

SUPPORTING STATEMENT FOR COAL SURVEY FORMS
(EIA-1, 3, 4, 5, 6Q, 7A, 8A and 20)
OMB number 1905-0167?

Request is made for a three-year extension with revisions for the Energy Information Administration (EIA) Coal Program:

X	EIA-1	"Weekly Coal Monitoring Report - General Industries and Blast Furnaces" (Standby)
X	EIA-3	"Quarterly Coal Consumption and Quality Report – Manufacturing and Transformation/Processing Coal Plants and Commercial and Institutional Coal Users”
X	EIA-4	"Weekly Coal Monitoring Report - Coke Plants" (Standby)
X	EIA-5	"Quarterly Coal Consumption and Quality Report – Coke Plants"
X	EIA-6Q	"Quarterly Coal Report" (Standby)
X	EIA-7A	"Coal Production and Preparation Report"
X	EIA-8A	“Coal Stocks Report – Annual”
X	EIA-20	"Weekly Telephone Survey of Coal Burning Utilities and Independent Power Producers” (Standby)

Changes proposed for the Forms EIA-3, EIA-5, EIA-7A and EIA-8A are described in the following sections. No changes are proposed for the remaining surveys in the Package (EIA-1, EIA-4, EIA-6Q and EIA-20). Copies of the forms and instructions are included in Appendix A.

Form EIA-3 (Quarterly Coal Consumption and Quality Report – Manufacturing and Transformation/Processing Coal Plants and Commercial and Institutional Coal Users)

EIA proposes to make several changes to the Form EIA-3 survey and instructions. The proposed changes are to obtain additional information about the facility, including county, and additional information about the details of the coal origins including U.S. Department of Labor’s Mine Safety and Health Administration (MSHA) ID and the costs of the coal receipts.

EIA proposes to make the data on the survey form publicly available except for the data element “Total Cost of Coal Received During the Quarter on a C.I.F. Basis (dollars)” in Section II, item F, and “Commodity Cost” in Section VI, item J.

EIA proposes to make additional minor revisions to the EIA-3 instructions and definitions to provide respondents detailed information on the additional data elements and to clarify existing data elements and instructions.

Form EIA-5 (Quarterly Coal Consumption and Quality Report – Coke Plants)

EIA proposes to make changes to the Form EIA-5 survey form and instructions. The proposed changes are to obtain additional information about the details of the coal plants, including county, additional information about the details of the coal origins including MSHA ID and the costs of the coal receipts.

EIA proposes to make the data on the survey form publicly available except for the data element “Total Cost of Coal Received During the Quarter on a C.I.F. Basis (dollars)” in Section II, item F, “Total Revenues from Commercial Sales” of coke and breeze in Section III, item I and “Commodity Cost” Section IV, item K.

EIA proposes to make additional minor revisions to the EIA-5 instructions and definitions to provide respondents detailed information on the additional data elements and to clarify existing data elements and instructions.

Form EIA-7A (Coal Production Report)

EIA proposes to make changes to the Form EIA-7A survey form and instructions. The proposed changes are to obtain additional information about the coal preparation, coal stocks at remote locations, and exports of coal. EIA also proposes to raise the threshold on the amount of coal mined during the year that is the basis of the requirement for a mine to complete the survey. Increasing the threshold will result in fewer respondents to the Form EIA-7A.

EIA proposes to make the data on the survey form publicly available except for the data element “Total Revenue or Value (dollars)” from open market sales (excluding exports), from captive market sales, and from exports of coal, each in Section V.

EIA proposes to make additional minor revisions to the EIA-7A instructions and definitions to provide respondents detailed information on the additional data elements and to clarify existing data elements and instructions.

Form EIA-8A (Coal Stocks Report)

EIA proposes to make changes to the Form EIA-8A survey form and instructions. The proposed changes are to obtain additional detailed information on the specific origin of the coal stocks. EIA also proposes to collect data on the coal exported by coal brokers including the amount of coal exports; the State of origin of the coal exports; the rank of the coal exports; and the total revenue associated with the coal exports.

EIA proposes to make the data on the survey form publicly available except for the “Total Revenue of Coal Exports”, in Section III, item J.

EIA proposes to make additional minor revisions to the EIA-8A instructions and definitions to provide respondents detailed information on the additional data elements and to clarify existing data elements and instructions.

Justification

1. Legal Authority

The following provisions provide the authority for these mandatory data collections:

Section 13(b), 15 U.S.C., Section 772(b), of the Federal Energy Administration Act of 1974 (FEAA) Public Law 93-275 states:

"All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the [Secretary] such information and periodic reports, records, documents, and other data relating to the purposes of this Act, including full identification of all data and projections as to source, time, and methodology of development, as the [Secretary] may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under the Act."

