



**Via Email (joe.decarolis@eia.gov)**

October 18, 2022

Dr. Joseph DeCarolis  
Administrator  
U.S. Energy Information Administration  
1000 Independence Avenue, S.W.  
Washington, DC 20585

**Re:** Reporting Ethanol Export Data in the *Weekly Petroleum Status Report*

Dr. DeCarolis:

The EIA's *Weekly Petroleum Status Report* (WPSR) is relied upon by market participants to provide an accurate, near real-time picture of fuel supply and demand conditions. However, whereas exports of crude oil and petroleum products are reported in the WPSR, ethanol exports are not. This is a glaring omission and leads to an incomplete picture of ethanol supply and demand, putting ethanol buyers and sellers at a distinct disadvantage relative to buyers and sellers of petroleum-based fuels. While crude oil and petroleum product exports are reported weekly by EIA, ethanol export data are published only on a monthly basis and with substantial lag time (i.e., roughly 7-8 weeks after the end of the month). Accordingly, I am writing to urge you to add weekly ethanol export data to the WPSR.

Exports are an important component of ethanol's supply and demand balance. On a monthly basis, as much as 17 percent of the ethanol produced in the U.S. has been exported; over the past five years, 10 percent of U.S.-produced ethanol has been exported. The need for near real-time export statistics has been particularly pronounced this year, as ethanol had its longest-ever streak of exports exceeding 100 million gallons per month, and annual exports are likely to be at near-record levels. This is occurring at a time when domestic consumption has not fully recovered from the pandemic and has been affected by the high petroleum prices experienced this year.

Ethanol is an essential component of the fuel supply, comprising more than 10% of finished gasoline sold in the U.S. Therefore, it is important that the WPSR contain the data needed to properly assess conditions in the ethanol market.

In February 2019, when the Renewable Fuels Association submitted [comments](#) on changes to the EIA's Petroleum Supply Reporting System, we took the opportunity to

request that ethanol export data be added to the WPSR. Since then, I have engaged in periodic communications with EIA staff about such reporting, and I was given the impression that the EIA was in favor of doing so and was communicating with the Office of Management and Budget about implementation. Adding ethanol exports to the WPSR would appear to be a relatively simple and straightforward action, since the data are available from the same source (i.e., U.S. Customs and Border Protection) that is already providing crude oil and petroleum product export data to EIA on a weekly basis. Indeed, some information from EIA suggests you may already be receiving biofuel export data on a weekly basis from CBP and that the existing Memorandum of Understanding with CBP would allow the publication of ethanol export data.<sup>1</sup>

However, contrary to these prior communications, I was notified by EIA staff in June that reporting would be deferred to the “spring of 2023 at the earliest” because of competing demands for information technology resources. After three years of communications, this statement does not provide confidence that this important market information, which EIA staff appeared to acknowledge would be beneficial, will actually start being reported in a reasonable amount of time.

Accordingly, on behalf of the ethanol industry, I urge you to direct your staff to develop and implement a plan for including weekly ethanol export data in the WPSR as expeditiously as possible. Please feel free to contact me at (636) 594-2287 or [srichman@ethanolrfa.org](mailto:srichman@ethanolrfa.org) to discuss this request and the communications that have occurred to date. RFA stands ready to assist EIA in any way necessary to ensure inclusion of ethanol export data in the WPSR.

Sincerely,



Scott Richman  
Chief Economist

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<sup>1</sup> See, for example, EIA. Appendix D: Statistical Methodology of Estimating Petroleum Exports Using Data from U.S. Customs and Border Protection. March 2022. Page 1 (“Beginning in 2013, we investigated data sources and methodologies to improve our weekly estimates of petroleum and biofuels exports. We found that we could use the administrative data collected by CBP through the ACE system, which cover U.S. exports (except for most exports to Canada) to improve our weekly export estimates. To obtain these data, we established a Memorandum of Understanding with CBP in September 2014 through the International Trade Data System (ITDS) process. In August 2016, the Office of Management and Budget (OMB) granted us an exception to the provisions of OMB’s *Statistical Policy Directive No. 3 on the Compilation, Release, and Evaluation of Principal Federal Economic Indicators*. This exception permits us to publish weekly estimates of export volumes of crude oil and six refined petroleum products **and biofuel categories** before USCB releases the official U.S. trade data (emphasis added).” <https://www.eia.gov/petroleum/supply/weekly/pdf/appendixd.pdf>