



Congressional Budget Office

June 21, 2017

Issues for the Renewable Fuel Standard

Presentation at the Environmental Protection Agency

Terry Dinan

Senior Adviser, Microeconomic Studies Division

With Ron Gecan and David Austin

Principal Analysts, Microeconomic Studies Division

This presentation is based on CBO's *Testimony on the Renewable Fuel Standard: Issues for 2015 and Beyond* (November 2015), www.cbo.gov/publication/50944.

Notes

These slides present results from an analysis that CBO conducted in November 2015. As a result, the analysis is based on 2015 projections of 2017 fuel and food prices and not on actual 2017 data. In addition, the “2016 Volumes” scenario is based on the renewable fuel volumes that were proposed for 2016, rather than on the finalized volumes for that year.

Overview

- The Energy Security and Independence Act (EISA) sets rising requirements for including renewable fuels in the supply of transportation fuels
- Full compliance with the Renewable Fuel Standard (RFS) mandates stated in EISA is challenging
- Food prices would be similar whether the RFS was continued or repealed
- Meeting EISA requirements would have significant effects on the prices of transportation fuels
- Reductions in greenhouse gas (GHG) emissions would be small in the near term but could be larger over the longer term depending on technology development

RFS Requirements

- The RFS was enacted in 2005 and expanded in 2007 under EISA
- Stated goals include reducing dependence on foreign oil and reducing GHG emissions
- EISA sets minimum volume requirements for amounts of renewable fuels that must be blended into transportation fuel; the requirements are “nested”

Nested Structure of RFS: Requirements for 2022

At least 36 billion gallons of biofuels . . .

. . . of which at least 21 billion gallons must be advanced biofuels.

Of the advanced biofuels,
at least 16 billion gallons must be cellulosic biofuels, and . . .

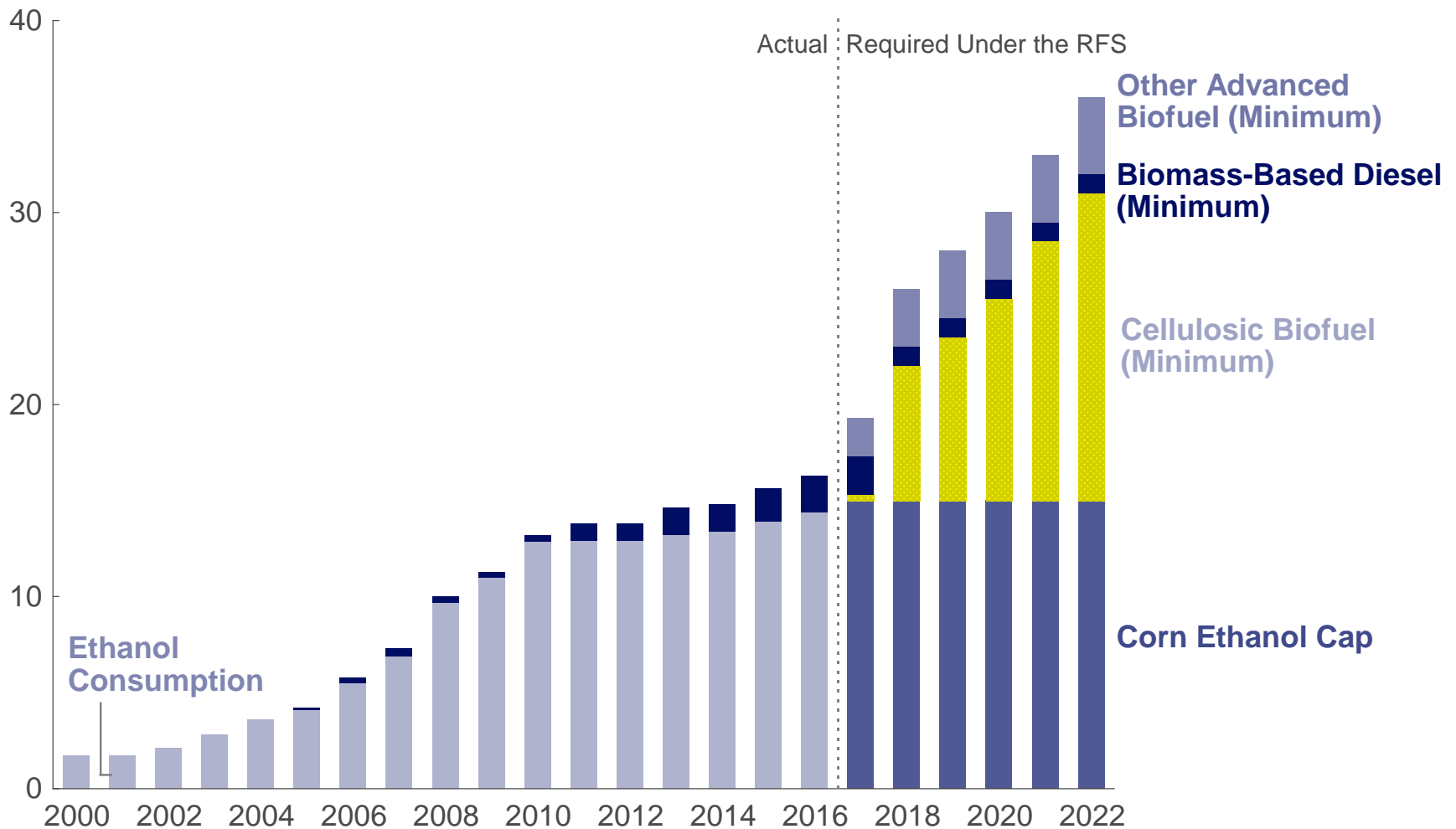
. . . at least 1 billion must be biomass-based diesel.

