

SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY
REPORTING REQUIREMENTS UNDER EPA'S CLIMATE LEADERS PARTNERSHIP
(Renewal)

1. IDENTIFICATION OF THE INFORMATION COLLECTION REQUEST

1(a) Title and Number of the Information Collection Request

Reporting Requirements Under EPA's Climate Leaders Partnership (Renewal), EPA ICR No. 2100.03, OMB Control No. 2060-0532.

1(b) Short Characterization/Abstract

Climate Leaders is an EPA-sponsored voluntary program that encourages companies to develop a corporate greenhouse gas (GHG) inventory and inventory management plan and to establish a GHG emissions reduction goal. Partners in the program benefit from participation by receiving public recognition from EPA for achieving progress toward their GHG emissions reduction goal. Partners also receive technical assistance in developing their GHG inventory and inventory management plan, and in identification of new cost-effective GHG reduction opportunities. The program is run through EPA's Climate Protection Partnerships Division (CPPD) in the Office of Air & Radiation.

Participation in the program begins with the submittal to EPA of a Partnership Agreement that outlines responsibilities of the Climate Leaders Partner and EPA. The Partnership Agreement begins a partnership between the Climate Leaders Partner and EPA wherein the Partner agrees to develop a corporate-wide GHG inventory and inventory management plan, and to report this inventory annually to EPA using the Climate Leaders Annual GHG Inventory Summary and Goal Tracking Form. To reduce the burden on Partners, EPA provides checklists and examples for developing inventory management plans, uses pre-populated electronic reporting techniques, and provides technical support during each step of the corporate GHG inventory and reporting process. Upon completion of their inventory, Partners then agree to set GHG emissions reduction goals. Partners are encouraged to publicize their involvement in the program, and EPA provides additional opportunities for public recognition to Partners who meet or exceed their goals. The

Partnership Agreement can be terminated by the Climate Leaders Partner or EPA with no notice or penalties.

This ICR provides a comprehensive description of the information collections under the Climate Leaders program. Sections 1 through 5 of this ICR describe the specific information collections (e.g., from the standpoint of need, use, and respondent activities). In Section 6, EPA estimates the annual hour and cost burden to respondents and the Agency under these collections.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

In an effort to mitigate global climate change, the President announced a Climate Change Strategy on February 14, 2002, wherein he set a national U.S. GHG intensity goal of 18 percent by 2012. Part of that strategy challenges companies to set GHG emissions reduction goals by working with EPA through the Climate Leaders program. To formally establish participation in the Climate Leaders program, EPA collects general company information in the Partnership Agreement. This information typically includes the identification of a company liaison and other contact information. EPA also provides technical assistance to Partners to help them develop a company-specific Inventory Management Plan, base year GHG inventory, corporate-wide GHG reduction goal and subsequent year corporate GHG inventories using the Climate Leaders Annual GHG Inventory Summary and Goal Tracking Form. Partners report their GHG inventory to EPA annually, which allows EPA to evaluate a Partner's progress and performance and to assess overall program results. This GHG inventory data and supporting documentation collected through this Partnership provides the necessary level of detail for accurately measuring each Partner's contribution towards reducing GHG emissions.

2(b) Practical Utility/Users of the Data

EPA uses information submitted in the Partnership Agreement to set up a database of Partner contact information, which facilitates information dissemination to Partners. EPA uses information submitted in the Inventory Management Plans to assure that the Partner's GHG inventory is of sufficient quality for recognition in the Climate Leaders program and to provide technical assistance and example plans to other Partners that are developing their own GHG management strategies. EPA uses information submitted in the Climate Leaders Annual GHG Inventory

Summary and Goal Tracking Form to accurately monitor the progress of Partners in reducing GHG emissions, in order to provide them with credible public recognition when they meet or exceed their goal. EPA also uses this information to provide technical assistance.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

In order to maintain the reputable standing of the voluntary Climate Leaders Partnership, and credibly discuss Partner corporations as “leaders” in reducing emissions of GHGs, the data collected under this ICR is very specific to each Partner’s GHG inventory and is subject to a rigorous review process. The information to be obtained under this ICR has not been collected by EPA or any other Federal agency, nor is it available from any other source.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995 (PRA), EPA issued a public notice in the Federal Register on May 30, 2008 (73FR 31087) No comments were received.

