

From: [Hutchins, Patricia](#)
To: [Hutchins, Patricia](#)
Subject: RE: [EXTERNAL] EIA Form EIA-63C Densified Biomass Fuel Report Public Comment
Date: Tuesday, June 25, 2024 1:00:19 PM

From: Hutchins, Patricia

Sent: Tuesday, June 25, 2024 1:00 PM

To: Darian Dyer <darian@forgreenheat.org>; John Ackerly <jackerly@forgreenheat.org>

Cc: Brown, Tyson <Tyson.Brown@eia.gov>; Murphy, Connor <Connor.Murphy@eia.gov>

Subject: RE: [EXTERNAL] EIA Form EIA-63C Densified Biomass Fuel Report Public Comment

Mr. John Ackerly and Mr. Darian Dyer:

We appreciate the thoughtful comments Alliance for Green Heat submitted on April 22 regarding the re-clearance of Form EIA-63C.

Product Type

You suggested we publish more granular data regarding the product type of densified biomass pellets.

Thank you for the suggestion. The product type drop-down list you provided in your comments is no longer applicable for the most current EIA-63C survey. The current data collection offers three categories: wood pellets for heating with PFI certification, wood pellets for heating without PFI certification, and industrial/utility-grade wood pellets. These categories were adjusted in previous years after research into the data collection informed us that our current groupings succeeded in keeping the data confidential.

Feedstock Data

You suggested that we provide more detailed feedstock data.

We appreciate the suggestion. The EIA-63C does not currently collect feedstock data in categories of premium/standard and utility-grade. We are assessing our ability to identify facilities via current data collection to assign feedstock data as premium/standard or utility-grade feedstock. As we consider this possibility, we will continue to assess whether altering the publication in this way maintains the confidentiality of the data. We currently collect feedstock data in units of green short tons and bone-dry short tons. We are also assessing our ability to break out these data points or adjust the publication using a conversion factor. This decision will be based on making sure the data stays confidential.

State Breakouts

You suggested we consider publishing our data by state breakouts.

We appreciate the suggestion. To protect the confidentiality of data, we are unable to break out data by all states. We are assessing the potential of providing a Top 5 or Top 10 state break out. The confidentiality of the data will be our priority as we consider adjusting the publication.

EIA is committed to ensuring respondents can submit timely and accurate data. If you need additional information regarding these comments, please contact Patricia Hutchins (patricia.hutchins@eia.gov) or Tyson Brown (tyson.brown@eia.gov).

Sincerely,
Patricia Hutchins
U.S. Energy Information Administration

From: Darian Dyer <darian@forgreenheat.org>
Sent: Monday, April 22, 2024 3:20 PM
To: Hutchins, Patricia <Patricia.Hutchins@eia.gov>
Cc: John Ackerly <jackerly@forgreenheat.org>
Subject: [EXTERNAL] EIA Form EIA-63C Densified Biomass Fuel Report Public Comment

Hi Patricia,

The Alliance for Green Heat submitted a public comment regarding EIA's request for comment on "Form EIA-63C Densified Biomass Fuel Report" (Document Number: 2024-03530) through the Federal Register's official portal.

I am attaching the comment here in case this is needed for the necessary procedure.

Thank you,

Darian Dyer (she/her)

--

Policy Analyst
[Alliance for Green Heat](https://www.allianceforgreenheat.org)
6909 Laurel Ave, #5461
Takoma Park, MD 20912
darian@forgreenheat.org



This message does not originate from a known Department of Energy email system.
Use caution if this message contains attachments, links or requests for information.

Board of Directors

John Ackerly
Alliance for Green Heat

Jonathan Kays
UMD Extension

Elliot Levine
Tech Transfer Consultant

Nick Salafsky
Foundations of Success

Norbert Senf
Masonry Heater Association

Adam Sherman
VEIC

Advisory Board

Michael Green
Center for Env. Health

Clarisse Hart
Harvard Forest

Eric Kessler
Arabella Advisors

Sarah Mittlefehldt
Northern Michigan Univ.

