



March 9, 2022

The Honorable Michael Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Dear Administrator Regan:

On behalf of America's retail fuel industry,¹ we write to encourage the Environmental Protection Agency ("EPA") to exercise its waiver authority pursuant to Section 211(c)(4)(C)(ii) of the Clean Air Act to authorize the year-round sale of gasoline blended with up to 15 percent ethanol ("E15"). This common sense step would provide much-needed price relief at the pump while enhancing America's energy security and improving gasoline's emissions characteristics.

Congress has expressly authorized EPA to take this action in response to "extreme and unusual fuel or fuel additive supply circumstances" which prevent the distribution of an adequate supply the fuel or fuel additive to consumers, provided such circumstances are the result of an "event that could not reasonably have been foreseen or prevented and not the lack of prudent planning" on the part of fuel suppliers, and it would be "in the public interest" to exercise its waiver authority.

In recent weeks, oil prices have risen at an extraordinary pace due in large part to geopolitical unrest in Europe and inflation rising domestically at a faster pace than at any time in more than forty years. Neither of these trends appears likely to dissipate in the coming months. This will result in continued, increasing pressure on transportation fuel markets that will make it challenging to ensure consistent gasoline supply in all regions. If additional, currently unforeseen developments arise, these challenges could become even harder to overcome. Fuel marketers and retailers could not have planned for these events. Allowing the year-round sale of E15 in all parts of the country would help enhance supply and lower prices for all American fuel consumers.

¹ NACS is an international trade association representing the convenience store industry with more than 1,500 retail and 1,600 supplier companies as members, the majority of whom are based in the United States. NATSO currently represents approximately 5,000 travel plazas and truck stops nationwide, comprised of both national chains and small, independent locations. SIGMA represents a diverse membership of approximately 260 independent chain retailers and marketers of motor fuel. Together, the associations collectively represent approximately 90 percent of motor fuel sales in the United States.

This is a unique situation where the Administration's energy security and geopolitical objectives are fully aligned with its environmental priorities. Allowing year-round E15 would make the U.S. more energy secure, enhancing the nation's geopolitical leverage all the while improving gasoline's emissions characteristics.

Thank you for your consideration of this request.

Sincerely,

National Association of Convenience Stores
NATSO, Representing America's Travel Plazas and Truckstops
SIGMA: America's Leading Fuel Marketers