

**Supporting Statement:  
Energy Efficiency and Conservation Block Grant Program  
OMB Control Number 1910-5150**

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

The Department of Energy (DOE) requires collection of information for the Energy Efficiency and Conservation Block Grant (EECBG) program as included in Funding Opportunity Announcement DE-FOA-0000013 Attachment C, the Energy Independence and Security Act of 2007 (P.L. 110-140), and the OMB requirements for (1) grant and financial administration, and (2) American Recovery and Reinvestment Act (ARRA) funds. DOE provides Federal financial assistance and technical support to states and local governments under Energy Independence and Security Act of 2007 (EISA). Information gathered provides current information required to respond to OMB, congressional and consumer requests and budget preparation.

EECBG is a brand new program that has \$3.2 billion under management to be expended by March 2012. Of the \$3.2B allocated to EECBG, \$2.7B has been apportioned to states, territories, tribes, and units of local government through a formula distribution based on population. These funds are intended to help expand local energy efficiency efforts and reduce energy use in the commercial, residential, transportation, manufacturing, or industrial sectors.

The remaining EECBG funds have been allocated via two competitive programs:

**\$390M: EECBG Competitive (Topic 1):** The Better Buildings Program (formerly Retrofit Rampup) which supports innovative programs that are structured to provide whole-neighborhood building energy retrofits. Twenty-five recipients have been awarded funding under EECBG Competitive (Topic 1).

**\$64M: EECBG Competitive (Topic 2):** The General Innovation Fund which supports cities, counties and State-recognized Indian Tribes that were not eligible to receive population-based formula grant allocations from DOE under the Energy Efficiency and Conservation Block Grant program. These funds are intended to help expand local energy efficiency efforts and reduce energy use in the commercial, residential, transportation, manufacturing, or industrial sectors. Twenty recipients have been awarded funding under EECBG Competitive (Topic 1).

For the purposes of administration, (10) EECBG Competitive (Topic 2) recipients will be administered by the Building Technologies Program in conjunction with the EECBG Competitive (Topic 1) in the Better Buildings program. The remaining (10) EECBG Competitive (Topic 2) recipients will be administered by the Weatherization and Intergovernmental Program. As such, some EECBG Competitive (Topic 2) recipients will report pursuant to the requirements of the Building Technologies Program while the remainder will report pursuant to the requirements of the Weatherization and

Intergovernmental Program. The distinction in reporting burden for Topic 2 recipients is made clearly in the responses below.

Many of the grant recipients are unfamiliar with the provisions surrounding the expenditure of federal funds and the vast majority does not have a pre-existing professional relationship with DOE. The size and pace of EECBG program execution create an urgent need for DOE to collect certain information on a monthly basis in order to adequately monitor, report, and ensure transparency and accountability.

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

The information collected is used by program staff to track the recipients' activities, their progress in achieving scheduled milestones, and funds expended (including expenditure rates). The information also enables program staff to provide required or requested information on program activities to OMB, Congress and the public.

The BetterBuildings program is funding numerous test-pilots to understand what works and what doesn't work in bringing effective energy efficiency programs to scale. Therefore, the BetterBuildings program will use this data to roughly identify best practices and lessons learned on a continuous basis to improve program management. These results are not final and are part of a larger, more robust, retrospective evaluation to be conducted near the end of the program.

## **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.**

All EECBG Formula recipients and the (10) EECBG Competitive (Topic 2) recipients administered by the Weatherization and Intergovernmental Program will report through the online database Performance and Accountability for Grants in Energy (PAGE). PAGE allows DOE to administer the EECBG grants on line and provides all network users access to current program records. PAGE reduces data redundancy and paperwork and provides the universal, complementary data collection to showing the positive results of the program. All records entered or updated are forwarded to a national database at DOE Headquarters. Information also is downloaded into the Department of Energy's integrated standard core accounting system (STRIPES). This allows the contracting officers to sign and send awards to states electronically.

