  |
| <b>Organization:</b>    | POET  |
| <b>Submitter Role:</b>  | Public  |
| <b>Submission Date:</b> | 5/17/2024 11:14:51 AM   |
| <b>Docketed Date:</b>   | 5/17/2024   |

*Comment Received From: POET  
Submitted On: 5/17/2024  
Docket Number: 23-SB-02*

**POET Comments on California Energy Commission's  
Transportation Fuel Assessment**

*Additional submitted attachment is included below.*



900 7th St. NW, Suite 820  
Washington, D.C. 20001  
Ph: (605) 965-2200  
[poet.com](http://poet.com)

May 17, 2024

California Energy Commission  
Docket Unit, MS-4  
Docket No. [23-SB-02](#)  
715 P Street  
Sacramento, California 95814

Submitted online via:

<https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=23-SB-02>

**RE: POET Comments on the California Energy Commission’s Transportation Fuels Assessment and Transportation Fuels Transition Plan Workshop**

Dear CEC Board Members:

POET is pleased to submit comments in response to the California Energy Commission’s (“CEC”) Transportation Fuels Assessment and Transportation Fuels Transition Plan Workshop on May 3, 2024. POET has engaged with the CEC throughout the Transportation Fuels Assessment process, including through comments submitted on August 31, 2023.<sup>1</sup> POET appreciates the CEC’s work on the Draft Transportation Fuels Assessment and positive comments regarding E15 in the report. POET is particularly pleased to see the inclusion of E15 as a “production enhancement” strategy and is supportive of the initiative in Section 5A of the report. Moreover, POET agrees with CEC’s recognition of the environmental and public health benefits of E15.

We write to address CEC’s articulation of perceived obstacles associated with adopting E15 in California. California is the only state in the Union yet to approve E15 for on-road use, and POET disagrees that there are meaningful technological or regulatory barriers that would preclude E15 approval. As explained in Attachment A, California is well positioned to adopt E15 and can do so without significant changes to existing infrastructure.

**CONCLUSION**

POET appreciates the opportunity to comment and looks forward to working with CEC to make E15 available in California. If you have any questions, please contact me at [Paul.Townsend@POET.com](mailto:Paul.Townsend@POET.com) or (605) 756-5612.

Sincerely,

Paul W. Townsend  
Associate Regulatory Counsel

---

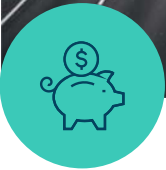
<sup>1</sup> Docket No. 23-SB-02, TN# 252081, submitted 8/31/2023.

## GET CALIFORNIA ON THE ROAD TO E15

E15 is a 15% bioethanol fuel blend that can boost octane while burning cleaner and cooler than conventional gasoline. In 2011, the U.S. EPA approved E15 for all light-duty vehicles Model Year 2001 and newer and all Flex Fuel vehicles. Since then, Americans have driven more than 100 billion miles on E15. Today, the nation's 245 million E15-compatible cars, pickup trucks, and SUVs represent more than 96% of vehicle miles traveled.

Arizona and Montana just lifted state restrictions on E15, following approvals by Nevada, Oregon, and New York in recent years. Despite the fuel's many benefits and longtime use of other bioethanol blends like E10 and E85, California is now the only state where E15 is prohibited.

E15 compliments California's climate and air quality goals. Even with large numbers of new electric vehicles entering the fleet, millions of internal combustion engines will still be on the road in California for decades to come. Californians should have the freedom to fuel those engines with the cleanest and most affordable fuel option available: E15.



### FUELS SAVINGS AT THE PUMP

E15 saves money without sacrificing fuel economy. Last year, Americans saved an average of 22 cents per gallon with E15 compared to E10 gasoline based on reported prices at the pump, with savings reaching 40-60 cents less per gallon. Department of Energy test program data "showed no statistically significant loss of vehicle performance (emissions, fuel economy, and maintenance issues) attributable to the use of E15 fuel compared to straight gasoline."



### CUTS CLIMATE EMISSIONS

E15 is better for our planet because it reduces lifecycle greenhouse gas (GHG) emissions in the fuel supply. Recent studies prove that plant-based bioethanol reduces lifecycle emissions by 40-46% compared to standard gasoline. In fact, a study by Air Improvement Resource, Inc. showed that shifting from E10 to E15 in California would cut 1.8 million metric tons of GHG emissions annually, equivalent to removing more than 411,000 cars off the road.



### IMPROVES AIR QUALITY

Bioethanol replaces benzene, toluene, and xylene (BTX) in gasoline. BTX is harmful to human health and linked to adverse developmental, reproductive, immunological, and cardio-pulmonary effects. By reducing tailpipe and evaporative emissions, including carbon monoxide, particulates, and volatile organic compounds, E15 can improve air quality in high-traffic neighborhoods that disproportionately suffer from air pollution and related health risks.



### UTILIZES EXISTING INFRASTRUCTURE

Most of California's existing fuel infrastructure is ready for E15. Numerous reports by the National Renewable Energy Laboratory, Department of Energy, EPA, and others confirm most underground storage tanks made in the last 30 years are approved up to 100% bioethanol, and most fuel dispensing equipment is manufacturer-approved for E15. California's bulk storage tanks and railcars are also easily repurposed from petroleum to biofuel.

## E15 FAST FACTS



Approved in  
**49 STATES**



Offered at  
**3,400 STATIONS**



Driven More Than  
**100 BILLION MILES**



2023 National Sales  
**1 BILLION GALLONS**



2023 Avg Savings  
**22 CENTS/GALLON**