

**Supporting Statement  
Western Area Power Administration  
“Applicant Profile Data” Collection**

**1. Explain the circumstances that make the collection of information necessary.**

Western Area Power Administration (Western) is a Federal agency under the Department of Energy (DOE) that markets and transmits wholesale electrical power from 56 Federal hydropower plants and one coal-fired plant. Western sells about 40 percent of regional hydroelectric generation in a service area that covers 1.3 million square miles in 15 states. To deliver this electric power to the western half of the United States, Western markets and transmits about 10,000 megawatts of hydropower across an integrated 17,000-circuit mile, high voltage transmission system. Western’s mission is to deliver this power to its statutorily defined preference customers, which include municipalities, cooperatives, public utility and irrigation districts, Federal and State agencies, and Native American tribes.<sup>1</sup> These customers, in turn, provide retail electric service to millions of consumers in Arizona, California, Colorado, Iowa, Kansas, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, South Dakota, Texas, Utah, and Wyoming.

The amount of Federal power Western has to market is limited. Western has discretion to determine who will receive an allocation of Federal power. Due to the high demand for Western’s power and limited amount of available power, Western needs to be able to collect information to evaluate who will receive an allocation of Federal power. As a result, the information Western collects is both necessary for the proper performance of its functions, and is useful in performing those functions. Western will use the information collected in conjunction with its marketing plan, to determine an entity’s eligibility and ultimately who will receive an allocation of Federal power.

The basis of Western’s authority is in Reclamation Law, which is a series of laws arising from the Desert Land Act of 1877 and includes, but is not limited to: the Desert Land Act of 1877, Reclamation Act of 1902, Reclamation Project Act of 1939, and the Acts authorizing each individual project such as the Central Valley Project Re-Authorizing Act of 1937.<sup>2</sup> The Reclamation Act of 1902 established the Federal reclamation program.<sup>3</sup> The basic principle of the Reclamation Act of 1902 was that the United States, through the Secretary of the Interior, would build and operate irrigation works from the proceeds of public land sales in the sixteen arid Western states (a seventeenth was added later). The

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<sup>1</sup> See, e.g., 43 U.S.C. § 485h(c).

<sup>2</sup> See Ch. 107, 19 Stat. 377 (1877), Ch. 1093, 32 Stat. 388 (1902), Ch. 418, 53 Stat. 1187 (1939), Ch. 832, 50 Stat. 844, 850 (1937), all as amended and supplemented.

<sup>3</sup> See Ch. 1093, 32 Stat. 388, as amended and supplemented.

Reclamation Project Act of 1939 expanded the purposes of the reclamation program and specified certain terms for contracts the Secretary of the Interior enters into to furnish water and power.<sup>4</sup> Congress enacted the Reclamation Laws for purposes that include enhancing navigation, flood protection, reclaiming arid lands in the western United States, and for fish and wildlife.<sup>5</sup> Congress intended that the production of power would be a supplemental feature of the multi-purpose water projects authorized under the Reclamation Laws.<sup>6</sup> No contract entered into by the United States for power may impair the efficiency of the project for irrigation purposes.<sup>7</sup> Section 5 of the Flood Control Act of 1944 is read *in pari materia* with Reclamation Laws.<sup>8</sup> In 1977, the Department of Energy Organization Act transferred the power marketing functions of the Department of Interior to Western.<sup>9</sup> Pursuant to this authority, Western markets Federal hydropower.

The applicable portions of the main authorizing statutes, specifically the Reclamation Project Act of 1939 (providing for contracts to provide power) and the 1977 Department of Energy Organization Act (transferring power marketing functions of the Department of Interior to a yet to be named agency under DOE) are attached to this Supporting Statement.

There is no other DOE collection tool in place to collect this needed information.

