



"Ensuring the growth of the renewable fuels industry in Nebraska"

1327 H Street, Ste. 103, Lincoln, NE 68528

402-310-0045

www.renewablefuelsne.org

January 17, 2020

Mike Johnson
Nebraska Dept. of Agriculture – Weights and Measures

RE: RFN Opposition to FAL 20.2 & 20.3 – National Conference on Weights and Measures

Mr. Johnson-

I write to ensure that you are aware of our organization's opposition to the proposals: FAL 20.2 and FAL 20.3, that have been submitted for consideration to the National Conference on Weights and Measures. As you know, RFN is the trade association representing Nebraska's ethanol industry and a resource encouraging public policy that ensures the growth and expansion of the nation's 2nd largest renewable fuels industry.

As you also know, ethanol is a high quality, consistent component in gasoline that must adhere to strict fuel quality specifications. At a time of significant motor fuel consumption, nearly every gallon of gasoline in the United States contains a minimum of 10% ethanol, and 15% ethanol blends are gaining market share. Consumers have now driven more than 8 billion miles on 15% ethanol blends and retailers have conducted millions of transactions.

The FAL 20.2 and FAL 20.3 proposals create dual regulatory authority for Federal regulation, placing additional burden on state government personnel with no technical justification. It is our preference that state level officials focus on the business of the state and not duplicate the efforts of Federal Agencies. U.S. Environmental Protection Agency already has a robust compliance program and misfuelling mitigation in place for E15 including a required sampling program that ensures proper blending and labeling. The FAL 20.2 and FAL 20.3 proposals are duplicative and unnecessary.

We feel these proposals have no merit and urge you to oppose these proposals by identifying these items to be "withdrawn" from consideration at the National Conference of Weights and Measures Interim Meeting at the upcoming meeting the week of January 27, 2020.

Thank you for your consideration. Please feel free to contact me at troyb@renewablefuelsne.org or 402-325-0045 if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Troy Bredenkamp".

Troy Bredenkamp
Executive Director

cc: Craig Van Buren, Chair, National Conference on Weights and Measures
Don Onwiler, Executive Director, National Conference on Weights and Measures
Steve Wellman, Director, Nebraska Dept. of Agriculture