3(c) Consultations

EPA followed the approved method of consultations with Climate Leaders Partners to obtain their views on this method of data collection and burden estimate. Various Climate Leaders provided their input, which, along with the previously obtained data from Climate Leaders Partners was used to estimate the burdens of this Information Collection Request.

EPA provided the Partners with a list of reporting requirements under the Climate Leaders Partnership, and asked them to estimate the associated hourly labor burden. Labor wage rates from the previous Information Collection Request were provided for reference and EPA requested comments on whether these labor rates were appropriate. The Partners provided hourly estimates for each activity, and either provided labor rates or indicated that the labor rates from the initial ICR were representative. Generally, the estimates provided by the Partners were consistent with EPA expectations of the labor burden.

3(d) Effects of Less Frequent Collection

The development of a Partnership Agreement, Inventory Management Plan and GHG emissions reduction goal are one-time information submittals from companies that choose to become Partners. EPA also asks Partners to prepare and submit the Climate Leaders Annual GHG Inventory Summary and Goal Tracking Form. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the program and to provide credible public recognition. Further, since this is a voluntary program, ongoing evaluation of results is critical to the program's success.

3(e) General Guidelines

This information collection request was prepared in compliance with OMB's implementing regulations and EPA's guidelines for ICR preparation.

3(f) Confidentiality

Participation in Climate Leaders is voluntary. Additionally, Climate Leaders focuses its information collection at the corporate level and does not retain records of facility specific data. For Partners that are concerned about data confidentiality, EPA will consider proposals to be able to review sensitive data by making an on-site visit to ensure credibility. Another alternative that EPA offers Partners is to have a third party conduct a credible GHG inventory audit, and provide that audit to EPA for review. EPA will not make company- or agency-specific information that is collected under this ICR and that is claimed as confidential business information (CBI) available to the general public without a Partner's permission, except in accordance with EPA's CBI regulations at 40 CFR, Part 2, subpart B. If a Partner asserts a claim of confidentiality covering all or part of the information collections covered in this ICR, EPA must and will treat the information in accordance with these regulations. EPA will also ensure that the information collections comply with the Privacy Act of 1974 and OMB Circular 108.

3(g) Sensitive Questions

No questions of a sensitive nature are asked in the Partnership Agreement, Inventory Management Plan, or Climate Leaders Annual GHG Inventory Summary and Goal Tracking Form.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

Following are the North American Industrial Classification System (NAICS) codes associated with the majority of companies currently participating in the program. Other types of companies may join this voluntary program in the future.

NAICS Title	NAICS Code
Breweries	31212
Carpet and Rug Mills	31411
Cement and Concrete Product Manufacturing	3273
Chemicals (except agriculture)	325
Clothing Stores	4481
Electric Power Generation, Transmission and Distribution	2211
Federal Government	9211
Financial Services	5221
Food Manufacturing	311
Lodging/Accommodations Services	7211
Motor Vehicle Manufacturing	3362
Office Machinery Manufacturing	333313
Oil & Gas Extraction	211
Petroleum Refineries	3241
Pharmaceutical Manufacturing	3254
Primary Metal Manufacturing	331
Semiconductor Manufacturing	3344
Waste Management	562
Glass and Glass Product Manufacturing	3272

4(b) **Information Requested**

EPA asks all Partners to submit a simple, one-page Partnership Agreement to indicate their intention to participate in the program. Within the first year of joining the program, Partners also develop and submit an Inventory Management Plan, base year inventory, and work to develop a GHG emissions reduction goal. They also submit a brief company profile which EPA posts on the Climate Leaders Web site to provide publicity and recognition.