**2. Indicate how, by whom, and for what purpose the information is to be used.**

The information collected will be used by Western (and specifically the individual Regions within Western) to determine eligibility and amount of allocation. The Energy Planning and Management Program<sup>10</sup> and the individual project marketing plans provide the methodology and criteria Western must follow in performing its resource allocation duties. The information collected will be used to determine whether an applicant is an eligible preference entity, whether it falls within a marketing area, and whether it is ready, willing and able to receive and/or distribute Federal power. Given the high demand and limited available power, Western will use the capacity and energy requirements of all eligible applicants to pro-rate how much power will be allocated.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or**

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<sup>4</sup> See Ch. 418, 53 Stat. 1187 (1939), as amended and supplemented.

<sup>5</sup> See, e.g., Ch. 832, 50 Stat. 844, 850 (1937), as amended and supplemented.

<sup>6</sup> See, e.g., Ch. 832, 50 Stat. 844, 850 (1937), as amended and supplemented.

<sup>7</sup> See 43 U.S.C. § 485h(c).

<sup>8</sup> See Act of December 22, 1944, Ch. 665, 58 Stat. 887, as amended and supplemented.

<sup>9</sup> See 42 U.S.C. § 7152(a)(1).

<sup>10</sup> See 10 C.F.R § 905

**other technological collection techniques or other forms of information technology.**

The Applicant Profile Data (APD) will be accessible for downloading via Western's website. Taking into consideration the use of information technology to reduce the burden, Western will accept electronic-mail submission of the APD. Western also took into consideration that some of the applicants may not have the technology available to submit electronic-mail submissions, so submission via fax or regular mail will also be accepted. At this time, applicants cannot enter the information in an electronic form on Western's website.

**4. Describe efforts to identify duplication.**

The collection of information under the APD will not be a duplication of reporting or available information. In fact, the information sought under the APD is not collected by other means or in another form by DOE or Western. To avoid unnecessary duplication, only entities who desire a new Western allocation are required to submit an APD.

As it relates to each of the components of the APD, there is no duplication. Section 1 is information Western needs to determine who the applicant is, whether the applicant is a statutorily defined preference entity and whether the applicant is ready, willing and able to receive and/or distribute Federal power. Section 2 identifies the amount of Federal power which the applicant requests. Section 3 identifies the applicant's loads. Section 4 identifies the applicant's resources. Section 5 identifies the applicant's transmission delivery arrangements necessary to receive Federal power. Section 6 is voluntary and provides the applicant with the ability to provide any additional information. Section 7 is an attestation that the information provided is true and accurate to the best of the applicant's knowledge.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

As indicated in item #5 of the OMB Form 83-I, this collection of information will not have a significant impact on small entities.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Without the collection of this information, Western will not be able to fulfill its mission required by statute, implementing regulations, and its marketing plans because Western will have no information on who desires an allocation of preference or whether such entities qualify for preference under Federal law. This information collection is a one-time collection when Western has available

power available under an allocation process. Western was able to reduce the burden to the minimum amount needed without encountering any technical or legal obstacles.

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines.**

There are no special circumstances, and the information collected will be conducted in a manner consistent with OMB guidelines.

**8. If applicable, provide a copy and identify the date and page number of publication in the *Federal Register* of the agency's notice, required by 5CFR 1320.8(d), soliciting public comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE.**

The 60-day FRN required under 5 C.F.R. 1320.8(d), which requests comments, was published in the *Federal Register* at Vol. 73, No. 20, at page 5555, Wednesday, January 30, 2008. A copy of that FRN is attached. The summary of comments and responses is as follows<sup>11</sup>:

**Comment:** Several commenters asked why this process is taking place at this point in time, i.e., what is driving this process.

**Response:** When a Federal agency requests information from the public that falls within the Paperwork Reduction Act, the agency must obtain approval (and an assigned control number) from OMB. Several of Western's Regional offices will be accepting applications for federal power in the next few years. Potential preference customers will be required to provide information by completing an Applicant Profile Data (APD) form. Western will use the APD to collect information to determine who may be eligible to receive a federal power allocation. Western must have OMB approval (and a valid control number) to request the information contained in the APD from potential preference customers. This process is an opportunity for the public to comment on the need, type, etc., of the information collected through Western's APD. The allocation of power from Western is outside the scope of this process and is completed in a separate process by each Western Region, when required.

