

**Supporting Statement:
U.S. Department of Energy
Better Buildings Challenge and the Better Buildings, Better Plants Voluntary Pledge
Program
OMB Control Number – 1910-5141**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for information from participants in the Better Buildings Challenge and the Better Buildings, Better Plants Voluntary Pledge Program. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, “Instructions for Completing OMB Form 83-I.”

This request for information combines data collection efforts from two related programs, the Better Buildings Challenge and the Better Buildings, Better Plants Voluntary Pledge Program. The Better Buildings, Better Plants Voluntary Pledge Program is part of the overarching Better Buildings Challenge program, hence a combined collection seemed the clearest approach for the public. Although some questions are similar between these programs, the Better Buildings Challenge requires a greater level of transparency, and thus a greater variety of surveys. However, the respondents in the Better Buildings Challenge are typically more sophisticated energy managers and the corresponding data burden is estimated to be less than respondents in the Better Buildings, Better Plants Voluntary Pledge Program.

A. Justification

- 1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

The Department of Energy (DOE) intends to collect information for its Better Building Challenge and the Better Buildings, Better Plants Voluntary Pledge Program. Section 421 of the Energy Independence and Security Act of 2007 (42 USC 17081) authorizes DOE to establish a national high-performance green building clearinghouse. Section 911 of the Energy Policy Act of 2005, as amended (42 USC 16191), instructs DOE to conduct programs that include research, development, demonstration, and commercial application of cost-effective technologies to improve the energy efficiency and environmental performance of buildings. The Better Buildings Challenge and Better Building, Better Plants Voluntary Pledge partners will provide information on best practices that will be distributed to facilitate reductions in energy intensity by other commercial, manufacturing, and community organizations. The information collected will support DOE in meeting the purpose of these statutory provisions.

Additionally, the *Energy Policy Act of 2005* (EPACT 2005) (P.L. 190-58), section 106, permits the Secretary of Energy to enter into voluntary agreements with industry to reduce energy intensity by not less than 2.5 percent per year during the period from 2007 through 2016. The Act further directs the Secretary of Energy to submit a report to Congress that

evaluates the success of the voluntary agreements no later than June 30, 2012, and June 30, 2017. The report must provide independent verification from a sample of the energy savings estimates provided by participating firms. DOE will collect annual information on primary energy use and energy savings from participating entities through the duration of the program. This data will be used to inform the required reports to Congress.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection**

The information being collected will be used to report the progress of participants in the DOE Better Buildings Challenge (BBC) program and the Better Buildings, Better Plants (BBBP) Voluntary Pledge program. The programs are voluntary leadership initiatives intended to drive greater energy efficiency in the commercial and industrial marketplace to create cost savings and jobs. This will be accomplished by highlighting the ways participants overcome market barriers and persistent obstacles with replicable, marketplace solutions. The program will showcase real solutions and partner with industry leaders to better understand policy and technical opportunities.

New Collection: Better Buildings Challenge

The Better Buildings Challenge respondents are organized into two categories: partners and allies. Partners are organizations that make a public commitment to implement plans to achieve lasting, organization-wide energy savings, while Allies are organizations that make a public commitment to support the energy efficiency marketplace. Partners are further categorized as portfolio partners (e.g., Transwestern, Best Buy, Houston Independent School District, State of Minnesota), community partners (e.g., City of Seattle), and manufacturing partners (e.g., 3M, Alcoa). Allies are further categorized as financial allies (e.g., Citibank, Ygrene Energy Fund) and utility allies (e.g. Southern California Edison).

DOE will collect several types of information from respondents. An organization seeking to join the BBC as a Partner or Ally will be asked to submit background information on the organization/company that will be used to create a website profile for each BBC participant. This information includes name, commitment in terms of square footage/number of plants and energy reduction goal, dollars committed by financial allies, percent of commercial customer class committed by utility allies, and a company logo and facility photo for each participant.

For Better Buildings Challenge Partners, DOE will collect the following information:

- Showcase Buildings. Partners will identify a showcase building project and submit the address of the showcase building, its climate zone, square footage of the building, project start date, description of the types of energy efficiencies to be showcased, and expected annual energy savings upon project completion (see attachment).

