

Supporting Statement A
for the
Natural Gas Data Collection Program Package
Office of Management and Budget (OMB) # 1905-0175

Introduction

Request is made for a 3-year extension of the following currently-approved natural gas survey forms with proposed revisions listed below:

EIA-176, “Annual Report of Natural and Supplemental Gas Supply and Disposition,”
EIA-191, “Monthly and Annual Underground Natural Gas Storage Report,”
EIA-757, “Natural Gas Processing Plant Survey,”
EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers,”
EIA-895, “Annual Quantity of Natural Gas Production Report,”
EIA-910, “Monthly Natural Gas Marketer Survey,” and
EIA-912, “Weekly Underground Natural Gas Storage Report.”

Forms EIA-176, EIA-191, EIA-757, EIA-857, EIA-910, and EIA-912 are all mandatory. Form EIA-895 is voluntary.

Summary of Changes

The U.S. Energy Information Administration (EIA) is proposing the following changes to each of the survey forms:

- For Form EIA-176: Add the collection of the respondent’s participation in retail choice programs as well as whether the respondent has acquired or sold parts of its service territory.
- For Form EIA-191A: Discontinue annual form and add the data elements to the monthly form EIA-191M.
- For Form EIA-191M: Add data elements currently collected on EIA-191A including storage field capacity and maximum deliverability. Re-name form EIA-191 and increase burden from 2.4 to 2.6 hours per response.
- For Form EIA-757: Remove data protection and release information at the processing plant-level .
- For Form EIA-857: Add the collection of natural gas used by the reporting company as well as monthly deliveries to the vehicle fuel sector. Decrease the number of sampled companies from 400 to 310 via a change in sample methodology from the current probability proportion to size (PPS) design to a cutoff design.
- For Form EIA-895: Discontinue collection as other sources of the data collected have been identified.
- For Form EIA-910: Reduce the collection to 6 States instead of the currently collected 12.

- For Form EIA-912: Increase number of respondents from 70 to 85.

In the Federal Register notice posted March 2, 2011, 76 FR 41-4622, the EIA proposes that the above mentioned changes related to monthly forms become effective with the collection of data for the January 2012 reference period, and those changes related to annual forms become effective with the collection of data for the 2011 reference period. The current versions of the monthly forms will be used until data are collected for January 2012.

Status of Reporting Burden on Form EIA-857

In 2010, OMB granted approval for a non-substantive change to the EIA-857 “Monthly Natural Gas Report of Purchases and Deliveries” with the following Terms of Clearance: *Terms of the previous clearance remain in effect. Upon resubmission at the currently approved expiration date, it is suggested the agency revisit the suggested non-substantive change and determine whether it imposed any respondent burden.*

The EIA began collecting the new data element on the EIA-857, “monthly total system sendout of reporting utilities,” for reference month August 2010. The introduction of the sendout question to the EIA-857 imposed a temporary burden to some respondents that had to locate the associated records. However there were no respondents that did not have the information already in their records. Also, pipeline companies that make up 10 percent of the 400 monthly respondents did not have to report this information as it is not applicable to their operations. Similarly, smaller respondents, typically municipal gas systems that account for approximately 20 percent of the 400 respondents, were already reporting the equivalent of total system sendout in their citygate purchases, line 1. For those companies, no additional burden was assessed to locate any additional records to comply with the additional question.

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A. Justification

A1. Legal Authority

The authority for these data collections is provided by the following provisions:

15 U.S.C. §772(b), of the Federal Energy Administration Act of 1974 (FEA Act), Public Law 93-275, outlines the types of individuals subject to the information collection authority delegated to the [Secretary] and the general parameters of the type of data which can be required. Section 772(b) 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 exercise of functions under the Act.”

The functions of the FEA Act are set forth in 15 U.S.C. §764(b), of the FEA Act, which states that the Administrator shall, to the extent he is authorized by Section 764(a) of the FEA Act,

“(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; . . .

(4) develop plans and programs for dealing with energy production shortages;

(5) promote stability in energy prices to the consumer, promote free and open competition in all aspects of the energy field, prevent unreasonable profits within the various segments of the energy industry, and promote free enterprise;

(6) assure that energy programs are designed and implemented in a fair and efficient manner so as to minimize hardship and inequity while assuring that the priority needs of the Nation are met;...

(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 764(b) above, 15 U.S.C. §764(a), of the FEA Act 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 Administrator by the Congress.”

Additional authority for this information collection is provided by 15 U.S.C. §790a of the FEA Act, which states that the Administrator:

“... [Shall] establish a National Energy Information System ... [which] shall contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption within and affecting the United States on the basis of such geographic areas and economic sectors as may be appropriate ...

“(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 and nonmineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;

“(2) the consumption of mineral fuels, nonmineral 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 and patterns of energy supply and consumption.”

A2. Needs and Uses of Data

The purpose of the Natural Gas Data Collection Program Package is to collect basic and detailed data to meet the EIA's mandates and energy data users' needs. Adequate evaluation of the natural gas industry requires collection and processing of data related to natural gas production, processing, transmission, distribution, storage, marketing, and consumption.

(1) The data that the EIA collects are used to address significant energy industry issues. In

line with its mandated responsibility to collect data that adequately describe the natural gas marketplace, the EIA evaluates the lifecycle of natural gas from its reserves and production to consumption and prices throughout the upstream and downstream markets. The data collected by the Natural Gas Data Collection Program Package surveys are among those that are required to address the status and future of the role of natural gas in the energy mix and overall economy. Among the data series resulting from the information collected in these surveys is the rate, location, and source of natural gas produced and entering the market, the quantities being stored and the location of the storage, and the quantities being delivered to various consuming sectors. Prices are also reported on at various points in the production and distribution stream.

- (2) EIA must collect some data at the State level. Congressional and State Agency users have strongly emphasized their need for such data. EIA's collection of these data is consistent with its mandated responsibilities to collect specific product information for appropriate geographic areas and economic sectors, to act as a central clearinghouse, and to disseminate relevant information to the States. At the same time, the EIA is committed to operate its data collections in a manner that will minimize the industry's reporting burden to the extent possible.
- (3) Timely data are essential to policy makers and industry planners who make decisions affecting all aspects of the natural gas industry. Customer surveys have increased the EIA's awareness of the need for data as quickly as reliable, accurate data can be released.
- (4) Alternative data sources do not adequately satisfy the needs of the EIA and its user communities. Accurate, meaningful, and independent price, supply, and demand statistics are essential to describe and measure phenomena in the marketplace. It is necessary that this information be collected by an unbiased, independent source, if the data are to be credible.

The data collected by the EIA on these forms are unique. While somewhat similar or related data may be available from private and/or industry sources, as well as from other Federal agencies, such data are not reasonable alternatives for the comprehensive data provided by the Natural Gas Data Collection Program Package survey forms.

