

From: [Hutchins, Patricia](#)
To: [LD Sheftel](#)
Cc: [Brown, Tyson](#); [Murphy, Connor](#)
Subject: RE: Proposed three-year extension to Form EIA-63C, "Densified Biomass Fuel Report."
Date: Tuesday, June 25, 2024 12:54:24 PM
Attachments: [image001.png](#)

Mr. L.D. Sheftel:

We appreciate the thoughtful comments Lignetics submitted on April 22 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.

Feedstock Data Characteristics

You suggested we consider aligning feedstock reporting on a wet or dry basis.

We appreciate the suggestion. We currently collect feedstock data in units of green short tons and bone-dry short tons. We are assessing our ability to break out these data points or adjust the publication using a conversion factor. This decision will be based on maintaining the proprietary integrity of the data.

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: LD Sheftel <lshftel@lignetics.com>

Sent: Monday, April 22, 2024 5:25 PM

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

Cc: Murphy, Connor <Connor.Murphy@eia.gov>

Subject: [EXTERNAL] Proposed three-year extension to Form EIA-63C, "Densified Biomass Fuel Report."

Hi Patricia – I do not think we have interacted before. On occasion, I trade emails with Conner. I am submitting the comments for Lignetics, which I have below, and will also be submitting online.

I will add that we support the comments being submitted by the Alliance for Green Heat. I have attached a copy of their comments, which I received today. They provide more details for some of the requested changes.

Lignetics appreciates the opportunity to provide comments for the U.S. Energy Information Administration (EIA) and the Department of Energy (DOE) on the proposed three-year extension to Form EIA-63C, "Densified Biomass Fuel Report." Lignetics and the entire Industry are acutely invested in the outcome of the EIA and DOE's decision to continue to collect data on pellets. We rely on this data for planning and decision-making; it is vital for our business and the Industry.

Below are some of the changes we are encouraging.

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 8, respectively). Still, 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. This hampers our ability to cite sawmill residual data in discussions with policymakers about the economic impact of wood pellet manufacturing in the States.

We support The Alliance for Green Heat's comments to break out via the classifications noted below or, at the very least, to separate premium/standard and utility-grade data.

- PFI-certified domestic heating pellets made year-by-year
- Non-PFI-certified pellets made year-by-year
- Utility pellets used domestically
- ENPlus A1 or A2 bulk heating pellets are made in the US
- Compressed bricks, compressed logs, and briquettes made year-by-year

2. Better visibility on pellets produced for BBQ markets.

"Are BBQ pellets included in the EIA data?" The Cooking Pellet market is a bit of a black box, with nearly all wood pellet producers participating in the market, even if only as a contract producer.

3. Align feedstock reporting on a Wet or Dry basis.

Report on feedstock material on a wet or dry basis instead of the combined as reported today.

4. **Smaller geographies.**

We have attached an image of our suggested Map. I believe the EIA has been hearing about the desire for smaller regions for some time and understands the reasoning for the request. We want to note that a significant benefit of the specific Regional breakdown suggested is that it will more closely aligns with NOAA's regions for reporting heating Degree Days, allowing for weather analysis and better planning.

Thank you,



**LIGNETICS
GROUP**

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