- **Implementation Models.** Partners will describe the approaches they are using to overcome market barriers to energy efficiency. This information will be collected via a telephone call with the partner. DOE will use this information to highlight successful strategies that non-participating organizations/companies can adopt to overcome challenges, and will be publicly available to enable other entities to use and/or adapt for their specific needs.
- **Organization-wide Plan.** Partners will describe their approach for achieving their energy reduction goals across their building portfolios. DOE will use organization-wide plans to work with partners on achieving their program goals (see attachment).
- **Energy Usage Data.** DOE will collect facility-level energy-related information for committed square footage or plants. This information will be used to quantify how deep energy retrofit measures impact.

For financial allies, DOE will also collect a description of the financial products offered by the ally. This is a one-time submission upon joining the BBC. Semi-annually, the financial allies will complete a template documenting the number of energy efficiency projects financed using these products. DOE will use this information to inform non-participating organizations/companies interested in replicating the energy reduction savings generated by the BBC Partners.

Existing Collection: Better Buildings, Better Plants

Better Buildings, Better Plants Voluntary Pledge Program (formerly known as the Save Energy Now LEADER initiative) is a national initiative to drive a 25% reduction in industrial energy intensity in ten years. This initiative is sponsored by the Advanced Manufacturing Office (AMO) within DOE's Office of Energy Efficiency & Renewable Energy (EERE) to reinforce energy efficiency as a profitable business model and expand markets for new energy technologies. The program's name was changed from Save Energy Now LEADERS to Better Buildings, Better Plants in December of 2011 to align it with the Better Buildings Challenge. In support of the name change and programmatic realignment, this collection request is being coupled with the BBC collection and the collection's titles has been changed from the Save Energy Now Voluntary Pledge Report to the Better Buildings Challenge and Better Buildings, Better Plants Voluntary Pledge Program.

Any company in the U.S. industrial or manufacturing sector can become a Better Buildings, Better Plants Partner, regardless of size and no matter their level of expertise in energy management. EAct 2005 defines energy intensity as the "primary energy consumed for each unit of physical output in an industrial process." Pledge partners are encouraged to measure energy intensity in a way that adheres to this definition. However, DOE understands that each company will need to adopt methods to measure and track energy intensity data that are appropriate for their operations. These energy intensity measurements will vary by industry and company. The units of physical output (or units of production) can be the number, mass, volume, size, functionality, or economic value of a product. Many companies will need to

track energy intensity across multiple product lines due to significant diversity in product groups. Segmenting energy use among specific product groups is challenging; however, efforts to do so will provide more accurate and valuable estimates of energy intensity for each product group.

The DOE has collected information for the current Save Energy Now Voluntary Pledge Report collection through a web-based, password-protected system, and via e-mail. Participants may use their password-protected pages to track progress and calculate intensity impacts. DOE is using the data to evaluate the impact of the Better Buildings, Better Plants program, and to provide recognition to companies that are on track to meet the 25%, 10-year energy intensity target. In addition, to meet the verification requirements of the EPACT 2005, results will be used for verification efforts on a sampling of companies. The verification effort will be conducted by independent parties on a sampling of approximately 25% of participating companies. All results will be used to evaluate the success of the program in the report that must be submitted to Congress in 2012 and 2017.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

DOE has requested that Better Buildings Challenge Partners submit facility-level energy usage data through a publicly available and widely used electronic tool, ENERGY STAR Portfolio Manager (hereafter referred to as Portfolio Manager). The U.S. Environmental Protection Agency (EPA) freely provides this tool, and the submission of facility-level energy usage data using this tool will result in greater efficiency, timely reporting and a reduced paperwork burden for partners and DOE program staff. Portfolio Manager is an approved OMB data collection tool.¹ BBC Partners simply need to modify their Portfolio Manager profiles to share with DOE data they are already entering.

Portfolio and community partners that do not use Portfolio Manager (estimated at ~25% of all commercial partners) will be asked to use another method to collect the facility-level energy usage data. DOE will provide an Excel spreadsheet for Partners to use to extract their data from their in-house tracking tools for submission to DOE. DOE will use this spreadsheet to ensure consistency across all data reported. This instrument, the Better Buildings Challenge Data Template, is attached.

The energy usage data requested from the manufacturing partners in the Better Buildings Challenge is not housed in Portfolio Manager. DOE has created a one-page data collection form, the Better Buildings, Better Plants Annual Report Form, to standardize the data collected from these partners. This instrument is attached.

