



Department of Energy

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Subject: EIA RESPONSE TO FRN COMMENTS FROM THE NATIONAL BIODIESEL BOARD ON PROPOSED EXTENSION OF FORM EIA-22M FOR 3 YEARS WITH NO CHANGES.

Thank you for your comments on our proposal to extend the expiration date on Form EIA-22M "Monthly Biodiesel Production Survey" with no changes for 3 years past the existing expiration date of February 29, 2012.

Form EIA-22M "Monthly Biodiesel Production Survey" is being incorporated into the set of surveys that make up the EIA petroleum and biofuels reporting system. The petroleum and biofuels reporting system consists of surveys and systems used to gather data on petroleum, selected alternative fuels, and biofuels. Data are integrated into U.S. and regional supply and disposition balances. Changes to all surveys in the monthly petroleum and biofuels reporting system are being considered starting in 2013. By extending Form EIA-22M with no changes for 3 years, we will be able to consider changes to Form EIA-22M in an integrated manner with related surveys.

In addition, the EIA-22M survey processing system is being replaced with a system that will improve all aspects of the survey from reporting data, processing the data at EIA, and ultimately publication of U.S. and regional totals. There are no changes being made to the existing EIA-22M survey processing system because it will be retired during 2012. All EIA resources available for systems work related to biodiesel are committed to work on the replacement system. Therefore, we are unable to make changes to Form EIA-22M that will require processing system modifications until 2013 at the earliest.

With the above information as background, here are responses to specific issues raised in comments from the National Biodiesel Board.

- **Coordination of reporting requirements with EPA** – There are ongoing contacts between EIA and EPA for discussion of reporting/data requirements and statistical methodology. To the extent possible, future versions of Form EIA-22M will reflect changes in EPA reporting requirements, fuel regulations, and industry practices. However, differences will continue to exist between EIA and EPA reporting requirements because the data collection efforts emphasize different purposes.
- **Reporting camelina oil as a separate biodiesel feedstock** – Camelina oil used as biodiesel feedstock is reported as “Other Vegetable Oil” on the current Form EIA-22M. We will consider separate reporting of camelina oil feedstock on future versions of Form EIA-22M.
- **Change the label for canola oil to canola/rapeseed oil on program tables** – We will consider this change on a future version of Form EIA-22M. In the interim, we will work with respondents to Form EIA-22M to minimize any ambiguity that may exist concerning canola oil used as biodiesel feedstock. We will change the label for canola oil to canola/rapeseed oil on the next release of publication tables to clarify the category for data users.
- **Track new biodiesel feedstocks by allowing reporting of specific products under the “Other Feedstocks” category** – We will consider adding requirements to a future version of the EIA-22M survey processing system to allow for additional product details in the “other feedstocks” category. There will likely always be a need to allow reporting of unspecified “other” feedstocks while taking steps to assure that quantities reported in the “other” category remain small.
- **Include used de-oiled corn oil as a separate and distinct feed category from corn oil** – Used de-oiled corn oil is currently reported as part of corn oil feedstock on Form EIA-22M. We will consider adding this additional feedstock detail to a future version of the survey form.
- **Include pennycress as a feedstock for B100 production** – Pennycress is reported as “Other Feedstock” on the existing Form EIA-22M. We will consider adding pennycress as a separate biodiesel feedstock on a future version of the survey form.

- **To the extent the information is not already collected and consistent with EIA authority, require reporting from companies that are registered to produce additional fuels EPA has approved under the RFS2 program that utilize the same feedstocks included on the biodiesel survey or may be considered biomass-based diesel under the RFS2 program. These fuels include renewable diesel, jet fuel, home heating oil, and cellulosic diesel** – This is the central issue with respect to integration of Form EIA-22M with other surveys in the EIA petroleum and biofuels reporting system. The existing petroleum and biofuels supply reporting system already captures certain biodiesel and renewable diesel data (e.g. renewable diesel production at oil refineries) that needs to be integrated with biodiesel production data from Form EIA-22M. We will assess biodiesel production data in the context of related data from other surveys, develop a plan and course of action to fill data gaps, eliminate unnecessary or irrelevant reporting requirements and data, and integrate data to present a comprehensive U.S. and regional view of petroleum, selected alternative fuels, and biofuels supply and disposition. This will be a long-term project with incremental improvements likely to be implemented in phases over time. Sustained engagement by interested parties including the Biodiesel Board will be important to the success of this effort.

Thank you again for your detailed comments on our proposed extension of Form EIA-22M. Your input will be valuable in developing future versions of the survey. Please contact me if you have any questions or wish to discuss this matter further.

Sincerely,



Michael R. Conner
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