In order to measure the progress toward meeting the GHG reduction goals, Partners complete and submit the Climate Leaders Annual GHG Inventory Summary and Goal Tracking Form. This form documents a Partner's GHG emissions during the past year. Partners may also

submit contact or profile updates through e-mail or the Climate Leaders Web site, as necessary. Each information collection activity is described below. EPA provides a variety of forms of technical assistance to help Partners complete their Reporting Forms, including on-site visits to collect and calculate data, assistance filling out the forms, and assistance using electronic tools such as spreadsheets.

(1) Partnership Agreement

EPA asks Climate Leaders Partners to develop and submit a Partnership Agreement.

(i) Data items. Partners provide the following information in the Partnership Agreement:

- The name, title, address, and telephone, e-mail address and facsimile number of a designated company representative.

(ii) Respondent activities. In developing the Partnership Agreement, Partners perform the following activities:

- Receive and review the Partnership Agreement.
- Gather address and contact information to complete the Partnership Agreement.
- Sign the Partnership Agreement and submit it to EPA.

(2) Inventory Management Plan

EPA asks Climate Leaders Partners to develop and submit a corporate-wide Inventory Management Plan to describe the Partner's process for completing a high-quality, corporate-wide GHG inventory. There is not a standard template for an Inventory Management Plan, instead each plan is tailored to the Partner's corporate structure so that the plan is most beneficial to the Partner corporation. Although each plan is unique, an Inventory Management Plan checklist provides guidance on the seven required areas included in the plan. EPA also posts examples of Inventory Management Plans on its website from several Partners that have completed the process.

(i) Data items. The Inventory Management Plan must contain details in seven different areas as listed below:

Partner Information:

- The legal name of the company and its physical address, as well as a contact name, title, address, telephone, e-mail address and facsimile number of a designated inventory representative for the company.

Boundary Conditions:

- Organizational boundary descriptions, which define a basis for reporting emissions data from partially owned or controlled assets, and a list of facilities with location, percent ownership or percent control that are included in the inventory.
- Operational boundary descriptions, which include a list of GHGs included in the inventory and a description of the procedure or method used to identify direct and indirect emission sources. For direct sources, a list of groups of emission sources by emission category for each facility or reporting unit; for indirect sources, a list of energy imports or exports that are reflected in the inventory; and for optional sources, a list of other sources that are accounted for in the inventory.

Emissions Quantification:

- A description of the emission quantification methodologies, with references, used for each emission source and offset project; a list of emission factors and other constants, with references, for each emission category; and a process for maintaining the use of current external references.

Data Management:

- A description to identify the source of data documents or processes required to complete the emissions quantification methodology (e.g., monthly fuel purchase records, fuel meters, etc.) for each item of activity data.
- A description of the process for collecting and processing activity or monitoring data from its original source to the final emission data entered into the inventory.
- A description of the normalization factor (units of product, \$ revenue, etc.) used to calculate emission intensity and associated documentation on selecting the normalization factor.*
- A description of the process flow for collecting and processing activity or monitoring data to obtain the final normalization factor data entered into the inventory.*
- A description of the major sources of uncertainty and quality assurance measures for the data process flow. This includes information on how measurement system accuracy is assessed.
- A description of how data collection system security is maintained.
- A description of how GHG reporting and processing is integrated with other reporting tools; and
- The frequency for reporting facility data to the corporate level.

* These items are only necessary if Partner chooses to set its GHG goal based on an intensity target.

Base Year:

- A description of the approach for adjusting base year emissions due to structural changes in the Partner corporation (e.g., mergers, acquisitions, divestitures, and outsourcing) or changes to the methodology (e.g., calculations, emission factors, or error correction).

Management Tools:

- A description of the overall roles and responsibilities for corporate GHG inventory development and maintenance, training received by inventory development team members, and version control of inventory management guidelines.

Auditing and Verification:

- A description of the internal audit process and timing and if applicable, a description of the external review process and timing.
- A description of the senior management review process.
- A description of the process for implementing and documenting corrective actions for all internal and external reviews.

(ii) Respondent activities. In completing the Inventory Management Plan, Partners perform the following activities:

- Review Inventory Guidance and Inventory Management Checklist for requirements on developing and reporting GHG emissions and example Inventory Management Plans; Draft and document corporate-wide Inventory Management Plan and submit to EPA for review.
- Revise Inventory Management Plan based on EPA comments and resubmit to EPA.
- Select location and prepare for on-site Inventory Management Plan Review.

