

From: [Hutchins, Patricia](#)
To: billbellmail@gwi.net
Cc: [Brown, Tyson](#); [Murphy, Connor](#)
Subject: RE: [EXTERNAL] Comment EIA-63C Densified Biomass Fuel Report
Date: Tuesday, June 25, 2024 1:11:50 PM

Mr. William Bell:

We appreciate the thoughtful comments Maine Pellet Fuels Association submitted on April 22 regarding the re-clearance of Form EIA-63C.

You suggested we separate the reporting of densified biomass fuel data into two reports: one containing wood heating pellets and one containing utility pellets. You also suggested that the accompanying map in the report identify individual plants as wood heating pellet or utility pellet producing plants.

We appreciate the suggestion. Production, inventory, and densified biomass characteristics data are divided into premium/standard and utility categories in our current publication. Currently, our feedstock data collection is not categorized as premium/standard or utility-grade feedstock. We are assessing our ability to identify facilities via current data collection as premium/standard or utility pellet production facilities to assign feedstock data into either category. We would also use this designation to assign individual plants as heating or utility pellet production in the accompanying report map. We will assess this publication change while continuing to keep the confidentiality of the data as priority.

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

-----Original Message-----

From: billbellmail@gwi.net <billbellmail@gwi.net>
Sent: Monday, April 22, 2024 4:35 PM
To: Hutchins, Patricia <Patricia.Hutchins@eia.gov>
Subject: [EXTERNAL] Comment EIA-63C Densified Biomass Fuel Report

Ms. Hutchins: Thank you for the opportunity to submit the attached comments.

Bill Bell, Executive Director
Maine Pellet Fuels Association
97A Exchange St., Suite 305
Portland, Maine 04101
207-752-1392
billbellmail@gwi.net

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April 22, 2024

Comment on the proposed three-year extension, with change, to Form EIA-63C
Densified Biomass Fuel Report:

The Maine Pellet Fuels Association is a standard 501 c 6 trade association, comprised of Maine's four heating pellet manufacturing firms, the firm which assembles and distributes throughout the US a major European brand of wood pellet heating boilers, various suppliers of goods and services to the above firms, and several nonprofit organizations.

One of the four pellet mills is owned by the very large national firm: Lignetics, Inc, which is reportedly submitting their own comments to this request from EIA. The other three pellet production firms in Maine find the required completion of Form EIA-63C *Densified Biomass Fuel Report* to be a time-consuming requirement without tangible benefit. In addition, these firms object to the required reporting of what they believe to be confidential financial data. The firms recognize that this data is treated as confidential by EIA but they remain uneasy about providing such information to another entity.

Our members' attitude would be more positive were they able to possess a more favorable view of the utilization of the information. Two of the three firms have solid reason for their skepticism: their capacity tonnage as published monthly by EIA has been seriously in error—not for several months, but for several years!

The above criticism should not detract from the importance of continuing the EIA 63-C report. Without this collection and publication of data, awareness among policymakers of wood heating pellets as a renewable fuel could be significantly reduced.

Our Association has one important request for improvement: the reporting of Densified Biomass Fuel data should completely separate wood heating pellets from utility pellets. While these two forms of pellets appear similar, with similar production methodology, they have completely different uses. The ultimate



purpose of “heating” pellets is to heat buildings, whereas “utility” pellets are used to produce electricity. Current EIA 63-C reports correctly distinguish between the two forms of pellets in terms of published capacity and production data. However, the accompanying map of individual plant locations fails to make such a distinction.

This failure to distinguish is also prevalent in the media and among policymakers. Such conflation has had significant consequences for heating pellet producers, their suppliers, and potential customer base. Peer-reviewed publications co-authored by Dr. John Gunn (University of New Hampshire) have pointed out both the substantial environmental drawbacks of substituting industrial wood pellets for coal to produce electricity (the “Manomet Report”) and the carbon-reduction advantages achieved by heating with wood pellets, which are generally produced from waste wood from lumber operations.

We believe that EIA should publish fully separate Densified Biomass Fuel reports, one relating to wood heating pellets and the other to Industrial Pellets. In addition, more of the data collected in these reports should be published, while protecting the confidentiality of individual reporting firms. There are significant differences in the origins of the fiber in heating pellets vs. utility pellets, impacting the efficiency and carbon impacts of their usage. This information should be available to the concerned public.

William Bell
Executive Director
97A Exchange St., Suite 305
Portland, Maine 04101
mainepelletheat.com
billbellmail@gwi.net



Maine Pellet Fuels
Association