

**SUPPORTING STATEMENT FOR THE
“QUARTERLY ELECTRICITY
IMPORTS AND EXPORTS REPORT”
OMB NUMBER 1905-NEW**

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**Office of Electricity, Renewables and Uranium Statistics
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SUPPORTING STATEMENT FOR FORM EIA-111, QUARTERLY ELECTRICITY IMPORTS AND EXPORTS REPORT

OMB NUMBER 1905-NEW

Background and Purpose

The U.S. Energy Information Administration (EIA) of the U.S. Department of Energy (DOE) is required to make independent, high-quality statistical data that reflect national electric capacity, generation, sales, trade, transmission, and pricing available to Federal and other government agencies, the electric power industry, and the general public.

The information collection proposed in this supporting statement has been reviewed in light of applicable EIA information quality guidelines. It has been determined that the information would be collected, maintained, and used in a manner consistent with the Office of Management and Budget (OMB), DOE, and EIA information quality guidelines.

On August 11, 2011, the OMB authorized the EIA to receive comments regarding the proposed collection under OMB No. 1905-NEW; Form Number EIA-111, “Quarterly Electricity Imports and Exports Report.” Form EIA-111 will collect U.S. electricity import and export data and be used to develop an accurate measure of the flow of electricity into and out of the United States from Canada and Mexico.

Electricity import and export data was previously collected by DOE with the OE-781R form, OMB Control Number 1901-0296. This survey was terminated on June 1, 2011 due to the excessive complexity of the survey and the high cost of maintaining the survey. EIA directly informed all OE-781R respondents of this change. EIA also posted an alert message on the internet data collection site that informed users attempting to access the previous survey about the suspension of the survey and EIA’s plan to launch a replacement. Additionally, EIA describes the transfer of reporting from the OE-781R to the EIA-111 on EIA’s website (<http://www.eia.gov/survey/#oe-781r>).

In order to meet the requirements of EIA and DOE’s Office of Electricity Delivery and Energy Reliability (OE) for a continuous data series, data will be collected retroactively from June 1, 2011 and forward. The plan to collect data retroactively was noted in the first Federal Register Notice (FR Vol. 76, No. 155, pg. 49758; <http://www.gpo.gov/fdsys/pkg/FR-2011-08-11/pdf/2011-20401.pdf>).

EIA Proposal

EIA requests a 3-year approval from the OMB for clearance of the following electric power survey form:

Form EIA-111, “Quarterly Electricity Imports and Exports Report”

This form is proposed pursuant to the authority granted to the Department of Energy by the Federal Energy Administration Act (FEA Act) (Public Law 93-275). The mandatory Form EIA-111 would collect monthly data on a quarterly basis and upon approval the EIA will begin processing data in 2012. Data will be collected to include the time period June 1, 2011 to when the collection begins, to ensure there is no break in the data series required by DOE’s Office of Electricity Delivery and Energy Reliability (DOE-OE).

The Form EIA-111 collects the following information:

1. Electricity Imports into the U.S. from Canada or Mexico
2. Electricity Exports from the U.S. into Canada or Mexico
3. Transaction Payments and Revenues
4. Category of Service (Firm, Non-Firm, Exchange or Other)
5. Transmission Operations (Actual and Implemented Interchange)
6. Exceeded Order Term Events

The EIA-111 consists of a set of schedules that arrange the collected data into groups. This information is collected by four schedules or sections.

Schedule 1 collects and verifies identification information.

Schedule 2A collects information from Purchasing and Selling Entities (PSEs) and organizations having U.S. Treaty obligations for **Imports into the U.S. from Canada or Mexico**. Previously on Form OE-781R, the EIA collected information only from PSEs that had export authorization.¹

In comparison, the Form EIA-111 will collect information from PSEs who may not have an export authorization but are authorized by the National Energy Board of Canada (NEB) to export from Canada into the U.S. By requiring these PSEs to file the EIA-111, we will be improving the collection of data for all imports into the U.S.

¹ On the OE-781R, trade information – both imports and exports – was only collected from entities that had authorizations to export electricity out of the U.S. However, since an export authorization is not required for those entities that are just importing electricity to the United States, data about these imports were missing from the data collection. The proposed EIA-111 corrects this gap in the earlier survey by requiring all entities that import electricity into the US to report data, whether or not they have an export authorization. This ensures complete coverage of imports.

