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Report to the Legislature

Retail Biofuel Infrastructure Grant Program

Kevin Hennessy, 651-201-6223 625 North Robert Street, St. Paul, MN 55155 www.mda.state.mn.us

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Pursuant to Minn. Stat. § 3.197, the cost of preparing this report was approximately \$420.

Executive Summary

During the 2015 legislative session, the legislature appropriated \$250,000 per year to the Minnesota Department of Agriculture (MDA) for retail biofuel (ethanol) infrastructure grants.

Funds from the \$500,000 appropriation were used to leverage a grant from the United States Department of Agriculture's (USDA's) Biofuels Infrastructure Partnership (BIP). The MDA received the \$8 million USDA-BIP grant award in late October 2015. Total funding for ethanol-compatible infrastructure was \$16,818,650, with the \$8,818,650 non-federal match consisting of the \$500,000 retail biofuel infrastructure grant appropriation, funds from the MDA's Agricultural Growth, Research, and Innovation (AGRI) Program (\$3,050,000), cash and in-kind contributions from private-sector partners (\$2,560,000), and the retailer share of the eligible cost of infrastructure (\$2,708,650).

In accordance with the grant agreement with the USDA, the grants fund ethanol infrastructure as follows:

- E15 retrofits, which can replace parts necessary to make an existing E10 dispenser compatible with ethanol blends up to 25%
- E85 compatible dispensers
- Ethanol blender pumps, which are compatible with ethanol blends up to E85 and can meter and blend E85 and E10 to create other blends of ethanol through the pump, such as E15 gasoline for 2001 and newer light duty vehicles
- Underground fuel storage tanks (USTs)
- Aboveground fuel storage tanks (ASTs)

The MDA released a request for proposals (RFP) for the Minnesota Biofuels Infrastructure Partnership (MNBIP) Grant Program on December 13, 2015, soliciting applications through its partner, the American Lung Association in Minnesota (ALAMN). Grant applications were accepted through Friday, February 5, 2016. Those applications were reviewed for their merit and impact. The MDA made awards beginning in the spring of 2016 so that funds could be disbursed and projects completed by December 30, 2016, the deadline specified in the USDA grant agreement with the State of Minnesota.

Amendments to the grant agreement between the MDA and the USDA were executed in 2016. The first amendment increased the funding amount for blender pumps while reducing the total number and funding amount for underground storage tanks. The second amendment extended the deadline for completion of station construction projects through December 31, 2017.

A second and third RFP were released in September and closed on November 18. Those RFPs resulted in 49 additional station applications, all of which have yet to be contracted.

The impact of the grant program on the percentage of ethanol in the gasoline supply is small, given that the gallons of ethanol delivered as a result of the grant awards represent a small percentage of the approximately 2.7 billion gallons of gasoline sold in Minnesota. Since 2008, the overall ethanol percentage in the gasoline fuel supply is estimated to have been between 10.1 and 10.55%. However, the grant programs have increased the number of stations in Minnesota offering higher blends of ethanol, thereby providing more options for consumers to purchase less expensive, cleaner-burning, and higher octane fuel, and improving prospects for growth in ethanol's share of fuel sales in the future.

Introduction

This report is submitted pursuant to the Laws of Minnesota 2015, Article 1, Section 2, Subdivision 4:

\$250,000 the first year and \$250,000 the second year are for grants that enable retail petroleum dispensers to dispense biofuels to the public in accordance with the biofuel replacement goals established under Minnesota Statutes, section 239.7911. A retail petroleum dispenser selling petroleum for use in spark ignition engines for vehicle model years after 2000 is eligible for grant money under this paragraph if the retail petroleum dispenser has no more than 15 retail petroleum dispensing sites and each site is located in Minnesota. The grant money received under this paragraph must be used for the installation of appropriate technology that uses fuel dispensing equipment appropriate for at least one fuel dispensing site to dispense gasoline that is blended with 15 percent of agriculturally derived, denatured ethanol, by volume, and appropriate technical assistance related to the installation. A grant award must not exceed 85 percent of the cost of the technical assistance and appropriate technology, including remetering of and retrofits for retail petroleum dispensers and replacement of petroleum dispenser projects. The commissioner may use up to \$35,000 of this appropriation for administrative expenses. The commissioner shall cooperate with biofuel stakeholders in the implementation of the grant program. The commissioner must report to the legislative committees with jurisdiction over agriculture policy and finance by February 1 each year, detailing the number of grants awarded under this paragraph and the projected effect of the grant program on meeting the biofuel replacement goals under Minnesota Statutes, section 239.7911. These are onetime appropriations.