Steve Nadel
ACEEE

Scott Nichols
Tarm Biomass

Charlie Nielbling
Consultant

Scott Williamson
Pelletstoveservice.com

April 22, 2024

The [Alliance for Green Heat \(AGH\)](#) would first like to thank the U.S. Energy Information Administration (EIA) and the Department of Energy (DOE) for giving the public an opportunity to submit comments on the proposed three-year extension to Form EIA-63C, “Densified Biomass Fuel Report.” As a national nonprofit that advocates for the reduction of fossil fuel heating through the responsible and sustainable use of wood and pellet heat, we are deeply invested in the outcome of the EIA and DOE’s decision to continue to collect data on pellets.

Summary: The EIA does not need to collect *more* information from pellet manufacturers. However, it does need to publicly release much more of the information it is gathering.

It is important for policymakers, environmental organizations, and the public to have a far more accurate understanding of the differences between how utility pellets are made, how premium heating pellets are made, and the carbon impacts of how they are used. Utility pellets have [biodiversity](#), [equity](#), and [carbon impacts](#) that are more serious than premium heating pellets based on their feedstock, the size and location of their manufacturing plants, and the enormous amount of waste heat that is lost when making electricity. Data gathered by the EIA provides some of the underlying metrics to understand those different impacts.

Wood pellets are an excellent low-carbon heating fuel for homes, businesses, and institutions. They will likely become an even [greater complement to heat pumps](#) in the future, based on the different pros and cons of each heating pathway as our energy grid seeks to keep up with increasing electric demand. Wood pellet production and use are also extremely important for better understanding air quality and whether states and air quality agencies have been able to increase the percentage of pellet stoves compared to wood stoves. Also, EIA data from their housing survey, part of the Residential Energy Consumption Survey, shows that wood pellets serve many very low-income homes. The 2020 data shows the income bracket with the highest reliance on pellet stoves compared to wood stoves is the \$10,000 - \$19,000 household income bracket. This makes wood pellets very relevant to the energy equity community.

Our industry and stakeholders have become used to seeing top-level data such as the wood pellet production capacity by region, overall production of heating vs. utility pellets, and domestic vs. foreign pellets. But to really appreciate the various roles this industry plays in providing renewable heating in America, we should all be versed in more granular detail.

For example, it is very important for government agencies, pellet stove manufacturers, pellet fuel distributors, retailers, and consumers to know the volume of:

- PFI certified domestic heating pellets made year-by-year,
- Non-PFI certified pellets made year-by-year if the percentage of bagged vs. bulk domestic heating pellets is trending up or down,
- Utility pellets used domestically,
- ENPlus A1 or A2 bulk heating pellets are made in the US (these would likely be bagged in Europe for residential distribution), and
- Compressed bricks, compressed logs, and briquettes made, year-by-year.

Product Type
(choose from drop down list)
Wood Pellets Premium (PFI certified) Bagged
Wood Pellets Premium (PFI certified) Bulk
Wood Pellets Standard (PFI certified) Bagged
Wood Pellets Standard (PFI certified) Bulk
Wood Pellets Utility (PFI certified) Bulk
Wood Pellets Premium (not certified) Bagged
Wood Pellets Premium (not certified) Bulk
Wood Pellets Standard (not certified) Bagged
Wood Pellets Standard (not certified) Bulk
Wood Pellets Utility (not certified) Bulk
Wood Pellets ENPlus A1 Bulk
Wood Pellets ENPlus A2 Bulk
Wood Pellets ENPlus B Bulk
Compressed Bricks
Compressed Logs
Briquettes
Other (please specify below)

“Product Type” as shown in the survey to collect data for monthly report.

The EIA could also provide more detail about where wood comes from. It provides summary, top-level data, but we believe there is more data available that does not infringe on confidentiality.

Feedstock Type	Wood Type	Wood Source	Units
(choose from dropdown list)	(choose from dropdown list)	(choose from dropdown list)	(choose from dropdown list)
Roundwood (timber quality, typically ten inches diameter or more)	Hardwood	Natural Forests (private)	Green Short Tons
Roundwood (pulpwood quality)	Softwood	Planted Forests (private)	Bone Dry Short Tons
Wood Chips from Chip Mill		Public Forests	
Wood Chips, Slabs, Sawdust or Edges from Sawmills		Other (specify)	
Residual Wood Chips, Shavings, or Sawdust from Wood Product Manufacturing		Unknown	
Logging Residues (trimmings and limbs)			
Unmerchantable Wood (e.g. off-spec wood, diseased and rotted wood, etc.)			
Bark			
Post-Consumer Wood Products (e.g., used pallets or crates, construction debris)			
Agricultural By-Products			

As shown in the survey to collect data for monthly report.

