



January 7, 2020

Ms. Sara Hoff  
U.S. Department of Energy  
Energy Information Administration  
Mail Stop EI-23  
1000 Independence Avenue, SW  
Washington D.C. 20585

**RE: Comments on Energy Information Administration (EIA) Data Collection Three-year Extension Proposal**

Dear Ms. Hoff:

The National Mining Association (NMA) appreciates the opportunity to provide comments on EIA's proposed three-year extension to the Coal Program package (*Federal Register* Notice, Dec. 2, 2019, Volume 84, No. 231, Page 65977).

The National Mining Association represents the interests of the nation's coal and non-fuel mineral producers; coal and mineral transporters; mining and mineral processing machinery and equipment manufacturers and suppliers; energy consulting firms and financial institutions that serve the mining industry. Its coal producing members and those members dependent on the coal industry use the data collected in the coal package for market and trend analysis and for forecasting. Complete, timely, reliable and publicly available data on the coal sector is vital to the coal industry and the public and private sectors for sound business, energy and environmental policy decisions. NMA appreciates the EIA Coal Team's ongoing quest to improve coal survey data collection and reporting as needed.

EIA Survey Forms

The proposal to request form extensions without changes to the Coal Markets Reporting System's 5 survey forms in this clearance round will be greatly appreciated by coal and coal related company respondents given the structural changes and consolidation occurring in the industry.

However, in a future clearance round we may be supportive of having coal producer reporting thresholds adjusted slightly to reduce paperwork burden hours if the reporting reduction does not result in a loss of collection quality, and the data remain compatible with prior year data collection.

We appreciate the opportunity to offer these comments.

Sincerely,  
/s/ Leslie Coleman

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