Data from the forms in the Natural Gas Data Collection Program Package are published in the *Annual Energy Outlook*, *Annual Energy Review*, *Natural Gas Annual*, *Natural Gas Monthly*, *Natural Gas Weekly Update*, *Weekly Natural Gas Storage Report*, *Monthly Energy Review*, *Short-Term Energy Outlook*, State Energy Profiles, and numerous other EIA products.

EIA's natural gas data are published in papers, trade journals, and technical reports as well as cited and republished in reports by consulting firms, financial institutions, and numerous other entities. A number of State agencies republish EIA data in reports to the public including Florida, Indiana, Iowa, Montana, New Hampshire, New Mexico, South Carolina, Tennessee,

Utah, Washington, Wisconsin, and Wyoming.

A3. Description of Individual Surveys in EIA's Natural Gas Data Collection Program Package

Following is a listing of the survey forms across all OMB Collection Packages that comprise the EIA's natural gas data collection program. For reference purposes, current OMB numbers of the surveys described in this section, as well as surveys referenced throughout this package, are described below:

EIA-64A, "Annual Report of the Origin of Natural Gas Liquids Production": OMB# 1905-0057,
EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition": OMB# 1905-0175,
EIA-191, "Monthly and Annual Underground Natural Gas Storage Report": OMB# 1905-0175,
EIA-757, "Natural Gas Processing Plant Survey": OMB# 1905-0175,
EIA-816, "Monthly Natural Gas Liquids Report": OMB#1905-0165,
EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers": OMB# 1905-0175,
EIA-895, "Annual Quantity of Natural Gas Production Report": OMB# 1905-0175,
EIA-923, "Power Plant Operations": OMB# 1905-0129,
EIA-910, "Monthly Natural Gas Marketer Survey": OMB# 1905-0175, and
EIA-912, "Weekly Underground Natural Gas Storage Report": OMB# 1905-0175.

The following describes the natural gas forms included in this clearance, 1905-0175 and their proposed changes:

A3.1. Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"

Natural gas supply and disposition data collection was initiated in 1910 and was conducted as a voluntary annual natural gas supply and disposition survey by the Department of Interior, Bureau of Mines (BOM) until 1977. With the establishment of the Department of Energy (DOE) in 1977, responsibility for the survey was transferred to the EIA within DOE. The voluntary survey was continued through 1979 by EIA using the BOM Forms 6-1340-A, "Supply and Disposition of Natural Gas," for non-producing distribution companies and 6-1341-A, "Supply and Disposition of Natural Gas," for all other respondents. The EIA received approval to continue the survey using a slightly-modified mandatory survey form EIA-176, "Supply and Disposition of Natural Gas," for report years 1980 and 1981. Approvals of the use of a substantially-revised form were granted for report years 1982 through 1986, and for the use of the form with minor revisions for report years 1987 through 2001. In 2002, EIA requested and received approval to revise the EIA-176 to collect data on natural gas deliveries to nonutility generators of electricity. In 2008, EIA requested and received approval to collect revenues collected from the deliveries of gas delivered on behalf of third-parties.

The Form EIA-176 provides the EIA with the major elements of information required to

combine and merge with data collected in other EIA surveys to develop gas supply and disposition balances and relevant cost, price, and related information at the State level. The data collected are necessary to continue a long-term consistent, but evolving, data series of basic summary information on natural gas. These data are essential to provide analysts with the tools necessary to make informed assessments of the variations in natural gas supply, demand, and prices over time and geography.

The EIA requests approval of the following significant change to Part 3 of the Form EIA-176:

- (1) Collection of the reporting company's participation status in State retail choice programs.
- (2) Collection of information on changes in the reporting company's service territory due to sale or acquisition.

In requesting the addition to Part 3 of Form EIA-176 of the reporting company's status in State retail choice programs, EIA is proposing to collect information on whether respondents, comprised primarily of natural gas utilities and municipal gas systems, have active customer choice programs for certain customer types and their rates of participation. This information will permit EIA to monitor the extent to which customer choice programs are being perpetuated and utilized. These data will allow the EIA to reduce spending on monitoring customer choice programs. Also in Part 3 of the form, the EIA proposes a question that asks companies to report whether their distribution service territory has changed via sale or merger in order to maintain the accuracy of the survey frame.

The burden estimate of 12.0 hours per response remains the same as status of participation in a customer choice program is readily available information respondents typically feature on their website. The information should correspond with an indication of service to transportation customers listed on Part 6, Line 11 which typically only affects larger companies. The information requested on Part 3, C related to sale or merger activity is already typically reported by most respondents in the Comments section on Part 7. It has been moved to the front of the form to make it more prominent, lower total survey error, as well as prevent unnecessarily follow-up with the respondent when data changes related to sale or merger activity are observed through the data editing process.

Approximately 2,000 companies are currently in scope of EIA-176 and the EIA-176 anticipates that the number of active respondents will remain at approximately 2,000 for the next 3 years.

The information collected on the Form EIA-176 is needed and used by the EIA for the following purposes:

- (1) to develop and make available to the Congress, the States, and the public an accurate quantified assessment of the supply of natural and supplemental gas available to each of the various States from all sources, both internal and external, and the manner in which such supply was used, consumed, or otherwise disposed of,

- (2) to determine the quantity of natural and supplemental gas consumed within each of the various States by market sector, the average prices for such gas, and the changes in consumption and price patterns over time from the first purchase through the final price paid by consumers,
- (3) to produce the *Natural Gas Annual (NGA)*,
- (4) to provide natural gas data for the State Energy Profiles,
- (5) to provide natural gas input data to energy supply, demand, and price forecasting models especially EIA's National Energy Modeling System and Short-Term Integrated Forecasting System,
- (6) to supply the Federal Energy Regulatory Commission (FERC) with background and baseline information on the total natural gas market by State and groups of States,
- (7) to provide natural gas input data to the following EIA publications: *Annual Energy Review*, *Annual Energy Outlook*, *Short-Term Energy Outlook*, and *Monthly Energy Review*, which are distributed to all members of Congress,
- (8) to respond to Congressional and internal departmental requests for analysis of policy and regulatory issues, and
- (9) to provide a frame for selecting respondents of the EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers" survey.
- (10) to provide a portal of company-level utility information collected on EIA-176 for external analytic purposes at <http://www.eia.gov/cfapps/ngqs/ngqs.cfm>.

A3.2. Form EIA-191, "Underground Natural Gas Storage Report"

Form EIA-191 requests monthly and annual data on the location, ownership, capacity, and operations of all active underground natural gas storage reservoirs in the lower-48 States. Substantial underground natural gas storage facilities are necessary because of fluctuating seasonal, daily, and even hourly marketing requirements. Natural gas is usually injected into storage when market requirements are below available gas flows in transmission lines, and then is withdrawn from storage when supplies from producing fields and/or the capacities of transmission systems are inadequate to meet peak requirements.

