March 20, 2017

The Honorable Mary Nichols, Chair

California Air Resources Board

1001 I Street

Sacramento, CA 95814

(Comment submitted electronically via online portal)

RE: ACC Midterm 2017; Advanced Clean Car Rule- Greenhouse Gas Standards

Dear Chair Nichols,

We appreciate the opportunity to provide comments regarding California’s Advanced Clean Cars Midterm Review (Midterm Review).

Specifically we believe more discussion is warranted regarding fuel properties that can enable advanced vehicle technologies such as high and variable speed compression ratios. We believe any further analysis supporting the re-opened federal midterm evaluation process should give consideration to the wide range of fuel properties—such as octane rating and carbon —that can best enable near term, low-cost advances in fuel economy and GHG emissions reduction. We further encourage the agencies to consider what additional regulatory actions may be necessary to ease commercialization of low-carbon fuels and blends that would help achieve the near- and mid-term objectives of both the ACC program and California’s Low Carbon Fuel Standard (LCFS). ARB has always deemed the fuel and vehicle as one system. As the autos propose new technologies, the right fuels also need to be factored in, regulated and incented. In the case of octane that also reduces carbon, ethanol is uniquely situated to provide both. Regulatory work is needed however to enable advanced fuels into the marketplace to be matched with the newer vehicles. We believe the use of FFV technology combined with high compression engines can help speed the reduction of greenhouse gases and reach further stringent mileage standards.We appreciate your consideration of adding this aspect into your report.

Sincerely,

Tom Koehler

Pacific Ethanol