



Theresa Gavarone
State Senator

Re: Renewable Fuel Standard Program: Renewable Fuel Standard Annual Rules

To Whom It May Concern:

I write today to comment on the Environmental Protection Agency's (EPA) proposed rule, "Renewable Fuel Standard Program: Renewable Fuel Standard Annual Rules," Docket ID No. EPA-HQ-OAR-2021-0324. The proposed rule as written will have an adverse impact on countless American families by risking thousands of jobs, harming our domestic fuel supplies, and increasing the price we pay for our fuel. As such, I encourage the EPA to lower the proposed Renewable Volume Obligations (RVO) for 2022 and to eliminate the proposed supplemental RVO.

As the rule is currently written, the 2022 ethanol standard will keep the cost of Renewable Identification Numbers (RINS) exceedingly high, to the point it will harm the operation of our refineries and, in turn, their employees. Many refineries already pay more for RINS to remain compliant with the Renewable Fuel Standard Program than they do for their operating costs. By causing these costs to remain high, this proposed rule is a major threat to workers and our domestic fuel supply, threatening American energy independence and a growing cost to the average consumer.

Additionally, the proposed rule to mandate fifteen billion gallons of conventional ethanol in 2022 is a major concern. Most vehicles on the road today are not built to handle more than 10 percent ethanol, and the demand for gasoline this year is expected to be at 138 billion gallons according to the Energy Information Administration. To comply with the mandate in the proposed rule, the cost to our energy producers would be astronomical. Moreover, the mandate would lead to the reduction in production by our refineries, leading to higher costs to consumers and the loss of jobs in our refineries.

These detrimental effects would be felt especially hard in Ohio. I'm proud to represent Northwest Ohio in the State Senate. The people I represent are hard-working, and they aspire to provide for themselves and their families. Many of the people I represent work at the Toledo Refining Company (The Refinery) in Oregon, Ohio. The Refinery employs hundreds of people and produces the energy that we in Ohio and across our region rely on. It is estimated that the Refinery contributes \$5.2 billion annually in total direct and indirect economic benefit to Northwest Ohio as well.

The EPA's proposed rule as it currently stands threatens the Refinery, its employees and their families, the cost of living for our citizens, and the entire region's economy. For my constituents and for my state, I strongly ask that the EPA reconsider its proposed rule and make the necessary changes to ensure our families, economy, and country remain strong.

Thank you for your consideration of my comments and your consideration on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read "Theresa Gavarone". The signature is written in a cursive, flowing style.

Theresa Gavarone
State Senator
2nd Ohio Senate District