EECBG Competitive (Topic 1) and (10) EECBG Competitive (Topic 2) recipients will report information into a comparable online database currently under development by DOE. The collection of the Better Buildings information has been standardized to provide reporting of program, utility, and financial information to the Better Buildings Information System (BBIS) on an automated basis. A standardized excel worksheet and web portal will be provided to grantees to be uploaded onto a website if the grant recipient is incapable of connecting to BBIS.

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

EECBG is a newly established program authorized by the Energy Independence and Security Act of 2007 (P.L. 110-140), funded through ARRA, and administered by DOE. The information collected from EECBG recipients by DOE is generally a unique collection and is focused on four primary categories of information: jobs, financial expenditures, process metrics, and impact metrics. A few of the data fields under the jobs and financial expenditures categories either directly or indirectly correspond to fields requested of EECBG recipients by the Office of Management and Budget to fulfill the ARRA Section 1512 reporting requirements. For these fields, DOE has developed an export feature PAGE to provide the overlapping data fields and minimize duplication.

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

Small businesses are not impacted by these requirements. Small local governments and tribal entities are subject to the reporting requirements. While the web-based system should not pose a problem for the local governments, certain tribal entities may have technical difficulties. DOE will provide technical assistance to these tribal entities and has worked closely with their tribal councils and the Bureau of Indian Affairs to ensure that they can comply and will not be penalized for delays due to any technical difficulties they experience.

**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.**

All programs funded through ARRA will be subject to increased attention and scrutiny from OMB, Congress, the media and the public. If this information is not collected, DOE will not be able to provide reports to OMB or respond to requests for information on ARRA-funded activities and expenditures. If the information is collected less frequently, DOE will not be able to track activities and funds status as closely as necessary, and timely information will not be available to OMB, the White House, Congress and the public. Frequent reporting will also allow any problems, barriers or system bottlenecks to be identified and dealt with right away.

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

There are none. The information collection is being conducted in a manner that 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 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 comments. Specifically**

**address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE.**

As published in the Federal Register on July 14<sup>th</sup>, 2010 (Vol. 75, No. 134 pp. 40796), DOE provided a 60-day public comment period on Energy Efficiency and Conservation Block Grant (EECBG) Formula program reporting guidance for formula grant recipients.

DOE received six comments during the 60-day public comments period from units of state and local government. All comments expressed an opinion that the reporting burden represented by the reporting guidance was undue, particular the requirement to report information on a monthly basis.

In response, DOE has significantly reduced the monthly reporting requirements for EECBG recipients with formula allocations >\$2M and will require only the report of outlays at the project activity level.

As published in the Federal Register on September 29<sup>th</sup>, 2010 (Vol. 75, No. 188 pp. 60094), DOE provided a 30-day public comment period on Energy Efficiency and Conservation Block Grant (EECBG) Formula, EECBG Competitive (Topic 2), and BetterBuildings program reporting guidance for formula grant recipients. The 30-day Federal Register notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

DOE has engaged in weekly telephone conferences with a number of stakeholder organizations since February 2010 to discuss a host of issues regarding EECBG, including quarterly and monthly reporting requirements.

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

No payment or gift has been or will be provided to respondents.

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

No identifiable confidential information is being requested, however grant recipients may collect some forms of confidential information for their own purposes

Regarding BetterBuildings, DOE would direct grantees, and their subawardees, to keep all confidential information regarding individual and household energy usage collected that identifies an individual by name or other linked or linkable identifying particular from being released. DOE is also looking to provide similar protections to that established in the WAP regulations.

**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.**

No questions of a sensitive, personal or private nature are being asked.

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

EECBG Formula

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Monthly Reporting burden

The 291 EECBG Grantees with formula allocations >\$2M are required to report monthly. It is estimated that the directly funded local communities, tribal nations, and state governments will spend one hour preparing each report.