Background

Funds from the \$500,000 appropriation to the Minnesota Department of Agriculture (MDA) for retail biofuel infrastructure grants (each of the \$250,000 allotments for FY16 and FY17) were used to leverage a grant from the United States Department of Agriculture's (USDA's) Biofuels Infrastructure Partnership (BIP). The MDA submitted its proposal in July 2015 and received the \$8 million award in late October 2015. Total funding for ethanol-compatible infrastructure was \$16,818,650, with the \$8,818,650 non-federal match consisting of the \$500,000 retail biofuel infrastructure grant appropriation, funds from the MDA's Agricultural Growth, Research, and Innovation Program (AGRI), cash and in-kind contributions from private-sector partners, and the retailer share of the eligible cost of infrastructure. The breakdown for the MDA/Partner match is shown in Table 1. Details on the Minnesota Biofuels Infrastructure Partnership grant program are described in the next section.

Table 1: Details of matching funds used to leverage \$8 million in USDA funding for ethanol storage and dispensing infrastructure grants.

Contributor	Cash (Infrastructure)	In-Kind (Marketing and Other Costs)	Total
USDA	8,000,000	-	8,000,000
AGRI Funding	3,050,000	-	3,050,000
E15 Appropriation	500,000	-	500,000
Total State	3,550,000	-	3,550,000
Minnesota Corn Research and Promotion Council	1,075,000	*925,000	2,000,000
Minnesota Biofuels Association (for 8 ethanol plants)	720,000	163,000	883,000
Prime the Pump (for 7 ethanol plants)	630,000	-	630,000
DENCO II Ethanol	90,000	-	90,000
Corn Plus Ethanol	45,000	-	45,000
Total Partner	2,560,000	1,088,000	3,648,000
Total Grant Funding	14,110,000	1,088,000	15,198,000
Retailer share	2,708,650	-	2,708,650
Grand Total Funding	16,818,650	1,088,000	17,906,650

^{*} Funds provided by Minnesota Corn Research and Promotion Council (MCRPC) to the American Lung Association in Minnesota for marketing and promotion activities

An amendment to the grant agreement was made to the USDA and executed by all parties on February 25, 2016. The amendment reallocated funds to allow for a larger reimbursement for grantees for blender pumps. This was accomplished by lowering the number of underground storage tanks in the agreement.

The results of the amendment changes from the original grant agreement are outlined in tables in the next section.

A second grant agreement amendment was executed December 13, 2016, that extended the construction deadline for contracted projects to December 31, 2017.

Grants and Effect of Grant Program

As described in the background section, funds from the 2015 retail biofuel infrastructure grant appropriation have been combined with other state and private funds to leverage USDA Biofuels Infrastructure Partnership grant funds. These funds have been used, in grant awards through the MNBIP program, for projects that offered E15 as a gasoline and met the other criteria set by the legislature.

USDA-BIP Grant Award

The \$500,000 Retail Biofuel Infrastructure Grant Program funds were used as part of the approximately \$8.82 million non-federal share of the ongoing Minnesota Biofuels Infrastructure Partnership (MNBIP) grant program, helping to leverage other funds for retail infrastructure grant awards. Total funding available for ethanol-compatible infrastructure was \$16,818,650 (\$8 million from the USDA-BIP grant award to Minnesota, \$6.11 million match, and \$2.56 million retailer share). The grants were available to fund ethanol infrastructure as follows:

