

December 3, 2018

The Honorable John Shimkus
2217 Rayburn House Office Building
Washington, DC 20515

Dear Mr. Shimkus:

The Illinois Corn Growers Association (ICGA) has reviewed the November 21, 2018 discussion draft of your legislative proposal with the working title of the 21st Century Transportation Fuels Act. We appreciate your leadership in conjunction with Mr. Bill Flores of Texas in beginning this important conversation among stakeholders. It is a promising start that has the potential to build a route for corn-based ethanol to enter the marketplace as a high-power, environmentally friendly, low-cost octane source for the country's hundreds of millions of motorists.

I have detailed our initial thoughts on the draft below. We look forward to having conversations with your office and the members of the House Energy and Commerce Committee and other stakeholders to further refine the next version of this draft legislative proposal. The purpose of the discussion draft is to spur discussion. We are ready to engage in a productive, forward-looking conversation to achieve that purpose.

Specifically, ICGA can enthusiastically support the following points within the draft as written:

- Reid Vapor Pressure parity for all blends above E10.
- The preemption of local and state level prohibition of ethanol blends above E10.
- The assurance of the Renewable Fuel Standard Renewable Volume Obligations be 15 billion gallons per year of corn ethanol for 2020, 2021, and 2022.

We thank you for including these items. We know you've heard from our membership on these specific points and it is meaningful to see them included in your draft.

We are pleased to see the following points included. To improve them as it relates to ICGA policy, we'd like to discuss:

- Upgrading the new fuel waiver for ethanol blends to the E25 level.
- Beginning with model year 2023, adapting the requirement for automakers to provide a warranty for all vehicles to use blends up to and including E25 as it would provide more market opportunities for corn farmer profitability through 2040.
- Although we're very pleased to see our messages regarding a higher-octane certification fuel have been heard, ICGA policy has always been to establish a 98 RON certification

fuel contingent on the E25-E30 blend of ethanol by year 2022, and that detail regarding the ethanol blend is not currently provided for in the draft.

Regarding the following points, we would like the opportunity to discuss with you how they might be further refined or included:

- The draft proposal indicates a sunset of the RFS requirement for conventional biofuels beyond 2022. ICGA policy does not support this provision at this time. We need some certainty beyond 2022 and need to better understand how we can achieve that certainty along with fair and open market access for biofuels.
- The proposal is overlooking the need to ensure that ethanol is properly credited with its true efficiency and carbon reduction benefits.
- The allowance of corn-starch ethanol to be considered an advanced biofuel based on it meeting existing performance standards is not addressed.

Our willingness and interest in discussing the draft proposal is not limited to the above-mentioned points, but we wanted to get you some initial feedback on this important, forward-thinking effort.

We understand that this issue involves a diverse and committed group of stakeholders, but we are positive that the 21st Century Transportation Fuels Act can achieve strong growth and prosperity while increasing efficiency and reducing emissions at the lowest-possible cost to motorists.

We are committed to be a part of the solution to the complex challenges this conversation brings.

Sincerely,



Ted Mottaz
Illinois Corn Growers Association President