

Message

From: Bennett, Tate [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1FA92542F7CA4D01973B18B2F11B9141-BENNETT, EL]
Sent: 10/1/2017 1:50:01 PM
To: Kathy Bergren [Bergren@ncga.com]
CC: Dominguez, Alexander [/o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=5ced433b4ef54171864ed98a36cb7a5f-Dominguez,]
Subject: Re: EPA's NODA on the RVO and Proposals on RIN Regulatory Changes - NCGA

Thanks, Kathy, for letting us know where NCGA stands and we would certainly welcome your all's input on this and all future proposals (if any). -Tate

On Sep 29, 2017, at 8:51 AM, Kathy Bergren <Bergren@ncga.com> wrote:

Thanks very much, Tate. Appreciate the "open door."

We will comment on the NODA, but we're also concerned about the reports about consideration EPA is giving to the refiners' proposal on changing RIN treatment for ethanol exports. Such a change would be detrimental to U.S. ethanol exports, which have been very positive for corn growers, as well as undermine domestic use of renewable fuels. To the extent EPA may be considering this additional proposal related to biofuel exports, we ask for the chance to weigh in before such a proposal might move further.

Again, thank you, Tate. And thank you, Alex, as well. NCGA is available anytime to provide additional information and perspective on this issue.

Kathy

From: Bennett, Tate [<mailto:Bennett.Tate@epa.gov>]
Sent: Thursday, September 28, 2017 2:52 PM
To: Kathy Bergren <Bergren@ncga.com>
Cc: Dominguez, Alexander <dominguez.alexander@epa.gov>
Subject: Re: EPA's NODA on the RVO and Proposals on RIN Regulatory Changes - NCGA

Hey there! You always have an open door with our office (I also do business/ industry outreach) and I've copied Alex in the Air office as well who works with Mandy. Here is our general response to inquiries:

"This morning the Administrator signed the Notice of Data Availability. Under this we are simply seeking comment on an approach that discounts imports for purposes of setting a domestic mandate."

Receiving as much information as possible as to why we import would be beneficial on our end.

Tate

On Sep 28, 2017, at 2:34 PM, Kathy Bergren <Bergren@ncga.com> wrote:

Hi, Tate. I hope you're doing well! I saw that you changed jobs at EPA, so hope the new position is working out.

I realized our RFS issues are not necessarily in your area, so sorry for adding another message to your inbox. I have reached out to Mandy to share our concerns, but just wondering if there is anyone else on the political staff you might suggest as an additional contact on RFS issues?

Thanks very much for your time (again!).

Kathy

Kathy Bergren

Director, Public Policy
National Corn Growers Association
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Mobile
bergren@ncga.com

From: Kathy Bergren

Sent: Thursday, September 28, 2017 2:07 PM

To: 'gunasekara.mandy@epa.gov' <gunasekara.mandy@epa.gov>

Subject: EPA's NODA on the RVO and Proposals on RIN Regulatory Changes - NCGA

Mandy:

With EPA's release of the additional proposal on RVO volumes for 2018/2019 this week, as well as the reported discussions around a proposed regulatory change on RINs with regard to export gallons, we wanted to relay corn growers' serious concerns with the impact these proposals would have for biofuels, a vital market for our producers, as you know.

While the NODA proposal does not directly impact the 15 billion gallon implied volume for conventional ethanol, NCGA has concerns about the implications for use of the general waiver authority going forward and the further reduction in total volumes, which will be addressed in comments.

With regard to the reports the agency is considering a regulatory proposal on RINs for export gallons, are you able to share any information on the status of these discussions and the degree of consideration EPA is giving such a proposal?

Ethanol exports have been a positive for corn growers, but allowing export gallons to generate RINs is not the pathway for growing exports. The U.S. is the leader in ethanol exports, and we're already winning on price. The impediments to our exports comes from barriers other countries erect, and changing the treatment of RINs will only cause those barriers to increase and draw threats to other U.S. exports, not to mention undermine domestic use of domestic renewable fuels.

Thank you for any information you can share about EPA's decision-making process on this additional regulatory proposal; we appreciate EPA's consideration of NCGA's views. NCGA is available to provide additional information on this issue if needed, and we will also provide detailed comments to the NODA on corn farmers' concerns.

Thank you for your time,

Kathy

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