**Comment:** We understand the impetus for going through this process is an upcoming partial reallocation within the Pick-Sloan Project. It would appear Western has decided to try to develop a form that can be used in all situations.

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<sup>11</sup> Note there were no comments received on cost and hour burden.

An explanation of that sort in the *Federal Register* notice would have cut down on the expressions of concern many entities have fielded about this process.

**Response:** In addition to the Pick-Sloan Post-2010 Resource Pool Project, other Western projects will be undertaking power allocations pursuant to existing marketing plans in the next few years. The commenter correctly notes that Western will be requiring potential preference customers to provide information on a common form and that this process seeks comments on the form, i.e., the proposed APD. When a Federal agency requests information from the public that falls within the Paperwork Reduction Act, the agency must obtain approval (and an assigned control number) from OMB. As discussed above, Western must have OMB approval (and a valid control number) to request the information contained in the APD from potential customers. An OMB control number is valid for a maximum three year period. As a result, Western will go through this or similar processes once every three years to maintain a valid OMB control number. In future Paperwork Reduction Act processes, Western will clarify the process by including a summary phrase such as:

The Paperwork Reduction Act process, at 44 U.S.C. 3501 et. seq., and associated *Federal Register* notice is a process whereby Western obtains approval from the Office of Management and Budget to collect information from the public. It is a legal requirement that Western must comply with before Western can request potential preference customers to submit an application for power. The Paperwork Reduction Act process is not the process whereby interested parties request an allocation of federal power. The allocation of power from Western is outside the scope of this process and is completed in a separate process by each Western Region, when required.

**Comment:** Several commenters asked whether they could obtain or apply for an allocation of federal power during the Paperwork Reduction Act process.

**Response:** The Paperwork Reduction Act process is not the process whereby interested parties request an allocation of federal power. The Paperwork Reduction Act process and the associated *Federal Register* notices are a process whereby Western obtains approval from OMB to collect information from the public. It is a legal requirement that Western must comply with before Western can request potential preference customers to submit an application for power. The allocation of power from Western is outside the scope of this process and is completed in a separate process by each Western Region, when required.

**Comment:** Several commenters asked whether Western would make the APD available on line and whether interested parties can file applications electronically.

**Response:** Western's Regions will issue a *Federal Register* notice for a Call for Applications through a separate process when required for the individual projects. At that time, Western will make the APD available on line and provide potential preference customers with the website and instructions on how to access the APD. Potential preference customers will be able to download the APD and submit the APD to Western under various methods (which Western will outline in the Call for Applications *Federal Register* notice), including via e-mail. However, Western currently does not have a website that would allow interested parties to fill out forms on line. In the event Western develops such a site, Western will provide notice of the availability of the site as part of the Call for Applications *Federal Register* notice.

**Comment:** A commenter stated a way to enhance quality, utility and clarity of information collection would be through automated collection of load data from any utility with that capability on the presumption that automated data should offer easier incorporation into Western's form.

**Response:** Developing software that would automatically collect data from each potential preference customer's computer system would be complex and expensive to develop for a small data collection effort. There are many different software developers and computer systems -- not all systems are compatible. Considering this is not a routine, ongoing, repetitive, collection of information, Western does not believe it would be cost effective for Western to develop software and systems that would automatically collect load data from any potential preference customer that may submit an application.

**Comment:** Several commenters noted they appreciate receiving Western power and wish to continue to receive Western power in the future.

**Response:** Comment noted. Western appreciates the support from customers.

**Comment:** A commenter opposed collecting a subset of the information. The commenter would like to see the same APD used for each allocation process unless legally directed otherwise. This practice will ensure fairness across all re-marketing processes.

**Response:** In its initial proposal, because all of Western's Regions do not need the same information, Western proposed to allow each Region to use subsets of the APD form. In other words, as the commenter notes, one Region's APD may request less information than another Region's APD. This is necessary since each Region, due to Region specific requirements, may not necessarily need all of the information collected in the proposed APD. Rather than over-collect unnecessary information, Western seeks to collect only the minimal amount of information it needs. Western evaluated the possibility of using the same APD form for each Call for Application while instructing

applicants to fill out only certain sections. This approach may lead to an applicant ignoring or misunderstanding Western's instructions and providing unnecessary information. Using a subset of information will lead to a more consistent process and will minimize the time an applicant uses to complete the APD.