- E15 retrofits, which can replace parts necessary to make an existing E10 dispenser compatible with ethanol blends up to 25%
- E85 compatible dispensers
- Ethanol blender pumps, which are compatible with ethanol blends up to E85 and can meter and blend E85 and E10 to create other blends of ethanol through the pump, such as E15 gasoline for 2001 and newer light duty vehicles
- Underground fuel storage tanks (USTs)
- Aboveground fuel storage tanks (ASTs)

Each of these five categories has been allotted a number of pumps and dollars under the USDA-BIP grant agreement with Minnesota. Table 2 and Table 3 show the infrastructure portion of the grant agreement:

Table 2: Details of original USDA-MDA grant agreement with infrastructure funding breakdown.

Type of equipment	Number	Average Capped Cost	Total allocation	Federal	Non- Federal	Federal Cost Share Percentage	Non- Federal Cost Share Percentage
E15 Retrofit	140	\$5,000	\$700,000	\$200,000	\$500,000	28.6	71.4
E85 pump	15	\$20,000	\$300,000	\$225,000	\$75,000	75.0	25.0
Blender pump	465	\$27,500	\$12,787,500	\$6,817,500	\$5,970,000	53.3	46.7
Underground storage							
tanks	90	\$32,000	\$2,880,000	\$720,000	\$2,160,000	25.0	75.0
Aboveground storage							
tanks	2	\$75,000	\$150,000	\$37,500	\$112,500	25.0	75.0
Totals	na	na	\$16,817,500	\$8,000,000	\$8,817,500	47.6	52.4
Pumps	620	na	\$13,787,500	\$7,242,500	\$6,545,000	52.5	47.5
Tanks	92	na	\$3,030,000	\$757,500	\$2,272,500	25.0	75.0

Table 3: Details of original USDA-MDA grant amendment executed in February 2016.

Type of equipment	Number	Average Capped Cost	Total allocation	Federal	Non- Federal	Federal Cost Share Percentage	Non- Federal Cost Share Percentage
E15 Retrofit	140	\$5,000	\$700,000	\$200,000	\$500,000	28.6	71.4
E85 pump	15	\$20,000	\$300,000	\$225,000	\$75,000	75.0	25.0
Blender pump	470	\$31,295	\$14,708,650	\$7,297,500	\$7,411,150	49.6	50.4
Underground storage tanks	30	\$32,000	\$960,000	\$240,000	\$720,000	25.0	75.0
Aboveground storage tanks	2	\$75,000	\$150,000	\$37,500	\$112,500	25.0	75.0
Totals	na	na	\$16,818,650	\$8,000,000	\$8,818,650	47.6	52.4
Pumps	625	na	\$15,708,650	\$7,722,500	\$7,986,150	49.2	50.8
Tanks	32	na	\$1,110,000	\$277,500	\$832,500	25.0	75.0

Both the original grant agreement and the amendment assumed grants covering awards for 165 stations.

Minnesota Biofuels Infrastructure Partnership Grant Program

The MDA released a Request for Proposals (RFP) for the Minnesota Biofuels Infrastructure Partnership (MNBIP) Grant Program on December 13, 2015, soliciting applications through its partner, the American Lung Association in Minnesota (ALAMN). The MNBIP Program RFP was based upon the USDA-BIP grant agreement discussed above.

The RFP closed on Friday, February 5, 2016. Applications were reviewed by a team from the MDA and the ALAMN. A meeting of the MDA, ALAMN, and other partners was convened on March 3, 2016, to review evaluation of applications and move forward with awards. The RFP yielded a total of 145 applications for individual stations representing a total of \$24.3 million in ethanol-related infrastructure costs.

The response to the first RFP included a request from a major Minnesota retailer, which alone would have resulted in 49 stations dispensing 147 M gallons per year of fuel. The total grant award would have been over \$7.2 million, using \$4.4 million of the USDA grant. Unfortunately, the retailer withdrew its request.

To date, 43 stations have received contracts from the MDA through the first RFP. These stations are listed below in Table 4. If a project received funds from the Retail Biofuel Infrastructure Grant Program, it is noted along with other details such as equipment funded and average fuel sales.