AMO has also created a one-page reporting form for its Better Buildings, Better Plants Program Partners (also attached). These forms are largely similar, however, the form for the

¹ See EPA ICR 1772.05, OMB Control Number 2060-0347, "Information Collection Activities Associated with EPA's ENERGY STAR Program in the Commercial and Industrial Sectors."

manufacturing partners in the Better Buildings Challenge contains two additional data entry fields: 1) asking for levels of investment in energy efficiency projects, and 2) requesting a breakdown of energy intensity performance at the plant level. The additional reporting requirements for the Challenge Partners is consistent with that program's goals for greater transparency of energy savings data. In efforts to reduce burden, the reporting document available can be submitted electronically. The collection requests can also be submitted by postal mail or by facsimile. The collection requests do not require a specific collection technique be used; automated, electronic, mechanical, or any other technological collection techniques may be utilized for the collection effort.

4. Describe efforts to identify duplication.

Other voluntary reporting programs were investigated for duplication, including the Environmental Protection Agency's Climate Leaders Program, the Energy Information Agency's Manufacturing Energy Consumption Survey, and its voluntary reporting of greenhouse gasses. The EPA has since discontinued the Climate Leaders program. While the EIA requires reports on total energy use, the Better Buildings, Better Plants Program requests information about a base energy intensity number and the annual change in intensity. This metric, defined in EPACT as "the primary energy consumed for each unit of physical output in the industrial process," is not collected by any other existing program.

To ease the reporting burden on the BBC recipients, DOE has opted to gather facility-level energy usage data using a pre-existing electronic tool widely available and used within the industry for such purposes. The majority of BBC partners have already submitted the facility-level energy data using this EPA tool.

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

The collection of information does not impact small businesses or other small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

To be successfully implemented, the programs require the collection of some unique and specific participant information.

The re-occurring reporting burden of the collections targets facility-level semi-annual energy usage data from the portfolio and community partners and annual data from the manufacturing partners. The difference in reporting frequency reflects the nature of energy systems changes in these different building types—for instance an annual reporting cycle reflects the need to smooth out production spikes found in the manufacturing sector DOE is requesting the minimum level of information required to fully support and implement the programs, and a less frequent collection of information would hinder DOE's ability to share

best practices of energy efficiency with other partners and the public, or to support the partners in achieving their energy reduction goals.

Additionally, without the information that comes directly from the information collection, the Department of Energy will not be able to implement the congressional directive requiring the Secretary to submit a report to Congress that evaluates the success of the voluntary agreements no later than June 30, 2012, and June 30, 2017.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection will be conducted in a manner consistent with all OMB guidelines.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a Notice and Request for Comments concerning the Better Buildings Better Plants Voluntary Pledge Report collection in the Federal Register on Thursday, January 19, 2012, Volume 77, F.R. No. 12. The Department also published a 60-day Federal Register Notice and Request for Comments concerning the Better Buildings Challenge collection in the Federal Register on November 8, 2011, volume 76, number 216, and page number 69251. The notices described the collection and invited interested parties to submit comments or recommendations regarding the collections. No comments were received..

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

There will be no payment of gift of any kind to respondents. The programs are voluntary and participants will not expect payment or gift in return for involvement.

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

All data and information reported to DOE is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. Partners and Allies agree to provide the information identified in this supporting statement as a means of informing the broader marketplace of commercial and industrial building owners and operators about successful implementation models that generate significant energy savings and quantifying the results of those models. DOE will aggregate the energy and carbon savings data for pledging entities to ensure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

The information collected for this project is energy consumption and conservation efforts of partner organizations and contains no personal data.

12. Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

The estimated combined number of respondents for the Better Buildings Challenge and BBBP Voluntary Pledge Program is 305, and the associated burden hour for the two programs is 3,731 hours. The following tables provide estimates of the specific details for the Better Buildings and the BBBP Voluntary Pledge Program.

The estimate of hour burden for the Better Buildings Challenge information collection is as follows.