PSEs will report the volume and revenue of all imports by Foreign Source and U.S. Sink Balancing Authority² Areas. The PSEs that are required to file the Form EIA-111 should report the transfer facility's Presidential Permit³ (PP) number, e.g., PP-101-A. In those rare cases where the transfer facility does not have a PP, the entity should enter the Transmission Service Provider's name.

Key information required:

- Category of Service (Firm, Non-firm, Exchange, Other)
- Energy Purchases/Exchange Imports (MWh)
- Energy Payments (\$U.S.)
- Other Payments (\$U.S.)
- Total Payments (\$U.S.)

Schedule 2B collects information from Purchasing and Selling Entities and Organizations having U.S. Treaty obligations for **Exports from the U.S. into Canada or Mexico**. All exporting PSEs are required to hold a valid Export Authorization⁴ to export electricity from the U.S. and are required to file Form EIA-111. PSEs will report the volume and revenues of all exports by U.S. Source and Foreign Sink Balancing Authority Areas. The PSEs that are required to file the Form EIA-111 should have a valid Export Authorization and are required to report the export authorization number, e.g., EA-101. The reporting PSE will also report the transfer facility's PP number. In those rare cases where the transfer facility does not have a PP, the PSE should enter the Transmission Service Provider's name.

Key information required:

- Category of Service (Firm, Non-firm, Exchange, Other)
- Energy Sales/Exchange Exports (MWh)
- Energy Revenues (\$U.S.)
- Other Revenues (\$U.S.)
- Total Revenues (\$U.S.)

Schedule 3A collects information from U.S. Border Balancing Authorities on **Actual Interchange**. Actual interchange is the metered value of electricity that flows from one balancing authority area to another. Actual interchange across U.S. borders involves only the balancing authorities that are directly interconnected with foreign (Canadian or Mexican) balancing authorities. The actual interchange is to be measured on an hourly integrated basis in megawatt-hours (MWh).

Key information required:

² A Balancing Authority is the responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time. In the context of this data collection, a sink Balancing Authority is the load area receiving electricity imports, while a source Balancing Authority is an area from which electricity exports originate.

³ Presidential Permits provide authority to construct, operate, maintain, or connect an electric transmission facility crossing the international borders between the United States, Canada, and Mexico.

⁴ Export Authorizations regulate the export of electric energy to Canada and Mexico.

- Actual Interchange Received and Delivered (MWh)
- The Canadian or Mexican Balancing Authority directly interconnected with U.S. Border Balancing Authorities

Note that Schedules 2A and 2B collect trade data (sales revenues or payments, volume, and contract type) from wholesale buyers and sellers. Schedules 3A and 3B collect the measured value of electricity transfers between electric systems over the border. The respondents on these schedules are different and they are reporting different aspects of import and export activity. The former involves commercial activity and the latter involves operational activity.

Schedule 3B collects information from U.S. Border Balancing Authorities on **Implemented Interchange**. Implemented interchange is the interchange values that the Balancing Authority enters into its Area Control error equation, i.e., uses to balance supply and demand of its electric system. U.S. Border Balancing Authorities are required to report the implemented interchange that crosses international borders via their system.

The interchange transaction information (e-Tag) contains the names of the source and sink balancing authorities and the name of the U.S. border transmission service provider. U.S. Border Balancing Authorities receive copies of e-Tags and can use this information to assist in completing the Form EIA-111.

Key information required:

- Source and Sink Balancing Authority Areas
- Presidential Permit Number or the Transmission Service Provider's name
- Implemented Interchange – Delivered (MWh)

Schedule 4 collects information from Presidential Permit Holders and DOE Export Authorization Holders about events in which the operational transmission system limits specified in the PP or Export Authorization (Order) was exceeded. If there are no events, the holder of the permit or authorization is required to state that there were no events on the form.

Key information required:

- Presidential Permit Number or Export Authorization Number
- Date and Hours of Exceeded Event
- Specific Order Term exceeded

Schedule 5 is where respondents can **Comment** on the data reported in the survey.

A. Justification

A.1. Legal Justification

The authority for this data collection is derived from the following provision:

Section 13(b), 15 U.S.C. §772(b), of the Federal Energy Administration Act (FEA Act), Public Law 93-275, outlines the types of individuals subject to the data collection authority delegated to the Administrator and the general parameters of the type of data which can be required. Section 13(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 proper exercise of functions under this Act.”