The EIA proposes the elimination of the EIA-191A form and the addition of the elements it collects (storage field type, working and total capacity as well as maximum deliverability) to the monthly form, now EIA-191. This will enable changes in natural gas storage field capacities to be recorded on a timelier basis and will improve the quality of the monthly and related weekly natural gas storage activity estimates. The EIA will continue to protect the confidentiality of proprietary information, including monthly working and base gas levels, and injections and withdrawals into storage, but will publish storage field type, location, capacity and maximum deliverability in disaggregated form as it currently does with data collected on the EIA-191A. The EIA also proposes to increase the monthly burden of EIA-191 from 2.4 hours per response to 2.6 hours per response to include the elements formerly being collected annually on form EIA-191A. The number of underground storage operators reporting on EIA-191 is 131 and the EIA anticipates that the survey frame will stay close to 131 for the next 3 years.

The information collected on Form EIA-191 is used by the EIA for the following purposes:

- (1) to provide State-level data on underground natural gas storage with respect to injections, withdrawal capabilities, inventories, type of storage facility, location of facilities, and capacity for the EIA's *Natural Gas Monthly*. State-level storage data are comparable to State-level production and consumption data published in the *Natural Gas Monthly*. This monthly data collection also provides reliable baseline data on storage operations necessary for analyses, modeling, and comparison with normal industry operations in case of severe weather, natural disaster, or other extreme circumstances. The data are also used in natural gas industry deliverability studies as described in item (6).
- (2) to serve as the universe from which the sample for the weekly survey EIA-912 is drawn,
- (3) to provide data on underground natural gas storage injections, withdrawals, and inventories for the EIA's *Natural Gas Weekly Update*, *Monthly Energy Review*, and *Annual Energy Review*,
- (4) to provide data on underground natural gas storage inventories for the forecasts contained in the *EIA Short-Term Energy Outlook*,
- (5) to provide data on all aspects of underground natural gas storage to enable the EIA, FERC, and other elements of the DOE to identify and assess the supplies of gas in storage by geographic location on a timely basis,
- (6) to provide data for system deliverability studies undertaken by the EIA as a part of its analysis tasks. Capacity information is collected at the reservoir level to allow comparisons of the utilization of the individual reservoirs. Storage data are a critical link in understanding the peak day deliverability of the natural gas system and overall system operations, and
- (7) to produce the *Natural Gas Annual (NGA)*.
- (8) to provide a source of storage field-level capacity and deliverability information collected on EIA-191 that is available at <http://www.eia.gov/naturalgas/data.cfm#storage>.

A3.3. Form EIA-757, "Natural Gas Processing Plant Survey"

The purpose of Form EIA-757 is to collect data on the operational status and capacity of natural gas processing plants to understand their production levels and characteristics, as well as to monitor constraints resulting from natural gas supply emergencies. The information is used to develop periodic reports presenting aggregate information on processing plant capacity and operations. In an emergency situation that disrupts natural gas supplies, the information collected from Schedule B of this form is used to assess the severity of the disruption to market conditions. The location of natural gas processing plants in the supply chain, between production and consumption, allows quick and relatively low-cost information about the impact of a natural gas supply disruption. For example, EIA used EIA-757 information to develop an energy fact sheet on the Gulf of Mexico available at http://www.eia.gov/special/gulf_of_mexico/map.cfm. This information is crucial during a natural gas supply disruption, for informed decision and policy making during emergency

periods of disruption of natural gas supplies. The information collected through this survey is used widely by Federal and State agencies, Congress, industry analysts and the general public to understand the operational capabilities and characteristics of natural gas processing plants. In the event of a natural gas supply emergency, it is used to understand the plant constraints and expected recovery from an emergency. The Office of Electricity Delivery and Energy Reliability within the U.S. Department of Energy uses information reported on Form EIA-757 in their Emergency Situation Reports available at http://www.oe.netl.doe.gov/emergency_sit_rpt.aspx. These reports are released daily on the U.S. Department of Energy's website after the impact of a hurricane to alert the affected region on what gas plants and other energy facilities are in the path of the storm so alternative supply arrangements can be made. After the storm, or other intervening natural disaster that may affect a region, daily reports are issued to inform the nation on what damage the event has caused and what energy supplies are available and the location of those supplies. The company level information shown in these reports are obtained either from the company's website or by informed consent at the time of collection.

Using information reported on Form EIA-757, EIA can publish periodic reports on the operational characteristics, status, and constraints of natural gas processing plants, providing aggregate statistics. EIA will report aggregate information from Schedule A each time Schedule A is filed, at most every 3 years. EIA will determine the frequency of reporting aggregate information from Schedule B at the time the schedule is activated. Activation requires advance written notification to the Office of Management and Budget from the Administrator of EIA who will indicate the nature of the emergency, the number of plants that will be surveyed, and the anticipated duration and frequency of the collection. Aggregate statistics, based on the Form EIA-757, will be published every 3 years or less frequently depending on resources so that State Government emergency preparedness plans can accurately estimate energy allocations in the event of an emergency. In the case of a natural gas supply disruption, aggregate statistics may be published either daily or weekly, in emergency status reports prepared by the EIA and the DOE, and used in the production of several other EIA information products. It is used:

- (1) to develop and make available to the Congress, the States, other Government agencies, and the public a timely and accurate quantified assessment of current natural gas processing plant operations and operational capacity
- (2) to develop and make available to the Congress, the States, other Government agencies, and the public a timely and accurate quantifiable assessment of natural gas processing plant outages and operational constraints
- (3) as an input to other EIA statistical information products, such as energy status reports,
- (4) to provide an input to supply, demand, and price forecasting models, such as the Short-Term Integrated Forecasting System, and
- (5) to respond to Congressional, internal Departmental and inter-Agency requests for analysis of natural gas supply constraints and operating levels in the United States, as well as policy and regulatory issues.

The EIA proposes to continue the collection of the EIA-757 in its present form but remove the data's protected status and publish it in disaggregated form so that State and local

Governments can access this information and develop and update emergency preparedness plans for their communities. Contact information would not be publicly released and would only be provided to another Federal agency that is consistent with their official purposes. EIA intends to develop a public query system and publicly release the reported survey responses through its website. This would allow media sources, local governments and other interested members of the public to access accurate information to either prepare or respond to an energy emergency. This also eliminates EIA's need to obtain informed consent from the respondents during an energy emergency and release objective information reports that accurately assess the energy supply conditions of a region that is in the path of a natural disaster event. Attribute information including location and capacity of gas processing plants are also collected and publicly released through other websites. For example, the Office of Natural Resources in the U.S. Department of Interior releases plant level capacity information available at <http://www.onrr.gov/fm/PDFDocs/gas99.PDF>. State government agencies such as the Texas Railroad Commission release company and plant level information available at <http://www.rrc.state.tx.us/data/online/index.php>. Private websites such as "The Right to Know Network" available at http://www.rtknet.org/db/rmp/rmp.php?all_naics=211112&datatype=T&reptype=a&detail=0&submit=GO also release this type of information at the facility level. EIA did not receive any comments on the proposal to make the information reported on Form EIA-757 publicly available when it published its federal register notice in March, 2011.

