

Appendix E

EIA Letter to OMB Regarding Comments Received

From the Environmental Protection Agency

In Response to Federal Register Notice

Vol. 75, No. 129, DOCID: fr07jy10-50

Published July 7, 2010



Department of Energy
Washington, DC 20585

SEP 09 2010

Ms. Christine Kymn
Desk Officer for DOE
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Clearance of EIA's 2011 Electric Power Survey Forms – EPA Comments

Dear Ms. Kymn:

This letter provides our response to the Environmental Protection Agency's (EPA) comments on the 2011 clearance of the U.S. Energy Information Administration's (EIA) electric power survey forms. This letter supplements my letter of August 26, 2010, which provided our response to the other comments received by OMB.


EPA's comments are included in the undated letter from Sam Napolitano which we discussed on August 30. EPA's primary request, on page 1 of the letter, is that EIA collect the efficiency of combined heat and power (CHP) systems from utility-owned power plants. This would be in addition to our original proposal to collect these data from non-utility plants. We recommend accepting EPA's suggestion.

EPA has 32 additional numbered comments, divided between the EIA-860 survey of power plant characteristics and the EIA-923 survey of power plant operations. These comments are addressed in the enclosure with this letter.

Where we recommend accepting EPA's comments, we do not believe the changes will add any material burden on respondents. Most of the changes involve clarifying instructions or adding new response options to existing questions. The collection of CHP system efficiency from utility power plants will affect only a handful of respondents because very few utility CHP systems exist.

If you have any questions or need more information please let me know at stan.kaplan@eia.gov or at 202-586-5114.

Sincerely,


Stan Kaplan
Director, Electric Power Division
U.S. Energy Information Administration

Enclosure

cc: Scott Sitzler, Dean Fennell, Jim Diefenderfer,
Glenn McGrath, Jason Worrall, Renee Miller



Summary of EPA Comments on the EIA-860 Survey and EIA's Response

EPA Comment No.	EIA-860 Instructions or Form Reference	Summary of EPA Comment	EIA Response
1.	Instructions, p. 4, item 15	Respondents are entering as owners of transmission facilities firms that no longer exist.	We will clarify the instructions and explore ways to improve the editing of these data.
2.	Instructions, p. 5, Item 5.	Adjust ordering of Prime Mover codes in the table.	EIA agrees with EPA's comment.
3.	Instructions, p. 5, item 5	Add the phrase "conventional hydroelectric" as clarification.	EIA agrees with EPA's comment.
4.	Instructions, p. 6, item 8	Add a reference to the EIA Glossary definition of "electric utility generator."	We will either add the reference or put the definition in the instructions.
5.	Instructions, p. 14	Change "5 year" to "10 year."	EIA agrees with EPA's comment.
6.	Instructions, p. 15	There is extraneous language referring to New Source Review.	This is a typographical error and the extraneous language will be removed.
7.	Instructions, p. 28, item 9	Redundant language dealing with longitude and latitude should be removed.	EIA agrees with EPA's comment.
8.	Instructions, p. 29, Table 1	EPA's comment deals with whether the new Energy Source code RC (Refined Coal) is equivalent to the obsolete code SC (Coal Synfuel).	The codes are not equivalent. SC, which was essentially coal treated with oil and other chemicals, has not been produced for several years due to the expiration of a Federal tax credit. There is no expectation that production of SC will resume in the absence of federal subsidies. RC is a commercial product and refers to coal that has been, for example, heat-treated to remove moisture and produce a fuel with better combustion and environmental characteristics. The instructions and form are therefore correct as proposed and no change is warranted.
9.	Instructions, pp. 29 and 30, Table 1	Remove highlighting and clean-up formatting of the table.	EIA agrees with EPA's comment.

EPA Comment No.	EIA-860 Instructions or Form Reference	Summary of EPA Comment	EIA Response
10.	Instructions, p. 30, Table 1	Add the phrase "run of river" to the description of the CUR (Currents) Energy Source code	We recommend rejecting this change. Our concern is that EPA's proposed language may lead to operators of conventional hydroelectric plants incorrectly choosing the CUR code.
11.	Instructions, p. 30, Table 1	Add the WAT (water) Energy Source code to the table.	EIA agrees with EPA's comment.
12.	Form, p. 1, Sch. 1	Correct typographical errors relating to name and telephone number.	EIA agrees with EPA's comment.
13.	Form, p. 2 - 6, Sch. 2	Reduce number of grid voltages or allow multiple owners of transmission facilities.	Consistent with EPA's comment, we will request in the form only one transmission connection (the connection with the highest voltage) and one owner. We will request respondents to identify other connections and owners in the comments section of the survey.
14.	Form, p. 8	Make line numbering consistent.	EIA agrees with EPA's comment.
15.	Form, p. 9, Sch. 3B	Add "nuclear fuel" after "combustible fuel."	EIA agrees with EPA's comment.
16.	Form, p. 9, Sch. 3B	Rearrange and renumber certain lines in a more logical order.	EIA agrees with EPA's comment.