The objectives of the FEA Act are set forth in Section 5(b), 15 U.S.C. §764(b), of the FEA Act, which states that the Secretary shall, to the extent (s)he is authorized by Section 5(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;...

(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), and 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 [Secretary] by the Congress.”

Authority for invoking Section 5(a) of the FEA Act is provided by Section 52, 15 U.S.C. §790(a) and (b), of the FEA Act, which states that the Administrator of the EIA:

“(a)... [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...

(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 non-mineral 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 and patterns of energy supply and consumption...”

A.2. Needs and Uses of Data

The purpose of the Form EIA-111 is to collect data about imports and exports of electricity into and out of the U.S.

A.2.1. Overview of Data Uses

The form is designed to collect data from all entities engaged in the sale, purchase, transfer or operational support for cross-border transmission of electricity.

Form EIA-111 survey data will directly support the mission of the DOE Office of Electricity Delivery and Energy Reliability (DOE-OE) which monitors compliance with the terms of Presidential Permits (PP) and Export Authorizations. DOE-OE needs the import/export data to determine whether to re-approve applications to import/export electricity, furnish decision

makers with accurate information on which to base trade policy, and to verify that the holders of PPs and electricity Export Authorizations have complied with the terms and conditions of the permits and Export Authorizations. DOE-OE will also use the data to ensure that exports of electric energy do not impair the sufficiency of electric power supply within the United States or impede the coordinated use of the U.S. power supply network.

State government regulators and analysts use these data for assessing electricity input and output that impact regional- and state-level market conditions. They also use this data to determine energy and environmental policies and for other uses. In the absence of the centralized and public data collection by the EIA, each state on an international border would have to undertake its own data collection effort, in many cases requesting duplicative information from firms within the electric power industry that support operations of international border transmission lines. This data collection has been designed to ensure consistent data at minimum cost to the public and respondents. In addition to government and power industry customers, these data will become the core information source for other private sector and academic analyses of the electric power industry and the associated trade across international borders.

In summary, examples of activities where these data covering international electricity trade and electrical systems are used include:

- Monitoring the compliance of permit and authorization holders
- Monitoring the electric power industry, its sectors, and reliance on international trade
- Analyzing the adequacy of short- and long-term electricity supply
- Verifying information provided to State and other Federal agencies in other forums
- Monitoring open transmission line access at the international border
- Evaluating transmission line constraints and system reliability
- Forecasting short- and long-term electricity supply and demand
- Evaluating the need for additional electric generating and transmission capacity
- Monitoring and analyzing the economic and operational impacts of industry restructuring
- Monitoring sales and prices of electricity for use by Public Utility Commissions when reviewing rate cases
- Answering queries from the Congress, other Federal and State agencies, the electric power industry, and the general public.

Other data users include electricity-related trade associations; regional transmission operators; electric utility companies; nonutility electric companies; energy service providers; wholesale electricity traders; electrical equipment companies; numerous local, State, and Federal government agencies; environmental associations; consumer groups; financial analysts; and the news media.

A.2.2. Overview of Data Collections

The information to be collected will provide verification of terms for each permit category and cover these major activities:

1. Oversight of electricity reliability (i.e., electricity flows at the border - actual, and implemented interchange, power flows, source and sink balancing authority area)
2. Electricity sales (i.e., energy payments, energy revenues, and exchange imports and exports).

A.2.3. Individual Form Data Uses

The Form EIA-111 data will be collected, reviewed, tabulated and used to provide statistics on U.S. electricity imports and exports. The data will appear in several EIA publications that are available from EIA's website. The most prominent are:

- Annual Energy Outlook <http://www.eia.gov/forecasts/aeo/er/>
- Electric Power Annual <http://www.eia.gov/electricity/annual/>
- Annual Energy Review <http://www.eia.gov/totalenergy/data/annual/>

The data will also be used in other EIA products such as the State Energy Data System and for EIA forecast models.