- (1) 291 grantees x 1 hour = 291 hours per reporting period;
- (2) 291 hours x 8 monthly reports = 2,328 hours annually

Quarterly Reporting burden

Of the 2359 EECBG Grantees required to report quarterly, 56 are state governments. States may require more time, since they are aggregating information from their small local communities. The estimated time required for preparation of a state's quarterly report is seventeen hours.

- (1) 50 states, 5 territories and DC = 56 grantees;
- (2) 56 grantees x 17 hours = 952 hours per reporting period;
- (3) 952 hours x 4 quarters = 3,808 hours annually

2303 EECBG Grantees (outside of state governments) required to report quarterly. The estimated time required for preparation of these reports is eleven hours.

- (1) 2303 grantees x 11 hours = 25,333 hours per reporting period
- (2) 25,333 hours x 4 quarters = 101,332 hours annually

EECBG Formula reporting burden summary:

- (1) Monthly reports= 2,328 hours
- (2) Quarterly reports= 105,140 hours

**EECBG Formula subtotal: 107,468 hours annually**

It should be noted that while the state and PMC staff reporting burden should remain fairly constant over the 3 years of ARRA fund expenditures, that of the local governments and tribal nations will not. Many local government/tribal projects will be completed within one year, and so will not be reported on in subsequent years.

Better Buildings: EECBG Competitive (Topic 1) & EECBG Competitive (Topic 2)

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Programmatic Data

- *One Time Reporting Burden*

The 35 Better Buildings grantees are required to report a small amount of data once during the life of the grant. It is estimated the grantees will spend six hours collecting this information.

- (1) 35 grantees x 6 collection hours = 210 hours over the life of the grant;
- (2) 210 collection hours x 1 report = 210 hours over the life of the grant;

Better Buildings will request, but will not require, a certain amount of programmatic information once during the life of the grant. Submitting this information is voluntary on the part of the grantees. It is estimated that roughly a quarter, 9 of the 35 grantees, will report this information. It is estimated that collection of the voluntary one time information will take nine hours.

- (1) 9 grantees x 9 collection hours = 81 hours over the life of the grant;
- (2) 81 collection hours x 1 report = 81 hours over the life of the grant;

It is estimated that transmission of this one time programmatic data to DOE via the electronic information system will take fifteen minutes.

- (1) 35 grantees x .25 transmission hours = 8.75 hours over the life of the grant;
- (2) 8.75 transmission hours x 1 transmission = 8.75 hours over the life of the grant

#### Programmatic One-Time Reporting Burden

= 210 mandatory + 81 voluntary + 8.75 transmission hours = 299.75 reporting hours

Programmatic one-time reporting subtotal: 299.75 hours annually

- *Monthly Reporting Burden*

The 35 Better Buildings grantees are required to report a small amount programmatic data monthly. It is estimated that the grantees will spend one hour collecting this information. There is no voluntary programmatic data requested on a monthly basis.

- (1) 35 grantees x .25 hours = 8.75 hours per reporting period;
- (2) 8.75 hours x 12 monthly reports = 105 collection hours annually

It is estimated that transmission of this monthly programmatic data to DOE will take fifteen minutes

- (3) 35 grantees x .25 transmission hours = 8.75 hours per reporting period
- (4) 8.75 transmission hours x 12 transmissions = 105 hours annually

#### Programmatic Monthly Reporting Burden =

105 collection hours + 105 transmission hours = 210 reporting hours

Programmatic monthly reporting subtotal: 210 hours annually

- *Quarterly Reporting Burden*  
*Mandatory*

The 35 Better Buildings grantees are required to report a larger amount of programmatic data quarterly. The estimated time for collection of the quarterly information is eight hours.

- (1) 35 grantees x 8 collection hours = 280 hours per reporting period;

(2)  $280 \text{ collection hours} \times 4 \text{ reports} = 1120 \text{ collection hours annually};$

*Voluntary*

DOE will request, but will not require, a certain amount of programmatic information quarterly. Submitting this information is voluntary on the part of the grantees. It is estimated that roughly a quarter, 9 of the 35 grantees, will report this information. It is estimated that collection of the voluntary one time information will take four hours.