RFS Requirements (Continued)

- EISA sets minimum requirement for amount by which renewable fuels must reduce GHG emissions relative to the fuels they replace
 - 20 percent for all renewable fuels
 - 50 percent for advanced fuels
 - 60 percent for cellulosic fuels
- EPA certifies qualifying fuels with a renewable identification number (RIN) attached to each gallon
 - Ethanol produced at plants built prior to or under construction in 2007 are exempt; they automatically receive RINs
- Fuel suppliers must submit the required number of RINs on the basis of their use of petroleum-based fuels
- RINs can be traded and banked

Past Use of Renewable Fuels and Future Requirements of the Renewable Fuel Standard

Billions of gallons



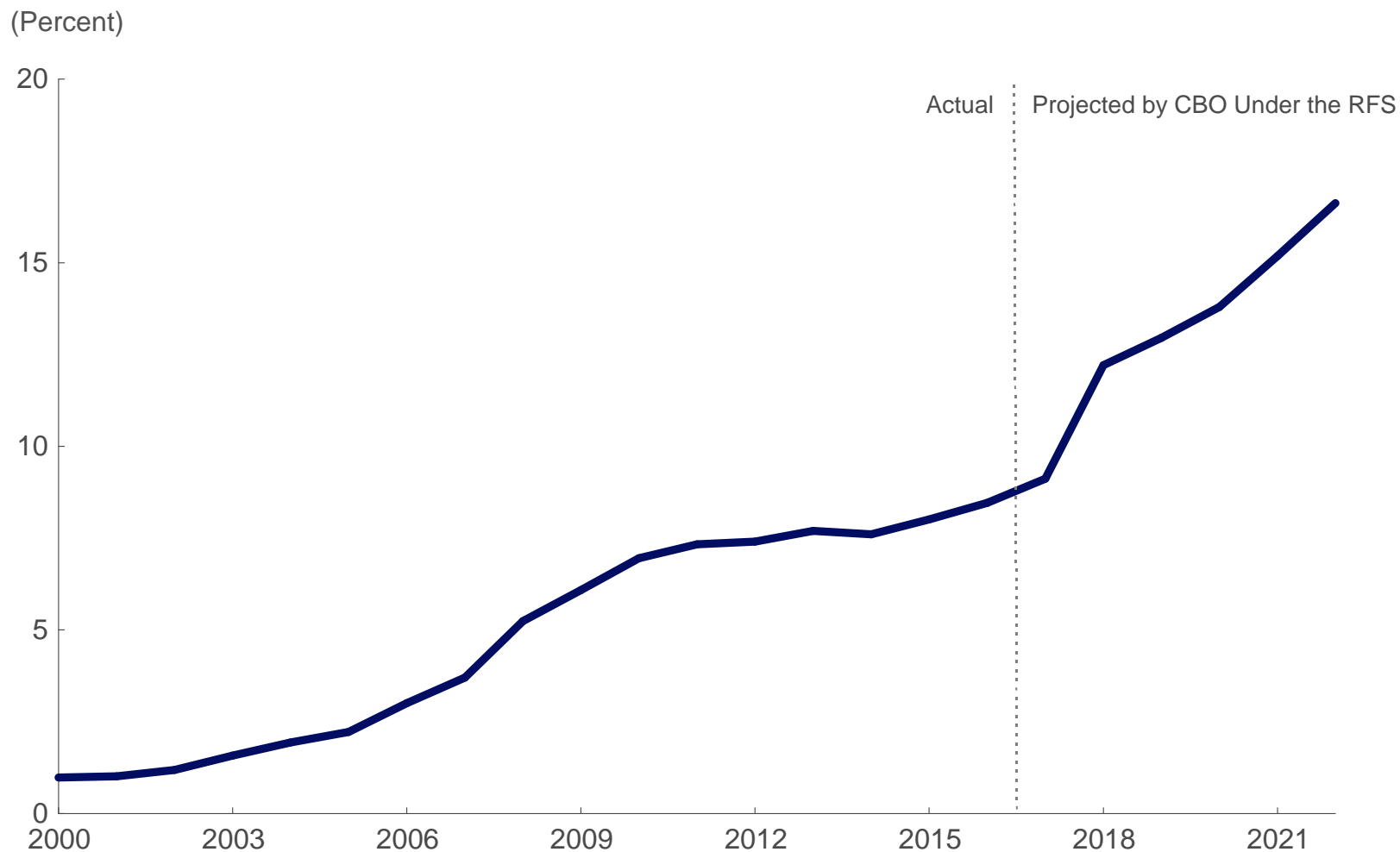
The Supply of Cellulosic Biofuels Is Limited

- EISA requirements for cellulosic biofuels began in 2010
- First commercial production began in 2013 with two plants
- More commercial production is expected, but far less than is required
 - EPA reports production in 2016 was about 200 million gallons; in contrast, the EISA requirement for 2016 was 4.25 billion gallons
- Production is complex, entails logistical challenges, and is costly