**Comment:** Several commenters asked Western to clarify whether the data obtained under the APD has historically qualified for protection from release under the Freedom of Information Act's (FOIA) proprietary information exemption. They also expressed concerns about whether some of the applicant's load and resource information should be made available to the public. Western should be especially sensitive to the new Federal Energy Regulatory Commission criteria on Critical Energy Infrastructure Information (CEII). Western should have a way of collecting CEII when necessary for legitimate agency purposes without exposing that information to disclosure.

**Response:** Historically, Western has not considered the information contained in the APD as proprietary or confidential business information. A potential preference customer's historical actual monthly and yearly demand and energy load has not traditionally been seen as proprietary. In contrast to real time schedules, which are subject to daily constraints and to significant market forces, historical monthly and yearly aggregates are not subject to the same type of manipulation. Western does not anticipate collecting any CEII through the APD. Western clarifies that in the event Western collects information protected by CEII or other confidential or business sensitive material, Western may withhold such information pursuant to FOIA.

**Comment:** A commenter stated that for Native American Tribes, the proposed rule does not appear to lessen any type of reporting burden previously imposed. With regard to load data; non-utility tribes generally spent many weeks retrieving data from their serving utilities in order to complete the applicant forms, while utility tribes required several work days to compile the information due to the mix of service from tribal and non-tribal entities and other factors.

**Response:** Western understands that, in some instances with regard to load data, non-utility Native American Tribes may have to work with serving utilities in order to obtain data for the APD. Estimated load data, which are subject to approval or adjustment by Western, may be used by the Native American Tribes when actual load data is difficult to obtain. Western believes the alternatives of estimating load data, as needed, lessen the Native American Tribes' burden to complete the APD.

**Comment:** A commenter stated Western should note an exception for Native American Tribes under Section 1(e). Providing Tribal membership lists is extremely burdensome and not relevant to Western's purposes under the collection.

**Response:** Western agrees Native American Tribes are not required to list individual members of the Tribe. Western included Section 1(e) to obtain information from member organizations such as Joint Power Agencies that may include numerous utilities. Western understands many Native American Tribes have individual members. While Native American Tribes are not required to list individual members, in the event numerous Tribes become members of an organization such as a joint power agency and apply for power under such an organization, the separate Tribes (but not individual members) should be listed. Western will clarify that Section 1(e) requires a list of organizational members not individual members.

**Comment:** A commenter stated Section 1(i) should provide an exception for Native American Tribes -- redirecting these applicants to Section 3(b) which addresses Tribes that do not operate their own utilities; alternatively, this section should include the phrase "if any."

**Response:** Western agrees Section 1(i) may not be applicable to Native American Tribes. Western has included the phrase "if applicable" in the Section.

**Comment:** Several commenters generally agreed the scope of information collected related to the proper performance of Western's functions. Western should not allocate resources blindly.

**Response:** Comment noted. Western appreciates the support from customers.

**Comment:** Several commenters noted the information will have a practical utility in that it will assist Western in allocating resources.

**Response:** Comment noted. Western appreciates the support from customers.

**Comment:** A commenter stated large organizations with which Western deals have staff that routinely handle this kind of information and can supply it to the individual tasked with filling out the form. Small organizations will have more trouble collecting this information. However, as Western points out, the resource is scarce and valuable and well worth the time.

**Response:** Western agrees large organizations will have more staff available to fill out the form. Western believes collecting the load data could be the most time consuming element of the APD organization. However, load data is essential to determine the amount of resources which Western may allocate to potential preference customers, small and large. In the event an organization needs assistance filling in the form, they may contact Western for assistance.



**Comment:** A commenter stated that, to achieve more clarity, Western should examine the list provided under type of entity/organization. There are several kinds of organizations that currently contract with Western but are not named. Two of those are electrical districts and power districts. The commenter suggested Western examines its potential contractors to see if it is missing additional categories that should be included in an existing category. For instance, irrigation district could be changed to special district (agricultural improvement, power, electrical, irrigation or other special district).