A.3. Use of Technology

General

The EIA is utilizing information technology to improve reporting options for respondents to all electric power surveys. The EIA will provide an electronic e-filing system that respondents may use to complete and submit the surveys via a secure internet browser-based system. The e-filing system allows respondents to enter their data directly into the EIA survey database which reduces the time needed for data collection and processing. The system also identifies data that fails edits prior to submission which allows respondents to make necessary correction or to explain unusual events impacting the reported data prior to submission. This reduces respondent burden by reducing the number of times a respondent must resubmit forms prior to acceptance by EIA. It also improves the timeliness of reporting the information to the public. The only equipment and software the respondent is required to have is a connection to the Internet and a standard industry web browser that supports secured socket layering. The EIA will continue to make all survey forms and instructions available for printing or downloading from the EIA web site.

Use of Pick-Lists (Including Dynamic Lists)

Pick-lists are a means of limiting a respondent's answers to a question to a finite set of acceptable choices. The objectives are to reduce respondent burden and to improve data quality, while reducing the time and effort needed by EIA to edit a response.

Pick-lists⁵ are used in software-enabled surveys to:

⁵ Pick-lists are sometimes referred to as "drop-down" lists because of the typical appearance of the list in a software application.

- Avoid typographical errors, such as mistyping the abbreviation for a state or month;
- Assure consistent responses to questions asking standard information, such as entering a state as text or a number;
- Assure consistent responses to questions asking for technical information when the same concept has multiple monikers (e.g., “short term” and “spot” fuel supply contracts).

When the pick-list requests a choice of technical information, the list typically includes an “Other” choice. In some cases the “Other” choice is accompanied by a request for the respondent to provide additional information in a comment area in the survey. The “Other” choice acts as a mechanism to ensure that the form is capable of collecting all possible categories when a pick-list is variable.

There are three types of pick-lists that may be used in software-enabled EIA surveys:

- Static pick-lists include information which does not change, such as a list of months.
- Variable pick-lists include choices that may be changed by EIA depending on the period of time covered by the survey or another circumstance.
 - **Time Dependent:** In the case of the proposed EIA-111 survey, data is collected for each month of the year on a quarterly basis. Therefore, for the first quarter 2013 data collection the pick-list of months (such as in Schedule 2.A.) would be limited to January, February, and March. In the second quarter of 2013 the pick-list would be limited to April, May, and June; and so on..
 - **Circumstance Dependent:** The EIA-111 will include a pick-list of balancing authorities (such as in Schedule 2.A.). Due to consolidation the number of balancing authorities is expected to shrink in the next few years. Therefore the pick-list of balancing authorities included in a survey for first quarter 2014 might be shorter than the list for first quarter 2013 (i.e., edited by EIA, as a routine maintenance function, in the software application).
- Dynamic pick-lists include a list of choices that varies depending on the respondent’s answer to another question. For instance, assume a survey asks a utility to list all the adjacent states with which the utility has direct transmission connections:
 - If the utility had given its location in a prior question as Maine, the pick-list of adjacent states would be limited to one choice, New Hampshire, the only state adjacent to Maine.
 - On the other hand, if the utility had given its location as Kansas, the pick-list would include all the states adjacent to Kansas (Nebraska, Missouri, Oklahoma, and Colorado).

In neither case would the respondent have to go through a list of 50 states and the District of Columbia to find the only possible choices.

A dynamic pick-list is analogous to another standard technique in software-enabled surveys, the skip pattern, also used to avoid spurious responses and to reduce respondent burden. As currently configured the EIA-111 does not include dynamic pick-lists, but this feature may be added to assist respondent data entry as part of routine software maintenance and upgrades.

A.4. Efforts to Reduce Duplication

Every effort has been made to ensure that data are not collected by more than one Federal government agency. As far as we know, no other organization based in the United States collects cross-border power transactions and reliability information for the States.

A.4.1. Analysis of Similar Existing Information

EIA evaluated all known sources of publicly available data relating to the cross-border electricity trade and operations of the electric power industry. EIA found no other source as comprehensive, timely, or detailed, to replace the proposed data collection. EIA determined that other sources cannot replace or even approximate the information proposed for collection here because of differences in classification, inconsistency, incompleteness of data, unavailability of data, or lack of universal coverage. These efforts taken together capture the entire electric power industry and keep the burden on industry to a minimum.