Table 4: Projects funded as of January 15, 2017, through the MNBIP program. *Denotes that the project received money from the E15 fund.

City	Station Name	No. Pumps	Underground Tank	Eligible Project Cost	Total MNBIP Cash Award	USDA Award	MDA Award	Partner Contribution
Alexandria	Cenex*	5		\$187,052	\$100,000	\$57,600	\$42,400	\$0
Ashby	Ashby Equity Association	3		\$100,000	\$70,000	\$46,500	\$17,500	\$6,000
Austin	Reed's*	4	у	\$210,856	\$132,625	\$70,100	\$23,150	\$39,375
Becker	Kwik Trip	6	у	\$168,000	\$112,500	\$97,000	\$6,500	\$9,000
Brooklyn Park	Go For It	6		\$172,654	\$138,000	\$85,000	\$33,000	\$20,000
Center City	Rod's Country Corner	4	у	\$187,342	\$96,625	\$57,250		\$39,375
Centerville	Center Mart*	4	у	\$231,400	\$123,625	\$69,550	\$14,700	\$39,375
Cottonwood	Co-op*	4	J	\$176,991	\$88,000	\$34,000	\$44,000	\$10,000
Elk River	Ralphies	6		\$219,228	\$134,375	\$85,500	\$9,500	\$39,375
Fridley	Bona Bros.*	4	у	\$189,417	\$123,625	\$69,500	\$14,750	\$39,375
Fridley	University Holiday	8	J	\$256,836	\$180,000	\$123,150	\$35,400	\$21,450
Glenwood	Cenex*	1		\$48,151	\$22,000	\$14,000	\$8,000	\$0
Golden Valley	Feist Automotive*	4	у	\$214,924	\$114,625	\$69,050	\$6,200	\$39,375
Greenwood	Greenwood Market*	3	у	\$165,358	\$111,625	\$54,500	\$17,750	\$39,375
Hinckley	Tobies*	5		\$186,695	\$135,375	\$77,600	\$18,400	\$39,375
Hopkins	Hopkins Express	6	у	\$288,316	\$167,000	\$101,000	\$43,000	\$23,000
International Falls	Forestland*	3	у	\$188,365	\$100,750	\$54,500	\$25,300	\$20,950
Little Falls	Ripley 1 Stop*	2		\$63,222	\$42,000	\$31,000	\$11,000	\$0
Melrose	Melrose 1 Stop*	3		\$80,322	\$65,000	\$39,800	\$15,200	\$10,000
Minneapolis	ProTec	24		\$70,226	\$48,750	\$20,000	\$28,750	\$0
Montevideo	Cenex Truck Stop*	4		\$176,750	\$88,000	\$60,000	\$18,000	\$10,000
New Brighton	Tobasi's*	4	у	\$183,502	\$133,375	\$70,100	\$23,900	\$39,375
New Hope	New Hope Gas	4	у	\$218,371	\$120,750	\$64,300	\$29,050	\$27,400
Northfield	Waterford			\$159,682	\$135,000	\$37,500	\$41,000	\$56,500
Ramsey	Little Dukes	3		\$87,963	\$75,000	\$46,550	\$17,700	\$10,750
Red Wing	Joe's*	3		\$116,674	\$89,375	\$40,500	\$9,500	\$39,375
Rochester	Jeff's Little Store*	4	У	\$215,256	\$123,625	\$69,500	\$14,750	\$39,375
Rochester	Jeff's Little Store*	4	у	\$220,371	\$123,625	\$69,500	\$14,750	\$39,375
St. Cloud	Super America West	4		\$113,045	\$88,000	\$55,500	\$21,500	\$11,000
St. Louis Park	SuperAmerica*	3	у	\$198,599	\$98,000	\$54,000	\$29,000	\$15,000