The functions of the Secretary are set forth in Section 5(b), 15 U.S.C., Section 764(b), of the FEAA, which states that the Secretary shall, to the extent he is authorized by Section 5(a) of the FEAA ... "

(2) assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public; ...

(9) collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data; ...

(12) perform such other functions as may be prescribed by law."

As the authority for invoking Section 5(b) above Section 5(a), 15 U.S.C., Section 764(a), of the FEAA in turn states:

"Subject to the provisions and procedures set forth in this Act, the [Secretary] shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions --

(1) specifically transferred to or vested in him by or pursuant to this Act; ...

(3) otherwise specifically vested in the [Secretary] by the Congress."

Authority for invoking Section 5(a) of the FEAA is provided by section 52, 15 U.S.C., Section 790a, of the FEAA, which states that the Administrator of the EIA:

"...[Shall] establish a National Energy Information System...[which] shall contain such information as is required to provide a description of energy supply and consumption...

(b) ...the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, ... and such energy information as is required to define and permit analysis of--

(1) the institutional structure of the energy supply system including patterns of ownership and control of mineral fuel... energy resources and the production, distribution, and marketing of mineral fuels and electricity;

(2) the consumption of mineral fuels, non-mineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;

(3) the sensitivity of energy resource reserves, exploration , development, production, transportation , and consumption to economic factors, environmental constraints, technological improvements, and substitutability of alternate energy sources...

(5) industrial, labor, and regional impacts of changes in patterns of energy supply and consumption."

2. Needs for and Uses of the Data

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EIA coal data and analyses are used by Congress, Federal agencies, and State and local governments to reach decisions on national and local policies and a variety of important coal-related issues, including energy development and use, environmental protection, domestic welfare, and the health of the coal industry. EIA provides information essential to Presidential and Congressional commissions dealing with Federal coal leasing actions, assessing coal mine safety and health issues, and evaluating the potential for the DOE Clean Coal Technology program. EIA coal data are used for conducting nonutility power producer growth analysis, evaluating electric utility responses to the Clean Air Act Amendments of 1990, determining appropriate changes to surface mining regulations, estimating Black Lung tax revenues, estimating coal export potential, and assessing transportation capabilities and rates.

Principal Federal users include the Departments of Energy, Interior, Labor, Commerce, Agriculture and Transportation, as well as the U.S. Army Corps of Engineers, the Environmental Protection Agency, and the Federal Reserve Board.

Within DOE, coal data are widely used for policy analysis, economic modeling, forecasting, coal supply and demand studies, and in guiding research and development programs.

Numerous Congressional committees, particularly those dealing with energy, the environment, public lands, health and safety, commerce, transportation, water resources, research and development, the Federal budget, and taxes need detailed coal supply and disposition data. Legislative analyses conducted by the Congressional Research Service of the Library of Congress also require reliable and comprehensive coal industry information.

Typical of some of the regional and State agencies that use EIA coal data and statistics for economic and energy supply and demand analyses are: the Geological Survey of Alabama; the Kentucky Department of Mines and Minerals; the New Jersey Energy Department; the New York State Energy Office; the Southern Governors' Association; the Utah Energy Office; the Virginia Department of Mines, Minerals and Energy Administration; the West Virginia Department of Energy; New Mexico Energy, Minerals and Natural Resources Department; Kentucky Governor's Office for Coal and Energy Policy; and Pennsylvania State University.

Trade associations also depend upon EIA coal data for economic, regulatory, and legislative analyses. Included in this group are: the Association of American Railroads, the Edison Electric Institute, the Indiana Coal Association, the Mining and Reclamation Council of America, the National Mining Association, the Mississippi Valley Coal Exporters Council, the West Virginia Coal Association and the Wyoming Mining Association.

Additional users of EIA data are coal producers and distributors, coal-consuming companies, financial/analytic service firms, publishing organizations, the media (electronic and printed), transportation companies, law firms, academic researchers, and coal labor unions, all of

which employ coal data for economic, financial, technical, and market analyses. EIA data also are used in provisions that support commercial contracts and labor agreements. EIA coal data was used in a research study by Stanford University in 2010 on the effect of unionization on coal mine safety. In 2009, the National Institute of Occupational Safety and Health began using EIA coal data and Mining Safety and Health Administration data as inputs to develop a model that generates predictions on mines that pose the highest statistical risk of serious injuries and fatalities.