Summary of Annual Burden Hours for BBC Information Collection				
Assumptions for the 130 unduplicated respondents: 85 participants are commercial partners 15 participants are industrial partners 22 participants are financial allies 8 participants are utility allies				
Description	Number of responses per year per participant	Hours per response per participant	Total hours per year per participant	Total hours per year for all participants
BBC Website Profile Page Template				
Non-recurring initial submission (130 participants). See attached form.	1	.5	.5	65
BBC Showcase Project				
Initial submission and quarterly updates (100 participants). See attached form.	4	.5	2	200
Implementation Model				
Initial submission and quarterly update (100 participants). This information will be collected via discussion on a conference call.	4	.5	2	200
BBC Organization-wide Plan				
Annual submission. (100 participants). See attached form.	1	.5	.5	50
Facility-level Energy Performance Data				
One time, non-recurring action to initiate sharing of data already entered into Portfolio Manager (64 commercial partners). No DOE information collection form. See EPA ICR 1772.05, "Information Collection Activities Associated with EPA's ENERGY STAR Program in the Commercial and Industrial Sectors."	1	.25	.25	16
Better Buildings Facility-level Energy Reporting Form: Semi-annual data sharing (21 commercial partners using DOE data collection tool. See attached form.	4	1	4	84
Better Buildings Better Plants Annual Reporting Form: Semi-annual data sharing (15 industrial partners using DOE data collection tool. See attached form.	2	1	2	30
Financial Ally Products				
Financial Allies Product Description (22 financial allies) This is a one-time submission. See attached form.	3	.5	1.5	33
Financial Allies Periodic Updates (22 financial allies. See attached form.	20	.25	5	110
Total burden = 788 hours				
Total number of responses = 1,714 responses				
Average burden per response = 2.2 hours				
Average annual burden per participant varies by type of participant = 1 - 6.5 hours				

The estimate of hour burden for the BBBP Voluntary Pledge Program information collection is as follows.

DOE estimates that 175 industrial companies will participate in the BBBP program and will respond to the annual data request. Although each company may represent multiple plants which may track their own progress, companies submit one aggregate report for all of their plants. DOE data on its existing BBBP partners indicates that each company has on average about 14 plants enrolled in the program. At approximately three-quarters of the companies, plant-level data is already collected and stored at the corporate level, so the process of reporting this data to DOE is relatively simple; DOE estimates that it will take these companies about 4 hours annually to review and report their data. A quarter of the participating companies do not have an existing collection system, therefore, it will require more time for these companies to collect, review, and report their data. DOE estimates that it takes these companies approximately 48 hours per company to complete these activities. This 48 hour estimate for the companies that lack an existing corporate-level tracking system is derived from two observations: 1) it takes these companies approximately 6 hours *per plant* to collect, review and report the data; and 2) these companies tend to be relatively smaller and have about 8 plants enrolled in the program, as opposed to the program-wide average of 14. As a result, DOE estimates each company will spend on average, 15.3 hours compiling and submitting the energy consumption data per year.

In addition, DOE will perform a one-time verification effort on approximately 25% of participating BBBP companies prior to the report to congress in 2017. DOE estimates that the one-time verification effort will require approximately 10 hours per company, or approximately 2 hours on an annualized basis. As part of its recognition efforts, DOE also plans to create individual web profiles hosted on the DOE website for each of the 175 companies participating in the BBBP program. DOE will develop the web profiles in house and share with the partners for their feedback. DOE estimates that it will require 1 hour annually for each company to review their web profile and suggest edits and new content. In total, the hours of burden requested for all BBBP participants is about 2,943 per year.

Annual Collection	Number of Companies	Burden Hours/ Company	Annual Burden Hours
Companies with collection System	130	4	520
Companies without collection System	45	48	2160
Subtotal	175		2680
Related Collection Efforts	Number of Companies*	Burden Hours/ Company	Annual Burden Hours
Web Profile Development	175	1	175
Report Data Verification	44	2	88
Subtotal			263
Total	175		2943
Average Time Burden Per Company			16.8

*Company numbers represent a subset of the 175 companies participating in the BBBP program

This estimate is based on input provided by five DOE-contracted technical account managers (TAMs), who are tasked with assisting BBBP companies in filing their annual reports with DOE. Together, these TAMs, work with 43 companies.

