From: Petroleum Marketing Program

To: <u>Jansky, Doris; Petroleum Marketing Program</u>

Subject: RE: Nebraska"s Comments in Response to EIA"s Notice in the Federal Register Concerning EIA-782C

Date: Friday, October 4, 2024 11:38:02 AM

Dear Doris,

Thank you for your comments in support of retaining and reestablishing <u>Form EIA-782C</u>, <u>Monthly Report of Prime Supplier Sales of Petroleum Products Sold for Local Consumption</u>, that was published in our <u>Petroleum Marketing Monthly</u>, Tables 45–47.

We understand your office was using the EIA-782C data to monitor fuel supply and demand during energy emergencies. In addition, we understand that your office used the list of prime suppliers to obtain the EIA-782C data directly from the suppliers and that without the federal mandate to provide these data, prime suppliers have not been providing these data to the Nebraska Department of Environment and Energy.

We recognize the discontinuation of the EIA-782C may affect states' current methodology for preparing for and responding to liquid fuels shortages and other energy emergencies. However, our other petroleum data collections and publications provide alternative data. Our weekly publications—

Weekly Petroleum Status Report (WPSR), Gasoline and Diesel Fuel

Update (GDFU), and Heating Oil and Propane Update (HOPU) (part of SHOPP)—provide a variety of geographic resolutions that maximize the amount of information we can provide with only a one-week lag. Our Petroleum Supply Monthly (PSM) provides more complete data but with a two-month lag.

For example, the combination of our weekly and monthly petroleum supply publications provide data for the prior week that is statistically grounded to our monthly complete census of petroleum product facilities (refineries, natural gas plants, terminals, etc.). We believe the timeliness and coverage at a PADD resolution of these publications outweighs the lack of state-level resolution and price data for all petroleum products.

Other resources may be of use to your work such as our <u>State Energy Data System (SEDS)</u>, which provides consumption data by state and end use for several energy products, including petroleum products. States provide motor gasoline tax volume data to the Federal Highway Administration (FHWA), which is <u>published at a state-level</u> on a lag of at least three months. In summary, we feel that viable alternative data sources exist within and outside of EIA. Given EIA's resource constraints, we affirm our proposal to discontinue Form EIA-782C.

Rosalyn Berry | U.S. Energy Information Administration
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From: Jansky, Doris < Doris. Jansky@nebraska.gov>

Sent: Friday, July 19, 2024 2:50 PM

To: Petroleum Marketing Program < Petroleum Marketing Program@eia.gov>

Subject: [EXTERNAL] Nebraska's Comments in Response to EIA's Notice in the Federal Register

Concerning EIA-782C

Hi:

Campbell Delahoyde, NASEO, asked me to forward my comments to you since you're counting the number of responses, too. Here they are:

The Petroleum Marketing Program's information collection is necessary for the proper performance of the Nebraska Department of Environment and Energy's (NDEE) emergency functions. NDEE staff would use the EIA-782C data to monitor fuel supply and demand during a fuel shortage (energy emergency). The EIA-782C survey serves Nebraska two-fold.

If EIA would reactivate the EIA-782C survey, NDEE staff would ask EIA for Nebraska's list of prime suppliers. With this list, NDEE staff would contact each prime supplier to request their input for the EIA-782C survey. When the survey was active, prime suppliers would send their data to states. If the EIA-782C survey is discontinued, the prime suppliers would elect not to provide the data to Nebraska. This is based on the prime suppliers' current actions. Since the survey has been suspended, the prime suppliers have not provided the data. (The data from the prime suppliers to the state is not mandatory while it is mandatory to provide to the Federal agency.)

Thank you!

Doris

Doris Jansky

Statistical Analyst | PLANNING & AID DIVISION

Primary Emergency Support Function 12 Coordinator – Energy Energy Emergency Assurance Coordinator

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