EIA provides the only comprehensive data on coal production, distribution, and consumption in the United States. EIA coal data are presented in numerous publications including the following reports published by agencies of the U.S. Government:

- o Annual Energy Outlook (EIA)
- o Annual Energy Review (EIA)
- o Annual Coal Distribution Report (EIA)
- o Annual Coal Report (EIA)
- o Industrial Production Report (monthly, Federal Reserve Board)
- o Monthly Energy Review (EIA)
- o Productivity Measures for Selected Industries
(annual, Bureau of Labor Statistics, Department of Labor)
- o Quarterly Coal Distribution Report (EIA)
- o Quarterly Coal Report (EIA)
- o Short-Term Energy Outlook (monthly, EIA)
- o Statistical Abstract of the United States (annual,
Bureau of the Census, U.S. Department of Commerce)
- o Weekly Coal Production (EIA).

EIA coal data are an integral part of international statistical reports on energy and are included in:

- o Coal Information, annual report published by the International Energy Agency
- o Energy Statistics of OECD Countries, annual report published by the Organization for Economic Cooperation and Development.

EIA coal data also provide the foundation for the development of the EIA's short- and long-term forecasts of coal supply and demand in domestic and world markets. The results of these forecasts are contained in numerous EIA publications, including:

- o Short-Term Energy Outlook (monthly, EIA)
- o Annual Energy Outlook (EIA).

The EIA models which use these data directly include:

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- o National Energy Modeling System (NEMS), Coal Market Module,
- o Short-Term Integrated Forecasting System (STIFS).

Much of EIA's coal data are available on the World Wide Web.

3. Use of Improved Technology to Reduce Respondent Burden

EIA continues to use information technology to improve reporting options to all coal survey respondents by making all survey forms and instructions available for download and printing from the EIA website. All respondents are encouraged to provide email addresses to facilitate and expedite communications.

EIA has implemented an Internet Data Collection system for Forms EIA-3, EIA-5 and EIA-7A. The Form EIA-8A currently uses a secure file transfer (SFT) technology and may be incorporated into the Internet Data Collection (IDC) system in the future. Reduced burden will occur because electronic submission reduces the time required to fill out the form and to correct edits, as the IDC has an edit function within its system, and it eliminates the respondent processing steps associated with sending the paper forms back to EIA by mail.

4a. Efforts to Identify Data Duplication

As part of a continuing effort to avoid data duplication, the EIA routinely reviews and evaluates coal industry information available from a variety of sources, including other Federal agencies, industry trade associations, State governments, and commercial information services, to identify instances of duplication. Additionally, in the public notices and consultations associated with the triennial re-clearance of the Coal Program Package, the EIA specifically encourages respondents and data users to identify alternate sources of the coal information the EIA proposes to collect.

Instances of potential data duplication identified by the EIA are evaluated in terms of data coverage, level of aggregation, frequency of collection, data reliability, and statutory requirements to determine whether alternate data sources represent a suitable substitute for EIA data.

4b. Why Similar Existing Information Cannot Be Used

The EIA has identified potential areas of duplication among Federal forms collecting coal production and related data, specifically the Form EIA-7A, "Coal Production Report," the MSHA Form 7000-2, "Quarterly Mine Employment and Coal Production Report," the Form OSM-1, "Production and Reclamation Fee Report," the Minerals Management Service's Form MMS-

4293, Product Valuation and Associated Allowances - Coal" and the Department of Justice's Form ATR-139, "Federal Coal Lease Review."

To make data collection and processing more efficient, EIA works closely with MSHA in a cooperative program aimed at reducing redundant work. MSHA runs a data survey to collect coal production and employment information used by both MSHA and EIA. For its part, EIA applies quality checks to the data before it is released. Consequently, EIA does not collect coal production and employment data on Form EIA-7A. The other data collected by EIA on Form EIA-7A is not duplicated on the MSHA and OSM surveys.

EIA's Manufacturing Energy Consumption Survey collects some similar information to the EIA-3, but it is conducted only every four years. To provide timely data EIA conducts the EIA-3 quarterly.

5. Provisions for Reducing Burden on Small Businesses

The EIA recognizes the need to minimize the reporting burden on small businesses and designs data surveys so that small operations are not unduly affected. Additionally, the EIA has established reporting thresholds for surveys likely to affect small businesses. These thresholds either eliminate the reporting requirement for small businesses or limit the amount of information they are asked to supply.

Reporting on the Form EIA-3, " Quarterly Coal Consumption and Quality Report – Manufacturing and Transformation/Processing Coal Plants and Commercial and Institutional Coal Users," is limited to manufacturing facilities including coal transformation plants, commercial entities and institutional entities consuming more than 1,000 short tons of coal annually.

All companies operating coke plants within the United States must submit Form EIA-5.