A breakdown by state also tells an important story of pellet production in the United States. North Carolina, the top producer of industrial pellets for export, makes nearly as many pellets as the bottom 20 states combined - which produce heating pellets.

State	Annual Capacity (tons per year)
North Carolina	2,137,821
Georgia	1,849,733
Louisiana	1,259,281
Virginia	964,156
Florida	826,725
Arkansas	744,060
Mississippi	690,122
Alabama	683,200
South Carolina	583,150
Texas	507,063
Pennsylvania	386,153
New York	315,574
Oregon	277,340
West Virginia	245,680
Maine	232,000
Wisconsin	230,000
Tennessee	174,500
Michigan	173,000
California	168,000
Missouri	157,000
Ohio	107,500
Washington	100,000
New Hampshire	90,000
Arizona	80,000
Kentucky	80,000
Idaho	73,900
South Dakota	69,960
New Mexico	19,000
Vermont	14,081
Iowa	10,000
Utah	9,000
Indiana	7,000

Annual pellet production by state.

Response to EIA questions:

1. In response to the invitation to comment on the following statement: “(a) The proposed collection of information is necessary for the proper performance of agency functions, including whether the information will have a practical utility,” AGH would like to highlight the value that the Densified Biomass Fuel Report provides to hundreds of stakeholders in the renewable energy space who need this information to assess the capacity of this sector. The data provided through the reports helps track trends in pellet production and increases the ability to produce accurate, science-based assessments on pellet heating. Without the Fuel Report, organizations would lose one of their most reliable and unbiased information sources on pellet data.

In the energy transition landscape that our nation is currently undertaking, being able to account for, and have accurate information on, all forms of renewable energy is paramount. If our nation’s leading agency on energy information is missing data and research on a large, mainstream, and established renewable energy source like biomass, the agency is failing to carry out its mission.

2. In response to the invitation to comment on the following statement: “(c) EIA can improve the quality, utility, and clarity of the information it will collect,” AGH would like to suggest that the EIA publish more of the data that it collects. Assuming no confidentiality conflicts, we believe publishing all gathered “Product Type” information is essential (e.g. amount of “Wood Pellets Premium (PFI certified) Bagged,” Wood Pellets Premium (PFI certified) Bulk”, etc.). Similarly, publishing data on “FeedStock Type” (e.g. “Roundwood,” “Sawdust,” “Waste Wood,” etc.) would be helpful when explaining to policymakers and the public the different supply chains in the pellet industry. This is particularly important for policymakers and the public to differentiate how heating vs. utility pellets are made. This would also provide industry and organizations with a clearer vision of the current capacity of biomass for heating, helping provide decision-makers with valid, data-driven information. Because this information is already gathered in the monthly reports, this would not add any time burdens on the pellet manufacturing companies.

Wood is a diverse and vital renewable energy source for America. Many Americans do not seem to know that up until 2015, wood produced more renewable energy than any other renewable source. Since 2016, biofuels have been the top producer, but the intensive process of converting solid biomass to biofuels sharply reduces its carbon benefits.

Many Americans may also be surprised that wood still produces more renewable energy than hydroelectric solar and geothermal combined. As recently as 2015, wood produced more energy than hydroelectric, solar, geothermal, and wind combined. It is a vital part of America’s transition to renewable energy to know that the use of wood as a renewable energy has been relatively stable but shrinking since 1985, and the amount of solar and wind energy has been rapidly growing. Part of this story is understanding and managing all the different feedstocks that go into wood energy - mainly pellets, wood chips, and wood logs.

The EIA can do a better job using the data that it collects from pellet manufacturers to tell a more detailed story about wood pellets made in America and pellet heating in America.

Sincerely,



John Ackerly, President



Darian Dyer, Policy Analyst