

**Supporting Statement:
U.S. Department of Energy
Save Energy Now Voluntary Pledge Program
OMB Control Number**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for processing of the proposed information collection, Save Energy Now Voluntary Pledge Report. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, "Instructions for Completing OMB Form 83-I."

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

The *Energy Policy Act of 2005* (EPACT 2005) (P.L. 190-58), section 106, permits the Secretary of Energy to enter into voluntary agreements with industry to reduce energy intensity by not less than 2.5 percent per year during the period from 2007 through 2016. The Industrial Technologies Program (ITP), part of the Department of Energy's (DOE) Office of Energy Efficiency and Renewable Energy (EERE), is working to implement the congressional directive requiring the Secretary to submit a report to Congress that evaluates the success of the voluntary agreements no later than June 30, 2012, and June 30, 2017. The report must provide independent verification from a sample of the energy savings estimates provided by participating firms. ITP will collect annual information on primary energy use and energy savings from participating entities through the duration of the program.

- 2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection**

Save Energy Now is a national initiative to drive a 25% reduction in industrial energy intensity in ten years. This initiative is sponsored by ITP within EERE to reinforce energy efficiency as a profitable business model and expand markets for new energy technologies. The *Save Energy Now* LEADER Pledge is a voluntary program for any company interested in reducing their energy intensity by 25 percent or more in ten years. The Pledge program is specifically designed to encourage and recognize United States companies that are in the vanguard of energy efficiency and will lead all industrial facilities by establishing and achieving ambitious energy goals.

Any company in the U.S. industrial or manufacturing sector can become a *Save Energy Now* LEADER, regardless of size and no matter their level of expertise in energy management. This includes subsidiaries, individual plants, or divisions of a plant. EPAct 2005 defines energy intensity as the "primary energy consumed for each unit of physical output in an

industrial process.” Pledge partners are encouraged to measure energy intensity in a way that adheres to this definition. However, DOE understands that each company will need to adopt methods to measure and track energy intensity data that are appropriate for their operations. These energy intensity measurements will vary by industry and company. The units of physical output (or units of production) can be the number, mass, volume, size, functionality, or economic value of a product. Many companies will need to track energy intensity across multiple product lines due to significant diversity in product groups. Segmenting energy use among specific product groups is challenging; however, efforts to do so will provide more accurate and valuable estimates of energy intensity for each product group. The information collected will be collected through a web-based, password-protected system. Participants may use their password-protected pages to track progress and calculate intensity impacts. The results will be used to evaluate the success of the program in the report that must be submitted to Congress in 2012 and 2017.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

In efforts to reduce burden, the reporting document is available and can be submitted electronically. Although electronic reporting is available, the collection request does not require automated, electronic, mechanical, or any other technological collection techniques.

4. Describe efforts to identify duplication.

Other voluntary reporting programs were investigated for duplication, including the Environmental Protection Agency’s Climate Leaders Program, the Energy Information Agency’s Manufacturing Energy Consumption Survey, and its voluntary reporting of greenhouse gasses. Although Climate Leaders and the EIA require reports on total energy use, the Save Energy Now LEADER Program requests information about a base energy intensity number and the annual change in intensity. This metric, defined in EPACT as “the primary energy consumed for each unit of physical output in the industrial process,” is not collected by any other existing program.

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

The collection of information does not impact small businesses or other 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 information that comes directly from the information collection, the Department of Energy will not be able to implement the congressional directive requiring the Secretary to submit a report to Congress that evaluates the success of the voluntary agreements no later than June 30, 2012, and June 30, 2017. As stated in the Energy Policy Act of 2005, section

106, the report must provide independent verification from a sample of the energy savings estimates provided by participating firms.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection will be conducted in a manner consistent with all 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 320.8(d), soliciting 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 to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a Notice and Request for Comments concerning this collection in the Federal Register on Tuesday, September 16, 2008, Volume 73, F.R. No. 180. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received as a result of the *Federal Register* Notice.

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

There will be no payment of gift of any kind to respondents. The Save Energy Now program is voluntary and participants will not expect payment or gift in return for involvement.

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

All data and information reported to DOE is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. DOE will aggregate the energy and carbon savings data for pledging entities to assure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

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. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

DOE is not requesting information of a sensitive or private 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. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

DOE estimates 20 companies will participate, and that each company will have an average of 14 plants participating for a total of 280 respondents. Although each plant will track its own progress, companies may submit one aggregate report from each plant. Each year, DOE estimates each plant will spend approximately 10 hours compiling and submitting the energy consumption data. In total, the hours of burden requested for all participants is 2,800 per year. This estimate is based upon the burden hours for the Manufacturing Energy Consumption Survey administered every four years by the Energy Information Agency.

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

There are no capital and start-up cost components or operations and maintenance associated with this data collection. The information is maintained in the normal course of business. Therefore, other than the cost of burden hours, there are no additional costs for generating, maintaining, and providing the information.

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

It is anticipated that the annualized cost is not expected to exceed regular staffing or program budget.

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

The Save Energy Now Voluntary Pledge Report is a new collection and the result of the congressional directive from EPLA 2005, section 106.

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

The results of the Save Energy Now Voluntary Pledge Report will only be published in program evaluation and metrics documentation. No complex calculations are required to track the progress of program participants towards the goal of reducing annual energy intensity. Results will be published in aggregate to report the impact of the DOE program.

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.

DOE is not seeking approval to not display the expiration date for OMB approval of the information collection.

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

There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.