(1)  $9 \text{ grantees} \times 4 \text{ collection hours} = 36 \text{ collection hours per reporting period};$

(2)  $36 \text{ collection hours} \times 4 \text{ reports} = 144 \text{ collection hours annually};$

*Quarterly transmission*

The estimated time for transmission of this information to DOE is fifteen minutes.

(1)  $35 \text{ grantees} \times .25 \text{ transmission hours} = 8.75 \text{ hours per reporting period};$

(2)  $8.75 \text{ transmission hours} \times 4 \text{ transmission} = 35 \text{ transmission hours annually}$

*Programmatic Quarterly Reporting Burden*

$= 1120 \text{ mandatory} + 144 \text{ voluntary} + 35 \text{ transmission hours} = 1299 \text{ reporting hours}$

Programmatic quarterly reporting subtotal: 1,299 hours annually

Programmatic reporting subtotal: 1,808.75 hours annually

Individual Retrofit Data

• *One Time Reporting Burden*

The 35 Better Buildings grantees are required to report a small amount of data once during the life of the grant (3 years) for each retrofit. The following calculations assume 66,700 retrofits annually. It is estimated the grantees will spend fifteen minutes collecting this information.

(1)  $66,700 \text{ retrofits} \times .25 \text{ collection hours} = 16,675 \text{ over the life of the grant}$

(2)  $16,675 \text{ collection hours} \times 1 \text{ report} = 16,675 \text{ annual}$

It is estimated that transmission of this one time programmatic data to DOE will take fifteen minutes.

(1)  $35 \text{ grantees} \times .25 \text{ transmission hours} = 8.75 \text{ hours over the life of the grant};$

(2)  $8.75 \text{ transmission hours} \times 1 \text{ transmission} = 8.75 \text{ hours over the life of the grant}$

*Individual retrofit one-time reporting burden*

$= 16,675 \text{ collection hours} + 8.75 \text{ transmission hours} = 16,683.75 \text{ reporting hours}$

Individual retrofit one-time reporting subtotal: 16,683.75 hours annually

- *Quarterly Reporting Burden*  
*Mandatory*

The 35 Better Buildings grantees are required to report a larger amount of individual retrofit data quarterly. The estimated time for collection of the mandatory quarterly information is fifteen minutes.

- (1)  $16,675 \text{ retrofits} \times .25 \text{ collection hour} = 4168.75 \text{ hours per reporting period};$
- (2)  $4168.75 \text{ collection hours} \times 4 \text{ reports} = 16,675 \text{ collection hours annually};$

*Voluntary*

DOE will request, but will not require, a certain amount of individual retrofit information quarterly. Submitting this information is voluntary on the part of the grantees. It is estimated that roughly a quarter, 9 of the 35 grantees, accounting for 7,411 retrofits annually will report this information. It is estimated that collection of the voluntary quarterly information will take fifteen minutes.

- (1)  $7,411 \text{ retrofits} \times .25 \text{ collection hours} = 1852.75 \text{ collection hours per reporting period};$
- (2)  $1852.75 \text{ collection hours} \times 4 \text{ reports} = 7,411 \text{ collection hours annually};$

The estimated time for transmission of this information to DOE is fifteen minutes.

- (1)  $35 \text{ grantees} \times .25 \text{ transmission hours} = 8.75 \text{ hours per reporting period};$
- (2)  $8.75 \text{ transmission hours} \times 4 \text{ transmission} = 35 \text{ transmission hours annually}$

Individual retrofit quarterly reporting burden

=  $16,675 \text{ mandatory hours} + 7,411 \text{ voluntary hours} + 35 \text{ transmission hours} = 24,121 \text{ reporting hours}$

Individual retrofit quarterly reporting subtotal: 24,121 hours annually

Individual retrofit reporting subtotal: 40,804.75

Financial Data

Financial data is only expected to be reported quarterly. This data is already collected by Financial Institutions.