City	Station Name	No. Pumps	Underground Tank	Eligible Project Cost	Total MNBIP Cash Award	USDA Award	MDA Award	Partner Contribution
St. Louis Park	Youngstedt's *	6	у	\$260,336	\$180,625	\$101,150	\$40,100	\$39,375
St. Paul	Tobasi*	4	у	\$180,825	\$133,375	\$70,100	\$23,900	\$39,375
Sartell	Super America Sartell	4		\$110,042	\$88,000	\$54,000	\$22,000	\$12,000
Shoreview	Gramsie Market*	2	у	\$145,424	\$84,625	\$39,050	\$6,200	\$39,375
St. Cloud	Kwik Trip	6	у	\$168,000	\$112,500	\$97,000	\$6,500	\$9,000
St. Paul	Holiday Stationstore #3503	5		\$240,000	\$125,000	\$77,500	\$29,500	\$18,000
Waite Park	Super America Waite Park	5		\$136,610	\$110,000	\$67,000	\$27,000	\$16,000
White Bear Lake	Northoaks Holiday	8		\$270,078	\$180,000	\$123,150	\$35,400	\$21,450
White Bear Township	WBT Holiday	6	у	\$279,252	\$169,000	\$100,000	\$37,000	\$32,000
Willmar	Central Lakes Coop*	4		\$145,466	\$92,000	\$40,000	\$37,000	\$15,000
Willmar	Little Dukes	4		\$115,317	\$98,450	\$58,750	\$22,400	\$17,300
Winona	Gordie's*	4	у	\$216,568	\$132,625	\$70,000	\$23,250	\$39,375
Winona	Severson*	4		\$145,276	\$92,000	\$62,000	\$20,000	\$10,000
Totals: 43 stations		200	20	\$7,508,762	\$4,779,450	\$2,783,750	\$963,900	\$1,031,800

The details of funding for the 24 projects receiving the E15 funding are listed in Table 5. Of the total, \$9,250 was used for administration costs. This represents 1.85% of the appropriation funding.

Table 5: Funding details of projects that received Minnesota E15 funds.

City	Station Name	Eligible Project Cost	Total MNBIP Cash Award	USDA Award	MDA Award- AGRI	MDA Award- E15 funding	Partner Contrib.
Alexandria	Cenex	\$187,052	\$100,000	\$57,600	\$0	\$42,400	\$0
Austin	Reed's	\$210,856	\$132,625	\$70,100	\$0	\$23,150	\$39,375
Centerville	Center Mart	\$231,400	\$123,625	\$69,550	\$0	\$14,700	\$39,375
Cottonwood	Co-op	\$176,991	\$88,000	\$34,000	\$0	\$44,000	\$10,000
Fridley	Bona Bros.	\$189,417	\$123,625	\$69,500	\$0	\$14,750	\$39,375
Glenwood	Cenex	\$48,151	\$22,000	\$14,000	\$0	\$8,000	\$0
Golden Valley	Feist Automotive	\$214,924	\$114,625	\$69,050	\$0	\$6,200	\$39,375
Greenwood	Greenwood Mkt.	\$165,358	\$111,625	\$54,500	\$0	\$17,750	\$39,375
Hinckley	Tobies	\$186,695	\$135,375	\$77,600	\$0	\$18,400	\$39,375
International Falls	Forestland	\$188,365	\$118,450	\$54,500	\$25,300	\$17,700	\$20,950

