

B. Description of Data Collection and Survey Design

B-1. Collection of Data

Because the EIA's Voluntary Reporting of Greenhouse Gases Program is voluntary, participation is determined through a self-selection process. **Statistical methodologies do not apply to this ICR.** The forms were developed on the working premise that the "volunteers" have done something to either reduce greenhouse gas emissions or sequester carbon and that these volunteers want to report and or "register" their emissions reductions achievements under this Program. Therefore, the pool of respondents will not represent a random probability sample of all possible reporters because the form is not designed as, nor is it used as, a statistical survey instrument developed according to a recognized statistical sampling theory or methodology.

B-2. Description of Survey Design

The structure of Form EIA-1605 is designed in such a way that its level of complexity is completely self-determined by the reporters. If reporters wish to report but not register reductions, does not have any subsidiaries, reports on only domestic activities and does not report emission offset reduction, and does not employ third-party verification will probably have fairly modest reporting requirements. Conversely, reporters wishing to register reductions, with multiple subsidiaries, reporting on domestic and foreign activities, with emission offsets and employs third-party verification will have a very comprehensive, fulsome report

Under the EIA's Voluntary Reporting of Greenhouse Gases Program, a reporting entity is a any business, institution, organization, government agency or corporation, or household that is recognized under any U.S. Federal, State or local law; is located and operates, at least in part, in the United States; and, the emissions of such operations are released, at least in part, in the United States. (Section 300.2, General Guidelines, April 2006).

B-3. Maximizing the Response Rate

EIA attempts to encourage additional responses to the Program by raising public awareness of the Program. These efforts are focused on the issuance of the Program's annual report, *Voluntary Reporting of Greenhouse Gases*, press releases regarding significant actions, Program Newsletters, list serve announcements and maintenance of the Voluntary Reporting section of EIA's website (<http://www.eia.doe.gov/oiaf/1605/frntvrvgg.html>). EIA also participates as an invited speaker at industry conferences to give presentations on the Program. It is important to note, however, that the concept of a response rate is not really applicable to the Voluntary Reporting Program because, as a voluntary survey, there is no way of identifying a number of "desired" potential respondents or "designated" in-scope cases that can be used as the denominator of a response rate.

B-4. Tests of Procedures or Methods

The Office of Management and Budget approved the Form EIA-1605 on May 26, 1995 (OMB No. 1905-0194) as a recurring annual survey collection instrument. As part of that approval process, tests of the procedures and methods were performed. Since their approval (May 26,

1995), the Form EIA-1605 has been in operational existence for 12 reporting cycles (with the expectation of a thirteenth cycle) and has demonstrated that it is operationally successful.

C. Terms of Clearance from Previous Information Collection Request

As part of the Terms of Clearance of the last data collection approval on May 2, 2005, OMB stated¹:

“This ICR is approved for an additional two years with the understanding that EIA will develop new reporting forms and instructions by early 2006 for collecting 2005 data as per the revised General Guidelines for Voluntary Reporting of Greenhouse Gases Program. OMB still views the issues that were noted in the Terms of Clearance” for the data collection approval granted by OMB on October 16, 2001, which extended for two-years, the previous expiration dates of the Forms EIA-1605 and EIA-1605EZ, to October 31, 2003, “with concern, and would ask EIA to take those comments into account in future collection and analysis of data.”

EIA could not possibly meet the early 2006 date for new forms and instructions per the revised General Guidelines because DOE did not issue Final General and Technical Guidelines until April 21, 2006, with an effective date of June 1, 2006. This late date has pushed out the launch of the new reporting forms and instructions to late 2007.

D. Name and Telephone Number of Program Contact Person

Should you have any questions or comments regarding this request for a 3-year extension of the Form EIA-1605, with revisions; and for the discontinuation of Form EIA-1605EZ (short form), please contact:

Mr. Stephen E. Calopedis
U.S. Department of Energy
Energy Information Administration, EI-81
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Washington, D.C. 20585

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E. Enclosure

Form EIA-1605 “Voluntary Reporting of Greenhouse Gases Reporting” package, which includes:

¹ E-mail from oir_a_docket@omb.eop.gov to Jay Casselberry EIA, authorized by Donald R. Arbuckle, Deputy Administrator, Office of Information and Regulatory Affairs, May 2, 2005.

- a) Cover letter
- b) Form EIA-1605
- c) Instructions to Form EIA-1605

Electronic versions (PDF) of the Revised Form EIA-1605 and accompanying instructions, are also available on the Internet at:

<http://www.eia.doe.gov/oiaf/1605/Forms.html>

If you wish to obtain additional hard copies of the enclosed documents, please:

Call **1-800-803-5182**; or **202-586-0688**

Write to the: Voluntary Reporting of Greenhouse Gases Program
Energy Information Administration
EI-81
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585; or

You may also contact the Program by Internet E-Mail at **infoghg@eia.doe.gov**