Summary of EPA Comments on the EIA-923 Survey and EIA's Response

EPA Comment No.	EIA-923 Instructions or Forms Reference	Summary of EPA Comment	EIA Response
17.	Instructions, p. 9, Table 2	Add a code for boilers operating under test conditions.	EIA agrees with EPA's comment.
18. And 19.	Instructions, p. 10	Collect sulfur content (Comment 18) and ash content (Comment 19) for additional fossil fuels.	<p>We recommend against collecting sulfur or ash content for distillate fuel oil, jet fuel, and kerosene (or ash for residual fuel oil). These products generally have extremely low sulfur and ash content and are not a significant contributor to air emissions. Adding these codes would put unnecessary burden on respondents.</p> <p>We also recommend against collecting sulfur or ash content for tire-derived fuels, waste oil, other biomass liquids, and liquid fuels recorded in the "Other" category. Respondents generally will not know the actual sulfur or ash content of these fuels. This is because the sulfur or ash content is known to be very low and/or the product is burned in small quantities mixed with a conventional fuel, such as coal, which dominates plant emissions.</p> <p>Another consideration for all of the fuels listed above is that they constitute a very small amount of energy consumption for power generation, and an even smaller portion of air emissions.</p> <p>We agree that EIA should collect sulfur and ash content for anthracite coal and refined coal, both of which could have high sulfur and/or ash content.</p>

EPA Comment No.	EIA-923 Instructions or Forms Reference	Summary of EPA Comment	EIA Response
20	Instructions, p. 10	For Sch. 3B (Fuel Consumption – Prime Mover Level) add data collection for battery energy storage, flywheel energy storage, and “Energy Storage, Other.” (Also see EPA Comment 22.)	<p>Our recommendation is to reject this comment. Battery and flywheel storage have characteristics of both generation and transmission stability support technologies. While we do want to collect the location and size of these units (on the EIA-860 survey) it would be premature to collect operating data until we better understand the function of these systems. It is possible that none of our existing surveys is properly designed to collect useful information on battery and flywheel operation. EIA will continue to examine this issue so we can capture operating data in the future.</p> <p>In respect to “Energy Storage, Other,” this category is designed to capture storage technologies we are not aware of (if any). We do not propose to collect operating data until we have an inventory of these “other” technologies and understand how they operate.</p>
21	Instructions, p. 10	For Sch. 3B (Fuel Consumption – Prime Mover Level) add data collection for fuel cells.	EIA agrees with EPA’s comment.
22	Instructions, pp. 13 & 14	For Sch. 5B (Prime Mover Level Generation) add data collection for battery energy storage, flywheel energy storage, and “Energy Storage, Other.” (Also see EPA Comment 20.)	Our recommendation is to reject this comment. For an explanation, please see the response to Comment 20, above.
23	Instructions, p. 19, Table 4	Add a cooling system status code for systems operating under test conditions.	EIA agrees with EPA’s comment.
24.	Instructions, p. 20, Table 5	Add flue gas particulate collection system status codes for systems operating under test conditions and systems in cold standby.	EIA agrees with EPA’s comment.
25.	Instructions, p. 21, Table 6	Add flue gas desulfurization collection system status codes for systems operating under test conditions, systems in cold standby, and systems in standby mode.	EIA agrees with EPA’s comment.
26.	Instructions, p. 22, Table 7	Add prime mover codes for battery storage and flywheel storage.	Our recommendation is to reject this comment. For an explanation, please see the response to Comment 20, above.

EPA Comment No.	EIA-923 Instructions or Forms Reference	Summary of EPA Comment	EIA Response
27.	Instructions, p. 23, Table 8	Eliminate a discrepancy between the EIA-860 and EIA-923 surveys in the heat content range shown for agricultural by-products.	EIA agrees with EPA's comment.
28.	Instructions, p. 24, Table 8	Rearrange the order of certain Energy Source codes; add the phrase "run of river" to the description of the CUR (Currents) Energy Source code	We agree with rearranging the order of the codes. We recommend rejecting the addition of the run of river language. Our concern is that EPA's new language may lead to operators of conventional hydroelectric plants incorrectly choosing the CUR code.
29.	Instructions, p. 24, Table 8	Eliminate the duplication of the WAT (water) code.	We recommend rejecting this change. The code appears twice due to the distinction between conventional hydroelectric generation and hydroelectric pumped storage systems.
30.	Form, p. 6, Sch. 3B	Clarify introductory text.	EIA agrees with EPA's comment.
31.	Form, p. 9, Sch. 5B	Reword the introductory text.	EIA agrees with EPA's comment.
32.	Various pages of the Instructions and Form	Remove highlighting.	EIA agrees with EPA's comment.