



July 5, 2023

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Re: Greenhouse Gas Emissions Standards for Model Years 2027 and Later Light-Duty and Medium-Duty Vehicles (EPA-HQ-OAR-2022-0829 FRL 8953-03-OAR)

Dear Administrator Regan:

The Energy Marketers of America (EMA) is a federation of 48 state and regional trade associations representing family-owned and operated small business energy marketers throughout the United States. Energy marketers represent a vital link in the motor and heating fuels distribution chain. EMA members supply 80 percent of all finished motor and heating fuel products sold nationwide including renewable hydrocarbon biofuels, gasoline, diesel fuel, biofuels, heating fuel, jet fuel, kerosene, racing fuel and lubricating oils. Moreover, energy marketers represented by EMA own and operate approximately 60,000 retail motor fuel stations nationwide, supply motor fuels to an additional 40,000 gas stations and heating fuel to more than 5 million homes and businesses.

EMA member companies provide a growing portfolio of affordable, efficient, and greener liquid fuels and alternative energy sources. These liquid fuels have played a critical role in lowering emissions over the past half century. Through innovation and technological advancements, liquid fuels will continue to reduce emissions further and be a crucial driver of economic growth in this country in the coming decades. Therefore, EMA fully supports and endorses the comments submitted by the American Fuel & Petrochemical Manufacturers (AFPM) regarding EPA's GHG standards for light-duty and medium-duty vehicles for model years 2027 and later.

EMA is concerned over EPA's tailpipe emission standards for light-duty and medium-duty vehicles for model year 2027 and later which will effectively discourage investment in lower carbon liquid fuels. EPA projects that a potential outcome of the rule would require nearly 70 percent of all new light duty vehicle sales to be battery electric vehicles (EVs) by 2032. Unfortunately, the focus on EV production will fundamentally eliminate an opportunity to provide clean green liquid fuels such as renewable diesel, biodiesel, renewable gasoline, clean hydrogen and ethanol that immediately lower emissions not only for new vehicles, but for the vehicles currently on the road. In addition, the rule will limit consumer choice on cleaner internal combustion engines and threaten the viability and jobs of small business energy marketers around the country.

EMA urges the EPA to consider lifecycle emissions and a technology neutral approach when considering emission reductions. The proposed rule should consider the lifecycle emissions associated with EV production, usage, and end-of-life disposal including emissions from raw material mining and refining, battery manufacturing, and electricity generation for EV charging. Further EPA needs to consider the logistics, investment, and timing associated with EV and battery production, electric generation and transmission, and EV charging to support a substantial increase in EV production. Achieving a significant ramp up of domestic supply of raw materials for batteries, mineral refining, and battery and vehicle manufacturing as well as upgrades to the electricity generation and transmission will be complex and take time.

Again, EMA urges the EPA to consider lifecycle emissions and a technology neutral approach when it comes to promoting policies to reduce emissions. The most cost-effective and timely way to reduce emissions from transportation is to support multiple technologies that do so for both new vehicles and vehicles currently on the road.

Thank you for the opportunity to submit comments on this proposed rule which impacts small family-owned and operated energy marketing businesses and their customers nationwide.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Underwood". The signature is fluid and cursive, with a prominent initial "R" and a long, sweeping underline.

Rob Underwood
President
Energy Marketers of America