The estimated time for transmission of this information to DOE is fifteen minutes.

- (1)  $35 \text{ grantees} \times .25 \text{ transmission hours} = 8.75 \text{ hours per reporting period};$
- (2)  $8.75 \text{ transmission hours} \times 4 \text{ transmission} = 35 \text{ transmission hours annually}$

Financial data quarterly transmission burden = 35 transmission hours

Financial data transmission subtotal: 35 hours annually

Program Management

Better Buildings staff will be connecting with grantees and grantee partners monthly to discuss program management activities and any concerns or complications that arise



regarding the implementation of the program. It is estimated that grantees and their partners will spend fifty hours a year, roughly four hours a month, discussing program management activities with Better Buildings staff.

- (1) 105 grantees/partners x 4 hours = 420 hours per reporting period;
- (2) 420 hours x 12 months = 5040 reporting hours annually

Program management monthly reporting hours = 5,040 reporting hours  
Program management reporting subtotal: 5,040 hours annually

Better Buildings reporting burden summary:

(1) Programmatic reports =	1,808.75	hours annually
(2) Individual retrofit reports =	40,804.75	hours annually
(3) Financial Data reports =	35	hours annually
(4) Program Management reporting =	5,040	hours annually

**Better Buildings subtotal: 47,688.5 hours annually**

#### EECBG Competitive (Topic 2)

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The (10) EECBG Competitive (Topic 2) recipients administered by the Weatherization and Intergovernmental Program will only be required to submit a quarterly report.

#### Quarterly Reporting burden

The estimated time required for preparation of an EECBG Competitive recipient's quarterly report is two hours.

- (1) 10 grantees x 2 hours = 20 hours per reporting period;
- (2) 20 hours x 4 quarters = 80 hours annually

**EECBG Competitive (Topic 2) subtotal: 80 hours annually**

#### EECBG Total

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EECBG Formula subtotal:	107,468 hours annually
Better Buildings subtotal:	47,688.5 hours annually
<u>EECBG Competitive (Topic 2) subtotal:</u>	<u>80 hours annually</u>
EECBG total:	155,237 hours annually

Total number of unduplicated respondents:

Reports filed per person: 2404

Total annual responses: 12504

Total annual burden hours: 155,237

Average Burden

Per Collection: 12.4 hours

Per Applicants: 64.3 hours

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

EECBG Formula

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1) Local governments and tribe cost burden	
a) Monthly reports: 235 entities x 8 reports x 1 hour/report=	1,880 hours
b) Quarterly reports: 2303 entities x 4 reports x 11 hours/report=	101,332 hours
c) 103,212 hours (1,880 + 101,332) x \$30/hour=	\$3,096,360
2) State government burden	
a) Monthly reports: 56 entities x 8 reports x 1 hour/report=	448 hours
b) Quarterly reports: 56 entities x 4 reports x 17 hours/report=	3,808 hours
c) 4,256 hours (448 + 3,808) x \$40/hour=	\$170,240
Total EECBG Formula cost burden=	\$3,266,600

Better Buildings: EECBG Competitive (Topic 1) & EECBG Competitive (Topic 2)

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*Assuming \$30/hr for local government costs (28 grantees) and \$40/hr for state government costs (7 grantees), grantee costs average \$32/hr*

*Programmatic Data Reports*

- a) One time reports: 299.75 reporting hours annually
- b) Monthly reports: 210 reporting hours annually
- c) Quarterly reports: 1299 reporting hours annually

Cost burden for Programmatic Data Reports  
= 1808.75 (299.75 + 210 + 1299) x \$32/hour = \$57,880

*Individual Retrofit Data Reports*

- a) One time reports: 16,683.75 reporting hours annually
- b) Quarterly reports: 24,121 reporting hours annually