EIA is proposing to raise the reporting threshold on the Form EIA-7A "Coal Production and Preparation Report ." Reporting on the Form EIA-7A is required for all coal mines (except those producing anthracite) that produced 25,000 or more short tons of coal during the report year, and other coal facilities that worked 5,000 hours or more during the report year. The previous threshold was 10,000 short tons of annual production. All anthracite coal mines that produced 10,000 short tons or more during the year must also report. Small bituminous and lignite coal mine operators producing fewer than 25,000 short tons of coal annually, anthracite coal mine operators producing fewer than 10,000 short tons annually and coal preparation plants recording fewer than 5,000 hours per year are not required to file the Form EIA-7A.

Reporting on the proposed Form EIA-8A, "Coal Stocks Report – Annual" shall be limited to all coal brokers, coal traders and coal terminals in the 50 United States and the District of

Columbia that owned stocks of 10,000 or more short tons of coal at the end of the reporting year or exported more than 10,000 short tons of domestically produced coal.

6. Results of Collecting Data Less Frequently

In keeping with its mandate, EIA is recognized as the major collector of comprehensive and reliable U.S. energy supply and demand data. The Federal Government, State governments, as well as the private sector of the economy rely on the EIA for energy statistics and consider its publications reliable and timely indicators of current energy conditions and trends. The non-standby coal forms proposed in the Package represent two quarterly surveys (EIA-3 and EIA-5) and two annual surveys (EIA-7A and EIA-8A). Less frequent reporting on any of these four forms would prevent EIA from meeting its mandate of providing timely, essential, and reliable information.

7. Compliance with 5 CFR 1320.5 Controlling Paperwork Burden on the Public

All EIA coal surveys are operated in accordance with the guidelines in 5 CFR 1320.5. In the event of a coal supply disruption, information could be collected weekly on Forms EIA-1, EIA-4, and EIA-20. This weekly frequency is justified by the need to provide rapid response during such a supply disruption to prevent adverse national economic impacts or to alleviate potential human suffering.

8. Summary of Consultations Outside the Agency

On July 19, 2010, the EIA published Federal Register notice 75 FR 41838 outlining proposed changes to the Coal Program Package and inviting interested parties to comment. All comments filed and EIA responses are provided in Appendix B. The National Mining Association (NMA) was the only set of comments received. Further, the NMA comments support the changes to the forms and the protection of data as proposed.

9. Remuneration

Respondents will not be paid or provided any gifts in return for responding to EIA coal data surveys.

10. Provisions for Confidentiality of Information ----

For Forms EIA-3, EIA-5, EIA-7A and EIA-8A , information collected will be considered public information and may be publicly released in identifiable form subject to the following exceptions:.

The information elements “Total Cost of Coal Received During the Quarter on a C.I.F.

Basis” (EIA-3, EIA-5), “Commodity Cost” (EIA-3, EIA-5) “Total Revenues from Commercial Sales” (EIA-5), “Total Revenue or Value” (EIA-7A), “Total Revenue of Coal Exports” (EIA-8A) will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

The Federal Energy Administration Act requires the Energy Information Administration to provide company-specific data to other Federal agencies when requested for official use. The information reported on these forms may also be made available, upon request, to another component of the Department of Energy (DOE); to any Committee of Congress, the Government Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are applied to the statistical data published from protected survey information to ensure that the risk of disclosure of identifiable information is very small.

For Forms EIA-1, EIA-4, EIA-6Q and EIA-20 the following data confidentiality provisions are used:

The information reported on this form will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

The Federal Energy Administration Act requires the Energy Information Administration to provide company-specific data to other Federal agencies when requested for official use. The information reported on these forms may also be made available, upon request, to another component of the Department of Energy (DOE); to any Committee of Congress, the Government Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are applied to the statistical data published from survey information to ensure that the risk of disclosure of identifiable information is very small.

For all the survey forms in this information collection package, the following provision applies:

Upon request specific to any of the forms, the name, address, and location (state or zip code) of the responding companies will be released in the form of a full or partial list of respondents.

11. Justification for Sensitive Questions

There are no questions of a sensitive nature on the coal survey forms.

12. Burden Estimates

a. Estimates of Hour Burden

The estimated respondent burden for each coal form is shown in Appendix C. The total annual burden is estimated to be 4,530 hours. There are a total of 1639 respondents to various coal surveys, and on average the estimated annual burden on each is 2.76 hours. In the previous authorization package (2008 -2011), EIA estimated an annual total respondent burden of 4,474 hours. The 1.3 percent increase in respondent burden is occurring because the additions to the EIA-3, EIA-5, and EIA-7A will require additional respondent hours. The number of respondents to the Form 7-A is being reduced, but will be less than the increase resulting from the additional data elements. The burden calculations can be seen in the table below.

