

**From:** [Petroleum Marketing Program](#)  
**To:** [Watts, Matthew \(DOR\)](#); [Petroleum Marketing Program](#)  
**Cc:** [Ramakrishnan, Sridhar \(DOR\)](#); [Bradbury, Marcela](#)  
**Subject:** RE: Petroleum Marketing FRN Comment Period  
**Date:** Friday, October 4, 2024 11:43:19 AM  
**Attachments:** [image001.png](#)

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

We understand that you were using our Prime Supplier Sales Volumes table for gasoline by grade (regular, midgrade and premium) for conventional and reformulated types to calculate an average wholesale price for gasoline, which your office used to set fuel tax rates for the state of Kentucky, as required by [KRS 138.228](#).

Our resource constraints have required us to make difficult decisions in terms of our data offerings. We understand that without the EIA-782C, volume data by grade and by state are no longer available; however, our emphasis is on providing more timely data with the flexibility to adapt to changes in energy markets.

At this point, we are unaware of another source of state-level gasolines sales volumes by grade and formulation and cannot provide further assistance on this matter. Given EIA's resource constraints, we affirm our proposal to discontinue Form EIA-782C.

Rosalyn Berry | U.S. Energy Information Administration  
Petroleum and Natural Gas Data Team Lead | Office of Energy Production, Conversion, & Delivery  
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**From:** Watts, Matthew (DOR) <Matthew.Watts@ky.gov>  
**Sent:** Wednesday, July 31, 2024 3:46 PM  
**To:** Petroleum Marketing Program <PetroleumMarketingProgram@eia.gov>  
**Cc:** Ramakrishnan, Sridhar (DOR) <Sridhar.Ramakrishnan@ky.gov>; Bradbury, Marcela <Marcela.Bradbury@eia.gov>  
**Subject:** [EXTERNAL] RE: Petroleum Marketing FRN Comment Period

To: Petroleum Marketing Program

Please accept this email as Kentucky's feedback regarding EIA's decision to discontinue data collection from the EIA-782C, Monthly Report of Prime Supplier Sales of Petroleum Products Sold for Local Consumption, surveys.

The information we used from this survey (website) was the Prime Supplier Sales Volume (Thousand

Gallons Per Day) figures for gasoline for all grades Regular, Midgrade and Premium for conventional and reformulated types. This information helps in determining the Average Wholesale Price for gasoline which in turn determines the fuel tax rates for the state of Kentucky. This calculation of average wholesale price of gasoline is a statutory requirement - [KRS 138.228](#).

Kentucky must have the information previously provided by the EIA-782C, Monthly Report of Prime Supplier Sales of Petroleum Products Sold for Local Consumption or some comparable alternative data. If EIA's decision is final, would you please direct us to other sources from which we can obtain this data. At the very least, please provide a contact with your organization that is willing to discuss alternatives that will enable us to fulfill our statutory mandate.

Thank you,



**Matthew Watts**, Branch Manager  
Office of Sales and Excise Taxes  
Department of Revenue  
Finance and Administration Cabinet  
501 High Street, Station 63  
Frankfort, Kentucky 40601  
Phone: (502) 564-9746  
[Matthew.Watts@ky.gov](mailto:Matthew.Watts@ky.gov)

As part of the Finance and Administration Cabinet, the mission of the Kentucky Department of Revenue is to administer tax laws, collect revenue, and provide services in a fair, courteous, and efficient manner for the benefit of the Commonwealth and its citizens.

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**From:** Bradbury, Marcela <[Marcela.Bradbury@eia.gov](mailto:Marcela.Bradbury@eia.gov)>  
**Sent:** Thursday, July 25, 2024 1:10 AM  
**To:** Ramakrishnan, Sridhar (DOR) <[Sridhar.Ramakrishnan@ky.gov](mailto:Sridhar.Ramakrishnan@ky.gov)>  
**Subject:** RE: Petroleum Marketing FRN Comment Period

Dear Sridhar,

Thank you for your call. As we discussed, at this stage, submitting a comment to the [Federal Register Notice](#) would be the most helpful. You can do this by sending an email detailing your concerns to Petroleum Marketing Program [PetroleumMarketingProgram@eia.gov](mailto:PetroleumMarketingProgram@eia.gov) no later than August 5, 2024. At some point after this period, we will be seeking other feedback from data users. The public comment period is the best place to address any issues to your office posed by

the discontinuation of the EIA-782A and EIA-782C surveys.

I will be back in the office on Monday, please let me know if you have any questions.

Best,

Marcela

Marcela Bradbury | U.S. Energy Information Administration  
Industry Economist | Office of Energy Production, Conversion and Delivery  
[marcela.bradbury@eia.gov](mailto:marcela.bradbury@eia.gov) | 202-586-4412  
Visit us @ [EIA.gov](https://www.eia.gov)

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**From:** Ramakrishnan, Sridhar (DOR) <[Sridhar.Ramakrishnan@ky.gov](mailto:Sridhar.Ramakrishnan@ky.gov)>  
**Sent:** Wednesday, July 17, 2024 7:14 AM  
**To:** Bradbury, Marcela <[Marcela.Bradbury@eia.gov](mailto:Marcela.Bradbury@eia.gov)>  
**Subject:** [EXTERNAL] RE: Petroleum Marketing FRN Comment Period

Hello Marcela:

Thank you for reaching out to me. Yes, I/We (including people from upper management) are very interested in providing feedback regarding this matter. Please let me know of a convenient time for you so we can set up a teams meeting to further discuss this, thank you.

**Sridhar Ramakrishnan**, Resource Management Analyst III  
Department of Revenue, Office of Sales & Excise Taxes  
Phone: 502-564-9243

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**From:** Bradbury, Marcela <[Marcela.Bradbury@eia.gov](mailto:Marcela.Bradbury@eia.gov)>  
**Sent:** Thursday, July 11, 2024 3:28 PM  
**To:** Ramakrishnan, Sridhar (DOR) <[Sridhar.Ramakrishnan@ky.gov](mailto:Sridhar.Ramakrishnan@ky.gov)>  
**Subject:** Petroleum Marketing FRN Comment Period

Hi Sridhar,

My name is Marcela Bradbury and I have taken over the Petroleum Marketing Monthly, which used to comprise the [EIA-782A, Refiners'/Gas Plant Operators' Monthly Petroleum Product Sales Report](#), and [EIA-782C, Monthly Report of Prime Supplier Sales of Petroleum Products Sold for Local Consumption](#), surveys. I see from my colleague's records that you reached out about the suspension of these surveys back in 2022.

Currently, EIA is proposing to formally discontinue the data collection for these surveys, and we are seeking public comment via a [Federal Register Notice](#).

Since you were a former data user for this series, we would appreciate your feedback on this proposal if you have any. If you would like to discuss this over the phone, please feel free to give me a call or send me an email to set up a time. The deadline for comment is August 5, 2024.

Thank you,

Marcela

Marcela Bradbury | U.S. Energy Information Administration  
Industry Economist | Office of Energy Production, Conversion and Delivery  
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