Cost burden for Individual Retrofit Data Reports  
= 40,804.75 (16,683.75 + 24,121) x \$32/hour = \$1,305,752

*Financial Data Reports*

- a) Quarterly reports: 35 reporting hours annually

Cost burden for Financial Data Reports  
= 35x \$32/hour = \$1,120

*Program Management*

- a) Monthly reports: 5,040 reporting hours annually

Total BetterBuildings cost burden for Financial Data Reports  
= 5,040 x \$32/hour = \$161,280

Total Better Buildings cost burden= \$1,526,032

EECBG Competitive (Topic 2)

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Cost burden for quarterly reports  
=10 recipients x 2 hours/report x \$40/hour x 4 quarters = \$3200

Total EECBG Competitive (Topic 2) cost burden= \$3,200

EECBG Formula=	\$3,266,600
Better Buildings=	\$1,526,032
<u>EECBG Competitive (Topic 2)=</u>	<u>\$3,200</u>
EECBG Total	\$4,795,832

Per the EECBG (Formula & Competitive) Funding Opportunity Announcement:

State applicants may expend for payment of reasonable administrative and planning costs not more than 10 percent of amounts provided under the program including the cost of reporting.

For local governments & tribes: Up to 10 percent or \$75,000, whichever is greater, of grant funds may be used for administrative expenses, excluding the cost of meeting the reporting requirements of the Program. Administrative costs are the allowable, reasonable, and allocable direct and indirect costs related to overall management of the awarded grant.

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

There are no additional costs to the federal government resulting from this collection.

**15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of OMB form 83-1.**

The emergency ICR concluded on March 4, 2010 contemplated only the additional burden represented by the implementation of monthly reporting for EECBG grantees >\$2M. As such, the inventory of 42,168 hours was in error. Properly calculated (including an increased monthly burden for process metrics), the burden was 130,796 hours. The reduction in metrics for monthly and quarterly reporting leads, along with a minor program change to 291 EECBG recipients >\$2M (vice 294), to a reduction of 23,328 hours to an inventory of 107,468 hours for EECBG Formula recipients only.

In addition to difference in cost burden driven by differences in the hour burden estimate, the emergency ICR incorrectly included the monetized reporting burden placed upon state and local governments. DOE estimates that state and local governments will be able to meet their reporting requirements within the administrative limit set forth in the FOA and as such an additional cost burden was not assessed to state and local governments.

Furthermore, the PMCs will not be required to review monthly reports and as such a cost will not be incurred from review of monthly reports.

Finally, the emergency ICR did not contemplate the addition of EECBG Competitive recipient reporting, as these awards were not made until June 2010. Extensive recipient engagement, particularly in the case of Better Buildings, was conducted in development of the reporting requirements.

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

The EECBG Formula and EECBG Competitive (Topic 2) programs have no plans to publish the results of this information collection request.

The Better Buildings program plans on publishing the results of this information request to grantees, and some forms of data to financial lending institutions and the research community.

- Grantees will receive information in the form of continuous improvement reports outlining roughly identified best practices and lessons learned for implementing energy efficiency retrofits in communities. These reports will enhance efficiency and effectiveness of program management. More robust results will be determined through the retrospective evaluation that will be conducted near the end of the program.
- The financial and research communities will have access to energy and financial data, scrubbed, masked, and top-coded of any personal information to reduce the ability to reverse-engineer identities. BetterBuildings has received guidance from data.gov and will continue to refer to them as needed to take necessary precautions in sharing any form of this data.

Access to this data will:

- Enable financial institutions to quantify lending risks, incorporate energy savings into underwriting criteria, and develop future efficiency financing products.
- Prompt the research community to design and conduct their own analyses and to draw their own conclusions on the economic and environmental viability of energy efficient retrofits.

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

DOE is not seeking approval not to display expiration date.

**18. Explain each exception to the certification statement identified in item 19 of OMB form 83-1.**

There are no exceptions are being requested.