(3) Annual GHG Inventory Summary and Goal Tracking Form (Base Year)

After a Partner has completed its Inventory Management Plan, EPA asks Climate Leaders Partners to calculate and summarize corporate-wide GHG emissions for the base year inventory.

(i) Data items: Partners provide the following information to EPA:

- The legal name of the company and reporting year, and the name, title, department, address, and telephone, e-mail address and facsimile number of an inventory contact person.
- For emissions in the United States:
 - Direct emissions from each source category (e.g., stationary combustion, mobile combustion) and the name and corresponding direct emissions from each source of chemical process or fugitive emissions.
 - Indirect emissions from purchased electricity, steam, and hot water.

- The name of each optional emission source with its corresponding emissions.
- Total GHG emissions from stationary and mobile sources of biomass combustion. Note that direct emissions listed above should not include biomass source emissions.
- For facilities that choose to self-track CFC / HCFC emissions from refrigerants, the metric tons of gas of CFCs and HCFCs.
- For non-utility facilities that choose to report the portion of direct stationary source emissions allocated to the amount of energy sold outside organizational boundaries, the quantity of electricity (MWh) or steam (Btu) sold and the emissions from these sold quantities.
- For emissions outside the U.S., if the Partner chooses to report non-U.S. emissions, enter base year emissions for all source categories as entered for emissions inside the U.S.

(ii) Respondent activities. In completing the base year inventory, Partners perform the following activities:

- Review the form instructions and requirements and Climate Leaders Inventory Guidance.
- Summarize the requested data at the corporate level.
- Complete spreadsheet form and submit to EPA.

(4) *GHG Emissions Reduction Goal Setting*

After a Partner has completed its base-year GHG inventory, EPA asks Climate Leaders Partners to set an aggressive corporate-wide GHG emissions reduction goal.

(i) Data items. Partners provide the following information to EPA:

- GHG emissions reduction goal in terms of an absolute GHG reduction or as a decrease in GHG intensity.
- Year of GHG emissions reduction goal.
- For a goal in terms of GHG intensity, the units of a normalization factor (e.g., tons of product).
- For a normalized goal, the values of the normalization factor for base year and annual year reporting.

(ii) Respondent activities. In selecting a GHG emissions reduction goal, Partners perform the following activities:

- Select and submit goal to EPA for review.
- Revise goal based on EPA input and resubmit to EPA for review.
- Enter goal, goal year, and normalization factor (if necessary) in the Annual GHG Inventory Summary and Goal Tracking Form.

(5) Annual GHG Inventory Summary and Goal Tracking Form (Subsequent Year)

In order to assist the Agency in evaluating whether Partners are on track to meet their GHG reduction targets, EPA asks Partners to update the base year inventory each subsequent year with the Annual GHG Inventory Summary and Goal Tracking Form.

(i) Data items. Partners provide the following information to EPA:

- For all categories of base year data entered, input the annual emission values for the current year inventory.
- New source categories and corresponding emissions, as necessary.
- If the inventory is re-baselined, due to an acquisition, the new base year estimate.
- Number of times the base year data has been adjusted since the first inventory submittal year with an explanation of each adjustment.
- Description of any changes in calculation methodologies or any other significant differences from the previous year data submittal to EPA.
- Year of inventory represented and the date the form was completed.

(ii) Respondent activities. In completing subsequent years of the Annual GHG Inventory Summary and Goal Tracking Form, Partners perform the following activities:

- Select and submit goal to EPA for review.
- Revise goal based on EPA input and resubmit to EPA for review.

(6) Web Profile

After a Partner has set its GHG emissions reduction goal, EPA requests Partners submit a short company profile, which will be posted on the Climate Leaders Web site.

(i) Data items. Partners provide the following information to EPA:

- Partner company information including: city and state of corporate headquarters, company Web site and company environmental Web site.
- GHG emissions reduction goal.

