

Biomass Rules, LLC

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A vision for strategic utilization of land and organic resources, development of renewable markets, and streamlining regulations

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Joseph T. Reilly,
Associate Administrator
National Agricultural Statistics Service
United States Department of Agriculture
Washington, DC

Re: 2008 On-Farm Renewable Energy Production Survey, and 2008 Organic Production and Marketing Survey. OMB Control Number: 0535--NEW.

Comments are invited on:

(a) Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information will have practical utility;

Collection of information about on-farm energy and organic production and marketing is very consistent with agency function. NASS does a commendable job keeping up with the production and marketing changes in agriculture. NASS understands that 'not' adapting to the agricultural industry they service would be an improper function.

(b) the accuracy of the agency's estimate of the burden of the proposed collection of information including the validity of the methodology and assumptions used;

NASS strikes that fine balance between raw data collection and estimation.

(c) ways to enhance the quality, utility, and clarity of the information to be collected;

Energy Data: There are three principle categories of energy related to on-farm energy. These are energy sales from the farm, farm generated energy feedstocks, and off-farm products used for energy on the farm.

I. On-farm energy sales: These would include energy produced on the farm. It may also include fuels that were brought in from off the farm to burn with farm-derived fuels (ie. off-farm waste vegetable oil with on-farm manure in a digester, or off-farm paper mixed with on-farm corn stalks in a gasifier).

Fuel sales, measured in direct revenue, would include the following:

- Ethanol
- Biodiesel
- Electricity
- Natural Gas Equivalent
- Firewood
- Fuel pellets

II. Farm products sold specifically for/to dedicated energy projects: These would include the largest component. Corn delivered directly to an ethanol plant. Manure delivered to a

central, off-farm digester, switchgrass or corn stalks delivered to an off-site powerplant.

Fuel sales in this category would include the following crops and products. These categories would include direct sales, but could also have an additional cost saving benefit. Manure sales for energy may also reduce the conventional disposal costs. In these cases, it would be useful to track the disposal costs avoided due to the availability of off-site energy sales.

Fuel	Direct Metric	Indirect Metric
Switchgrass (Iowa)	Sales	
Corn stover	Sales	
Bean stalks	Sales	
<u>Wheat straw</u>	<u>Sales</u>	
Manure	Sales	Cost savings
Mortalities	Sales	Cost savings

III. Off-site fuels of on-farm energy consumption: There are farms that have energy enterprises that bring in material from off-site to provide energy for farm operations. An example of this would be using sawdust or litter to run a furnace for a poultry house. The sawdust would not be grown on the farm, but the energy use would be directly on the farm.

Wastewood (pallets, C&D)
Sawdust

Although it is not directly related to energy, livestock farms with anaerobic digesters will likely be getting increasingly more common payments for sequestering carbon (carbon credits). Other land use activities that receive payments include no-till farming and forestry.

If there is interest in following up, please contact me by email below.

Respectfully,



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