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**Edeniq’s Verbal Testimony Delivered at the
Public Hearing held in Ypsilanti, MI on the Environmental Protection Agency’s
Proposed Rule for the “Renewable Fuel Standard Program: Standards for 2019 and
Biomass-Based Diesel Volume for 2020”
July 18, 2018**

Thank you for the opportunity to provide verbal testimony on EPA’s proposed 2019 RFS rule.

My name is Sarah Caswell. I am here on behalf of Edeniq, a leading biotechnology company headquartered in Visalia, California, with an office in Omaha, Nebraska. We develop processes for producing and measuring cellulosic ethanol from corn kernel fiber through our Intellulose technology. I serve as the company’s Vice President of Government and Regulatory Affairs.

Edeniq is troubled by the proposed cellulosic RVOs and EPA’s assumptions and analysis for the production of liquid cellulosic fuel in 2019. For instance, EPA estimates only 24 million gallons of liquid cellulosic biofuels, including cellulosic ethanol from corn kernel fiber made using Edeniq’s technology. This assumes production from only Edeniq customers with prior approval – no new plants. Edeniq’s technical experts worked closely with EPA technical staff in 2015, 2016 and 2017 to provide all required data for the agency to process and approve our customers’ registration applications. EPA staff thus demonstrated the ability to evaluate individual applications and technology without an established blanket standard for measurement.

Three of the approvals occurred during the Obama Administration and three during the Trump Administration. In fact, in 2017 EPA was processing and approving new cellulosic production registration applications using Edeniq’s previously approved technology every six to eight weeks. However, the last such application was approved in November of 2017. Several new registrations for cellulosic production using Edeniq’s already approved technology have been sitting before the agency for its approval for months already. These applications represent millions of new cellulosic biofuel gallons avoided during 2018, which are therefore not being considered as part of the 2019 RVO analysis.

We believe EPA is bound to administer the RFS law in such a way that promotes the production and use of cellulosic biofuels into the nation’s transportation fuel supply. For this reason, we



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believe that EPA should immediately resume fully processing and approving new registration applications for the production of qualified cellulosic biofuels, especially those applications proposing to produce the fuel using technology previously approved by EPA. The agency should also set the final 2019 cellulosic RVOs at an appropriate level that accurately encompasses actual expected volumes that take into account (1) volumes avoided by delays in such processing this year, and (2) volumes that are projected to come online next year under a restored, efficient approval process that would accurately project actual expected cellulosic volumes.

Edeniq's current customers using or proposing to use already approved technology could produce 25 million gallons in 2019. And, if the EPA moves forward with reviewing and approving new applications with technical improvements, Edeniq customers could provide more than 50 million gallons of cellulosic ethanol from corn kernel fiber in 2019. These potential gallons will only be realized if the agency approves new cellulosic production registrations. We stand ready to work with agency staff to answer any questions or provide any data necessary for such approvals.

Thank you.