October 5, 2017

Office of Transportation and Air Quality
Assessment and Standards Division
Environmental Protection Agency
2000 Traverwood Drive
Ann Arbor, MI 48105

Office of the Chief Counsel
National Highway Traffic Safety Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Submitted electronically to www.regulations.gov
Docket ID No. EPA-HQ-OAR-2015-0827


The American Petroleum Institute (API) appreciates the opportunity to comment on the reconsideration of the final determination of the midterm evaluation of greenhouse gas emissions standards for model year 2022-2025 light-duty vehicles. API is the only national trade association representing all aspects of America’s oil and natural gas industry. API supports cost effective energy efficiency measures, API members provide America’s fuels, and as such they are impacted by this final determination and future CAFE / CO2 vehicle standards. Our 650 corporate members, from the largest major oil company to the smallest of independents, come from all segments of the industry. They are producers, refiners, suppliers, marketers, pipeline operators, and marine transporters as well as service and supply firms. They provide most of the nation’s energy and are backed by a growing grassroots movement of more than 30 million Americans.

API supports EPA’s and NHTSA’s reconsideration of the Mid-Term evaluation process, which was cut short abruptly and prematurely by the Obama Administration in early January 2017.

API submitted comments on EPA’s “Technology Assessment Report and proposed determination conducted in 2016 as well as during the development of the light-duty vehicle greenhouse gas emissions and corporate average fuel economy for model years 2022-2025”. We continue to stand by those

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1 82 FR 39553 (August 21, 2017)
comments and urge the EPA to review them in the process of reconsidering the final determination of the Midterm Evaluation. These earlier comments are incorporated here by reference. The issue of reference/baseline year was especially highlighted by API in September 2016. API objected to using 2021MY as baseline and, instead, recommended that costs and benefits of model year 2022-2025 standards be compared “against the latest year for which actual sales and technology cost data are available.”

In the August 21, 2017 Federal Register notice, the Environmental Protection Agency (EPA) invited comments on “… factors relevant to setting greenhouse gas emission standards under section 202(a) of the Clean Air Act for model years 2022 through 2025…” Among these factors, EPA mentioned “[t]he impact of the [model years 2022 through 2025] standards on advanced fuels technology, including but not limited to the potential for high octane blends.”

Today, auto manufacturers can certify/warranty their vehicles with regular or premium fuel. API acknowledges the fact that octane may be beneficial for future, high compression ratio, advanced gasoline engines, but believes that the octane issue should be part of a comprehensive transport policy that addresses vehicles and fuels as a system. Increases in the octane number of gasoline were not considered during the rulemaking process when the U.S. Environmental Protection Agency (EPA) and the Department of Transportation’s National Highway Traffic Safety Administration (NHTSA) issued final regulations in 2012 to further reduce greenhouse gas (GHG) emissions and improve fuel economy for model years (MYs) 2017 through 2025 light-duty vehicles. Nor was fuel octane number considered when formulating the technical studies and programs which fed into the Technology Assessment Report in support of the Mid Term Evaluation process in 2016. Therefore, EPA has no basis for including octane number as a factor when reconsidering the final determination of the midterm evaluation of the GHG standards for model year 2022 – 2025 light-duty vehicles.

API appreciates the opportunity to submit these comments. Please contact me if you have any questions about these comments.

Sincerely,

[Signature]

Senior Fuels Policy Advisor