



# American Forest & Paper Association

July 2, 2015

Attn. DOE Desk Officer,  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
New Executive Office Building  
Room 10102,  
735 17th Street NW.  
Washington, DC 20503  
(Chad\_S\_Whiteman@omb.eop.gov)

Copy to:  
Rebecca Peterson  
U.S. Department of Energy  
U.S. Energy Information Administration  
Mail Stop EI-23  
Forrestal Building  
1000 Independence Avenue SW  
Washington, DC 20585  
(EIA-63C@eia.gov)

## **Re: Collection of Information for Densified Biomass Fuel Report**

Dear Sir or Madam:

The American Forest & Paper Association appreciates the opportunity to provide follow-up comments regarding the Energy Information Administration's proposal to collect and publish timely data pertaining to the production and sales of wood pellets (a.k.a., densified biomass fuel).

### **Who We Are**

The American Forest & Paper Association (AF&PA) serves to advance a sustainable U.S. pulp, paper, packaging, and wood products manufacturing industry through fact-based public policy and marketplace advocacy. AF&PA member companies make products essential for everyday life from renewable and recyclable resources and are committed to continuous improvement through the industry's sustainability initiative - Better Practices, Better Planet 2020. The forest products industry accounts for approximately 4 percent of the total U.S. manufacturing GDP, manufactures over \$200 billion in products annually, and employs approximately 900,000 men and women. The

industry meets a payroll of approximately \$50 billion annually and is among the top 10 manufacturing sector employers in 47 states.

**Comments on the Proposed Wood Pellet Survey**

AF&PA appreciates the EIA's proposed plan to collect and publish timely data regarding wood pellet production and sales. We are pleased that the EIA considered our previous comments and added additional feedstock categories such as pulpwood quality roundwood and bark to the survey form. We also find it useful that the survey form now seeks information regarding the type of forest the wood comes from (natural, planted, public) and how much of the wood going to pellet plants is used to generate process energy to manufacture the pellets.

As refinements, we urge that the survey form also include a breakout for thinnings that are smaller than pulpwood grade – i.e., trees that are less than five inches in diameter at breast height. Also, the pulpwood quality category should specify that it includes trees that are wider than 5 inches in diameter at breast height. This breakout is important since it will provide a more comprehensive picture of the types of wood being used to make pellets and whether they have alternative markets.

\* \* \* \*

Thank you for the opportunity to comment on the Proposal. If you have any questions about these comments, please contact Paul Noe, Vice President, Public Policy, (202) 463-2777, [Paul\\_Noef@afandpa.org](mailto:Paul_Noef@afandpa.org), or Stan Lancey, Economist, (202) 463-2469 or [Stan\\_Lancey@afandpa.org](mailto:Stan_Lancey@afandpa.org).

Sincerely,

Paul Noe  
Vice President, Public Policy  
American Forest & Paper Association