A.5. Provisions for Reducing Burden on Small Businesses

The EIA is mindful of the need to minimize burden on small business and to the extent possible, designs its data surveys so that small operations are not unduly affected. EIA has determined that most businesses that engage in electricity transmission are not small businesses; however, a marketer could operate on a much smaller scale than other entities. In comparison to earlier data collections, the new EIA-111 form has been streamlined to make reporting easier and the burden less for each reporting entity. The use of electronic data collection, including features such as pick-lists (see A.3., above) is also intended to reduce the response burdens for small business.

A.6. Consequences of Less-Frequent Reporting

Eliminating the EIA's ability to collect monthly electric power import and export data on a quarterly basis would undermine its ability to advise and inform Congress, State and local governments, private industry, and various offices of the Federal government. Less frequent reporting would also place a larger burden on State governments to collect and process their own data in addition to trying to obtain similar information from other States for comparison and monitoring purposes. Conversely, less frequent reporting would also place a larger burden on the EIA-111 respondents who would need to provide their information to more than one data collection agency.

A.7. Compliance with 5 CFR 1320.5

The data are being collected consistent with the guidelines in 5 C.F.R. 1320.5.

A.8. Summary of Consultations outside the Agency

Consultations were conducted using a Federal Register notice (FR Vol. 76, No. 155, pg. 49757) published on August 11, 2011. Copies of the notice were mailed to potential respondents, industry associations, and environmental and consumer groups for comment. This supporting statement will be made available on the EIA website, along with drafts of the proposed new form and instructions. A summary of the comments received, along with the EIA responses provided are in Appendix A below.

A.9. Payments or Gifts to Respondents

No payments or gifts are made to the respondents of the survey.

A.10. Provisions for Confidentiality of Information

EIA requested comments from interested parties who might be affected by public release of the data collected on the Form EIA-111. It is the intent of the EIA to release as much information as needed to evaluate market conditions and assess future market demand and supply factors. The EIA evaluated the comments along with the implications of any action(s) taken, the laws governing this regulatory survey collection series, and the data needed by the Congress, other Federal agencies, States, and other users. The laws and regulations considered are:

1. The Trade Secrets Act, (18 U.S.C. 1905);
2. The Freedom of Information Act (FOIA), (5 U.S.C. 552);
3. The Department of Energy, Freedom of Information Act (FOIA) Regulations, (10 C.F.R. 1004);
4. The Paperwork Reduction Act, (44 U.S.C. 35);
5. The Clean Air Act, (CAAA90, Public Law 101-549); and

There are no changes in level of disclosure from the previous survey. All data collected on the prior OE-781R was made publicly available by DOE, and EIA will continue the same policy of making the data reported on Form EIA-111 publicly available. (Almost all of the electric power data the agency collects, with the exception of a few sensitive data variables, are made publicly available through EIA's website.) EIA did not receive any comments regarding the lack of protection of the reported data and EIA's proposal to make the data publicly available. The survey respondents will be told the following:

The information reported on Form EIA-111 will be considered public information and may be publicly released in identifiable form.

A.11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

A.12. Estimate of Respondent Burden Hours and Cost

The number of respondents for the EIA-111 can fluctuate at any given time due to changes in the number of valid export authorizations. The overall annual burden for this package is estimated to be 1,038 burden hours (Table 1). As in the past, the burden estimate includes time gathering and maintaining the data needed, and completing and reviewing the collection of information.

Table 1. Electric Power Burden Information for OMB Number 1905-NEW

Form EIA-111, “Quarterly Electricity Imports and Exports Report”				
Number of Respondents Per Quarter	Burden Hours per Response	Number of Responses per Year per Entity	Annual Number of Responses	Annual Burden Hours
173	1.5	4	692	1038

The total annual cost of the surveys is estimated to be \$70,314 (burden hours times \$67.74 per hour). An average cost per hour of \$67.74 is used because that is the average loaded (salary plus benefits) cost for an EIA employee. EIA assumes that the survey respondent workforce completing surveys is comparable with the EIA workforce.

A.13. Annual Reporting and Record Keeping Cost

There are no additional capital and start-up cost components or operations and maintenance associated with this data collection effort that is being funded by the EIA. The information is maintained in the normal course of business. Therefore, other than the cost of burden hours,

there are no additional costs for generating, maintaining, and providing the information. EIA's expectation is that the use of electronic data collection, including features such as pick-lists (see A.3., above) will help minimize the burden on respondents. In addition, by improving data quality these features will reduce the need for respondents to spend time resolving data errors with EIA.

