



July 24, 2019

Mr. Brandon DeBruhl
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building
Room 10102
735 17th Street NW
Washington, DC 20503

VIA EMAIL

Brandon_F_DeBruhl@omb.eop.gov
PetroleumSupplyForms@eia.gov

Re: Comments on Proposed Extension and Changes to the Petroleum Supply Reporting System (84 Fed. Reg. 29506; June 24, 2019).

Dear Mr. DeBruhl,

As the leading trade association for America's ethanol industry, the Renewable Fuels Association (RFA) is pleased to submit the following comments in response to the U.S. Energy Information Administration's (EIA) request for a three-year extension of the Petroleum Supply Reporting System (PSRS) and related changes.

On February 25, the RFA submitted comments in response to the EIA's initial PSRS proposal (83 Fed. Reg. 66688; December 27, 2018). The EIA responded to the RFA's comments, and some of the changes that were suggested are reflected in the revised survey forms. Accordingly, this letter is limited in scope, focusing on revised Form EIA-819 and related general comments.

In the past, Form EIA-819 *Monthly Oxygenate Report* was brief and generally straightforward. Its replacement, Form EIA-819 *Monthly Report of Biofuels, Fuels from Non-Biogenic Wastes, Fuel Oxygenates, Isooctane, and Isooctene* is considerably more lengthy and complex. This is due in part to the previous form being merged with Form EIA-22M *Monthly Biodiesel Production Report* and expanded to include other types of biofuels.

For this reason, the RFA requested in its February comments that ethanol producers continue to be surveyed separately from other biofuel producers. In response, the EIA indicated that it would implement Form EIA-819 as a webform and that there could potentially be other reporting options, and it stated that after

a one-time screening question the survey respondents would only see the applicable parts of the survey. We would request that this protocol be implemented, or that if it cannot be implemented ethanol producers continue to be surveyed separately.

If the EIA proceeds with changes to Form EIA-819, we would ask that the EIA offer training to employees of biofuel-producing companies who will be responsible for filling out the form, so that the questions are clearly understood and the proper data are provided. This should be done sufficiently in advance of the first date when data for the new form needs to be submitted. Specifically, the RFA would like to offer to host a webinar for our members during which one or more EIA representatives could provide training and could answer questions.

The following are comments regarding specific line items contained in Form EIA-819:

- In Part 1, contact information is requested four times. It is possible that the same contact information could be applicable in more than one place. It is recommended that a simple way to reuse contact information be incorporated into the webform and/or other electronic reporting tools, to minimize the number of times it needs to be entered. Alternatively, the information could be auto-filled after the first time it is provided.
- Part 2 asks that certain information be provided if “there are any plans to sell or lease this plant.” Asking about “plans” is vague, which could cause the form to be filled out in a way that is unintended by EIA (e.g., it is unclear at what stage of the process the seller/lessor is considered to have a plan, or a planned transaction could subsequently be terminated). It is recommended that the EIA instead ask whether a contract has been executed for a sale or lease of the plant.
- In Part 4, it appears that “Gasoline not blended with ethanol (>E0-E10)” is a typographical error and should instead be “Gasoline blended with ethanol (>E0-E10).”
- In Part 9, the EIA now specifies that quantities be reported in pounds, whereas the previous draft of the form allowed the user to select the units to be used. It is recommended that in its instructions or another clearly visible location the EIA show conversion factors from commonly used units to pounds (e.g., a bushel or corn or sorghum/milo is 56 pounds). Similarly, for Part 11 it is recommended that EIA indicate the conversion factor from other units used for natural gas (primarily British thermal units) to standard cubic feet. If possible, it would be helpful for the EIA to incorporate conversion capabilities into the webform and/or other electronic reporting tools.

Thank you again for the opportunity to provide these comments regarding the proposed changes to the PSRS. Please do not hesitate to contact me at srichman@ethanolrfa.org or (636) 594-2287 should you have questions or wish to discuss these comments more fully.

Sincerely,

A handwritten signature in blue ink that reads "Scott Richman". The signature is fluid and cursive, with a long horizontal stroke at the end.

Scott Richman
Chief Economist