

60 Day Comment for Form EIA-63C

From: Stan Elliot [mailto:Stan@pcpellets.com]
Sent: Thursday, November 30, 2017 5:25 PM
To: DensifiedBiomass2018 <DensifiedBiomass2018@eia.gov>
Subject: Densified Biomass Form Changes

Dear EIA,

Several members of the PFI (Pellet Fuels Institute) have responded to my call for comments on the changes you are proposing in the Densified Biomass form.

In conclusion, we would agree to eliminate Questions 2.2, 2.4, 2.7 and 3.2.

However, we would recommend keeping the following Questions:

- 2.5: Knowing why pellet extrusion equipment was not fully utilized is very important to our industry. Having this knowledge could be very important for planners and economists to better understand how this industry works.
- 2.6: Knowing planned maximum annual production is important information for anyone wishing to participate in regional pellet densification. A current plant that only produces 50,000 tons, but has plans to expand to 250,000 tons could be very important.
- 4.2: As the US continues to expand its pellet exports, it might be very useful to know which ports are being used.

We would ask for your consideration on these questions.

Warm Regards,

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EIA Response

Dear Mr. Elliot,

Thank you for submitting comments on behalf of the Pellet Fuels Institute. Our responses are below:

- Question 2.5, capacity utilization: We agree with your comment that the question provides useful data and should be retained. The problem with this question was finding a way to publish the data that was both useful and did not compromise data protection. The solution we have arrived at is to provide a narrative rather than tabular summary of the data.
- Question 2.6, planned capacity: Our plan is still to remove this question. Respondents have been unable to consistently provide accurate data. Problems have included reports of planned capacity less than existing capacity, and reported capacity expansions that never occurred.

- Question 4.2, export port: Our plan is still to remove this question. Because only a small number of respondents provide the export port, we cannot publish the data without violating data protection rules designed to maintain the confidentiality of company-specific information.

We greatly appreciate how active the PFI organization has been in supporting this survey and providing us with very valuable feedback on ways to improve it. If you have any questions about this response please let us know.