As of 2008, the last time EIA-757 A was collected, approximately 500 processing plants were in the scope of the survey. The EIA anticipates that the number of gas processing plants in scope of EIA-757 to remain at approximately 500 based on subsequent frame updates. EIA surveyed 39 plants on EIA-757 B when it was collected in 2008 due to Hurricanes Gustav and Ike and is assuming a similar number of plants may be affected by any future supply disruption for the purposes of estimating burden for EIA-757B.

A3.4. Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"

Form EIA-857 was designed to collect monthly natural gas data at the State level consisting of average natural gas purchase prices, consumption of natural gas by sector, and average price by sector from a sample of the respondents reporting on the EIA-176. These data are necessary to provide timely information needed to measure the combined impact of Government, industry, and consumer actions; geographic location; interfuel competition; climatic or seasonal conditions; and a host of other factors upon the natural gas industry and natural gas consumers.

The EIA requests approval of the following significant changes to the Form EIA-857:

- (1) The collection of company-use gas
- (2) The collection of deliveries to the vehicle fuel sector

These changes are in addition to a new question asking for monthly system sendout by

responding companies added to the EIA-857 via a nonsubstantive change request approved by the Office of Management and Budget in 2010. The addition of monthly company-use gas and monthly deliveries to the vehicle fuel sector will further improve the calculation of monthly natural gas consumption so it better aligns with the calendar month, as consumer deliveries are reported according to billing cycles for some of the respondent population. These items are currently collected on an annual basis on the EIA-176, *Annual Report of Natural and Supplemental Gas Supply and Disposition*. However, their inclusion on the EIA-857 will facilitate more accurate consumption estimates on a monthly basis. The burden estimate to EIA-857 will remain at 3.5 hours per response; cognitive testing of the EIA-857 in 2010 revealed that the current burden estimate was generous and that data for the additional questions are in most cases readily available on internal gas operations reports respondents currently utilize to fill out EIA-857.

In addition, the EIA is proposing to reduce the sample size of the EIA-857 by approximately 25 percent (400 to 310) by moving to a cut off sample that can achieve a similar level of quality as the current sampling and estimation protocol.

The purchased gas data collected on the Form EIA-857 are needed to develop average delivered, or city gate, prices to provide analysts and decision-makers with information on the levels and rates of change in “wholesale” prices to distribution systems and the differences in such prices across the Nation. This information provides direct measures of the combined effect of producer prices, transportation costs, and pipeline-provided services upon distributors’ purchased gas costs and the variations geographically, seasonally, and under changing market conditions. The information also enables analysts to monitor the effects of Public Utility Commission actions at the State level.

The consumer price information collected enables the EIA to provide information on the prices by major consumer class on a monthly basis. Consumer prices provide analysts and decision-makers with direct measures of average consumer prices and price changes, geographically, seasonally, among consumer classes, and under changing market conditions.

Collection of revenue data associated with gas distributed to end users for the account of others is used by the EIA to analyze changes in distribution tariffs and for projections of future natural gas prices in EIA’s *Short-Term Energy Outlook* and *Annual Energy Outlook*. Specifically, EIA calculates the average cost of distribution services charged by local natural gas utilities to end-use consumers. EIA exempts pipeline companies in the EIA-857 sample from reporting transportation revenues that are outside the scope of the reporting requirement.

The EIA currently collects information about the number of customers, for each of the end-use sectors for gas sold and transported to residential, commercial, industrial, electric power, and other customers. Having these data enables EIA to better monitor fluctuations in monthly volume reporting that are commonly the result of changes to the number of customers being served.

Current data on consumption by the major consumer classes by State are necessary to enable the EIA to provide timely information on any changes in the levels of consumption at the State level by sector, analyze the patterns of change over time and the underlying drivers, and develop projections of future usage patterns for inclusion in the *Short-Term Energy Outlook* and *Annual Energy Outlook*.

State-level data are necessary, as indicated above, to enable the EIA to provide information on the frequently substantial differences in prices and consumption patterns among the various States. The cumulative effect of location relative to supply sources, climatic conditions, regulatory agency policies, interfuel competition, industrial activities, sources of supply, storage and peak shaving requirements, and location of transmission facilities result in significantly different price and consumption profiles across the Nation. Information on consumption profiles is necessary to enable analysts and decision-makers to assess ultimate impacts of various legislative or industry actions upon particular areas or regions.

The information collected on the Form EIA-857 is used to estimate:

- (1) monthly average price by State of natural gas delivered by local distribution companies,
- (2) monthly average price of natural gas billed to residential, commercial, and industrial consumers in each of the various States, and
- (3) total quantity of natural gas used by residential, commercial, industrial, electric power, and vehicle fuel consumers each month in each of the various States.

State and national level aggregate data are published in EIA's *Natural Gas Monthly*, *Monthly Energy Review*, and *Winter Fuels Report*, and made available to the Executive Branch, Congress, State governments, industry, and the public.

If the collection of information on the Form EIA-857 were not conducted, the EIA would be unable to provide information on the actual effects upon the natural gas market of current or future legislation and regulation in the detail and time frame necessary to adequately monitor and evaluate the market. Seasonality of the market is an important driver of the price and supply. Monthly data are the minimum level of reporting that will allow for assessment of the impacts of weather and other seasonal factors on the consumption and price patterns.

A3.5. Form EIA-895, "Annual Quantity and Value of Natural Gas Production Report"

The EIA-895 provides a standard reporting system for the amount of natural gas produced by State by month. The form is filed, on a voluntary basis, by 32 of the 33 natural gas producing States. It provides information on gross withdrawals from gas and oil wells, coalbeds, and shale, on volumes vented and flared, volumes used for repressuring, nonhydrocarbon gases removed, natural gas used as fuel on leases, and the amount of natural gas available for marketing. These data are collected by the States for taxation and statistical purposes.

EIA proposes to discontinue the EIA-895 because of the inconsistencies with which many of the data elements are reported by the responding States. For instance, some of the responding States do not keep records that allow for gross withdrawals to be reported by source type or for the valuation of marketed production to be consistent with the Form instructions. However, EIA has identified alternative public and private sources that will allow for all data series related to the EIA-895 to continue until resources permit the development and fielding of a permanent replacement survey(s) that can serve as the data source for gross production by source type, gas vented and flared, gas used for repressuring, nonhydrocarbon gases removed, gas used on leases, and the value of marketed gas. All data series will continue to be reported, but components (some unmarketed components and wellhead prices) may be estimated.

