

May 10, 2023

The Honorable Michael S. Regan
Administrator, U.S. Environmental Protection Agency (EPA)
1200 Pennsylvania Avenue, N.W.
Washington, DC 20004

Dear Administrator Regan,

On behalf of the Business Council for Sustainable Energy (BCSE), I write to express strong support for the inclusion of renewable electricity in the Renewable Fuel Standard (RFS) and to urge EPA to follow through on the creation of a national eRINs program as part of the final SET Rule that is expected to be released in June.

The BCSE advocates for energy and environmental policies that promote markets for clean, efficient, and sustainable energy products and services. Since its founding in 1992, BCSE has focused on policy adoption that will increase the deployment of energy efficiency, natural gas, renewable energy, as well as energy storage, sustainable transportation, and emerging decarbonization technologies.

Many BCSE members have participated in the RFS and are pleased that the EPA is considering implementing updates to the program. Please see the [comments that BCSE submitted](#) in response to requests for feedback on EPA's RFS proposal. Specifically, since the establishment of the RFS in 2007, BCSE has eagerly anticipated the creation of an electric pathway that would allow producers of renewable electricity to generate tradeable credits for powering electric vehicles. Although the SET Rule proposal that was released in December 2022 is more favorable to some of our members than others, we nonetheless recognize it as a tremendous step forward that can still be expanded in coming years to include all renewable feedstocks.

EPA has long recognized the many environmental and economic benefits associated with eRINs, including critical reductions in greenhouse gas emissions. The opportunity to include renewable electricity in the RFS and create a national eRINs program is timelier than ever. eRINs are complementary to other federal policies that encourage the production of renewable fuels and eRINs will directly support the electrification of the U.S. vehicle fleet. Collectively, BCSE believes that eRINs will support a broad market transformation of the electric vehicle and all eligible renewable power sectors. As such, BCSE urges EPA to continue its important work to bring eRINs fully into the RFS in its final rule. In closing, as stated in our submission earlier this year, we urge EPA in its final rule to include robust volume levels consistent with current market growth rates.

Thank you for your consideration and please do not hesitate to contact me via email (ljacobson@bcse.org) with any questions regarding this letter or if BCSE can be of assistance on this important matter.

Sincerely,



Lisa Jacobson, President