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Mr. Michael Conner
Petroleum, Natural Gas, and Biofuels Statistics
U.S. Energy Information Administration
Forrestal Building
U.S. Department of Energy
1000 Independence Ave. SW, EI-25
Washington, DC 20585

Subject: OMB No. 1905–0165; Information Collection Request: Petroleum Supply Reporting System; U.S. Energy Information Administration (EIA), Department of Energy (DOE)

Dear Mr. Conner:

The Energy Information Administration (EIA) proposes changes to surveys in the Weekly Petroleum Supply Reporting System as part of their notice and request for renewal. (83 *Federal Register* 66688, (December 27, 2018)). The American Fuel & Petrochemical Manufacturers (“AFPM”) submits these comments in response to this notice. AFPM’s members comprise virtually all the nation’s refining capacity and will be substantially affected by these reporting changes.

Specifically, AFPM has comments on proposed EIA-810 and EIA-814 forms.

I. EIA Should Use Seven Motor Gasoline Categories

In the notice, EIA proposes to reduce the number of separate finished motor gasoline products from nine to six and reorganize motor fuel categories to track ethanol blending:

- “Gasoline Not Blended with Ethanol (E0)”
- “Gasoline Blended with Ethanol up to E10”
- “Midblend Gasoline with Ethanol > (E10–E50)”
- “Flex Fuel (E85) Blended with 51% to 83% Ethanol”
- “Reformulated Blendstock for Oxygenate Blending (RBOB)”
- “Motor Gasoline Blending Components”

According to the draft instructions for EIA-810 (on page 6), Conventional Blendstock for Oxygenate Blending (CBOB) and Gasoline Not Blended with Ethanol (E0) are reported in one category with EIA Code 170. This should be redefined as only E0 excluding CBOB. The proposed RBOB category should be redefined as RBOB/CBOB. CBOB should not be in same category as finished E0. CBOB should be in the same category as RBOB.



Furthermore, EPA defines all E11-E15 as gasoline. Therefore, there should be a seventh category: E11-E15. Since E11-E15 has a partial EPA Clean Air Act section 211(f)(4) “substantially similar” waiver and E10 has a full EPA substantially similar waiver, they should be reported separately.

It would be inappropriate to report E11-E15, which has a partial substantially similar waiver, in the same category as E16-E50 that does not have a substantially similar waiver.

Based on comments above, AFPM recommends the following seven categories for gasoline:

- E0 (excluding CBOB)
- E1-E10
- E11-E15
- E16-E50
- E51-E83 (E85)
- RBOB/CBOB
- Motor Gasoline Blending Components

II. Revisions to EIA-814

The proposed instructions for EIA-814 (on page 3) do not match the form, as it references “Ed55” while the form includes blends up to E50. The instructions should be revised to conform to the 50/51% distinction for E16-E50 (Midlevel Ethanol Blends) versus E85. Ed55 should be replaced by Ed50 as Ed55 is based on an old definition of E85. E85 had been redefined by ASTM to include ethanol blends as low as 51%.

If you have any questions, please contact me at (202) 457-0480.

Sincerely,

Tim Hogan
Director, Motor Fuels