A.14. Annual Cost to the Federal Government

The annual cost is estimated at \$114,000 in FY 2011. This cost estimate includes personnel, maintenance, collection, and processing by EIA. Regulatory analysis and support are outside the scope of this survey.

The estimate of \$114,000 is 80% of one full time equivalent (FTE) EIA employee.⁶ The 80% assumption is based on experience with the prior OE-781R survey and other EIA electricity surveys, the anticipated frame size of about 173 respondents, and the frequency of data collection. (In comparison, the prior OE-781R survey required most of an EIA FTE plus two full-time contractors.) The estimate also reflects the expected benefits from the use of electronic data collection, including features such as pick-lists (see A.3., above). The internet data collection systems have, in EIA's experience, improved the speed and quality of data submissions and reduced the number of personnel needed to operate a survey.

A.15. Changes in Burden

The total annual burden for the proposed Form EIA-111 is 1038 hours (OMB Number 1905-NEW). The proposed burden per response is 1.5 hours, an increase of 0.85 hours compared with the previous OE-781R survey form. However, since the form EIA-111 only needs to be filed quarterly while the Form OE-781R was filed monthly, the annual burden per respondent has dropped from 7.8 hours to 6.0 hours. We reduced respondent burden by eliminating several questions and by removing the need for an entity to report multiple times. The previous OE-781R required entities to file by functional type; therefore, entities with multiple functional types were required to file multiple times. The EIA-111 does not require filings by functional type.

The OE-781R was cleared in 2009 with 247 respondents. However, by the time OE-781R survey was discontinued, the frame consisted of 155 respondents. The EIA-111 clearance anticipates about 173 respondents. In both the OE-781R and the EIA-111, most of the respondents are holders of presidential permits and export authorizations from the Office of Electricity Delivery and Energy Reliability.

Changes to the respondent frame occur for criteria-based and for company-specific reasons. Examples of criteria-based reasons include the issuance or retirement of presidential permits and export authorizations. Examples of company-specific reasons include restructurings that either consolidate respondents or separate them. Companies may create subsidiaries that manage the

⁶ The current estimate of the hourly rate for an EIA employee is \$67.74/hour. Assuming 2,100 hours per year the annual cost is \$142,254, of which 80% is \$113,803.

operation of different presidential permits or export authorizations. Alternatively, they may bring these subsidiaries back into a single reporting entity. EIA encourages companies to align their reporting procedures with their company structures to facilitate the least burdensome and most accurate submittal of data. The EIA-111 and OE-781R survey the same basic set of companies, but the OE-781R classified respondents by roles which created opportunities for redundancy and, in several cases, resulted in a single entity responding to the form multiple times as separate respondents. The EIA-111 has each responding entity fill out the form as a unique respondent.

The EIA-111 requires the following entities to respond: (1) entities importing power into the U.S., (2) entities with export authorizations exporting power out of the U.S. (3) Organizations that have U.S. treaty obligations involving the exchange of power between the U.S. and Canada or Mexico, (4) U.S. Border Balancing Authorities that are directly interconnected with foreign electricity systems, and (5) Owners and operators of international electricity transmission lines authorized Presidential Permit.

The OE-781R required the following entities to respond: (1) Holders of Export Authorizations and Presidential Permits, (2) Transmission Operators engaged in international commerce, (3) Purchasing and Selling Entities engaged in international commerce, and (4) Transmission Owners engaged in international commerce.

There is a significant, although not complete, overlap between the frames of OE-781R and the EIA-111. The key distinction is that the EIA-111 requires PSEs that do not have export authorizations or presidential permits to provide data. EIA estimates that there are 10 respondents that import electric power from Canada or Mexico without EAs or PPs, and were not included in the OE-781R frame. The primary difference between the two survey frames is due to the changes in the industry participants during the time since the OE-781R was cleared.

A.16. Collection, Tabulation, and Publication Plans

The data collected on this form will be released in EIA reports and they will be made available on the EIA website.

A.17. OMB Number and Expiration Date

The OMB number and expiration date will be displayed on the form. Currently, we have a place holder until we receive the approval from OMB (OMB Number 1905-NEW).

A.18. Certification Statement

This submission meets all certification requirements of the "Certification for Paperwork Reduction Act Submissions," for OMB Form 83-I.