City	Station Name	Eligible Project Cost	Total MNBIP Cash Award	USDA Award	MDA Award- AGRI	MDA Award- E15 funding	Partner Contrib.
Little Falls	Ripley 1 Stop	\$63,222	\$42,000	\$31,000	\$0	\$11,000	\$0
Melrose	Melrose 1 Stop	\$80,322	\$65,000	\$39,800	\$0	\$15,200	\$10,000
Montevideo	Cenex Truck Stop	\$176,750	\$88,000	\$60,000	\$0	\$18,000	\$10,000
New Brighton	Tobasi's	\$183,502	\$133,375	\$70,100	\$0	\$23,900	\$39,375
Red Wing	Joe's	\$116,674	\$89,375	\$40,500	\$0	\$9,500	\$39,375
Rochester	Jeff's Little Store	\$215,256	\$123,625	\$69,500	\$0	\$14,750	\$39,375
Rochester	Jeff's Little Store	\$220,371	\$123,625	\$69,500	\$0	\$14,750	\$39,375
St. Louis Park	SuperAmerica	\$198,599	\$95,150	\$54,000	\$0	\$26,150	\$15,000
St. Louis Park	Youngstedt's	\$260,336	\$180,625	\$101,150	\$0	\$40,100	\$39,375
St. Paul	Tobasi	\$180,825	\$133,375	\$70,100	\$0	\$23,900	\$39,375
Shoreview	Gramsie Market	\$145,424	\$84,625	\$39,050	\$0	\$6,200	\$39,375
Willmar	Central Lk. Coop	\$145,466	\$92,000	\$40,000	\$0	\$37,000	\$15,000
Winona	Gordie's	\$216,568	\$132,625	\$70,000	\$0	\$23,250	\$39,375
Winona	Severson's	\$145,276	\$92,000	\$62,000	\$0	\$20,000	\$10,000
Total: 24 projects		\$4,147,800	\$2,545,350	\$1,387,100	\$25,300	\$490,750	\$642,200

MNBIP resumed taking applications in September for both E15 retrofits and blender pump projects. Both RFPs closed on November 18, 2016. These RFPs resulted in 49 applications for station projects. There also exist 10 projects from the first RFP that cannot move forward either because a grant agreement amendment from the USDA is required, or paperwork from the station has not been received that would allow the MNBIP project contract to be circulated for signatures and final execution. A summary of the contracts that have been executed, and the pending and RFP #2 contracts, are listed in Table 6.

Table 6: Prospective funding for MNBIP with RFP 1 contracts, pending projects, and RFP 2 applications.

Category	Total Eligible Costs	Total MNBIP Cash Award	USDA Award	MDA Award-E15 funding	Partner Contribution	# of Pumps	Under- ground Tank
Totals: 43 stations	\$7,508,762	\$4,779,450	\$2,783,750	\$963,900	\$1,031,800	200	20
Pending submissions: 10 stations	\$2,702,803	\$1,664,750	\$866,100	\$548,300	\$250,350	45	5
Totals RFP 1: 53 stations	\$10,211,565	\$6,444,200	\$3,649,850	\$1,512,200	\$1,282,150	245	25
RFP 2 applications: 49 stations						229	40
Prospective totals:						474	65

Impact of Minnesota BIP Grant Program on Biofuel Goals in Minn. Stat. 239.7911

During FY 14 and 15 the MDA, in partnership with the Minnesota Corn Research and Promotion and Council (MCRPC), awarded biofuel infrastructure grants totaling \$2.5 million over the years of 2013-15. New pumps and tanks installed under that program, combined with the new infrastructure funded by the MNBIP grant program, coincide with growth in the total gallons of ethanol-blended fuel in the state. Gallons of E15 sold as gasoline, during the months permitted by federal law, have increased dramatically. Also the price of E15 has been consistently lower than E10, making it an appealing fuel for the economically-concerned consumer (see Figure 1).

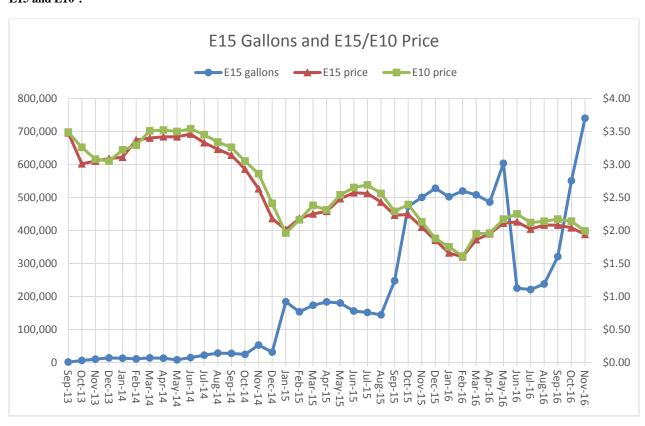


Figure 1: E15 sales in gallons since September 2013 (when first E15 gasoline station opened in state) and comparative pricing of E15 and E10¹.