- Descriptions of company, reason for joining climate leaders, GHG emission reductions before joining climate leaders, approach to GHG management, and progress towards goal completion.
- (ii) Respondent activities. In preparing a Web profile form, Partners perform the following activity:
- Complete and submit Web profile form to EPA.

(7) *Additional Activities*

During participation in the program, Partners may be requested to notify EPA of any change, such as a change in Climate Leaders Company Representative.

- (i) Data items. Partners provide the following information to EPA:
- Changes in information, such as the name of a new company representative, change in address or update to the Web profile.
- (ii) Respondent activities. In updating information, Partners perform the following activity:
- Provide EPA with new information, such as the name of a new liaison or change in address via e-mail or Climate Leaders Web site.

5. AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

This section discusses the forms and associated Agency activities under EPA's Climate Leaders Partnership.

(1) *Partnership Agreement*

- Review Partnership Agreement and file.
- Enter Partnership Agreement contact information into database.
- Participate in calls with Partners.

(2) *Inventory Management Plan*

- Assist Partner in developing and documenting Inventory Management Plan.

- Receive and review draft Inventory Management Plan according to required components from the Inventory Management Plan checklist and submit comments to Partner, as necessary.
- File final version of Inventory Management Plan after corrections have been made.
- Prepare and attend on-site Inventory Management Plan Review.
- Document on-site review visit.

(3) *Annual GHG Inventory Summary and Goal Tracking Form (Base Year)*

- Assist Partner in summarizing inventory data and completing form.
- Receive, review, and enter information from spreadsheet form into database.

(4) *GHG Emissions Reduction Goal Setting*

- Assist Partner in selecting a key performance indicator.
- Create a sector benchmark for comparing GHG emissions performance.
- Review Partner GHG emissions reduction goal against the projected benchmark GHG emissions improvement rate for each Partner's sector.
- Compare Partner's current emissions intensity to sector-wide emissions intensity.
- Negotiate GHG emissions reduction goal with Partner, as necessary.
- Enter Partner's goal in database and post on Web.

(5) *Annual GHG Inventory Summary and Goal Tracking Form (Subsequent Year)*

- Pre-populate spreadsheet form with data from all previous years and contact information.
- Receive, review, and enter updated information from spreadsheet form into database.

(6) *Web Profile*

- Compile information from each Partner's Web Profile and post on Climate Leaders Web site to publicize the Partner's commitment and progress towards achieving GHG emissions reduction goal.

(7) *Additional Activities*

- Enter revised contact or profile information updates submitted by Partners through the Climate Leaders Web site or e-mail.

5(b) Collection Methodology and Management

The methods selected for this information collection are chosen based on efficiency and minimization of burden for respondents and EPA. The Partnership Agreements can be downloaded from the Climate Leaders Web site and returned to EPA either by fax or mail. EPA will review and then enter the contact information obtained from the Partnership Agreement into a data base. Resources for developing Inventory Management Plans, calculating a base year inventory, setting a GHG emissions reduction goal, and completing the Annual GHG Inventory Summary and Goal Tracking Form can be downloaded from the Climate Leaders Web site. In addition, EPA allocates a substantial amount of technical assistance hours for supporting each Partner as it develops an Inventory Management Plan, calculates a base year inventory, and selects a GHG emissions reduction goal. All of these reporting requirements, other than the initial Partnership Agreement are submitted to EPA electronically.

For the base year inventory, EPA has developed an electronic spreadsheet Annual GHG Inventory Summary and Goal Tracking Form, with detailed instructions and embedded macros and calculations in order to reduce the amount of data a Partner must enter into the base year spreadsheet. The Partner will submit the completed form to EPA electronically. For subsequent year inventories, EPA will send a pre-populated Annual GHG Inventory Summary and Goal Tracking Forms to Partners each year containing the information previously submitted. Partners need only review the information for accuracy and submit any updates for the current year inventory, thus further minimizing the burden of the respondents and maintaining data accuracy and consistency. The Annual GHG Inventory Summary and Goal Tracking Forms are submitted to EPA electronically. All information received through the forms will be reviewed by EPA for accuracy and completeness before being entered into the database or on the Climate Leaders Web site.