Coal Program Burden Estimates

Form	Individual Response Burden	Respondents	Annual Reporting Frequency	Total Burden
EIA-3 Manufacturing	1.25	460	4	2300
EIA-3 Coal Synfuel	0.9	56	4	201.6
EIA-5	1.5	20	4	120
EIA-7A	1.8	1006	1	1810.8
EIA-8A	1	97	1	97
Total				4530

b. Estimates of Annualized Cost to Respondents

Based on the estimated rate of \$66.86 per hour for employees who would complete these forms, the total annual respondent cost for all forms is estimated to be:

$$\$66.86/\text{hour} \times 4,530 \text{ hours/year} = \$302,876$$

An average cost per hour of \$66.86 is used because that is the average loaded (salary plus benefits) cost for an EIA employee assigned to data survey work. EIA assumes that the survey respondent workforce completing surveys for EIA is comparable with the EIA workforce.

13. Estimate of Total Annual Cost Burden to Respondents

The EIA estimates that there are no capital, start-up, or operating costs to respondents beyond the cost of the hours described in Item 12.

14. Estimated Annualized Costs to the Federal Government

Federal Government activities and costs associated with the surveys included in the Coal Program Package are included in the Annual Operating Plans for the Office of Coal, Nuclear, Electric and Alternate Fuels (CNEAF) of EIA. The estimated annualized cost to the government, including personnel, for forms development, maintenance, data collection, processing, analysis, and publication is \$586,000. The overall annual costs to the Federal Government have fallen from about \$785,000 estimated for the last year of the current authorization cycle) representing a 25% savings in Federal costs.

The Federal Government coal forms cost estimate for FY 2008 is shown below:

ANNUAL COST TO THE FEDERAL GOVERNMENT, COAL FORMS (ESTIMATED)

Maintenance	\$ 110,000
Data Collection & Processing	300,000
Programming and System Enhancement	70,000
Data Analysis & Publication	60,000
Total	<u>\$ 540,000</u>

15. Changes in Respondent Burden

It is estimated that there will be a 56 burden-hour (1.3 percent) increase because of proposed changes to the coal forms. In the previous authorization package (2008 -2011), EIA estimated an annual total respondent burden of 4,474 hours. The burden associated with this proposed authorization package is 4,530 hours. The proposed changes are necessary to adapt to changes in the coal market and to provide improved information, in terms of both coverage and quality, about the coal industry. In addition, the proposed changes will permit additional quality

checks, and cross-survey quality reviews between coal surveys and electricity surveys. The result will be improvements in both coal and electricity data provided by EIA.

16. Schedule for Collecting and Publishing Data

Plans to tabulate and publish data collected by the coal data collection forms are described below.

a. Weekly Forms

The weekly data reported on Forms EIA-1, EIA-4, and EIA-20 will be collected only during coal supply disruptions from a sample of respondents and will not be published in an individually identifiable form. The data collected from Forms EIA-1, and EIA-4 from manufacturing and coke plants will be used in the compilation of public statistical reports for monitoring coal consumption and stocks. Form EIA-20, if and when activated, will include electric utilities and independent power producers, and is designed to gather up-to-date information that will enable DOE to closely monitor electric power coal consumption and stocks and evaluate the potential impact of a coal supply disruption.

A report week is defined as a calendar week beginning 12:01 A.M. on Sunday and ending at midnight on the following Saturday. A telephone call will be made to collect the data on each form beginning each Monday of each report week during the coal supply disruption.

b. Quarterly Forms

The data collected on Form EIA-3 (manufacturing and transformation/refining plants, and commercial and institutional users) and Form EIA-5 (coke plants) will be used in the compilation of aggregated statistical reports to provide Congress with basic statistics concerning coal receipts, coal consumption, coal stocks, coal prices at reporting facilities, coal origin, transport mode, and coal quality. Schedule EIA-6Q would, if activated, collect coal production data from U.S. coal producers and distributors. Currently, EIA-6Q type quarterly production data are collected by the Mine Safety and Health Administration (MSHA) and provided to EIA under a cooperative agreement. EIA plans to continue to obtain quarterly coal production data from MSHA and only would activate form EIA-6Q in the eventuality that MSHA discontinued its coal production survey.

Data from Forms EIA-3 and EIA-5 appear in the EIA publications, Quarterly Coal Report, Monthly Energy Review, Annual Energy Review, and the Annual Coal Report. In addition, EIA uses the data for coal supply analyses and in short-term modeling efforts requested by Congress that forecast coal supply, prices, and environmental quality.

The quarterly forms are due approximately one month after the close of each quarter. The quarters are:

- (1st) January 1- March 31
- (2nd) April 1 - June 30
- (3rd) July 1 - September 30
- (4th) October 1 - December 31

The approximate due dates are May 1, August 1, November 1, and February 1, respectively, following each quarter.

Data compiled from the quarterly surveys (EIA-3 and EIA-5) are available for distribution to the public as web-accessible data about 75 days after the close of the quarter.