**Response:** Section 1(c) of the APD lists the majority of types of organizations found eligible for allocations in processes under past marketing initiatives. To the extent there are other types of organizations submitting an ADP, they may use the box marked “Other” and write in their specific organizational type.

**Comment:** A commenter stated as to existing customers, much of the information that would be put in the proposed APD is already known to Western and is in Western’s system. The commenter suggests that, for existing customers, Western ask for updated information in lieu of forcing applicants to give the agency information it already has if there are no changes. For existing customers, Western could merely note the last time such types of information were submitted and request that the applicant provide any changes to that type of information from that last submission.

**Response:** The APD is designed to obtain current information from applicants who are seeking an allocation of Federal power. Western requires only those applicants desiring power under a Call for Applications to submit an APD. The APD is typically used to obtain information from new potential preference customers, but may also be used for existing preference customers who apply for an allocation increase, if allowed under the Regional marketing plan. To ensure consistency in the allocation processes, Western requires applicants applying under a Call for Application to submit an APD with current information.

**Comment:** Two commenters made statements about the estimate burden associated with completing the APD and the annual reporting. One commenter stated that there is no real way to estimate how long it will take to fill out this form until one tries to do so. Another commenter stated Western underestimated the completion estimate and recordkeeping burden for Native American Tribes.

**Response:** In recognition of these comments, Western has increased the burden estimate for completing the APD, by doubling the estimated time from 4 hours to 8 hours. While some potential preference customers may require more time than others, Western still anticipates most customers will be able to complete the APD within 4 hours. By increasing the average burden to 8 hours,

Western recognizes that it may take longer for some entities to complete the APD. Because the amount of annual recordkeeping is minimal, Western considers the annual burden estimate of 1 hour for recordkeeping as accurate.

In addition to requesting comments through publishing the 60-day FRN, Western sent a notice to over 1,000 potentially interested parties on the FRN publication. Western sent notices on the following dates:

- February 1, 2008 to over 100 interested parties in its Sierra Nevada Region;
- February 6, 2008, to over 200 interested parties in its Colorado River Storage Project Management Center;
- February 6, 2008 to almost 100 interested parties in its Rocky Mountain Region;
- February 12, 2008 to over 400 interested parties in its Upper Great Plains Region;
- February 14, 2008 to over 300 interested parties in its Dessert Southwest Region.

**9. Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

Western will not, and has not provided any payment or gift to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

Western provided notice that the proposed collection of information in this program will not be part of a system of records covered by the Privacy Act<sup>12</sup> and will be available under the Freedom of Information Act.<sup>13</sup>

**11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.**

None of the information requested in the APD is of a sensitive nature.

**12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated.**

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<sup>12</sup> See 5 U.S.C. § 552(a).

<sup>13</sup> See 5 U.S.C. § 552. Western reserves the right to redact information to protect confidential or sensitive information, as provided under FOIA

There is only one collection instrument proposed, specifically the APD. Western has identified the following class of respondents as the most likely to apply: municipalities, cooperatives, public utilities, irrigation districts, Native American Tribes, Federal and State agencies. The respondents will be located in Arizona, California, Colorado, Iowa, Kansas, Minnesota, Montana, Nebraska, Nevada, New Mexico, North Dakota, South Dakota, Texas, Utah, and Wyoming. Depending on the amount of power that becomes available for allocation, Western anticipates it could receive up to 100 requests for power during the 3-year period when the OMB Clearance Number is in effect. Western does not anticipate annual responses. The responses will be periodic and occur when Western has power available under an allocation process.

The number of Burden Hours for completing the APD is estimated as follows. Western anticipates that it will take 8 hours or less to complete the APD, which includes the time needed to search any data sources, gather the information, and review the information. Once the respondent completes the APD, it will submit the APD to Western for Western's review. After submitting the APD, provided the APD is complete and no clarification is required, Western does not anticipate requiring any further information for the APD from the applicant, unless the applicant is successful in obtaining a power allocation. The applicant submits only one APD. It does not submit an APD every year. If the applicant receives a power allocation, the applicant will need to complete a standard contract to receive its power allocation. Western's standard contract terms are outside the scope of this process.

