

From: [Coal 2023](#)
To: [Coleman, Leslie](#); [Coal 2023](#)
Subject: RE: Comments on EIA Proposed 3-Year Extension and Change to Data Collection
Date: Thursday, April 13, 2023 9:44:22 AM
Attachments: [image001.png](#)

Hi Leslie,

We appreciate the National Mining Association's comment on EIA's proposed survey form extension and changes. The EIA-7A proposed reporting threshold change from 25,000 to 50,000 short tons will reduce the reporting burden of this collection while maintaining the utility and integrity of the data. Our analysis indicates that the proposed change will maintain data collection pertaining to more than 99% of the expected coal production. EIA remains committed to balancing the costs associated with collecting data (for both respondents and taxpayers) with the benefits of providing a more complete data set. The U.S. energy industry is dynamic, and our surveys and publications have and will continue to flex to provide the best value to the American people in support of efficient energy markets. We will explore the best options for presenting the data to minimize compatibility concerns in our Annual Coal Report. We also appreciate NMA's support of our efforts to avoid duplication of data collected for the EIA-8A survey.

Rosalyn Berry | U.S. Energy Information Administration
Coal Program Lead Operations Research Analyst | Office of Energy Production, Conversion, & Delivery
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From: Coleman, Leslie <LColeman@nma.org>
Sent: Monday, March 6, 2023 4:15 PM
To: Coal 2023 <coal2023@eia.gov>
Subject: [EXTERNAL] Comments on EIA Proposed 3-Year Extension and Change to Data Collection

Hi Rosalyn,

I hope all is well with you. Attached are NMA's comments on the proposed EIA-7A threshold change.

Thanks for all you and the coal team do for the industry!

Best,
Leslie

Leslie Coleman
Assistant VP, Statistical Services



NMA

**National
Mining
Association**

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March 6, 2023

Ms. Rosalyn Berry
Energy Information Administration
1000 Independence Avenue, SW
Washington, D.C. 20585
Coal2023@eia.gov

RE: Comments on Energy Information Administration (EIA) Proposed 3-Year Extension and Change to Data Collection

Dear Ms. Berry:

The National Mining Association (NMA) appreciates the opportunity to provide comments on EIA's proposed survey form extension and changes (*Federal Register* Notice, January 13, 2023, Vol. 88, No. 9, Page 2349).

NMA represents over 250 corporate and organization members who are involved in all aspects of coal and mineral mining, from individual producers and developers to equipment suppliers and service providers. NMA member companies represent approximately 75 percent of U.S. coal production.

Please accept our comments on the proposed EIA-7A and EIA-8A coal survey form extension and change to data collection.

Form EIA-7A Survey

The proposed reporting threshold reduction for coal operations producing 50,000 or more short tons from the current 25,000 or more short ton threshold would reduce reporting burden but may also result in a reduction in collection quality. Although the change may result in the loss of around several million tons of production primarily in Appalachia, some of our members view the current 25,000 or more production threshold as valuable in providing a more complete survey as well as keeping the data compatible with prior year data collection.

Form EIA-8A Survey

We support the proposed exclusion of coal stocks and exports on the EIA-8A if respondents are already reporting that same information on the EIA-7A and it will reduce the reporting burden as proposed.

Again, we appreciate the opportunity to offer these comments.

Sincerely,
/s/ Leslie Coleman

Leslie Coleman
Assistant Vice President, Statistical Services
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