Tables showing the distribution of coal by origin, by destination and by transport mode developed from the EIA-3, EIA-5, and alternatives to the EIA-6A survey (if approved) would be posted to EIA's public website about 75 days after the close of the quarter. This posting schedule would represent an improvement in data timeliness. EIA normally posts EIA-6A annual distribution data about 9 to 12 months after the close of the survey year. Producer and distributor end-of-year stock data gathered on the EIA-7A and EIA-8A forms would be posted annually, approximately six months after the close of the reporting year.

c. Annual Forms

Form EIA-7A collects information on coal production and related information from U.S. coal mining operations. Form EIA-8A collects coal stocks data from U.S. coal brokers, coal traders and coal terminals. These data appear in the Weekly Coal Production Report, Annual Coal Report, Quarterly Coal Report, and Annual Energy Review. These data are also used extensively in the EIA's coal analysis and forecasting models. Respondents are required to submit Forms EIA-7A and EIA-8A no later than April 1st of the year following the reporting period, based on the calendar year.

The Annual Coal Report, developed primarily from EIA-7A data is posted to EIA's public website about mid-August following the end of the reporting year.

17. Expiration Date Exception

The expiration date will be included on the forms.

18. Certification

There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

Appendix A
Public Consultation



September 17, 2010

Mr. William Watson
Energy Information Administration
Coal, Nuclear and Renewables Division, EI-52
Forrestal Building
U.S. Department of Energy
Washington D.C. 20585

RE: Comments on Energy Information Administration (EIA) Data Collection Revisions and Extension Proposals

Dear Mr. Watson:

The National Mining Association (NMA) appreciates the opportunity to provide comments on EIA's proposed revisions and extension to the Coal Program package (*Federal Register* Notice, July 19, 2010, Volume 75, No. 137, Page 41838).

The National Mining Association represents the interests of the nation's coal and non-fuel mineral producers; coal and mineral transporters; mining and mineral processing machinery and equipment manufacturers and suppliers; energy consulting firms and financial institutions that serve the mining industry. Its coal producing members and those members dependent on the coal industry use the data collected in the coal package for market and trend analysis and for forecasting. Complete, timely, reliable and publicly available data on the coal sector is vital to the coal industry and the public and private sectors for sound business, energy and environmental policy decisions. NMA appreciates the EIA Coal Team's continuing quest to improve coal survey data collection and reporting.

EIA-3 and EIA-5 Survey Forms

NMA supports the agency's proposal to obtain more detailed information about coal plants, specific origins and costs of coal receipts, as well as keeping the cost of coal received (CIF) data elements confidential.

EIA-7A Survey Form

The proposal to add additional information on coal preparation and coal stocks held at remote off-site locations will be beneficial in further understanding coal supply and inventory levels. We are supportive of the higher producer reporting threshold to be raised from mines producing greater than 10,000 tons to greater than 25,000 tons, assuming it does not result in a loss of collection quality, and the data remain compatible with prior data collection.

Regarding release of revenue and value data elements, the release of sensitive economic data may result in revealing competitive information and may result in some producers becoming unwilling to provide survey data. We therefore

support the withholding of sensitive data elements such as revenue and value for individual companies.

EIA-8A Survey Form

The added collection of detailed information on coal stock origins as well as from coal exported by brokers (origin state and rank), as proposed, should be helpful to EIA in better quantifying coal movements and export patterns nationally.

We appreciate the opportunity to offer these comments.

Sincerely,
/s/ Leslie Coleman

Leslie Coleman
Director, Statistical Services
National Mining Association
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Washington, DC 20001
202-463-9780

Appendix B
Coal Program Package

Respondent Burden Hour Estimates

EIA Survey/ Frequency	Number of Sites Per Cycle	Number of Reports Annually Per Site	Total Number of Annual Responses	Burden Hours Per Response	Response Burden Total Hours
EIA-3 Manufacturing/ Quarterly	460	4	1,840	1.25	2,300
EIA-3 Coal Synfuel/ Quarterly	56	4	224	0.9	202
EIA-5/Quarterly	20	4	80	1.5	120
EIA-8A/Annual	97	1	97	1	97
EIA-7A/Annual	1,006	1	1,006	1.8	1,811
Totals	1,639		3,247		4,530

Note: No data are shown for Forms EIA-1, EIA-4, EIA-6 Schedule Q, and EIA-20 since they are standby forms.

* Response rate is based upon the number of sites submitting forms.

Appendix C
Sample Correspondence from EIA to Survey Respondents

The following pages contain sample correspondences to EIA coal survey respondents. The correspondences are delivered via letter or e-mail.