5(c) Small Entity Flexibility

Because Climate Leaders is designed primarily for large industrial and commercial companies, EPA expects that less than 10 of the Climate Leaders Partners will be small entities (having fewer than 1,000 employees). EPA has designed its program and reporting forms to minimize respondent burden while obtaining sufficient and accurate information. The partnership program was designed to be highly flexible and the hourly burden estimates for reporting requirements under the Climate Leaders Partnership will be lessened due to the less complex structure of GHG emissions inventories at small entities. Additionally, Partners create their own

Inventory Management Plans and GHG emissions reduction goals, subject to the Inventory Management Plan checklist and goal-setting criteria, and based on individual Partner resources. As discussed above, Climate Leaders provides technical assistance to Partners, including small entities, and facilitates electronic submittal of information. In conclusion, the burden associated with Climate Leaders is inherently reduced since the agreement to participate is voluntary.

5(d) Collection Schedule

EPA collects initial contact information via the Partnership Agreement, which is completed and submitted by each Partner upon agreement to participate in the program. Other one-time information collection activities include the Inventory Management Plan, base year inventory reporting via the Annual GHG Inventory Summary and Goal Tracking Form, GHG emissions reduction goal-setting, and Partner Web Profile, which is completed and submitted by each Partner during its first year in the program. EPA collects information annually via the Annual GHG Inventory Summary and Goal Tracking Form to monitor progress towards the GHG emissions reduction goal. Finally, EPA may collect other program information on a periodic basis or as the information is submitted; these items include notification of changes such as company representative, address, or Web Profile information.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Hour

In order to obtain an accurate cost estimate, EPA consulted with and obtained burden estimates from three Partners (respondents) from the Climate Leaders Partnership.

6(b) Estimating Respondent Costs

In order to obtain an accurate cost estimate, EPA consulted with three Partners (respondents) from the Climate Leaders Partnership on hourly wage rates for each type of labor. EPA presented these Partners with hourly wage rates from the previous ICR and asked them if these rates were still appropriate, and if not, to include an estimate of a revised hourly rate.

(i) Labor Costs

For purposes of this analysis, EPA estimates an average hourly respondent labor cost (including fringe and overhead) of \$109 for legal staff, \$98 for managerial staff, \$94 for

technical staff, and \$47 for clerical staff.

(ii) Capital Costs

Capital costs usually include any produced physical good needed to provide the needed information, such as machinery, computers, and other equipment. EPA does not anticipate that respondents will incur capital costs in carrying out the information collection requirements covered in this ICR.

(iii) Operations and Maintenance (O&M) Costs

O&M costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as "the recurring dollar amount of cost associated with O&M or purchasing services." For this ICR, a \$3 operations costs for submitting each Partnership Agreement via mail or facsimile is included in the burden estimate.

6(c) Estimating Agency Hour and Cost Burden

EPA's estimate of the Agency hour and cost burden associated with all of the requirements covered in this ICR is summarized in Exhibit 2. EPA estimates an average hourly labor cost (labor plus 60% for overhead) of \$83.16 for legal staff, \$83.16 for managerial staff, \$44.39 for technical staff, and \$20.20 for clerical staff. To derive these hourly estimates, EPA used the "2008 GS Salary Table of Annual Rates by Grade and Step," from the Department of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

Legal Staff - GS-15, Step 5

Managerial Staff - GS-15, Step 5

Technical Staff - GS-12, Step 1

Clerical Staff - GS-5, Step 1

EPA then divided annual compensation estimates by 2,080, which is the number of hours in the Federal work-year. EPA then multiplied hourly rates by the standard Federal government overhead factor of 1.6.

EPA also estimated an average hourly labor rate of \$147.00 (including overhead) for technical labor from EPA contractor staff. To derive these hourly estimates, EPA examined the technical work performed by contractors and estimated an hourly rate for GHG inventory assistance activities based on an average of the fully loaded labor rates from the contractor invoices on the current Climate Leaders contract.

