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VIA ELECTRONIC SUBMISSION

November 10, 2023

Messrs. Glenn McGrath & Tim Shear
Energy Information Administration
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

**Re: 88 F.R. 74483 – EIA Notice for Public Comments on Uranium Data Program –
Comments of the Ad Hoc Utilities Group**

Dear Messrs. McGrath and Shear:

On behalf of the Ad Hoc Utilities Group (“AHUG”), collectively and individually on behalf of its members,¹ we respectfully provide the attached comments to the Energy Information Administration (“EIA”) regarding proposed revisions to the EIA Uranium Marketing Annual Report (“the Report”).

This submission is in response to EIA’s *Federal Register* notice requesting comments on proposed changes to the Uranium Data Program.² Based on our discussion, we understand that the EIA encourages comments on proposed revisions to the Report through this official comment process.

Should you have any questions regarding this letter, please contact the undersigned at the details provided above.

Respectfully submitted,

Nancy A. Fischer
Benjamin J. Cote
Ata A. Akiner

Counsel to AHUG

¹ Members of AHUG include Ameren Missouri, Constellation Energy Generation, LLC, Dominion Energy Services, Inc. on behalf of Virginia Electric and Power Company and Dominion Energy Nuclear Connecticut, Inc., Dominion Energy South Carolina, Duke Energy Carolinas, LLC and Duke Energy Progress, LLC, Energy Northwest, Entergy Corporation, Pacific Gas and Electric Company, and Xcel Energy Services Inc.

² Agency Information Collection Extension, 88 Fed. Reg. 74,483 (Oct. 31, 2023).



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AHUG consists of nuclear generators that operate a majority of the 93 nuclear reactors in 28 U.S. states. We have an efficient, reliable, world-wide supply chain for our nuclear fuel, and we employ tens of thousands of U.S. workers with high-paying jobs. We power U.S. homes, offices, and hospitals with emissions-free, around-the-clock, affordable energy, including 20% of electricity and 50% of the carbon free energy in the United States. We are also instrumental in supporting the U.S. defense supply base, through interdependencies in equipment, services, and human capital.

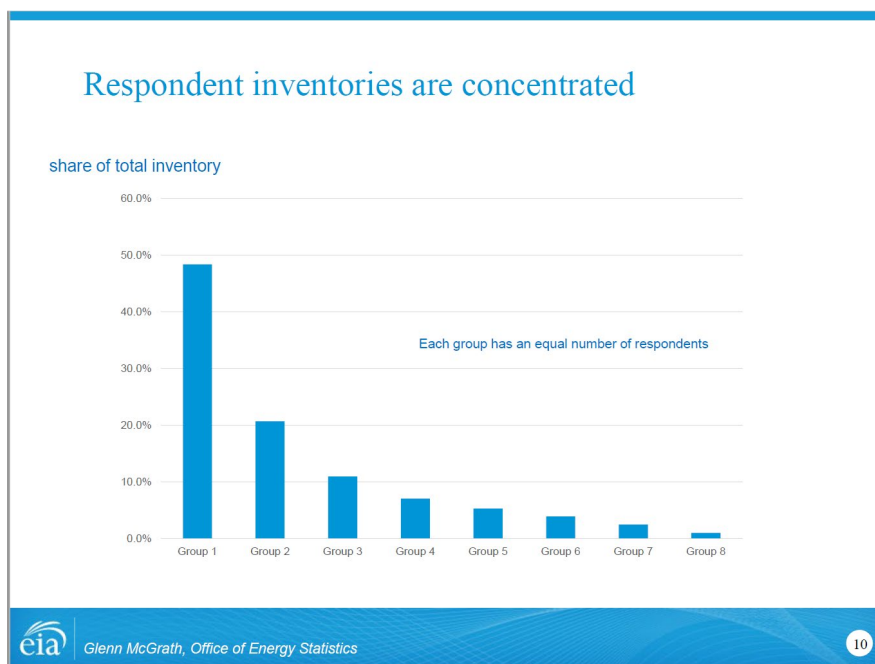
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In these comments, we propose:

1. That an updated version of the chart that was presented at the NEI Fuel Supply Forum conference in July 2023 (copied below) be included in the EIA Uranium Marketing Annual Report.



2. We propose some adjustments regarding the information presented in the chart, based on information that EIA already has in its possession. Specifically:
 - a. Include the number of reactors that are represented in the number of respondents. This number should add up to the total number of reactors currently operational in the United States (i.e., 93).
 - b. Add the exact percentage to each group.
 - c. Normalizing how the inventory is depicted: specifically, instead of using just pounds equivalent, taking inventory totals reported in Item 2 of the survey and dividing this by the average of the last three years reported for Item 4 (to capture different reload cycles).
 - d. Providing this chart for the different forms of U3O8, UF6, and EUP as well as the overall uranium inventories.
3. Present the data underlying the chart itself in a table (similar to other tables in the EIA report).

We emphasize that all of this information is already available through information collected by EIA through Form EIA-858 surveys.

* * *

We thank you for your consideration of the above, and welcome further discussion on constructive ways to support the U.S. nuclear industry.