KANSAS CORN GROWERS ASSOCIATION

TESTIMONY OF
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BEFORE THE
U.S. HOUSE OF REPRESENTATIVES, HOUSE OVERSIGHT COMMITTEE
SUBCOMMITTEE ON ECONOMIC GROWTH, ENERGY POLICY, AND REGULATORY AFFAIRS

"DRIVING BAD POLICY: EXAMINING EPA'S TAILPIPE EMISSIONS RULES AND THE REALITIES OF A RAPID ELECTRIC VEHICLE TRANSITION"

MAY 17, 2023

Good afternoon, Chairman Fallon, Ranking Member Bush, and Members of the Committee. Thank you for the opportunity to testify today. My name is Josh Roe, and I serve as the CEO of the Kansas Corn Growers Association, and I am a 7th generation farmer in North-Central Kansas. The Kansas Corn Growers Association represents farmers on state and national legislative and regulatory issues, and actively works with other organizations to maximize the voice of Kansas corn producers.

The agricultural and liquid fuels industries stand ready to assist in reducing air pollution. Unfortunately, current, and proposed EPA rules prevent us from being part of the solution, and adversely impact low income and rural citizens across the United States.

Increased public and private investment in an all-electric transportation system is being driven by the desire to reduce greenhouse gas (GHG) emissions with lofty goals to achieve carbon neutrality. While we believe that electric vehicles (EVs) will play a vital role in achieving these goals, other complementary alternatives, such as biofuels, have a key role to play but are being pushed aside. High octane low carbon (HOLC) fuels containing higher biofuel content reduce emissions, both because they're less carbon intensive to produce, and because higher octane means significant gains in fuel economy. These next generation fuels can save consumers money and are compatible with 97% of the vehicles on the road today. In other words, HOLC fuels offer a solution to air quality problems, combat inflation, do not

require a publicly funded overhaul of our transportation infrastructure, or require consumers to purchase vehicles that may not be compatible with their way of life. EVs are $10,000-25,000 more expensive than comparable internal combustion engine vehicles, placing them out of reach for many consumers including those in rural America where median incomes are lower than that of urban areas.

The EPA defines EVs as zero-emission vehicles. However, EVs are not truly zero-emission vehicles. While they do not have a tailpipe, you still need to account for the emissions that come from the power grid. The US power grid is currently 60% powered by coal and natural gas.[1] Current and proposed EPA rules do not account for these upstream emissions when calculating compliance, let alone the additional emissions and toxic pollution generated by mining rare earth minerals around the world.

Given the makeup of today's power-grid, vehicles running on HOLC fuels provide very similar GHG emission savings compared to EVs.[2] Plug-in hybrid vehicles operating on E85—85 percent ethanol and 15 percent gasoline—can be even cleaner as they have the potential to take advantage of low-carbon ethanol in their combustion engines and a low-carbon electricity grid while in battery mode.

The proposed EPA standards allow the automakers to use a zero grams/mile compliance value for EVs and set emission standards such that the only way to comply is by shifting production to nearly 70% EVs in the next decade. Meeting those goals will be extremely costly, requiring a massive amount of public spending in electrical infrastructure, a complete retooling of auto production plants, and a change in where materials are sourced.

By contrast, HOLC fuel standards such as those proposed in *The Next Generation Fuels Act*, reduce emissions, and require minimal public investment.[3] Instead of mandating a technology, a HOLC fuel standard simply removes regulatory barriers and sets tech-neutral benchmarks[4]. The bill's co-sponsors include Chairman Comer and Congresswoman McClain.

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[1] Energy Information Administration: https://www.eia.gov/energyexplained/electricity/electricity-in-the-us.php
[2] Concise analysis on the carbon intensity of internal combustion engine and EV vehicles contained in this letter: https://d35t1syewk4d42.cloudfront.net/file/2514/RFA%20Cleaner%20Fuels%20Letter041823Final.pdf

[3] Additional information on the Next Generation Fuels Act: https://www.ncga.com/key-issues/other-topics/high-octane-low-carbon
[4] University of Chicago, Environmental and Health Benefits of the Next Generation Fuels Act: https://erc.uic.edu/wp-content/uploads/sites/633/2021/12/NGFA-HealthEnviron-Benefits-v2.pdf

In conclusion:

- Today, there are more than 271 million light duty vehicles in the Unites States, with less than 1% being battery powered[5].
- These existing vehicles, along with those sold in the next decade, will consume over one trillion gallons of fuel.
- 97% of all vehicles on the road are warrantied for E15 (fuel containing 15% ethanol).
- Using E15 in all compatible vehicles would reduce carbon emissions by 280 million tons in the next decade.

If the Administration's goal is to improve air quality, they should look at solutions that will make a difference now, rather than going all-in on a more expensive technology that will limit the mobility of low-income American households. Thank you for the opportunity to provide this testimony today.

[5] Federal Highway Administration. Highway Statistics 2021. "State Motor-Vehicle Registrations – 2021." https://www.fhwa.dot.gov/policyinformation/statistics/2021/mv1.cfm (Note: 9.8 million motorcycles and 0.93 million buses are excluded from the 271 million figure.)