A3.6. Form EIA-910, “Monthly Natural Gas Marketers Survey”

To ensure the coverage of all natural gas sales to residential and commercial consumers in its natural gas price data, the EIA is requesting continued use of the Form EIA-910, “Monthly Natural Gas Marketers Survey.” This survey was first approved for use in May 2001, under ICR 1905-0202. The survey collects State-level monthly data on sales to residential and commercial customers by companies that market natural gas but are not involved in the physical final deliveries of gas to customers. Form EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers,” collects information on direct sales and gas transported for others from companies making deliveries of natural gas. Combining information from the EIA-910 and EIA-857 helps ensure complete price coverage of natural gas deliveries in the States surveyed.

In 2008, the OMB granted permission for EIA to continue data collection activities of natural gas marketers in 11 States and the District of Columbia. Respondents were selected to report data for States with active customer choice programs; data are currently collected for the States of Florida, Illinois, Michigan, New Jersey, Virginia, West Virginia, Georgia, Maryland, New York, Ohio, Pennsylvania, and the District of Columbia. EIA was concerned about residential and commercial coverage and missing price data in these States. EIA estimates that the current EIA-910 survey frame brings the percentage of volumes represented by published prices in the commercial sector to 100 percent in those areas.

The EIA compiles and incorporates the EIA-910 data collected from marketers who sell natural gas to residential and commercial customers into EIA’s monthly and annual natural gas databases to improve the completeness and accuracy of the EIA’s price estimates. Data from the EIA-910 supplements information already tabulated and published in the EIA’s publications. The data are used in EIA’s modeling and analytical efforts, and to answer questions from Federal policymakers, Congress, and the general public. These data are needed for policy making; for assessing supply, demand and price developments within the industry; and for assessing the competitiveness of the industry. The data are not intended to be collected for regulatory purposes and no rulemaking is involved.

Originally, the EIA had proposed to continue the monthly EIA-910 in its present form but also proposed to add an annual schedule that would ask respondents to report on a new form, EIA-910A, the annual totals of all the existing elements on the monthly survey broken out for each

local distribution company's territory in which the respondent operates. Due to recent budget reductions, the EIA has recently discontinued collecting the EIA-910 in all States except Georgia, New York, and Ohio and does not have the resources to field the originally proposed annual schedule at this time. While the EIA currently collects EIA-910 from three States for 2012, it proposes to clear collection of the current EIA-910 for up to six States in 2013-2014, if resources and priorities allow, in order to improve the coverage of residential and commercial prices in States with the heaviest participation rates by natural gas marketers. If the EIA were to expand the EIA-910 beyond Georgia, New York and Ohio, the additional three States would be selected based on the extent to which natural gas is being sold by marketers in those States based on the most recent data collected on form EIA-176. Based on the current collection in Georgia, New York, and Ohio, approximately 100 respondents are currently in the collection and the number of respondents could grow to 200 if an additional three States were included in the survey in 2013 or 2014.

The EIA had also proposed to publish company-level data collected on the proposed EIA-910A 9 months after its collection period and to change the confidentiality protection on the current monthly EIA-910 from the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) to exemptions under the Freedom of Information Act and provisions in the Trade Secrets Act. Now that the EIA-910A proposal is being withdrawn, EIA also withdraws its request to change to the confidentiality protection used for the monthly EIA-910; the data collected on the form will remain protected under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA.)

A3.7. Form EIA-912, "Weekly Underground Natural Gas Storage Report"

Form EIA-912, "Weekly Underground Natural Gas Storage Report," provides a data series for natural gas in underground storage similar to that formerly published by the American Gas Association (AGA). AGA began data collection in 1994 and discontinued its data collection on May 1, 2002. EIA initiated data collection on March 15, 2002 under an emergency clearance (ICR 1905-0202). The emergency clearance allowed EIA to survey a sample of underground storage operators on a weekly basis to continue the data series.

The *Weekly Natural Gas Storage Report (WNGSR)* is the EIA's only report designated a Principal Federal Economic Indicator (PFEI). The WNGSR was designated as PFEI in January 2008, because it is a key source of weekly natural gas volumetric data, a market signal of readily available natural gas supply. Each week, EIA collects data about the amount of working natural gas in underground storage facilities as of 9 a.m. Friday. EIA compiles and processes these data for release on its website the following Thursday at 10:30 a.m. Summary totals are presented for the United States broken into three regions: the West, the East, and the Producing Region. The total volume of natural gas in underground storage reservoirs is classified as either base gas or working gas. Underground storage facilities may be reservoirs in depleted oil and gas fields, aquifers, or salt caverns.

Respondents are also instructed to submit revisions to data for previous weeks if those

revisions were greater than 500 million cubic feet and to include notes explaining any unusual activity. Examples of unusual activity might include reclassification of working and base gas, or changes in ownership or operation of storage fields. In practice, respondents do not often have the need to provide notes on unusual activity.

The EIA-912 data are used to respond to requests from industry to provide weekly measures of natural gas underground storage operations. EIA uses the data to prepare analytical products assessing storage operations in the three geographical regions of the survey and the impact of those operations on supplies available for the winter heating season.

The EIA proposes to continue the collection of the EIA-912 in its present form but expand the sample size from 70 to 85 in order to maintain the same level of market coverage given recent and further anticipated expansion in the number of natural gas storage fields in operation.

A4. Technological Considerations to Reduce Burden

All survey forms are available electronically and may be completed using an Excel spreadsheet, or hand or typewritten on a PDF form for transmission via mail, fax, or email. Form EIA-176 is also available to respondents as an electronic filing system and can be downloaded from the EIA website. Due to time constraints on the weekly survey, EIA-912 respondents are required to file by e-mail or facsimile. More than 95% of forms are submitted electronically.

A5. Efforts to Identify Duplication and Analysis of Similar Existing Information

A discussion of similar data items is provided below.

EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"

Certain data elements similar to those reported on the Form EIA-176 are collected and compiled or estimated from other EIA surveys. Data on electric power sector consumption and price available from Form EIA-923, "Power Plant Operations Report," is used for electric power sector consumption and price summaries to maintain consistency in published consumption information. Electric power data collected on the Form EIA-176 are for internal balancing of individual reports and for cross-checking data collected on the Form EIA-923. This cross-check enables the EIA to identify misreporting or double reporting by electric power consumers, a benefit which far outweighs the negligible burden involved. The inclusion of lines for reporting deliveries to electric power generators and volumes transported to electric power generators for the account of others allows the respondent to account for all volumes of natural gas delivered to end users. The respondent then can perform reasonableness checks on the supply/disposition balance and for unaccounted volumes. This internal check is designed to eliminate some follow-up calls and reduce reporting burden for the respondent.