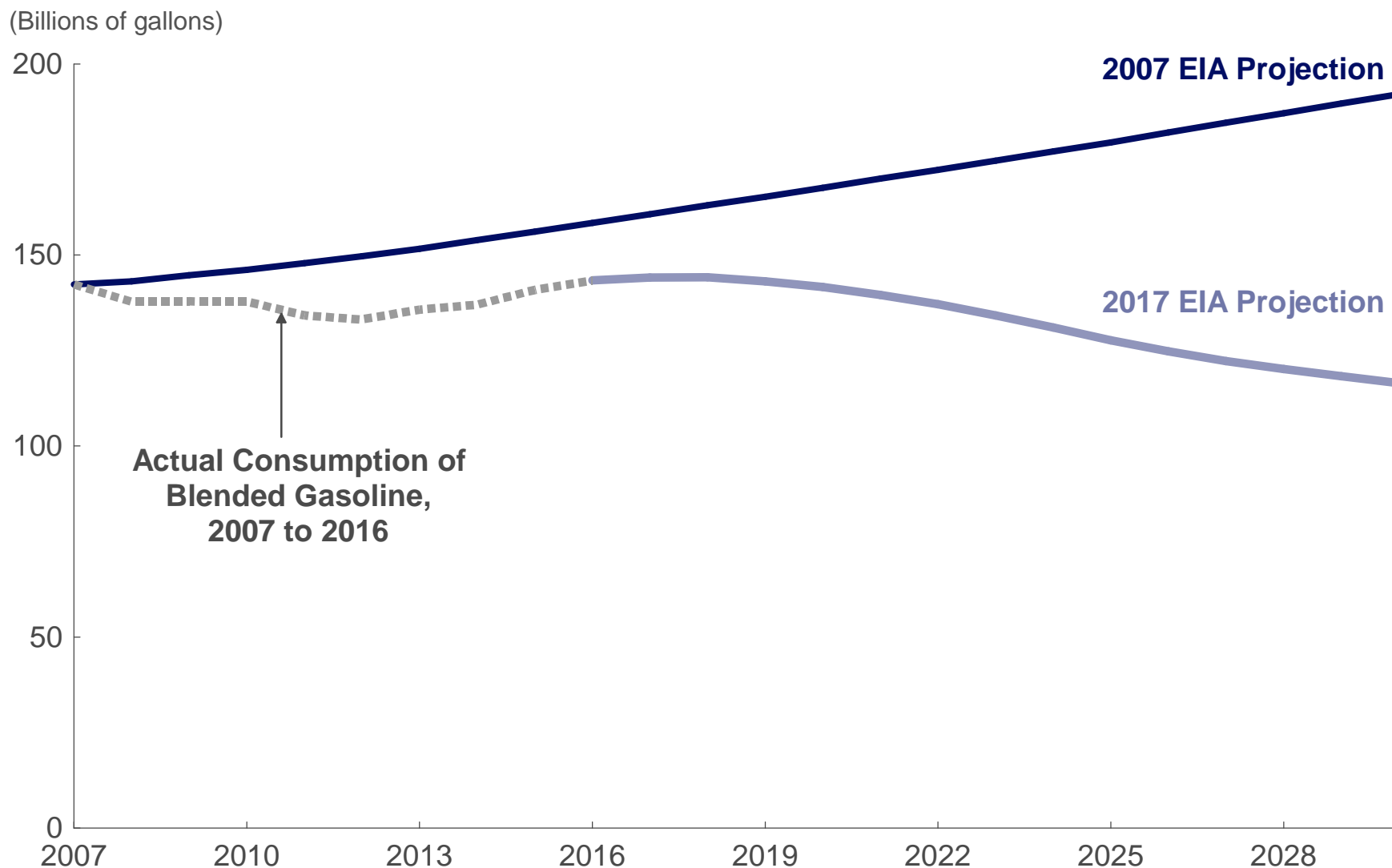
Using the Required Volume of Renewable Fuels Is Difficult

- 10 percent is the maximum ethanol content for blended fuel that can be used by most vehicles on the road
 - Protects the engines and fuel systems of cars built before 2001
 - Many states prohibit higher blends, except for in flex-fuel vehicles (E85)
- Increases in required volume pushed ethanol content in 2016 slightly past the 10 percent “blend wall”
- Challenges posed by the blend wall are exacerbated by lower consumption of blended gasoline than had been projected at the time the standard was set