The annual recordkeeping burden is estimated as follows. There are no mandatory recordkeeping requirements on the applicant if it does not receive an allocation of Federal power. In such case, any recordkeeping of the APD by a respondent is voluntary. For those entities that receive a Federal power allocation, Western requires the successful applicant keep the information for 3 years after the applicant signs its Federal power contract. The 3-year, record retention policy will allow Western sufficient time to administer the contract and to ensure the applicant provided factual information in its application. A 3-year, record retention policy will have little impact on most businesses in the electric utility industry. Western anticipates that it would take less than 1 hour per successful candidate, per year, for recordkeeping purposes. Western anticipates that in a 3-year period, Western will have less than 30 successful applicants.

Based on the total number of burden hours and the total number of applications described above, Western expects that over a 3-year period, the total burden hours to complete the APD is 800 hours over 3 years (100 applicants over 3 years x 8 hours per applicant). This converts to an annual hourly burden of 267 hours. An entity will only complete the APD once. It is not required each year.

Additionally, based on the above, Western anticipates that there will be a burden for record keeping of 1 hour per year for each successful applicant, i.e., each applicant who receives a Federal power allocation. Western anticipates that over the course of 3 years there will be 30 successful applicants. The power may be allocated in year 1, year 2 or year 3. For the purposes of determining the cost burden, Western will presume all 30 applicants received an allocation in year 1. As a result, the annual hourly burden for record keeping is 30 hours.

For the purposes of this cost burden analysis, Western is assuming that a utility staff specialist will complete the APD. Western estimates a utility staff specialist rate, including administrative overhead, to be approximately \$100/hour. For recordkeeping, Western estimates an administrative support rate of \$50/hour. Based on the above, Western estimates the total annual cost as  $(266.67 \text{ hour/year} \times \$100/\text{hour}) + (30 \text{ hour/year} \times \$50/\text{hour}) = \$28,167$  per year.

Using the above estimates, on a per applicant basis, assuming the applicant receives a Federal power allocation, the total cost for the applicant over a 3-year period is \$950. The cost to complete the APD is a one time cost of \$800. In addition to the one time cost, the applicant, if it successfully receives a power allocation, will incur an additional expense of 1 hour for record keeping per year x \$50 per hour for a total record keeping cost of \$150 for 3 years.

**13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

Other than those described above, Western does not anticipate any annual cost burden to respondents (or recordkeepers) for (a) any capital and/or start-up cost components, or for (b) operation, maintenance and purchase of services components. Given the nature of the respondents' businesses, the information requested under the APD will be readily available, so there will not be a need for capital investments in computers, software, or other start-up costs. Given the estimated burden for filing out the APD is a one-time 8 hour requirement, Western does not anticipate respondents will need to contract for any outside services, nor will there be any ongoing operation and maintenance costs.

**14. Provide estimates of annualized cost to the Federal government.**

There are no separate costs or additional operational expenses to Western apart from Western's performance of its overall program of marketing Federal hydropower; i.e., the costs are fully bundled in Western's overhead and are not tracked separately. Western's power marketing offices will administer and evaluate the applications. Use and management of the collected information has been factored into each office's functions and resource requirements. Historically, Western has requested the same relative information from applicants and effectively

used Western resources to utilize and manage the information in its determinations. Each power marketing office will make a recommendation to Western's Administrator on which applicant(s) should be awarded a Federal power allocation based on the information contained in the APD. Western's Administrator shall use his discretion in the final power allocations. The procedure and process for the allocation of power shall be the subject matter of a separate notice and is outside the scope of this process.

**15. Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.**

There are no program changes or adjustments.

**16. For collections whose results will be published, outline the plans for tabulation and publication.**

The information contained in the response to the collection of information (APD) will not be published.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

Western will display the OMB number and expiration date on the APD.

**18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

Western has no exceptions to the certification statement in item 19 of OMB Form 83-I.