Total number of unduplicated respondents: 175

Reports filed per person: 1

Total annual responses: 175

Total annual burden hours: 2,943

Average Burden Per Collection: 15.3 hours

Per Applicants: 16.8 hours

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

The estimated total annual cost burden to respondents from the Better Buildings, Better Plants Voluntary Pledge Report collection of information is about \$113,000, while the estimated annual cost for the Better Buildings Challenge is \$30,251, for a total cost of approximately \$143,251. The per respondent cost for the Better Buildings, Better Plants Voluntary Pledge Reports is about \$650 and the approximate per respondent cost for the Better Buildings Challenge is \$84, for a combined total of approximately \$734. These numbers are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$38.39) for industrial engineers, compiled by the U.S. Department of Labor's Bureau of Labor Statistics (see <http://www.bls.gov/oes/current/oes172112.htm>). There are no capital and start-up cost components or operations and maintenance associated with either of these data collections.

14. Provide estimates of annualized cost to the Federal government.

DOE will require contractor support to process and analyze the data being reported by recipients and prepare an annual summary of energy savings achieved. The following estimate reflects the DOE and contractor resources needed to process and analyze the data being reported by participants.

BBBP Voluntary Pledge Report Collection Costs

90 hours per year to collect and review annual reports (approximately ½ hour per report)

90 hours @ \$150 per hour = \$13,500

Total cost = \$13,500

BBC Collection Costs

120 hours per quarter to collect and review annual reports = 480 hours annually

480 hours @ \$90.00 per hour = \$43,200

Data Management for both BBBP and BBC

144 hours per year to store the data in a centralized database and manage the database (approximately 12 hours per month)

144 hours @ \$100 per hour = \$14,400

Therefore, total costs to the Federal government for both collection efforts will be \$71,100.

15. Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

The Better Buildings Better Plants Voluntary Pledge Report is an existing, approved collection effort that is being renewed; it is the result of the congressional directive from EPLA 2005, section 106. Three important changes have been made to the estimated burden time that increase the total projected hourly burden from the 2,800 hours per year cited in the original information collection request (ICR), to the 2,943 cited in this request. Part of this is driven by fact that the number of companies participating in the program has increased. Most significantly, the original request assumed that individual plants would act as respondents under the program. So while it was estimated that 20 companies would participate, because each company was assumed to own and operate 14 plants, the original ICR projected a total of 280 respondents. Each individual response was expected to take 10 hours, so the total estimated time per respondent was calculated at 2,800 hours (280 * 10 = 2,800).

In practice, DOE requires that each corporate entity submit one report that covers all its plants. There are today 109 companies participating in the Better Buildings, Better Plants program, and DOE estimates that the program will grow to 175 companies by 2015. Each company submits one report that provides rolled up data from all its plants, regardless of how many facilities it operates. In about three-quarters of the cases, the plant-level data is already collected and stored at the corporate level, so the process of reporting this data to DOE is relatively simple. The reporting process is more burdensome for the 25% of companies that

do not have an existing system in place to collect plant-level data. In all, DOE estimates that companies spend on average a little more than 15 hours per year compiling, checking, and submitting the corporate-level information to the department. The underlying assumptions and calculations behind this number are detailed in question 12 above.

An additional change is that DOE is now including time required by participants to assist DOE in verifying a sample of their reported energy savings estimates. Section 106 of EPLA 2005 requires that DOE submit reports to Congress by June 30, 2012, and June 30, 2017, that evaluate the success of voluntary agreements to reduce energy intensity and provide verification of a sample of energy savings estimates provided by participating firms. DOE anticipates verifying data from one-quarter of the participating companies. Each company within the sample is expected to spend about 10 hours assisting in this verification process, which entails sharing raw energy bill data with their TAM. This will take place over a five year period, as the verification activities covered through this ICR extension request will need to be completed by June of 2017. This works out to about two hours per year for about 44 companies (25% of 175).

Finally, DOE plans to create individual web profiles for each of the 175 companies participating in the program. The department will develop the web profiles in house, then share the profiles with partners for their feedback. DOE estimates it will require 1 hour annually for each company to review their web profile and suggest edits and new content.

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

This package contains no collections whose results will be published for statistical use. Information collected through this effort will be used to publicize the efforts and strategies of Better Plants and Better Buildings Challenge partners via the program's websites as a means to encourage other organizations to learn from their successes and adapt their implementation models to achieve similar reductions in energy intensity. The results of the programs will only be published in program evaluation and metrics documentation. No complex calculations are required to track the progress of program participants towards the goal of reducing annual energy intensity. Results will be published in aggregate to report the impact of the DOE program.

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

DOE is not seeking approval to not display the expiration date for OMB approval of the information collection.

18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.