Certain data collected in the Form EIA-176 survey are similar to data reported by interstate natural gas pipeline companies on FERC Form 2, "Annual Report of Major Natural Gas

Companies.” However, the content and format of the FERC Form 2 are not directly comparable to the data requirements of the Form EIA-176 survey, particularly in terms of State specific, physical custody data. State-by-State data necessary to develop individual State gas balances, compatible with data collected from respondents other than interstate pipeline companies on the Form EIA-176, cannot be extracted from the FERC Form 2 report. The tracking of movements of natural gas across State lines and tracking of flows of natural gas from production areas to end users are two of the essential purposes of the EIA-176 survey. Transport of natural gas across State lines is performed almost entirely by interstate pipeline companies and the volumes transported State-to-State are not reported on the FERC Form 2.

Each of the above mentioned systems collect data that are similar in some respects to data collected on the Form EIA-176. However, with the exceptions noted, data collected cannot be reasonably substituted, in whole or in part, for data collected on the Form EIA-176.

EIA-191, “Monthly and Annual Underground Natural Gas Storage Report”

Data similar to the underground storage information on the monthly Form EIA-191 are collected on the weekly form EIA-912, “Weekly Underground Natural Gas Storage Report.” However, the weekly survey is collected from a sample of the monthly survey respondents in order to provide more timely measures of this market information. The EIA-191 is collected from the universe of underground storage operators and is used as the benchmark for adjustments to EIA-912 data.

EIA-757, “Processing Plant Survey”

Data similar to the capacity and design of gas processing plants collected on the Form EIA-757 are not currently gathered by EIA or any other organization. EIA investigated alternative ways to obtain timely and precise natural gas processing plant information for use in assessing processing plant operations, damage and expected restoration during a supply emergency. The alternatives considered were use of monthly data from natural gas processors, Form EIA-816, Monthly Natural Gas Liquids Report, and a new survey of natural gas processing plants.

A summary of the review of the alternatives to the Form EIA-757 follows: EIA has collected monthly data from operators of natural gas processing plants on Form EIA-816, “Monthly Natural Gas Liquids Report” (OMB No. 1905-0165) for many years. The survey collects information on the supply and disposition of natural gas liquids from operators of natural gas processing plants (which extract liquid hydrocarbons from a natural gas stream) and fractionators (which separate a liquid hydrocarbon stream into its component products.) The EIA considered revising the form to collect additional information, in order to assess processing plant operations and capabilities during a natural gas supply emergency. The EIA found that, in addition to not being sufficiently timely to provide information about emergency operations and constraints, certain aspects of the survey would result in undue burden and, further, would prevent the generation of reliable information about processing plant operations, capabilities and recovery during a supply emergency. The current reporting lag for data collected on Form

EIA-816 is 60 days after the end of the month and this is insufficient for the EIA to satisfy the need for information during a supply emergency. For instance, if a supply emergency happened on September 4, data from the Form EIA-816 would not be available until the end of December. The use of Form EIA-816 would not satisfy EIA's need for timely information during a natural gas supply emergency.

EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"

Certain elements of data similar to these collected on the Form EIA-857 are available to the EIA from other surveys or sources but none that could be used or modified for the purposes described above.

Monthly information on the average price of natural gas to residential consumers is available from the Bureau of Labor Statistics (BLS) but the price is only for given quantities of gas in major metropolitan areas. Volume information is not available. The data cannot be presented by State and do not represent average prices of quantities actually consumed.

Annual information is available by State on purchased gas prices, consumer prices by market sector, and consumption by market sector from the Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition." The Form EIA-857 complements the Form EIA-176 by providing current information reflecting monthly and seasonal variations. The Form EIA-176 information is used to develop the Form EIA-857 sample frame and provides an annual control for testing and adjusting the Form EIA-857 estimation procedures.

The Form EIA-923 survey of power plants collects fuel used for electric power generation. The data are used as the measure of natural gas consumed by this sector. However the data are also collected on the EIA-857 to assure that gas delivery agents have a full list of appropriate sectors to completely account for all gas deliveries.

EIA-910, "Monthly Natural Gas Marketer Survey"

The data elements collected on the EIA-910 are not duplicated in other surveys or sources.

EIA-912, "Weekly Underground Natural Gas Storage Report"

Data similar to the underground storage information on the monthly Form EIA-912 are collected on the monthly form EIA-191M, "Monthly Underground Natural Gas Storage Report." However, the monthly survey is collected from the universe of underground storage operators and is used as the benchmark for adjustments to EIA-912 data. The EIA-912 is collected from a sample of the monthly survey respondents in order to provide more timely measures of this market information.

A6. Impacts on Small Businesses or Other Small Entities

Data requested provide the minimum information necessary to fulfill the EIA's responsibility to provide meaningful, timely, objective, and accurate energy data. Respondents to the survey complete only those data elements applicable to their operations. For small firms, fewer data elements are generally applicable and are easily obtained from generally existing records. EIA staff members are also available during normal business hours to provide assistance by telephone.

The EIA encourages electronic reporting on all natural gas surveys.

For the EIA-857 survey, burden on all gas companies has been reduced to the minimum necessary to achieve the desired accuracy. The new sampling plan for the EIA-857 will in most cases relieve smaller respondents of a reporting obligation on EIA-857.

Companies responding to the Form EIA-191 and EIA-912 are not small businesses.

The EIA-176 is required of all companies with natural gas deliveries to end-use customers regardless of size. However, the majority of the small-sized respondents only have to fill out a small percentage of the data elements on the form as the majority of the questions asked are not applicable to small-sized respondents. Therefore, the burden to small businesses on the EIA-176 is the minimum necessary to gather the information required.

The Form EIA-910 survey burden is the minimum necessary to gather the information required. Similarly, the natural gas processing plant operators that complete Form EIA-757 are not small businesses or other small entities.

A7. Consequences of Less Frequent Reporting

Data are required at requested frequency in order to satisfy EIA's programmatic needs as described in A2 above. Requested frequency of reporting is: EIA-176, annually; and EIA-191, EIA-857, EIA-895, and EIA-910 monthly. The EIA-912 is filed weekly. The EIA-757 baseline survey, Schedule A, is filed no more than once every 3 years. Without these data, natural gas market participants including local distribution companies, producers, importers, gas purchasers, Federal and State agencies providing income assistance for energy, and the gas trading community would not have timely information about natural gas supplies. The importance of timely information and the fact that there are no other sources are the basis for the requested report frequency. If the Form EIA-757 collection is not conducted, EIA would not be able to meet its goal, and could not provide essential natural gas processing plant information prior to and during a supply emergency. Less frequent reporting would prohibit EIA from meeting its mandate of providing timely and reliable energy information. The frequency of reporting on Schedule B will be determined at the time the survey is activated in response to a supply emergency.

A8. Special Circumstances

There are no special circumstances for these collections.

