



July 29, 2025

RE: Renewable Fuel Standard (RFS) Program: Standards for 2026 and 2027, Partial Waiver of 2025 Cellulosic Biofuel Volume Requirement, and Other Changes

Docket No: EPA-HQ-OAR-2024-0505

Dear Administrator Zeldin,

The Pennsylvania Manufacturers' Association (PMA) is the nonprofit, statewide trade organization representing the manufacturing sector in the state's public policy process. Manufacturing directly employs 560,000 Pennsylvanians on the plant floor, sustaining millions of additional jobs in supporting industries, and generating more than \$111 billion in gross state product. PMA's mission is to improve Pennsylvania's economic competitiveness by advancing pro-growth public policies that reduce the baseline costs of creating and keeping jobs in our commonwealth.

We write to express serious concern with EPA's proposed rule on Renewable Volume Obligations for 2026 and 2027. The proposal poses significant risks to Pennsylvania businesses, especially those supporting or contracting with independent refineries through increased costs and operational uncertainty.

As Pennsylvanians, we are proud of our centuries-long legacy of energy leadership. Pennsylvania stands as a global energy leader, home to abundant natural resources, a robust and talented workforce, and an incubator for innovation. As such, we are alarmed by EPA's proposed rule setting Renewable Volume Obligations for 2026 and 2027 under the RFS. This proposal threatens countless businesses in Pennsylvania and throughout the country with higher costs and lost opportunities, especially those that contract with refineries for goods, professional, and mechanical services.

Manufacturers rely on affordable, reliable energy to power complex supply chains and distribution networks. Many of our members maintain close partnerships with independent refiners in the Northeast to meet fuel demands. However, the current structure of the RFS continues to burden these refiners, forcing them to spend more on compliance credits known as RINs than on payroll, maintenance, or utilities. Since 2019, the U.S. has lost over 1.4 million barrels per day of refining capacity; an unsustainable trend contrary to Congressional intent.

Compounding the problem, EPAs proposed 15-billion-gallon conventional biofuel target exceeds projected ethanol demand. As a result, actual blending will likely fall short, inflating

RIN prices and endangering the financial stability of the few remaining independent refineries. These refineries are critical not only to energy supply but also to Pennsylvania's economy.

Thousands of Pennsylvanians depend on refining-related jobs, both directly and across upstream and downstream industries such as pipe, valve, and chemical manufacturing. This proposal puts those high-quality, family and community sustaining jobs at risk.

We urge EPA to revise the ethanol volume requirement to 14.2 billion gallons, which aligns more closely with actual demand and would help stabilize RIN prices. Without this adjustment, we risk further destabilizing domestic fuel supply chains and exacerbating dependence on foreign energy sources while driving local manufacturers and refiners closer to collapse.

On behalf of the manufacturers of Pennsylvania, we strongly urge EPA to revise the rule. Thank you for your consideration.

Respectfully,



David N. Taylor
President & CEO



Carl A. Marrara
Executive Director