



March 17, 2026

Co-Chair Paul Novotny
Co-Chair Kelly Moller
House Public Safety Finance and Policy
Minnesota State Capitol, Room 120
St. Paul, MN 55155

Dear Co-Chair Novotny, Co-Chair Moller, and members of the Committee:

On behalf of the Minnesota Bio-Fuels Association, I write to share our support for HF 3651 - Representative Harder's bill to harmonize equipment compatibility standards for E15, a gasoline blend with 15 percent ethanol that can be safely used in all light-duty automobiles model year 2001 or newer. This bill would help extend our gasoline supply and increase access to a lower-cost fuel that supports the agricultural economy and domestic energy security.

For Minnesota-based retailers to legally sell E15 blends, they must prove that they have compatible infrastructure. This includes dispensing equipment like hoses, nozzles, breakaway fittings, swivels, flexible connectors, vapor recovery systems, leak detection devices, and pumps, but also underground equipment like storage tanks and piping, fittings, flanges, and valves.

The problem is these two categories of equipment – underground and aboveground - have conflicting regulatory standards. The Minnesota Pollution Control Agency (MPCA) accepts either Underwriters Laboratory (UL) certification or the manufacturer's written statement proving compatibility for all underground equipment, whereas the fire code requires separate UL certification for aboveground equipment for each fuel blend.

The Fire Code standard prevents many retailers from offering E15 even though their current equipment has been certified for E15 by the MPCA and tested by the manufacturer for E15 blends using the same standardized protocol as UL. Moreover, the cost to replace aboveground equipment that already has a manufacturer warranty for E15 can be prohibitively expensive for many local small businesses.

Adding an additional 5 percent ethanol to an E10 blend does not create safety risks. Oak Ridge National Laboratory studied this topic and noted that "materials were not significantly different when exposed to either [E10 or E15]¹." Furthermore, the state of Iowa acted on this guidance in 2010 by amending its state fire code to allow E10 dispensers for E15 use. In the 16 years since, no safety incidents have been reported as a result of the change.

In a time of cost pressures for consumers and fuel retailers, this bill is a no-cost solution to expand access to a lower-cost fuel at the pump by allowing retailers to avoid replacing equipment needlessly. It would mitigate concerns about gasoline affordability and supply, while saving consumers money and strengthening our domestic energy security.

¹ [\(PDF\) Analysis of Underground Storage Tanks System Materials to Increased Leak Potential Associated with E15 Fuel](#)



I appreciate your consideration of this important bill. If you have any questions, please contact me at bwerner@mnbiofuels.org or (651) 356-4330.

Sincerely,

A handwritten signature in blue ink that reads "Brian Werner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Brian Werner
Executive Director
Minnesota Bio-Fuels Association