

Good morning,

My name is Steve Seabrook and I work for POET Ethanol Products in Wichita, Kansas. We are the marketing arm of POET, LLC. In this role, we market ethanol for 34 ethanol refineries including POET's 27 plants. In total we represent over 2 Billion gallons of ethanol annually.

First, I would like to express my appreciation for the timely release of the 2017 target volumes. This allows the proper amount of time for stakeholder comments to be compiled and received, along with the proper amount of time for those comments to be evaluated and applied, prior to formal publication of the target volumes.

Additionally, I would also like to compliment the EPA for indicating that no compelling evidence exists that would prevent the nationwide average ethanol concentration in gasoline moving above 10%. The acknowledgement that no blend wall exists is critical as our industry continues to make significant investments in retail infrastructure that will allow ethanol to efficiently flow into the gasoline pool at levels well above 10%. Our industry efforts around "Prime the Pump" coupled with tremendous support from the USDA's Biofuel Infrastructure Partnership has allowed some of the largest gasoline retailers in the U.S. to install E-15 infrastructure that will provide consumers with even more access to higher blends of ethanol.

POET Ethanol Products spends a significant amount of time understanding U.S ethanol supply and demand. With this understanding, we evaluated the proposed 14.8B target for non-advanced biofuels with two key pieces of information in mind: First, regarding gasoline demand, we feel the latest STEO includes expected gasoline demand that is understated by one percent, which is the equivalent of 150MM gallons of ethanol demand not currently included in the 14.8B target. When you combine this increase with small adjustments to expected growth in E-15 and E-85, coupled with the number of diesel RINs that qualify within the D6 category, it is our feeling target volumes in the non-advanced biofuel category are underestimated by 200MM gallons. Second, we believe the ethanol industry can sustain production rates equal to 15B gallons on an annual basis. When you combine these factors, we are convinced that a 14.8B non-advanced target is too conservative as we transition to 2017.

Therefore, based on the information mentioned above, it is our request that the EPA give serious consideration to include an additional 200MM non-advanced biofuels in the 2017 target. Not only would this change be realistic, but it would return our target obligation to the original 15B of non-advanced biofuels outlined in the original statutory targets from 2007. This target obligation would also support the EPA's desire to maintain a reasonable amount of RIN availability in the marketplace for obligated parties.

I thank you for the opportunity to speak today, and look forward as the renewable fuel industry continues to prove itself as a sound economical alternative in today's liquid fuels market.

Sincerely,

Steve Seabrook