6(d) Estimating the Respondent Universe and Total Hour and Cost Burden

(1) Respondent Universe

Table 1 presents the number of companies expected to participate in the program over the three-year period of this ICR. At the beginning of 2008, EPA had 155 enrolled Partners. For purposes of the ICR’s burden calculations, EPA has averaged the number of new and existing Partners over the three-year period, to conclude that there will be, on average, 35 new Partners per year for each of the three years of this ICR. We anticipate that this will result in a total enrollment 260 Partners by the end ICR year three. EPA derived these universel estimates based on Partner growth in recent years, and Climate Leader program goals.

Table 1: Number of Respondents Expected to Participate in the Climate Leaders Partnership Over the Three-Year Period of the ICR

Type of Respondent	Year 1 (2008)	Year 2 (2009)	Year 3 (2010`)	Average
Existing (at beginning of year)	155	190	225	190
New (during year)	35	35	35	35
Existing (at end of year)	190	225	260	225

In the following paragraphs, EPA uses these respondent universe estimates in its respondent hour and cost burden calculations.

(2) Annual Respondent Hour and Cost Burden

Based on the respondent universe data presented in Table 1, EPA estimates respondent burden associated with all of the requirements covered in this ICR in Exhibit 1. A discussion of the assumptions used in developing these burden estimates are detailed below and in the footnotes of Exhibit 1.

(i) Partnership Agreement. Corporations wanting to become Partners of the Climate Leaders Partnership Priorities program are required to complete and submit to EPA a Partnership Agreement. EPA estimates that, on average, 35 new organizations per year become Partners and will conduct this activity.

(ii) Inventory Management Plan (IMP). Partners will review the Inventory Management Plan checklist and example Inventory Management Plans before drafting a corporate wide Inventory Management Plan. Each Partner will draft and submit to EPA an Inventory Management Plan within the first year of joining the Partnership. EPA will review and provide comments to the Partner on each Inventory Management Plan, and the Partner will make needed corrections before a final Inventory Management Plan is approved. As part of the Inventory Management Plan review process, Partners will prepare for and participate in a one day on-site Inventory Management Plan review with EPA. Based on the projected number of new Partner organizations, EPA estimates that, on average, 35 Partners will complete a base year inventory each year.

In lieu of developing an Inventory Management Plan and going through the Inventory Management Plan review process and on-site visit, a Partner may opt to have a third party verify that their Inventory Management Plan meets the requirements of the Climate Leaders GHG inventory review. The third party verifier would provide a verification letter to EPA certifying that these requirements have been met. Given the costs of a third party review, this option is mostly reserved for Partners that are participating in other GHG reduction programs that require a third party review. EPA estimates that one new Partner per year over the next three year period will choose to use a third party verifier.

(iii) Annual GHG Inventory and Goal Tracking Form (Base Year). After completing its Inventory Management Plan, Partners must calculate and summarize their corporate-wide base year emissions on the Annual GHG Inventory Summary and Goal Tracking Form. EPA has provided detailed instructions and has allocated technical support hours to assist Partners in completing this form. Based on the projected number of new Partner organizations, EPA estimates that, on average, 35 new Partners will complete a base year inventory each year.

(iv) GHG Emissions Reduction Goal Setting. After successfully completing the base year inventory, Partners must work with EPA to set an aggressive GHG emissions reduction goal.

Partners must select the timeframe to reach the goal between five and 10 years from the base year reporting, as well as the format of the goal as either an absolute GHG reduction or as a decrease in GHG intensity. Once this goal is approved or negotiated with EPA, the Partner must enter this goal on its Annual GHG Inventory and Goal Tracking Form. Based on the projected number of new Partner organizations, EPA estimates that, on average, 35 new Partners will establish a GHG emission reduction goal each year.

(v) Annual GHG Inventory and Goal Tracking Form (Subsequent Year). For each year subsequent to the base year reporting, Partners will receive a pre-populated Annual GHG Inventory and Goal Tracking Form from EPA. Partners must update this form with the current year inventory reporting and make any corrections to the contact information or revised goal or base year information. EPA estimates that only those Partners who have completed all the one-time will be responsible for updating the annual GHG Inventory and Goal Tracking Form. Based on the projected number Partners, EPA estimates that, on average, 190 Partners will make updates to their subsequent year inventories each year.