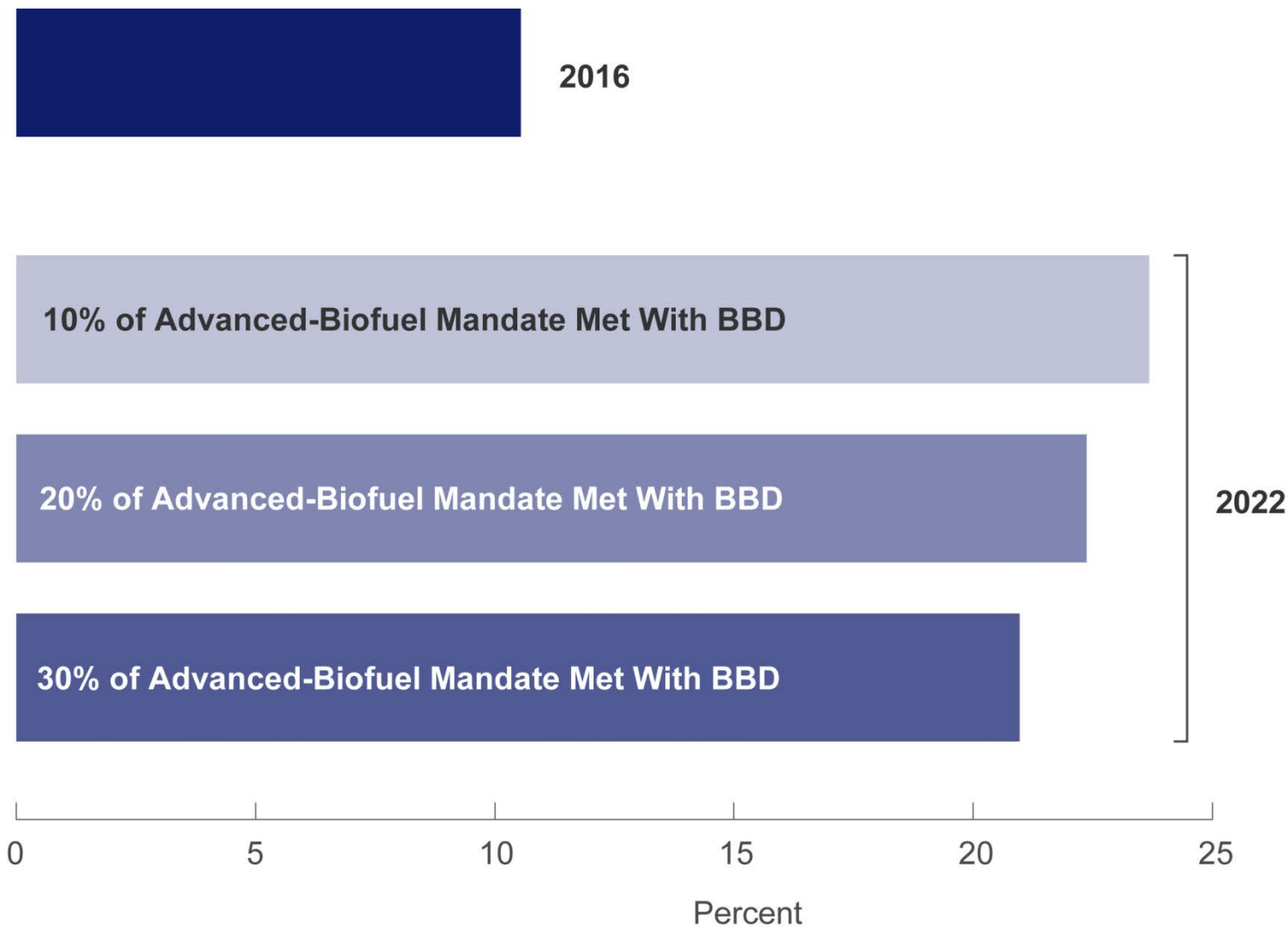
Renewable Fuels as a Share of the Total U.S. Supply of Transportation Fuels



Changing Expectations About the Future Consumption of Blended Gasoline



Ethanol as a Percentage of Blended Gasoline Under Different Assumptions About the Future Use of Biomass-Based Diesel



Ways Around the Blend Wall: Increasing the Use of E85 in Flex-Fuel Vehicles

- Flex-fuel technology is relatively inexpensive
- Many flex-fuel vehicles are now on the road
- Increasing the use of E85 in existing flex-fuel vehicles is more challenging
 - Only about 2.5 percent of stations offer E85
 - Lower energy content means users demand lower prices
- Use of E85 is growing, but at its current rate, it would reach only about 0.5 billion gallons in 2022 (out of a projected 135 billion gallons of blended gasoline)

Ways Around the Blend Wall: Increasing the Use of E15

- There is disagreement about the risk of damage with use of E15
 - EPA has certified that vehicles built since 2001 (80 percent of current vehicles) can run on E15 without damage
 - Most automakers have stated that vehicles built since 2015 can use E15
 - Many automakers discourage the use of E15 in older vehicles
- Until mid-2012 no stations offered E15
 - A small number of stations now have pumps
 - Offering both E10 and E15 requires new pumps and storage tanks, and it raises liability concerns if E15 is put in older vehicles

Ways Around the Blend Wall: Drop-In Fuels

- Drop-in fuels, made from cellulose, are chemically identical to gasoline and diesel and can serve as direct substitutes
- The technology is new and production is costly

EPA's Response to Compliance Challenges

- EPA used waiver authority to reduce the required use of cellulosic biofuels
 - Eliminated the requirements for 2011 and 2012
 - Reduced the mandate in subsequent years, reflecting production capacity (from 5.5 billion gallons to 311 million gallons in 2017, for example)
 - Largely required fuel suppliers to use additional biodiesel, sugarcane ethanol, or other advanced fuels in lieu of cellulosic biofuel
- EPA waivers have probably contributed to the slowing growth of cellulosic production capacity

The Effects of the RFS

- CBO considered the effects of the RFS on the prices of food and transportation fuels as well as the effects on emissions
 - Focus on the near term for food and fuel prices
 - Qualitative discussion of emission effects
- Effects are heavily dependent on decisions made by EPA
- In 2015, CBO considered three alternative scenarios for 2017
 - EISA Volumes Scenario: Requires compliance with total renewable fuel and advanced-fuel mandates and the corn-ethanol cap as stated in EISA
 - 2016 Volumes Scenario: Holds volume requirements at levels that were proposed for 2016
 - Repeal Scenario: No volume requirements