A9. Summary of Consultations Outside the Agency

A request for comments from interested persons was solicited in a notice describing the proposed extension of the forms and proposed modifications to each form. The notice was published May 2, 2011, in the Federal Register, pp. 11444-11446. An announcement of the Federal Register notice was sent to a list of trade groups and others interested in natural gas data programs. In addition, the notice and proposed versions of the survey forms were posted on EIA's website.

Summary of Responses to Federal Register Notice of May 2, 2011:

As of May 2, 2011, six responses to the Federal Register Notice were received which are summarized below.

Comment1: National Energy Marketers Association (NEM), expressed opposition to the EIA's proposed changes to EIA-910 which included the addition of an annual schedule which would require each respondent to report by each local distribution company in which they serve customers instead of on a State-basis due to concerns over the reporting burden. NEM is also concerned at the EIA's proposal that such data collected on the newly proposed annual schedule would be published on a company-level due to the perception of competitive harm it would cause the reporting companies.

Response1: EIA's position is that the proposed collection of annual data on the EIA-910A would be a significant improvement to the accuracy of the EIA's published prices. However, EIA is withdrawing the proposal for this annual data collection due to a lack of funding and resources to administer the survey. EIA withdraws the proposal to change the confidentiality provisions and the monthly data reported on Form EIA-910 will continue to be protected under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA.)

Comment2: United States Department of Commerce, Economics and Statistics Administration, Bureau of Economic Administration, strongly supported the continuation of forms cited in the Federal Register notice. BEA uses information collected on Forms EIA-176 and EIA-895 to prepare the U.S. input-output accounts. Also, Forms EIA-176, EIA-857, EIA-910, and EIA-895 are used in the annual estimates of gross state product (GSP) and gross domestic product (GDP).

Response2: The EIA acknowledged BEA for their response and has no plans to discontinue any data series the Bureau of Economic Analysis is currently using, despite the discontinuation of the EIA-895. The EIA will be using publicly available as well as third-party information in order to maintain the series at this time.

Comment3: A consortium of natural gas industry trade groups, the American Exploration & Petroleum Council, the Independent Petroleum Association of America, the Natural Gas Supply

Association, the American Petroleum Institute, the National Ocean Industries Association, and U.S. Oil & Gas Association, supports the continuation of the EIA-895 as it yields data of use to the natural gas market. However, the group is opposed to the EIA collecting such information directly from gas producers and/or processing plants as they maintain that collecting such information from the States is more efficient and less burdensome to private firms who are presumed to already be furnishing similar information in the States where they operate.

Response3: Though the EIA proposes to discontinue collection of the EIA-895 in lieu of collecting the information from alternative public and private data sources, a permanent survey replacement that would involve surveying natural gas producers and/or gas processing plants is still being considered. Collecting information on gas production by type, gas vented and flared, gas used for repressuring, gas used on leases, nonhydrocarbons removed and the value of marketed gas which is used to produce wellhead prices, has proven difficult to collect from the States as the States do not collect and/or report all of the information in a consistent fashion on form EIA-895.

Comment4: The South Carolina Energy Office wrote a letter of support of the U.S. Energy Information Administration's natural gas data program, emphasizing the important role such State-level data play for South Carolina and other States who do not have the resources to collect State-level energy information required for policy and analysis.

Response4: The EIA acknowledges the South Carolina Energy Office's use of the U.S. Energy Information Administration's natural gas data series and looks forward to engaging with them and other States in the future as evaluations of the EIA's various data collection programs are made.

Comment5: The Montana Department of Environmental Quality stated that they support the continuation of the State-level gross and marketed production data series as they are used for Montana energy balances as well as their upcoming Montana Energy Assurance Plan.

Response5: The EIA acknowledges the Montana Department of Environmental Quality's use of the U.S. Energy Information Administration's gross and marketed natural gas production data series and looks forward to engaging with them and other States in the future as evaluations of the EIA's various data collection programs are made. The EIA plans to continue both these series.

Comment6: Elliott Associates inquired as to whether increasing the sample size of the EIA-912 was adequate to insure proper coverage of natural gas storage operations, particularly in the Producing Region.

Response6: The EIA responded that the new sample size increase of 70 to 85 should be adequate to ensure optimal survey coverage in all regions as described in the Weekly Underground Natural Gas Storage Report technical notes currently and during the next three years.

A10. Payments or Gifts

No payments or gifts are made to the survey respondents.

A11. Provisions for Data Protections

The EIA considers information collected on Forms EIA-176, EIA-757 and certain data elements collected on EIA-191 to be public information that does not need protection

The following statement of the confidential provisions below is included in the instructions to the proposed versions of Forms EIA-176, and EIA-757:

Information reported on Form EIA-xxx is considered public information and may be publicly released in company or individually identifiable form.

The following statement of the confidential provisions below is included in the instructions for the proposed version of Form EIA-191:

Information collected in Parts 1, 2, and 3 on Form EIA-191 is considered public information and may be publicly released in company or individually identifiable form. Information collected in Part 4 (including Base Gas, Working Gas and Total Gas in Storage data), will be protected and not disclosed 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. U.S.

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 nonstatistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are not applied to the statistical data published from EIA-191M survey information. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.

Forms EIA-910 and EIA-912 collect confidential data under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). These data are considered confidential and will be used exclusively for statistical purposes. The instructions to Forms EIA-910 and EIA-912

contain the following data confidentiality notice:

The information you provide on Form EIA-xxx will be used for statistical purposes only. U.S. In accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 (Title 5 of Public Law 107-347) and other applicable Federal laws, your responses will be kept confidential and will not be disclosed in identifiable form to anyone other than employees or agents without your consent. By law, every EIA employee, as well as every agent, is subject to a jail term, a fine of up to \$250,000, or both if he or she discloses ANY identifiable information about you.

EIA will protect the values reported on Forms EIA-857 and Form EIA-191. The instructions for the proposed version of EIA-857 and EIA-191 contain following pledge of protection:

The name, address, and contact information of the responding company are considered public information. These data elements may be released in company identifiable form. All other information reported on Form EIA-xxx 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 EIA to provide company-specific data to other Federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of the Department of Energy (DOE); or to any Committee of Congress, the U.S. 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 nonstatistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation procedures are not applied to the statistical data published from EIA-857 survey information. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.

A12. Justification for Questions of a Sensitive Nature

The forms contain no questions of a sensitive nature.

A13. Estimates of Respondent Burden Hours

See Table 1 for the estimates of respondent burden for the individual forms contained in this package. The overall annual respondent burden is estimated to be 50,131 hours. The estimated costs to respondents for the burden hours are estimated to be \$3,401,436 (50,429

hours times \$67.45 per hour). \$67.45 is average loaded hourly rate of a GS-13 Federal employee in FY11. The EIA presumes the cost of a Federal worker for a private firm to be commensurate with the cost of a Federal employee.