(vi) Web Profile. After a Partner has completed its base year inventory and GHG emissions reduction goal, the Partner will complete a Web Profile form to help publicize its commitment to reducing emissions of GHGs. This Web Profile is a one-time burden and EPA expects that, on average, 35 new Partners will submit a Web profile to EPA each year.

(vii) Miscellaneous Activities. As needed, Partners may submit updated contact information or updates to the Web profile. These updates would notify EPA of a change such as a new Partner representative, address change, or update to Web profile information. EPA estimates that approximately 10 percent of Partners, or on average 20 Partners, will submit this update each year.

6(e) Bottom Line Hour and Cost Burden

(1) Respondent Tally

Exhibit 1 shows the aggregate annual hour and cost burden to respondents. As shown in the exhibit, EPA estimates the annual respondent burden to be 19,636 hours and \$1,847,721.

(2) Agency Tally

As is shown in Exhibit 2, the annual Agency hour and cost burden associated with all the requirements covered in this ICR is estimated to be 10,184 hours and \$1,008,190.

6(f) Reasons for Change in Burden

The previously approved ICR, ICR Number 2100.02, estimated the annual hourly burden for respondents to be 11,955 and the annual cost for respondents to be \$878,176. This renewal estimates the annual hourly burden for respondents to be 19,636 hours and the annual cost for respondents to be \$1,847,721.

This is a difference of 7,681 hours. There are several reasons for the increase in burden. First, the program has continued to grow since its inception; the original ICR had an average respondent base of 70 Partners over the 3-year ICR reporting period, compared to an average of 225 Partners reflected in this renewal ICR. Second, as a result of both an adjustment in the types of corporations joining the Partnership and program changes made to the reporting mechanisms, the size and scope of some of the Partner inventories and their associated Inventory Management Plans and Goal-setting processes are more complex and detailed in order to best suit the corporation's structure. The Partner consultations used in the revised ICR were able to gauge input from larger companies with more complex inventories that were not completed during the initial ICR. As a result, the initial ICR may have underestimated the burden. Third, as a result of discussions with corporate Partners, a program change modified several mechanisms of reporting including the types of inventory reporting forms and the process for outlining an Inventory Management Plan. Although these changes incur a higher burden up front, it is expected that these changes make a GHG inventory and emissions reduction goal more useful to the Partners and EPA. Climate Leaders Partners expect the modified reporting forms to reduce burden substantially in subsequent year inventories.

The annualized costs were overestimated in the original ICR and have been adjusted in this renewal. Since the inception of the Climate Leaders Partnership, it was found that the capital cost of the filing cabinet line item was not an accurate cost of the program, and it was removed from this renewal ICR. The only remaining annual cost is \$3 for each Partnership Agreement submitted by mail or facsimile, a total of \$105 for an estimated 35 new respondents per year.

The burden outlined below for the information collection envisioned under this ICR is necessary to help EPA determine that the Partners merit recognition as corporate leaders in GHG reduction and to determine whether Climate Leaders is achieving its goals under the

Administration's Climate Strategy. The activities undertaken by Partners in Climate Leaders are anticipated to offset some of this burden as Partners identify new emission reduction opportunities that result in savings to the company through, for example, enhanced energy efficiency or revenue from other GHG emissions reduction trading programs.

6(g) Burden Statement

Burden Statement: The annual public reporting and recordkeeping burden for this collection of information is estimated to be 87 hours per year per respondent. Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a docket for this ICR under Docket ID No. EPA-HQ-OAR-2002-0094, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West Building, Room 3334, 1301 Constitution Ave., NW, Washington, DC. The EPA/DC Public Reading Room is open from 8 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is 202-566-1744, and the telephone number for the Air and Radiation Docket Center is 202-566-1742.

An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can

send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. EPA-HQ-OAR-2002-0094 and OMB Control Number 2060-0532 in any correspondence.