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Submitted via email: EIA-63C@eia.gov

March 2, 2015

Attn: 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

RE: Comments from the Biomass Thermal Energy Council on the Energy Information Administration's Proposed New Survey Form—EIA-63C, the Densified Biomass Fuel Report

Dear Ms. Peterson,

The Biomass Thermal Energy Council (BTEC) appreciates the opportunity to share our perspective on the U.S. Energy Administration's (EIA) proposed new survey form, EIA-63C, the Densified Biomass Fuel Report. BTEC is a non-profit association of biomass fuel producers, forest landowners, appliance manufacturers, combined heat and power project developers, thermal energy utilities, district energy systems, supply chain companies and non-profit organizations that view biomass thermal energy as a renewable, responsible, clean and energy-efficient pathway to meeting America's energy needs. BTEC is strongly supportive of the EIA's efforts to develop the survey, as we believe that the survey and its resulting data will raise the national profile of biomass thermal fuels and bolster efforts to include biomass thermal technologies across the built environment and public policy.

EIA's engagement with the biomass fuel industry throughout the survey's development in 2014 has produced an initial form fit to capture production, sales, and inventory trends across the nation. We have identified four opportunities for EIA to improve the survey's acceptance among densified biomass producers, reduce the costs of compliance, and increase the precision of data collection. These recommendations are addressed below (in no order of importance):

- **De Minimus Waiver:** BTEC recommends that the survey include a de minimus production waiver for facilities under a widely accepted threshold. Facilities above the threshold would be required to participate in the survey, while facilities below the line could participate voluntarily. The threshold should be determined through considering the desired rate of producer participation (e.g. 95% of U.S. production) with the level of EIA resources required to contact, track, and ensure compliance from small producers of densified biomass fuels.

While the densified biomass fuel industry is certainly moving towards larger annual production volumes, small fuel producers remain an important part of the sector's development and history. These small producers are likely to operate on irregular schedules when feedstock is available, view fuel production as a strategy to offset low business cycles from their complementary products (i.e. forest products), or produce fuel in response to immediate local demand. They may also be located in remote areas and difficult to contact. Given its limited resources, we encourage EIA to develop a production volume that would most efficiently capture market data. A threshold of 10,000 tons per year (TPY) may serve this purpose, though we encourage EIA to explore the threshold concept further.

- **Frequency of Survey:** BTEC recommends that the survey's monthly production responses be collected/reported quarterly or bimonthly during the first three years of the program. This less

frequent survey schedule will assist the industry as it grows familiar with survey process and develops internal data reporting to make its reporting processes more efficient.

- **Inclusion of Biomass Brick Fuels:** BTEC recommends the explicit referencing of compressed biomass bricks/briquettes within the survey's product and sales information questions. Wood bricks are rapidly growing in popularity to augment or replace firewood/cordwood in wood stoves for residential renewable energy use, and thousands of homes in the Northeastern U.S. exclusively use wood bricks to meet their heating needs. Capturing these densified biomass fuels could be accomplished through including "Biomass Bricks" in the survey form questions 3.2, 3.3, and 4.1.

After the survey's initial three year period, other densified and refined biomass fuels could be considered for inclusion, such as semi-dry wood chips (based upon the record of fuels previously listed as "Other"). The state of biomass energy is quickly changing in response to more efficient fuel production methods and advances in energy conversion technologies (e.g. wood and pellet stoves, boilers, and furnaces), and a survey that adapts to this market will best serve the interests of the public and policy makers.

- **Disclosure Concerns:** BTEC recommends that EIA consider reporting fuel production figures using regional or multi-state boundaries rather than individual state reporting. We are aware of EIA's precautions in data reporting for states in which fuel production is dominated by one or two producers and data publication could reveal otherwise confidential production numbers. EIA's practice of aggregating production information across many states into U.S. Census Regions or equivalent would serve the twin purposes of protecting confidential production information while publishing valuable data on industry trends.

Again, BTEC wishes to express its support of the EIA's Densified Biomass Fuel Report, and we thank the EIA for the opportunity to submit comments. The residential and commercial use of biomass for heating continues to grow across the country, and the EIA's survey will shed light into the sector's growth and assist in guiding its expansion. Should you have any questions or comments, please do not hesitate to contact me with the information below.

Sincerely,



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CC: Rebecca Peterson, EIA Analyst, Rebecca.Peterson@eia.gov