Use of Renewable Fuels in 2017 Under CBO's Alternative Scenarios for the Renewable Fuel Standard

	2016 Volumes Scenario ^a		EISA Volumes Scenario		Repeal Scenario
	Volume Requirement (Billions of gallons)	Blend Requirement (Percent)	Volume Requirement (Billions of gallons)	Blend Requirement (Percent)	Estimated Volume (Billions of gallons)
Advanced Biofuels					
Biomass-based diesel	2.7	1.5	3.0	1.6	About 1
Other advanced biofuels	0.7	0.4	6.0	3.4	
Subtotal	3.4	1.9	9.0	5.0	About 1
Corn Ethanol	14.0		15.0		13.4
Total Renewable Fuels	17.4	9.6	24.0	13.3	14 to 15

a. Based on 2016 volumes proposed as of November 2015. Finalized 2016 volumes were slightly higher.

Effects on Prices and Spending for Food: The Repeal Scenario Relative to the 2016 Volumes Scenario

- Ethanol accounts for 40 percent of the corn produced in the U.S.
- In 2015, CBO projected that
 - Ethanol use in 2017 would likely be the same if mandates were held at proposed 2016 levels or if the RFS was repealed
 - Fuel suppliers would continue to use a 10 percent blend because ethanol was projected to cost less per gallon than gasoline in 2017
 - Some demand would probably be prompted by ethanol’s effect on octane and carbon monoxide emissions
 - Food prices and spending in 2017 would be much the same if the RFS was repealed

Effects on Prices and Spending for Food: The Repeal Scenario Relative to the 2016 Volumes Scenario (Continued)

- Repeal could lead to a larger decrease in corn ethanol use over the long run
 - The price of corn ethanol could rise above the price of gasoline
 - Less expensive additives could be developed

CBO's 2015 Estimates of Production and Price of Corn in 2017 Under Alternative Scenarios for the Renewable Fuel Standard

	2016 Volumes Scenario ^a	EISA Volumes Scenario	Repeal Scenario
Projected U.S. Corn Production in 2017 (Billions of bushels)	13.7	14.0	13.6
Projected Average Price of Corn in 2017 (Dollars per bushel)	3.70	3.80	3.60

a. Based on 2016 volumes proposed as of November 2015. Finalized 2016 volumes were slightly higher.

CBO's 2015 Estimates of the Effects of the EISA Volumes Scenario on Food Prices and Spending in 2017

	Change Under the EISA Volumes Scenario
Estimated Change in the Average Price of Corn (Dollars per bushel)	0.10
Change in Spending on Food (Billions of dollars)	
Food products that contain corn	0.2
Meat, poultry, and dairy products	0.6
Soybeans	0.8
Total	<u>1.6</u>
Projected 2017 Food Expenditures (Billions of dollars)	1,770
Percentage Change in Spending on Food	0.1

CBO's 2015 Estimates of the Effects of the EISA Volumes Scenario on Fuel Prices Relative to the 2016 Volumes Scenario

- The EISA Volumes Scenario would require 5.6 billion more gallons of advanced biofuel than the 2016 Volumes Scenario would
- Illustrative examples of the challenge of using 5.6 billion additional gallons of advanced biofuel:
 - Meeting 1.5 billion gallons by further increasing use of BBD would require a 60 percent increase in production relative to EIA projections
 - Meeting 3 billion gallons by importing sugarcane ethanol from Brazil would require a 50 percent increase in Brazil's 2017 projected production
 - Those increases in BBD and sugarcane ethanol would still leave suppliers 1.1 billion gallons short of 5.6 billion gallons

Existing Literature Does Not Address the Effects of Meeting EISA Mandates on 2017 Fuel Prices

- Some studies find that the RFS would cause only a small increase—or even a decrease—in the price of E10
 - A decrease is possible through the effect on the world price of oil
 - CBO anticipates no change in the world price of oil because a decrease in global demand would be small and could be offset by suppliers' strategic behavior

Existing Literature Does Not Address the Effects of Meeting EISA Mandates on 2017 Fuel Prices (Continued)

- Existing studies do not apply to the EISA Volumes Scenario because they
 - Allow the market 10 to 15 years to adjust
 - Assume that up to 20 percent ethanol could be blended into gasoline with no changes in fueling infrastructure or decrease in demand for blended fuel because of its lower energy content
 - Do not account for the cross-subsidy needed to encourage additional use of E85
 - Do not model compliance with all EISA requirements (they do not account for the fact that gasoline suppliers have to submit BBD RINs)

CBO's Method of Estimating Effects on Fuel Prices Under the EISA Volumes Scenario

- CBO determined fuel suppliers' RIN requirements
- CBO estimated RIN prices on the basis of an illustrative example of how additional advanced biofuel requirements (relative to the 2016 Volumes Scenario) would be met:
 - 1.5 billion gallons BBD
 - 3 billion gallons sugarcane ethanol
 - 1.1 billion gallons other
- CBO determined the effects of RIN requirements on marginal costs for suppliers of E10, E85, and diesel