Dear EIA-3 Respondent,

Welcome to the Energy Information Administration (EIA) Internet Data Collection (IDC) system. By using the IDC system for the Quarterly Coal Consumption and Quality Report (Form EIA-3) you will be able to easily enter and submit your data to EIA.

As soon as possible please complete IDC Registration by clicking:

<https://signon.eia.doe.gov/ssoserver/login>

Then follow the steps in the attached guide.

In order to register you will need a Mail ID and Code. The Mail ID will be provided in this letter. The code will be sent within the next several days in a separate e-mail from our OIT Department. Wait until you have the Mail ID and Code before registering. Please keep this email containing your Mail ID and the email containing your Code in an accessible place so you can complete registration.

The second email containing your Code has

From: OITDevelopment@eia.doe.gov

Subject: DOE Energy Information Administration – code

The Code is found near the bottom of the email message.

The Single Sign-On Registration (pages 1-4 in the attached guide) takes approximately 5 minutes to complete. Please record the Userid and Password that you assign to yourself exactly as you type them into the Registration Window. Also, please put the Userid and Password in an accessible place. In all subsequent logons to the EIA system you will need to enter the Userid and Password.

Once you have set your Userid and Password, proceed to the next step, which is to gain access to your EIA-3 Survey Form. Start at the bottom of page 4 in the attached guide. When you arrive at the screen (page 6 in the Guide) where you enter your **Mail Id**, enter this number:

1000000000

Enter your case-sensitive code in the Code input box (see page 6 in the Guide). Follow the instruction on pages 7 and 8 in the attached guide to gain access to your survey forms.

A second separate guide attached to this email will help you to complete the Survey form. Print both guides and put them in a folder for future reference

Sincerely,

Coal Program Package – January 2011

Nicholas Paduano

Coal Program Package – January 2011

Dear EIA-7A Respondent:

We are attempting to close-out the Form EIA-7A survey and need your 2009 submission. With 99% response rate, we hope to make this year a first for the EIA-7A survey, by receiving a survey form from every respondent.

We would appreciate your 2009 EIA-7A data as soon as possible. You can submit your data for this survey by facsimile or mail:

By Facsimile: 202-287-1944
Attn: Form EIA-7A

By Mail: U.S. Energy Information Administration, EI-24
Office of Oil, Gas and Coal Supply Statistics
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585
Attn: Form EIA-7A

If you have any questions or need help in filing, I can be reached at 202-586-9787. You may also contact the EIA-7A Survey Manager, Paulette Young, at 202-586-1719. We fully understand the many priorities our respondents have in their day-to-day responsibilities. However, your data is valuable and critical to our mission to report to Congress and our customers accurate data for the coal industry. Thank you, in advance, for your coal production information.

Sincerely,

Barbara Mariner-Volpe
Coal Statistics Team Leader
Office of Oil, Gas and Coal Supply Statistics
U.S. Energy Information Administration

Coal Program Package – January 2011

Dear EIA-8A Respondent:

You were recently sent a pre-populated Form EIA-8A, “Coal Stocks Report,” that contained an invalid or obsolete URL for transmitting your data to the Energy Information Administration (EIA) via the secure file transfer (SFT) option. We apologize for the error. After completing your EIA-8A form, please submit it using the following URL:

<https://signon.eia.doe.gov/upload/notice8a.jsp>

If you have any questions or need further assistance, please contact me (202-586-1719) or Michael Lintner (202-586-0667). Thank you, in advance, for your coal stocks data submission.

Sincerely,

Paulette Young
EIA-8A Survey Manager
Office of Oil, Gas, and Coal Supply Statistics
U.S. Energy Information Administration

Attention:

Dear EIA-8A Respondent:

The purpose of this email is to confirm that you will be preparing and submitting 2010 data on Form EIA-8A, "Coal Stocks Report." We will be announcing the start of the 2010 reporting period on January 3, 2011.

According to our records, you either submitted Form EIA-8A "Coal Stocks Report" for the 2009 reporting period, or you have been identified in our database as the person who will submit this report for the 2010 reporting period.

If you are no longer the person submitting the EIA-8A form, please provide the following information:

Name of New Preparer:
New Preparer's telephone #:
New Preparer's email address:
Name of Alternate Preparer/Supervisor:
Alternate/Supervisor's telephone #:
Alternate/Supervisor's email address:

Please send this information to:

EIA-8A@eia.doe.gov

on/or before December 30, 2010. The subject line should be New Contact.

For questions, please contact Paulette Young (202-586-1719) or Michael Lintner (202-586-0667). Thank you, in advance, for your assistance.

