

Supporting Statement for Paperwork Reduction Act Submissions
Electric Power Service Application, 25 CFR 175
OMB Control Number 1076-0021

Terms of Clearance: None.

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 collection of information.**

The Bureau of Indian Affairs (BIA) owns, operates, and maintains three electric power utilities that provide a service to the end user, pursuant to 25 CFR 175 (Indian Electric Power Utilities). The BIA must collect customer information to identify the individual responsible for repaying the government its costs for delivering the service and bill for those costs. The BIA must also collect information to identify the location of the service delivery (i.e., electrical hook-up). In addition, the Debt Collection Improvement Act of 1996 (DCIA), Public Law 104-134, requires that certain information be collected from individuals and businesses doing business with the government. This information includes the taxpayer identification number for possible future use to recover delinquent debt.

- 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.**

The individual Bureau power projects use the information from customers to identify the individual requesting electrical service, the site where electrical service is to be provided, the types of electrical service requested, and address to send bills.

- 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, and the basis for the decision for adopting this means of collection. Also describe any consideration of using information technology to reduce burden [and specifically how this collection meets GPEA requirements].**

Presently, the BIA program office is developing a system to allow BIA to view customer records via the Internet using secured access unique to the individual customer. Once completed, the system will be enhanced to allow the customers access to information related to their individual accounts. The BIA program office will also review whether the system will support electronic submissions. Once implemented, we expect the burden hours to be reduced for the public and BIA program personnel. The system will be enhanced and implemented following implementation of the new billing and

collection system, likely in the next two to three years.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The information collection is tied specifically to providing the electrical services that the public seeks at discrete locations. The individuals requesting electrical service do not provide this information to any other agency. No other sources can provide this information.

5. If the collection of information impacts small businesses or other small entities (Item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The information required is as minimal as possible. The information collection will not impact any small businesses or other small entity because the information is readily available to them and, in most cases, can probably be provided by recollection without referring to any documents.

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.

The consequences of non-collection would be lack of electrical service to the Indian and non-Indian customers served by the Bureau. In most cases the collection of information is a one-time effort when electrical service is initially applied for by an electrical service applicant; therefore, reducing the frequency of the collection is not possible.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

*** Requiring respondents to report information to the agency more often than quarterly;**

No reports are required of the respondent besides the agreement to start the service and to notify the bureau when service is to be terminated.

*** Requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**

Respondents are not required to prepare a written response in fewer than 30 days of receipt.

*** Requiring respondents to submit more than an original and two copies of any document;**

Respondents are not required to submit more than an original and two copies of any document.

- * **Requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
Respondents are not required to retain records. Each power project does mail each customer a monthly bill stating their power consumption and the total amount due. The bill is for their records, but there is no requirement that respondents maintain those records.
- * **In connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
This information collection does not include a statistical survey.
- * **Requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**
This information collection does not include a statistical data classification.
- * **That includes a pledge of confidentiality that is not supported by authority established in statute or 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; or**
This information collection does not include a pledge of confidentiality.
- * **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 only confidential information respondents must submit is a Taxpayer ID number, as required by the Debt Collection Improvement Act. BIA maintains the records containing this information in accordance with its Privacy Act System of Record Notice entitled Indian Electric Power Utilities--Interior, BIA-26.

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 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice [and in response to the PRA statement associated with the collection over the past three years] and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

Describe efforts to consult with persons outside the agency 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 reported.

A notice providing a 60-day comment period on this information collection was published in the Federal Register on May 19, 2009 (74 FR 23428). No comments were

received in response to this notice.

New users (customers) were provided a questionnaire after filling out the application form. None of the customers had any concerns with the availability of the data, the frequency of collection, or any data elements to be reported. None of those contacted wanted their names to be public. The program manager can be contacted to obtain the name and how to contact an irrigation user with the understanding that this must not be released to the public.

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

No payments or gifts are provided.

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

No assurance of confidentiality is provided to respondents; however, BIA maintains files containing their personally identifiable information in accordance with the Privacy Act System of Record Notice entitled Indian Electric Power Utilities--Interior, BIA-26.

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 the agency 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.

No questions of a sensitive nature are included in this collection.

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, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- * If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens in Item 13 of OMB Form 83-I.**

- * **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included in Item 14.**

We estimate that 3,000 new users submit information requesting electrical hook-up each year and that it takes ½ hour for the new users to provide the information. Each user will only need to provide the information once. Based on these figures, we estimate that the total annual hourly burden is 1,500 hours.

We estimate the salary of respondents at \$28.87 per hour*. Including a multiplier of 1.4 for benefits, the total salary of respondents is estimated to be \$40.18 per hour.

The total hour burden is therefore estimated to be \$60,270.

Users are not required to maintain records but may do so for business purposes. The information they submit is for the purpose of obtaining a benefit, namely electricity connection.

Public Burden						
Respondents, annually	Responses per respondent, annually	Hours per response	Total annual hour burden (respondents x responses x hours)	Cost per hour	Total cost burden (Total annual hour burden x cost per hour)	Start-up and O&M
3,000	1	0.5	1,500 (3,000 x 1 x 0.5)	\$40.18*	\$60,270 (\$40.18 x 1,500)	\$0

* BLS news release USDL: 08-1802, *Employer Costs for Employee Compensation*, December 10, 2008 (Table 1, All Workers – Total Compensation): <https://www.bls.gov/news.release/pdf/ecec.pdf>

13. Provide an estimate of the total annual [non-hour] cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden shown in Items 12 and 14).

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information [including filing fees paid]. Include descriptions of methods used to estimate major cost factors including system and**

technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.

- If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.
- * Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.

There are no non-hour or start-up costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information. Agencies also may aggregate cost estimates from Items 12, 13, and 14 in a single table.

The cost to the federal government assumes the collecting, recording and filing of information is performed by a GS-4 assistant. It is estimated that the assistant will be a GS 4, Step 5, with an hourly salary of \$13.12**. Including a multiplier of 1.5 for benefits results in a total salary cost of \$19.68. By law, the cost of providing this service by the federal government is recovered in the rates charged the consumers.

Federal Government Burden				
Submissions annually	Hours per submission	Cost per hour	Cost per submission (hours per submission x cost per hour)	Total cost burden (submissions x hours x cost per hour)
3,000	0.25	\$19.68**	\$4.92 (0.25 x \$19.68)	\$14,760 (3,000 x 0.25 x \$19.68)

**Salary Table 2009-GS, Effective January 2009.

<http://www.opm.gov/oca/09tables/pdf/gsh.pdf>

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

There is no program change or adjustment included in this request for approval.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No results will be published.

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

We will display the OMB Control Number and the expiration date.

18. Explain each exception to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

We are not seeking any exceptions.

B. Collections of Information Employing Statistical Methods.

The agency should be prepared to justify its decision not to use statistical methods in any case where such methods might reduce burden or improve accuracy of results. When Item 17 on the OMB Form 83-I is checked "Yes", the following documentation should be included in the Supporting Statement to the extent that it applies to the methods proposed:

No statistical methods are needed or used.