CBO's 2015 Estimate of 2017 RIN Requirements Under the EISA Volumes Scenario

- Fuel suppliers' RIN requirements would be based on EISA volumes and fuel projections
- For each 100 gallons of gasoline or diesel they sell, suppliers are required to submit
 - 1.6 biomass-based diesel RINs
 - 3.4 additional advanced biofuel RINs
 - 8.3 additional renewable fuel RINs (met with corn ethanol)

CBO's 2015 Estimates of the 2017 Price of Renewable (Corn Ethanol) RINs Under the EISA Volumes Scenario

- CBO's renewable RIN price estimate for 2017 was \$1.55 to \$2.10
- A price premium of 5 cents per gallon would be needed to increase the supply of corn ethanol by 1.6 billion gallons
- The renewable RIN price covers the cost of incentivizing the E85 market to absorb roughly 6 billion more gallons of ethanol than can be used in E10

CBO's Method to Calculate the Subsidy Needed to Stimulate Sufficient Demand for E85

- The subsidy compensates drivers for
 - Refueling more often
 - Driving farther to find a station that offers E85
- In Brazil, the fuel cost of driving with E85 rather than with E10 would have to be 40 percent for the market to absorb roughly 6 billion additional gallons of ethanol in E85
 - The study assumed that vehicle owners would drive 10 miles out of their way to refuel with E85
- CBO calculated the subsidy necessary to incentivize sufficient amounts of E85 as the amount that would reduce consumers' fuel cost of driving with E85 40 to 60 percent below the cost of driving with E10
- 10 cents of the per-gallon subsidy compensates retail stations for the capital costs of new E85 tanks

CBO's 2015 Estimate of the 2017 Price of Advanced Biofuel RINs Under the EISA Volumes Scenario

- CBO's price estimate for advanced biofuel RINs is \$3.00 to \$6.00
- Cost of absorbing roughly 6 billion more gallons of ethanol than can be used in E10 (same as for renewable RINs)
- Increasing the supply of advanced biofuels by 7 billion gallons would require a \$1.50 to \$4.00 per gallon price premium
 - Lower end of the range: 50 cents more than the average spot price premium for BBD RINs in 2011 and 2012 (when RFS compliance was not constrained by a blend wall)
 - Upper end of the range: set at \$4.00 to reflect the fact that the price premium might need to be much higher than in the past because of the large required increase in supply

CBO's 2015 Estimate of the 2017 Price of BBD RINs Under the EISA Volumes Scenario

- The price of BBD RINs would be the same as the price of advanced biofuel RINs:
 - Fuel suppliers will overcomply with the BBD requirement to meet the advanced biofuel requirement
 - BBD RINs will trade at the same price as advanced biofuel RINs (\$3.00 to \$6.00)

CBO's 2015 Estimate of the 2017 Effects on Fuel Prices Based on Blend Ratios Associated With the EISA Volumes Scenario

- For each 100 gallons of petroleum-based fuel (gasoline or diesel) they use, suppliers would be required to submit
 - 1.6 biomass-based diesel RINs
 - 3.4 additional advanced biofuel RINs
 - 8.3 additional renewable fuel RINs (met with corn ethanol)

- RIN requirements per 100 gallons of specific fuels
 - Petroleum-based diesel: RIN requirement for 100 gallons of petroleum-based fuel
 - E10 (90 percent petroleum): $0.9 \times$ [RIN requirement for 100 gallons of petroleum-based fuel]
 - E85 (25 percent petroleum, on average): $0.25 \times$ [RIN requirement for 100 gallons of petroleum-based fuel]

CBO's 2015 Estimate of the 2017 Effects of RIN Requirements on the Marginal Cost for Each Fuel

- Net effect of RIN transactions
 - Fuel suppliers would acquire RINs with biofuel purchases and could use or sell them at market price, with sales reducing marginal costs
 - Fuel suppliers not using biofuel would buy RINs at market price
- Example: For each 100 gallons of E10 produced under the EISA Volumes Scenario, a supplier
 - Buys 10 gallons of corn ethanol and acquires 10 renewable RINs
 - Uses 7.47 renewable RINs to meet its own compliance requirements: $7.47 = 0.9$ (petroleum share of its fuel) \times 8.3 (renewable RIN requirement for each 100 gallons of petroleum-based fuel)
 - Sells 2.53 renewable RINs ($10 - 7.47$) at market price
 - Buys (0.9×1.6) BBD RINs at market price
 - Buys (0.9×3.4) advanced biofuel RINs at market price

CBO's 2015 Estimate of the Effects of the RFS on 2017 Fuel Prices: EISA Volumes Scenario (Relative to the 2016 Volumes Scenario)

- Price of E10 would increase
 - \$0.15 to \$0.30 per gallon
 - 5 percent to 10 percent

- Price of petroleum-based diesel would increase
 - \$0.25 to \$0.45 per gallon
 - 8 percent to 14 percent

- Price of E85 would decrease
 - \$0.80 to \$1.20
 - 26 percent to 40 percent

CBO's Method of Estimating Effects on Fuel Prices Under the Repeal Scenario

- CBO determined fuel suppliers' RIN requirements
 - 1.5 billion gallons BBD
 - 0.4 billion gallons sugarcane ethanol
 - 7.7 billion gallons other
- In 2015, CBO estimated RIN prices in 2017 would be 10 percent higher than 2015 prices
 - 40 cents for a renewable RIN
 - 55 cents for an advanced biomass-based diesel RIN
 - 55 cents for an advanced biofuel RIN

