

United States Department of Energy
Supporting Statement
Reliability, Survivability and Resiliency (RSR) Project
OMB Control Number 1910-(NEW)

This supporting statement provides additional information regarding the Department of Energy (DOE) request for processing of the proposed information collection, Reliability, Survivability and Resiliency Project. 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 collection of information.**

ISER, as an office within DOE-Office of Electricity Delivery and Energy Reliability, is responsible for leading DOE's infrastructure and preparedness, planning, analysis, and operational efforts and for developing strategies, policy and plans to successfully execute Energy Sector responsibilities. Its mission is to lead the national effort to enhance energy infrastructure security and reliability. Infrastructure Security & Energy Restoration's (ISER) approach supports enhancing risk management decisions at all levels to ensure that critical infrastructure is available and that operational capabilities are in place to respond to and recover from major disasters. This effort in partnership with energy sector asset owners and operators contributes to the DOE led energy security partnership under the Department of Homeland Security's National Infrastructure Protection Plan in addressing the complex issues associated with energy reliability, survivability and resiliency.

The Infrastructure Security & Energy Restoration in conjunction with Department of Homeland Security/Federal Emergency Management Agency is also responsible for coordinating DOE's response to energy emergencies and for supporting the national homeland security policy, which requires DOE to secure energy infrastructure and assist State and local governments with energy assurance planning and preparing for disruptions response to disruptions.

Therefore, Infrastructure Security and Energy Restoration have the responsibility to address two needs: 1) Infrastructure analysis and planning and 2) Infrastructure operations and support.

This voluntary participation in collection of information is necessary in order for Department of Energy-Office of Electricity Delivery and Energy Reliability-Infrastructure Security and Energy Restoration to have the Energy Sector Information that impacts reliability, survivability and resiliency as a system.

The authority for this collection is provided in the following statutes:

Department of Energy Organization Act (DOE Act), 42 U.S.C. 7101 et seq., the Federal Power Act, 16 U.S.C.792 et seq. Section 1016(e) of the USA Patriot Act of 2001 (42 U.S.C. §5195c).

Homeland Security Presidential Directive/HSPD7

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 information collected will be used to determine where the Energy Sector potential areas of concern and possible choke points exist that may slow restoration and recovery from major energy disasters as it pertains to the energy sector as a system. Thus, the focus is on system issues impacting multiple energy assets. Supply chain issues impacting energy system recovery will be identified. Feedback to sector partners will encourage voluntary planning and responses to the issues identified through this project. This collection effort will allow comparative analysis by asset owners and operators to support emergency response planning and operational support requirements by utilizing a patented Scientific Assessment Technology (SAT®) that provides intelligent analysis.

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.

The collection of this information is submitted directly from industry through Virtual Private Network, electronically submitted to a secure lab for analysis. The project information will be collected electronically and there will be no paper copies and there is no energy site visits.

The questionnaire is dynamic and the same questions will not be asked of each site which fills it out. The questions that are asked are self-selecting based on answers to other questions in the questionnaire as well as “double-checking” previous answers to prevent the misrepresentation of information.

4. Describe efforts to identify duplication.

Although there have been several efforts to gather energy Critical Infrastructure/Key Resources (CIKR) information, particularly by agencies with regulatory responsibilities, this collection effort and capability will focus on the Energy Sector and will provide reliability, survivability and resiliency information that is analyzed for the energy sector as a system and provides critical information to DOE-OE ISER. This will be the only

effort that will provide an Executive Summary Report to industry that will contain company proprietary 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.

Within the energy sector, multiple industries will participate which may include small businesses that volunteer to participate. The amount of time to participate is limited and disruption to operations will not be significant due to the scientific technology utilized via a virtual private network, with no requirement to provide additional personnel on site. There is no requirement for record keeping or additional resources to participate. Site participants can start and stop as their schedule permits. The questionnaire does not have to be completed at one sitting.

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.

HSPD-7 directs the Department of Energy to “conduct or facilitate” assessments of the energy sector and the RSR project enables us to meet this responsibility in the most cost efficient manner. Additionally, the collection of this information supports the ISER Strategic Plan and goals for supporting a more resilient and reliable Energy Infrastructure. Without this information, DOE-OE ISER will be unable to have the analytical data for Energy Sector as a system which could impact decision making and emergency response planning.

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

There are none. The package is 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 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 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. Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every 3 years - even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.**

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 20, 2009, volume 74, number 96, and page number 23685. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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

No payment or gift to respondents is being proposed under this information collection.

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

Where confidential information is involved in an information collection, the provisions for dealing with this confidential information are set forth in the related Departmental regulations; these are the normal regulations for the handling of management and program information by the Department.

- 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 personally sensitive nature, such as sexual behavior and attitudes, religious beliefs included in this information collection.

- 12. Provide estimates of the hour burden of the collection of information.**

The estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 1500 sites industry wide (Individual energy sites such as petroleum refineries, storage facilities, pipelines, and generation facilities will be asked to take part in this data collection. The highest number of sites that could complete the questionnaire and have their responses analyzed over the three year approval period is 1,500)

Reports filed per person: 1 response per industry site participant

Total annual responses: 1500

Total annual burden hours: 30,000

Average Burden Per Collection: 20

Per Applicant: 20

The public/industry reporting burden for the collection of information is estimated to average 20 hours per response which includes time to coordinate with lab and assign Subject Matter Expert participants and includes time to complete the questionnaire. The 20 hour per response was an estimate that took into consideration time collecting the information and gathering the correct people to answer the questions. However, after completion of the pilot, the total average for the first seven facilities was 6.2 hours. The highest time was 7.1 hours and the lowest 4.9 hours.

13. Provide an estimate for the total annual 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).

There is no requirement for record keeping by participants.

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

There are no costs associated with this collection that will impact the Federal government.

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

This information collection is a new collection of information.

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

This package contains no collections whose results will be published for statistical use.

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.

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