From: <u>Hutchins, Patricia</u>
To: <u>Stephen Faehner</u>

Cc: Brown, Tyson; Murphy, Connor

Subject: RE: EIA Biomass Reporting

Date: Tuesday, June 25, 2024 12:33:35 PM

Mr. Stephen J Faehner:

We appreciate the thoughtful comments American Wood Fibers submitted on March 29 regarding the re-clearance of Form EIA-63C.

Feedstock Data Categories

You suggested that we separate the feedstock data into premium/standard and utility-grade 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.

BBQ Pellets

You suggested we consider adding BBQ pellets (cooking pellets) to the EIA-63C data collection

We appreciate the suggestion. We have investigated this potential and have determined that cooking pellets do not fall under the jurisdiction of the EIA-63C survey as it is currently defined.

Geographic Categories

You suggested we expand our geographic categories and break out our current East grouping into two smaller groupings, East and Central.

We appreciate the suggestion. We are assessing our ability to break out the current three geographic categories into four categories in our publication using current collection data. This decision will be based on making sure the data stays confidential.

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: Stephen Faehner < SFaehner@AWF.com>

Sent: Friday, March 29, 2024 1:38 PM

To: Hutchins, Patricia < Patricia. Hutchins@eia.gov>

Subject: [EXTERNAL] EIA Biomass Reporting

Hello Patricia Hutchins,

I'm a member of the Pellet Fuels Institute and have been for nearly 20 years. Our company processes nearly 1 billion pounds of wood and paper fibers into value added products. Every year we convert wood by-products from the forestry industry into fuel & grilling pellets for either home heating or backyard barbecue purposes. We utilize the data that DOE EIA provides to navigate the complex markets and various regions within the sector.

We would offer up a few thoughts to improve upon the reports.

1. Separate feedstock data into premium vs. utility grade.

Production, inventory, and sales are each bifurcated into premium/standard and utility-grade data. Sales data are split into domestic and export data (Table 7 and Table 8 respectively), but those familiar with the two markets know that domestic sales represent bagged premium wood pellets and export sales are utility-grade pellets. That said, feedstock data (in Table 3) combines data from all producers making it difficult to arrive at an exact number of sawmill residual purchases for premium pellet production, say. This one is notable to me as I regularly cite sawmill residual data in discussions with policymakers about the economic impact of wood pellet manufacturing in the state. I don't quote the exact number the EIA offers (7.7 million tons in 2023) and instead use a formula that supposes residual purchases at 160-200% of the tonnage of the finished product. I'd like to see feedstock purchases separated in the same way as the other data points, premium vs. utility.

2. Better visibility on pellets produced for BBQ markets.

"Are BBQ pellets included in the EIA data?" I get this question about 5-6 times a year. On the "About" tab of the report, this is offered about Table 7, "Displays sales (tons) and average price (revenue per ton) of primarily wood pellets in the domestic heating market for the reporting month. Sales and average revenue per ton include both retail and wholesale sales." Good data on the entire BBQ market is still in a bit of a black box and nearly all wood pellet producers participate in the market, even if only as a contract producer.

3. Smaller geographies.

I know this one has been offered before and I know this request is difficult because as reporting geographies get smaller, it gets difficult to protect individual respondent data. Still, Missouri and Maine feel like very different markets, but they are both rolled up into one region.

The Monthly Densified Biomass Fuel Report is an enormously important data set that offers incredible utility to our sector and the individual players within the sector.

Best Regards,

Stephen J Faehner American Wood Fibers Columbia, Maryland, USA W 410-792-4101 Past Chairman of PFI

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