CBO's 2015 Estimate of the Effects of the RFS on 2017 Fuel Prices: Repeal Scenario (Relative to the 2016 Volumes Scenario)

- Price of E10 would change by only a very small amount
- Price of petroleum-based diesel would decrease by roughly 5 cents per gallon
- Price of E85 would increase, because of removal of RFS-induced subsidies, by 26 cents per gallon

RFS Emission Requirements

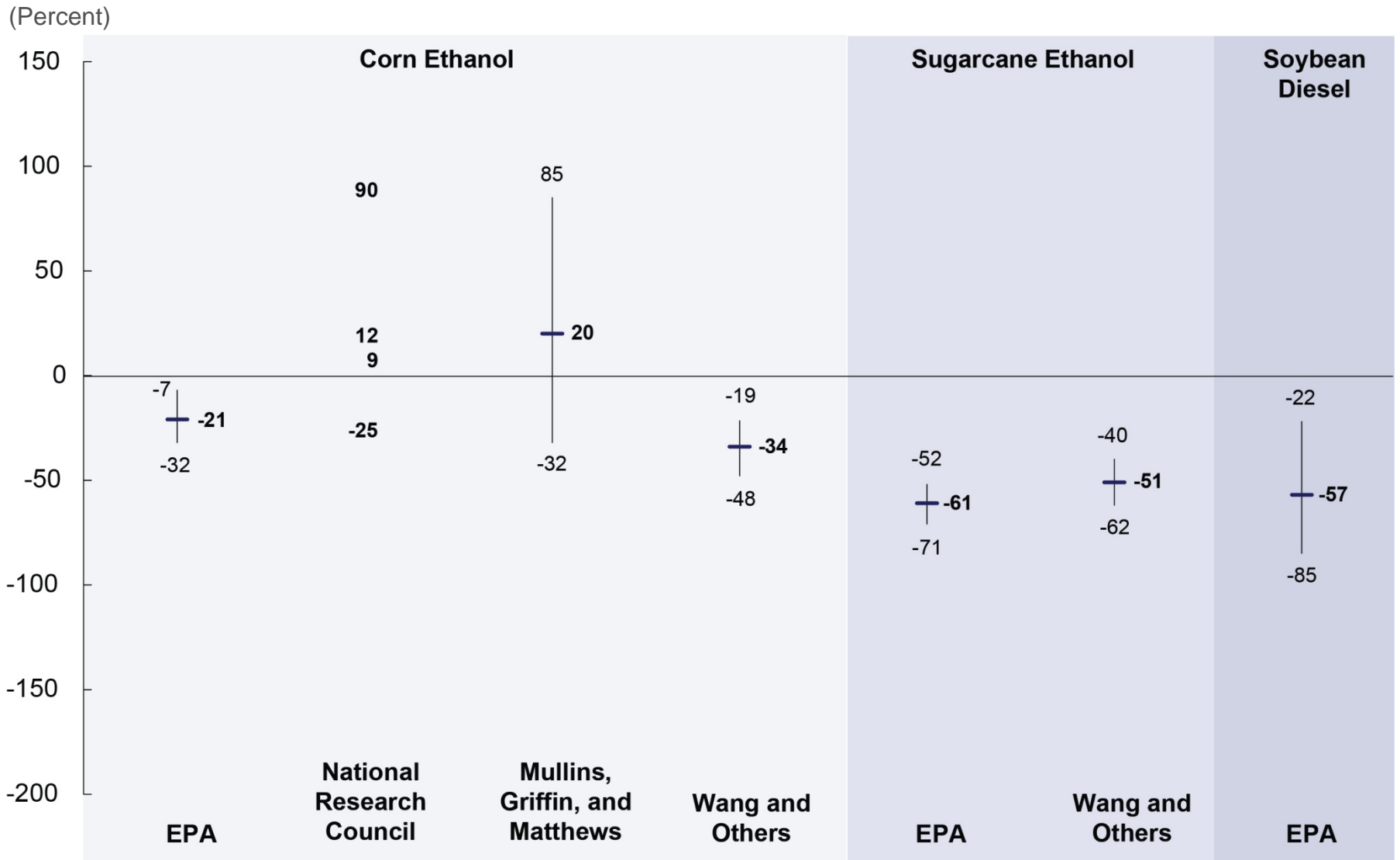
- The RFS sets fuel-specific emission reduction requirements relative to fuel being replaced
 - Cellulosic fuels must reduce emissions by 60 percent
 - Advanced biofuels (sugarcane ethanol and BBD) must reduce emissions by 50 percent
 - All other renewable fuels (primarily corn ethanol) must reduce emissions by 20 percent unless produced at a plant in operation or under construction by end of 2007

- EPA's emissions estimates determine which fuels qualify for compliance purposes; other researchers produce different estimates