Table 1. Estimate of Respondent Burden

	A	B	A*B	C	(A*B)*C	
Form	Number of Respondents	Number of Reports Annually	Number of Annual Responses	Burden Hours per Response	Annual Burden Hours	
EIA-176	2,000	1	2,000	12.0	24,000	
EIA-191	131	12	1,572	2.6	4,087	
EIA-757 Sch. A	500	0.33	165	0.5	83	
EIA-757 Sch. B	39	0.33	13	1.5	19	
EIA-857	310	12	3,720	3.5	13,020	
EIA-910	200	12	2,400	2.0	4,800	
EIA-912	85	52	4,420	1.0	4,420	
Total	3,265	90	14,290	n/a	50,429	

* EIA-757 Schedule B will be collected only in response to a significant disruption in natural gas supply. 39 respondents will be accounted for Schedule B based on the number of respondents surveyed the last time EIA-757 Schedule B was collected in 2008 due to Hurricanes Gustav and Ike.

A14. Estimate of Cost Burden to Respondents - Capital/Start-up Costs and Operation/Maintenance/Purchases of Services

The EIA estimates that there are no additional costs to respondents associated with the surveys in the Natural Gas Data Collection Program Package other than the costs associated with the burden hours as set forth in item A13 above.

A15. Annual Cost to the Government

The six surveys in the clearance package are included in the Annual Operating Plan for the Office of Oil, Gas and Coal Supply Statistics. The annualized costs for this data program are estimated to be \$2,300,000 in FY11 which is based on expenditures on contract survey analysts of \$825,000, and the balance, \$1,475,000 in Federal salary expense.

A16. Changes in Burden or Costs to Respondents

The overall burden for the Natural Gas Data Collection Program Package is estimated to be 50,429 hours annually for all the forms included in this clearance package. The information collections in this request are currently approved under OMB control number ICR 1905-0175 for a total existing burden of 52,569 hours. This request will result in a net decrease of 2,138*

hours for all the forms in this clearance package. The changes are due in part to the combining of the EIA-191M and EIA-191 A (resulting in +451 hours-adjustment), a decrease in the number of respondents in the EIA-857 (resulting in – 2,940 hours-adjustment), the discontinuation of the EIA-895 (resulting in a -208 hours-adjustment), a decrease in the number of States and respondents reporting on EIA-910 (resulting in a -240 hours-adjustment) and the increase in the number of respondents on EIA-912 (resulting in a + 780 hours-adjustment.) Additionally, annual burden was increased by 19 hours to account for the triennial EIA-757 Schedule B.

Table 2. Changes to Annual Time Burden Estimates (hrs)

Form	Time Burden From Most Recent Clearance (2008)	Proposed Time Burden	Program Change due to Agency Discretion	Change due to Adjustment in Agency Estimate	Total Change in Time Burden
EIA-176	24000	24000	0	0	0
EIA-191M	3514	0	-3514	0	-3514
EIA-191A	122	0	-122	0	-122
EIA-191	0	4087	4087	0	4087
EIA-757 Sch. A	83	83	0	0	0
EIA-757 Sch. B	1.5	19	0	19	19
EIA-857	15960	13020	-2940	0	-2940
EIA-895	208	0	-208	0	-208
EIA-910	5040	4800	-240	0	-240
EIA-912	3640	4420	780	0	780
Total	52569	50429	-2157	19	-2138*

*Difference between previously approved annual total burden hours of 52,569 and 50,429 proposed is 2140 but sum of differences total to 2138 due to rounding error.

Table 3. Changes to Annual Number of Responses

Form	Annual Response from Most Recent Clearance	Proposed Annual Number of Responses	Program Change due to Agency Discretion	Change due to Adjustment in Agency Estimate	Total Change in Responses
EIA-176	2000	2000	0	0	0
EIA-191M	1464	0	-1464	0	-1464
EIA-191A	122	0	-122	0	-122
EIA-191		1572	1572	0	1572
EIA-757 Sch. A	165	165	0	0	0
EIA-757 Sch. B	1	13	0	12	12
EIA-857	4560	3720	-840	0	-840

EIA-895	416		-416	0	-416
EIA-910	2520	2400	-120	0	-120
EIA-912	3640	4420	780	0	780
Total	14888	14290	-610	12	-598

A17. Data Collection and Publication

Annual Surveys

The data collected, reviewed, and tabulated by the EIA from the Form EIA-176 will be merged with data collected in the Forms EIA-816, EIA-64A, EIA-923, EIA-857 and EIA-910 surveys to develop quantitative overviews of gas available to each of the various States and the sources of such gas; gas used or otherwise disposed of in each of the various States; average wellhead prices, average prices of gas produced and purchased from producers; and the number of consumers, total and average quantities consumed, and total and average prices paid by consumers by market sector in each of the various States. The data will be used as input to the State Energy Data System, the Short-Term Integrated Forecasting System, the National Energy Modeling System, and other supply, demand, and price forecast models. They are published in the Natural Gas Annual, and provide input to the *Natural Gas Monthly*, *Annual Energy Review*, *Annual Energy Outlook*, *Monthly Energy Review*, *Short-Term Energy Outlook*, and State Energy Profiles.

The time schedule for the *Natural Gas Annual* data collection, tabulation, and publication is shown in the table below.

EIA Form	Due date	Extension Date	Processing completion	Posted on website
EIA-176	March 1	April 1	September 30	December 30

Monthly Surveys

Data gathered monthly on the Forms EIA-191, EIA-857, and EIA-910 will be reviewed, verified, and aggregated to be used as input for the *Natural Gas Monthly* and the *Monthly Energy Review*. In addition, data from the Form EIA-191 will be used in specific studies of peak day supplies to major market areas, utilization of storage capacity, and the load leveling function of storage in the market.

Individual company reports will be checked for reasonableness by comparing current reports with prior responses. Mathematical calculations will be checked for accuracy and all data will be checked for internal consistency. Respondents will be required to refile reports containing any inconsistencies or errors.

A typical time schedule for the monthly EIA-191, EIA-857, and EIA-910 data collection tabulation and publication is shown below using August data release for the example:

Natural Gas Monthly – August 20xx Issue

EIA Form	Data report month	Due Date	Processing complete	Posted on website
EIA-191	June	July 20	August 20	August 31
EIA-857	June	July 30	August 20	August 31
EIA-910	June	July 30	August 20	August 31

A typical time schedule for the weekly EIA-912 data collection, tabulation and publication is shown below using the first several weeks of August as example:

Weekly Natural Gas Storage Report – August 20xx Issues

EIA Form	Data report for week ending	Due Date	Processing complete	Posted on website
EIA-912	August 1	August 4	August 6	August 7
EIA-912	August 8	August 11	August 13	August 14
EIA-912	August 15	August 18	August 20	August 21

A18. Display of Expiration Date

The expiration date will be displayed on all forms.

A19. Exceptions to Certification

EIA takes no exception to the certification statement.