Funds under the MDA/MCRPC program also aided in the recovery of the number of stations and volume of E85 sold in the state, which had been depressed due to a 2011 USEPA ruling regarding compatible infrastructure for storage and dispensing of ethanol blends. (See Figure 2.)

¹ Data provided by Minnesota Department of Commerce.

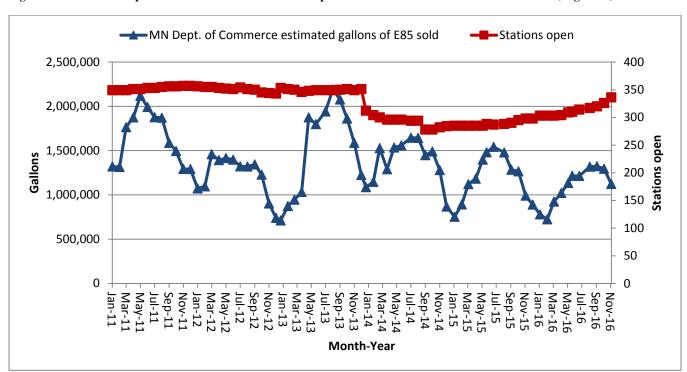


Figure 2: E85 Stations open in Minnesota and Minnesota Department of Commerce's E85 Sales Estimates (in gallons). ²

The impact of the grant programs on the percentage of ethanol in the gasoline supply is small, given that the gallons of ethanol delivered as a result of the grant awards represent a small percentage of the approximately 2.7 billion gallons of gasoline blended and sold in Minnesota. As shown in Figure 3, overall ethanol percentage in the gasoline supply remains flat. Since 2008, when the number of E85 stations in Minnesota peaked at 362 in February 2009, the overall percentage of ethanol has fluctuated between 10.10 and 10.55%.

However, the grant programs have increased the number of stations in Minnesota offering higher blends of ethanol, thereby providing more options for consumers to purchase less expensive, cleaner-burning, and higher octane fuel, and improving prospects for growth in ethanol's share of fuel sales in the future.

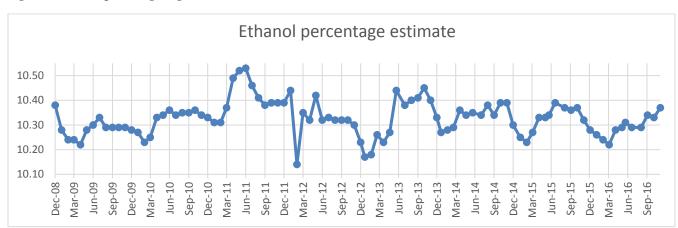


Figure 3: Ethanol percentage of gasoline sold in Minnesota

² Data provided by Minnesota Department of Commerce.

Summary

Funds from the \$500,000 E15 appropriation were used as a portion of a match for an application to the USDA-BIP grant program. As a result, the funds helped to leverage an \$8 million award to Minnesota, which has been used to expand ethanol-compatible infrastructure around the state through MNBIP grants.

A first RFP for grant applications was accepted through Friday, February 5, 2016. Those 145 station applications were reviewed, and offers were made, which resulted in 43 contracts with grantees to date. A second round of RFPs was released in September and closed in November. MDA and ALAMN continue to work with applicants, representing an additional 49 stations, to complete required documents and execute grant contracts.

The impact of the grant programs on the percentage of ethanol in the gasoline supply is small, given that the gallons of ethanol delivered as a result of the grant awards represent a small percentage of the approximately 2.7 billion gallons of gasoline blended and sold in Minnesota. However, the grant programs have increased the number of stations in Minnesota offering higher blends of ethanol, thereby providing more options for consumers to purchase less expensive, cleaner-burning, and higher octane fuel, and improving prospects for growth in ethanol's share of fuel sales in the future.

The information contained in this document is current as of the date of publication. Because laws can change, it is important to check to see if there have been any changes or updates to applicable laws and regulations.