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June 17, 2022

VIA ONLINE SUBMISSION

Vanessa A. Countryman, Secretary
Securities and Exchange Commission
100 F Street NE
Washington, DC 20549–1090

RE: Comments on SEC's proposed Enhancement and Standardization of Climate-Related Disclosures for Investors, File No. S7-10-22

Dear Ms. Countryman:

Thank you for the opportunity to comment on the SEC's proposed Enhancement and Standardization of Climate-Related Disclosures for Investors rule (the "Proposed Rule"). Growth Energy is the world's largest association of biofuel producers, representing 89 U.S. plants that each year produce more than 8 billion gallons of renewable fuel; 103 businesses associated with the production process; and tens of thousands of biofuel supporters around the country. Together, we are working to bring better and more affordable choices at the fuel pump to consumers, improve air quality, and protect the environment for future generations. We remain committed to helping our country diversify our energy portfolio in order to grow more green energy jobs, decarbonize our nation's energy mix, sustain family farms, and drive down the costs of transportation fuels for consumers.

The Proposed Rule would require many public companies to calculate and disclose GHG emissions from throughout their entire supply chain and production cycle. How obligated parties calculate the GHG emissions associated with biofuels in their supply chains – and the modeling and data those parties rely on – could significantly impact the biofuels industry and the critical role that biofuels can play in addressing climate change. It is therefore important that these disclosures are accurate and based on the most updated lifecycle emissions science.

We expect that many obligated parties will be looking for guidance in characterizing biofuels' GHG emissions for the purposes of their GHG disclosure obligations. The SEC should ensure that obligated parties use the best available science in calculating these emissions. In particular, the best available and most recent science–including studies published by the Department of Energy's Argonne National Lab and the U.S. Department of Agriculture— demonstrate that the lifecycle GHG emissions of corn ethanol are substantially lower than a petroleum baseline, in the

range of 39-46% lower. These results are bolstered by other studies, including the expert analyses of Environmental Health & Engineering, Inc. (EH&E) and Life Cycle Associates.[1]

Thank you for your consideration.

Sincerely,

Joseph S. Kakesh
General Counsel
Growth Energy

[1] *See* Scully, et. al., *Carbon intensity of corn ethanol in the United States: state of the science* (2021) (showing reduction of 46%); Lee, et. al., *Retrospective analysis of the U.S. corn ethanol industry for 2005–2019: implications for greenhouse gas emission reductions* (2021) (showing reduction of 44%%); Rosenfeld, et. al. *A Life-Cycle Analysis of the Greenhouse Gas Emissions from Corn-Based Ethanol* (Sept. 5, 2018) (showing reduction of 39%).