Sincerely,

Paulette Young
Form EIA-8A Survey Manager
U.S. Energy Information Administration
paulette.young@eia.gov

Coal Program Package – January 2011

202-586-1719

REMINDER

This is a reminder. The **Form EIA-7A**, “Coal Production and Preparation Report”, for the current reporting year should be completed and returned to the Department of Energy, U.S. Energy Information Administration (EIA), within 90 days after the close of the calendar year. To date, we have not received your form. Your data are important component of EIA’s coal program. The information filed on the **Form EIA-7A** is used by Congress, as well as in the public and private sectors.

Response to this survey is required by law. If you have already submitted the form, please accept our thanks and disregard this reminder. If not, please submit your data promptly. The Form EIA-7A Internet Data Collection (IDC) system is available for your data submission. Using <https://signon.eia.doe.gov/ssoserver/login> to report your data is quick and easy; please email us your mailing contact information to begin. Our email address is EIA-7A@eia.doe.gov. Or, please fax or mail your response promptly. Our fax number is (202) 287-1944.

If you need assistance with completing your form or need help with **registering** on the EIA Single Sign-On System, please contact the Help Desk at (202) 586-9595, or email CNEAFhelpcenter@eia.doe.gov.

If you have any questions about this survey or require assistance in completing it, please contact the Survey Manager, Paulette Young, at (202) 586-1719, or paulette.young@eia.doe.gov

Thank You

Attention:

Dear EIA-5 Respondent,

Your EIA-5 data survey form is more than 3 weeks overdue. February 1, 2011 was the due date for the EIA-5 2009 Quarter 4 survey data. Please submit your data survey no later than February 19, 2010. If you cannot meet this date then please click eia-5@eia.doe.gov and enter the date by which you will submit your data.

First, you must complete registration in EIA's Single Sign-On system where you self-assign a Userid and Password that gives you access to your survey form.

To complete the SSO registration, again we are sending a Mail ID and Code. Here is your Mail ID:

XXXXXX

You will receive the Code in a separate follow-on e-mail.

Please keep this email containing your Mail ID and the email from EIA containing your Code in an accessible place so you can complete registration.

As soon as possible please complete IDC Registration by clicking:

<https://signon.eia.doe.gov/ssoserver/login>

Then follow the steps in the attached guide.

After you have set your Userid and Password, use them to access your EIA-5 survey form. Please complete and submit the 2009 Q4 form as soon as possible.

A users guide for completing the EIA-5 Survey Form is attached.

Best regards,

Nicholas Paduano

Attention:

Your EIA-5 data survey form for 2009 Quarter 4 is almost 4 weeks overdue. At this time we have received data survey forms from over 99% of sites in our national survey. Your site is among a few outstanding sites.

The purpose of this letter is to request your cooperation in submitting the Form EIA-5, "Quarterly Coal Consumption and Quality Report – Coke Plants," which your company is required to complete. The completed form was due by February 1, 2011. We have made several attempts by e-mail and telephone to obtain the data for your company. As of the date of this letter, our records indicate that we have not received your company's completed survey form. Please provide the requested data immediately to avoid possible penalties as described in the instructions to the survey. Under the Federal Energy Administration Act of 1974 (Public Law 93-275), your company's failure to respond to the survey could result in monetary penalties being applied to your company.

It is very important for the completion of our survey that we receive your data as soon as possible and not later than cob, Wednesday, March 4th. We greatly appreciate your cooperation in submitting this form. Mr. Nicholas Paduano of my staff, who can be reached by e-mail at Nicholas.paduano@eia.doe.gov or by phone at (202) 587-6326, is available to assist you.

Please logon at:

<https://signon.eia.doe.gov/ssoserver/login>

If you are registered, enter your userid as below or complete registration to set userid:

regesmg

I am attaching a guide for the EIA-5 Survey Form.

Sincerely,

Barbara Mariner-Volpe
Coal Statistics Team Leader
Office of Oil, Gas and Coal Supply Statistics

Coal Program Package – January 2011

U.S. Energy Information Administration

Coal Program Package – January 2011

Attention:

Dear EIA-3 Respondent:

We are now collecting the EIA-3 2010 QTR 4 data. You may now access the Internet Data Collection (IDC) system. Please have your Userid and Password (which you created) handy. If you forgot your Password, select “Forgot your password?” from the Single Sign On (SSO) screen.

To help you get started we are providing your Userid:

Userid

Please submit the EIA-3, “Quarterly Coal Consumption and Quality Report, Manufacturing Plants,” survey form for 2010, Quarter 4 by February 1, 2011.

<https://signon.eia.doe.gov/ssoserver/login>

**If you are no longer the person submitting the EIA-3 forms then please provide the following information in a reply email. Send e-mail to EIA-3@eia.doe.gov
The subject line should be New Preparer.**

Name of New Preparer:

New Preparer’s telephone number:

New Preparer’s email address:

A visual guide to the EIA-3 form is attached.

Best regards,

Nicholas Paduano
Survey Manager