

March 18, 2026

Representative Paul Novotny, Co-Chair
Representative Kelly Moller, Co-Chair
House Public Safety Finance and Policy Committee
Centennial Office Building
Saint Paul, Minnesota 55155

Re: Support for HF 3651 - E15 Equipment Compatibility

Dear Chair Novotny, Chair Moller, and Members of the Committee:

The Minnesota Ethanol Producers Association (MEPA) writes in support of HF 3651, which would allow fuel dispensing equipment with Underwriters Laboratories (UL) certification for E10 and manufacturer certification for E15 to meet Minnesota's fire safety standards for dispensing E15. This is a targeted, common-sense change that would expand consumer access to lower-cost, cleaner fuel without compromising safety.

Federal EPA regulations allow fuel dispensing site owners to demonstrate E15 compatibility through either UL listing or a written manufacturer statement of compatibility. Minnesota's own MPCA rules for underground storage tank systems follow the same approach. However, the fire code, which governs the above-ground dispensing equipment, does not recognize this flexibility, instead requiring a blend-specific UL listing. This long overdue update would bring compliance with the fire code in line with federal regulations, Minnesota's own MPCA rules, and the approach already adopted by neighboring states.

E15 is a 15% ethanol blend approved by the EPA for all vehicles model year 2001 and newer. It has been available in Minnesota since 2013 and has consistently been priced lower than E10 every year since entering the market, cumulatively saving Minnesota drivers nearly \$80 million. Despite these benefits, only 551 of Minnesota's more than 2,500 fueling stations currently offer E15.

Minnesota Fire Code, Section 2306.8.1, requires all dispensing equipment: dispensers, hoses, nozzles, breakaway fittings, swivels, flexible connectors, emergency shutoff valves, vapor recovery systems, leak detection devices, and pumps, to carry a UL listing specific to the ethanol blend being dispensed. Stations that installed equipment before 2010, when UL certification for E15 and higher blends became available, have equipment that is UL-listed for E10 only. That equipment is safe and manufacturer-warranted for E15, but because newer dispenser models on the market are UL-listed for E15 and higher blends, manufacturers have little incentive to seek retroactive UL certification on older models that stations will eventually replace. The result is that stations with safe, warranted equipment cannot legally offer E15 without purchasing entirely new dispensing systems.

The scientific and technical evidence supports this change. A 2012 Oak Ridge National Laboratory study, commissioned by the U.S. Department of Energy for the EPA, found that “the volume swell and hardness results of tested polymer materials were not significantly different when exposed to either CE10a or CE15a.” In plain terms, the 5% increase in ethanol content from E10 to E15 does not create new material compatibility or safety risks for dispensing equipment.

Underwriters Laboratories itself has confirmed this conclusion. In February 2009, UL issued a press release announcing that it supports authorities having jurisdiction to permit existing UL-listed E10 dispensers to be used with fuel containing up to 15% ethanol. UL’s own research found no significant incremental risk between E10 and E15. Critically, E10 dispensers were tested using E15 as the aggressive test fuel under the UL 87 standard, meaning every E10-certified dispenser already proved it could safely handle E15 during the original certification process. The UL certification validates all critical fire and electrical safety systems for alcohol-blended fuel dispensing, including electrical safety in hazardous locations, static discharge prevention, emergency shutoff functionality, impact resistance, and vapor recovery. These safety systems do not fundamentally change between E10 and E15.

Both dominant manufacturers of fuel dispensers in the United States have warranted their standard dispensers for E15. Wayne Fueling Systems has stated that its standard dispensers have always been warranted for E15. Gilbarco Veeder-Root extended its E15 warranty coverage in March 2010, retroactive to dispensers manufactured since April 2008. Manufacturer certification for E15 validates materials compatibility using the same standardized testing protocols as UL, 60°C temperature, extended exposure, and aggressive test fluids, without re-testing the fire and electrical safety systems already validated by UL.

Iowa provides real-world precedent. In 2010, the Iowa Fire Marshal amended the state fire code to allow E10 dispensers for E15 use, acting on the same UL guidance and manufacturer documentation referenced above. That policy has been in place for 16 years without a safety incident.

An independent infrastructure analysis conducted by Ecoengineering, Inc. in December 2025, using the MPCA’s Underground Storage Tank Database, found that 77% of Minnesota’s nearly fueling sites can already prove E15 compatibility for their underground storage tanks. The above-ground dispensing equipment addressed by HF 3651 represents the most readily solvable piece of the E15 access puzzle, by recognizing compatibility through the combination of UL E10 listing and manufacturer E15 certification.

HF 3651 adds this second pathway to compliance. A station could meet the safety standard with either a blend-specific UL listing, which is the current requirement, or a combination of UL listing for E10 and a written manufacturer certification for E15. This does not lower any safety standard. It recognizes an additional, well-established method

of proving equipment compatibility, one that is consistent with how UL and the manufacturers have treated this equipment for over a decade, and with how Iowa has safely managed E15 dispensing since 2010.

MEPA respectfully urges the committee to support HF 3651. Expanding E15 access supports Minnesota's ethanol producers and corn growers, delivers real savings to consumers at the pump, and reduces greenhouse gas emissions. This bill removes an unnecessary barrier to achieving those goals.

Sincerely,

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