Key Factors Affecting Emission Estimates

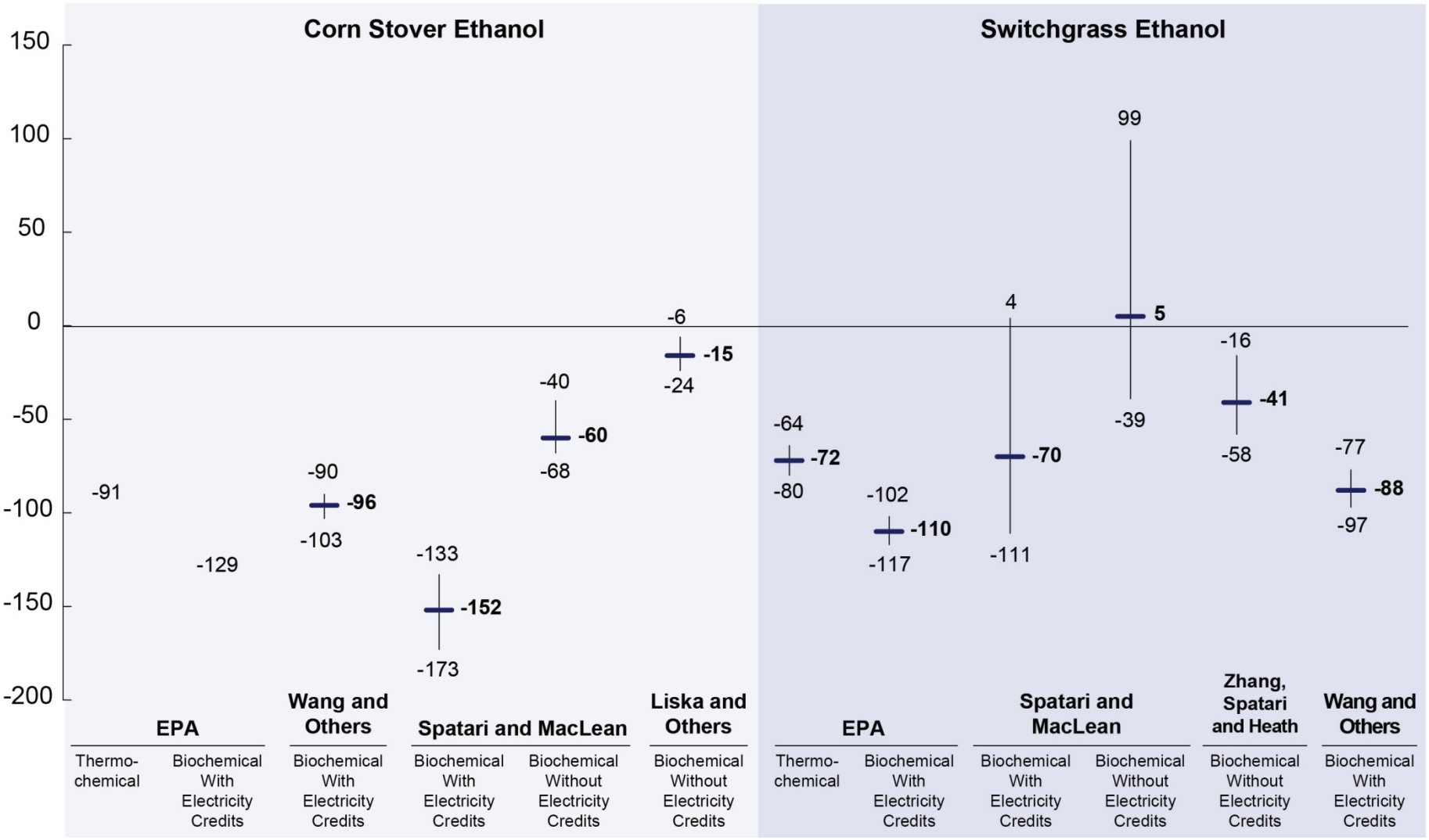
- Crop yields
- Fertilizer use
- Changes in land use and amounts of carbon in the soil
 - Includes direct and indirect effects
 - Potentially large and uncertain sources of emissions
- Efficiency of the feedstock-to-fuel conversion process
- Generation of electricity credits with cellulosic production
 - Use of residual material (lignin) to generate electricity
 - Assumptions about fuel used to generate displaced electricity
- Rebound effect
 - Most emission studies do not take a rebound effect into account; it would reduce potential emission reductions

Estimated Difference Between the GHG Emissions Associated With Biofuels and the Emissions Associated With the Gasoline or Diesel They Replace



Estimated Difference Between the GHG Emissions Associated With Biofuels and the Emissions Associated With the Gasoline or Diesel They Replace

(Percent)



Conclusions About Emissions

- Emission reductions are uncertain; estimates differ
 - Changes in land use and soil carbon
 - Assumptions about electricity credits
- Reductions in 2017 emissions under the EISA Volumes Scenario would be small
 - Limited use of cellulosic biofuels
 - Continued use of corn ethanol from grandfathered facilities
- Reductions over the longer term are dependent on the development and deployment of technology

Summing Up

- To date, RIN prices have typically been low
 - Fuel suppliers have complied by using corn ethanol in E10
 - EPA has waived cellulosic requirements
- In the future, meeting EISA mandates will be challenging
 - Cellulosic production capacity likely to remain well below mandated levels
 - Substituting other advanced fuels for cellulosic biofuels would entail large and rapid increases in their supply
 - Overcoming the blend wall will require capital investments in fueling stations and significant subsidies to encourage use of E85

Summing Up (Continued)

- The EISA Volumes Scenario
 - Small effects on food prices
 - Significant effects on transportation fuel prices
 - Small effects on emissions

- Potential for significant emission reductions in the longer term depends on technology development

- The RFS illustrates the trade-off between the use of waivers to contain costs and the effectiveness of the policy in forcing technologies