



December 2, 2022

Commissioner Charles Rettig  
Internal Revenue Service  
CC:PA: LPD:PR (Notice 2022-58)  
Room 5203  
P.O. Box 7604  
Ben Franklin Station  
Washington, DC 20044

Commissioner Rettig,

Thank you for the opportunity to comment on the Internal Revenue Service's (IRS) plan to issue guidance regarding important provisions of the Inflation Reduction Act (IRA) that will drive reductions in greenhouse gas (GHG) emissions and grow American jobs. National Sorghum Producers is a trade association representing the interests of 50,000 U.S. sorghum farmers and their partners in industry, including several ethanol plants which collectively use one-third of the U.S. sorghum crop to produce fuel ethanol.

A core goal of the IRA is to facilitate innovation in clean energy technologies and to incentivize development of these technologies at scale in order to reduce U.S. GHG emissions. The section 45Z tax credit is one of the most important tools Congress created to realize these goals, as it is central to further decarbonization of the U.S. transportation fuel supply. And ethanol has long been the primary driver of GHG emissions reductions in transportation fuels, resulting in the avoidance of approximately 544 million metric tons of CO<sub>2</sub>-equivalent emissions between 2005 and 2019.

This letter suggests how the Treasury Department and the IRS may structure the Section 45Z program in order to achieve the IRA's important GHG reduction goals in an effective and efficient manner. Ethanol trade association Growth Energy and a key stakeholder for our farmers is submitting comments with further detail on these and additional points, but we wish to highlight several important to our farmers here.

First, the GREET-based emissions rate table for ethanol should reflect the key technologies the ethanol industry uses to reduce GHG emissions. Second, any successor model to GREET must be equally comprehensive, adopted only after public notice and comment and most importantly, consistent with the best available science. Finally, clean fuel producers using carbon capture and sequestration should have flexibility in electing section 45Z or section 45Q credits.

We appreciate your work on this important initiative. Please do not hesitate to contact us with additional questions.

Sincerely,

A handwritten signature in black ink, appearing to read "John Duff". The signature is fluid and cursive, with the first name "John" being more prominent than the last name "Duff".

John Duff  
On Behalf of National Sorghum Producers