

**INFORMATION COLLECTION REQUEST  
for  
EPA'S GREEN POWER PARTNERSHIP AND  
COMBINED HEAT AND POWER PARTNERSHIP**

**EPA ICR NUMBER 2173.05 (Renewal)**

**OMB CONTROL NUMBER 2060-0578**

## **SUPPORTING STATEMENT A**

### **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

#### **1(a) Title and Number of the Information Collection Request**

EPA's Green Power Partnership (GPP) and Combined Heat and Power (CHP) Partnership (Renewal), EPA ICR No. 2173.05, OMB Control No. 2060-0578.

#### **1(b) Short Characterization/Abstract**

In 2001, EPA launched two new partnership programs with industry and other stakeholders: the Green Power Partnership (GPP) and the Combined Heat and Power Partnership (CHPP). These voluntary partnership programs encourage organizations to invest in clean, efficient energy technologies, including renewable energy and combined heat and power. EPA collects information from GPP and CHPP Partners to assess the success of these programs in achieving their national energy and greenhouse gas (GHG) reduction goals.

EPA has developed this ICR to obtain authorization to collect information from organizations participating in the GPP and CHPP. Organizations that join these programs voluntarily agree to the following respective actions: (1) designating a GPP or CHPP liaison and filling out a Partnership Agreement or Letter of Intent (LOI), respectively; (2) for the GPP, reporting to EPA on an annual basis their progress toward their green power commitment via a 3-page reporting form; (3) for the CHPP, reporting to EPA information on their existing CHP projects, new project development and other CHP-related activities. Partners are organizational entities that have volunteered to participate in either Partnership program.

### **2. NEED FOR AND USE OF THIS COLLECTION**

#### **2(a) Need/Authority for the Collection**

EPA needs to collect the information in the Partnership Agreement or LOI to formally establish participation in the GPP or CHPP program and to obtain general information about new Partners. Additional information collected through information forms is needed to allow EPA to track GPP Partner progress toward meeting their commitments, to enable the programs to facilitate and provide assistance to encourage green power purchases and the implementation of CHP projects, and to determine progress in meeting the programs' national energy and GHG reduction goals. This information collection will assist the GPP in increasing demand for the use of qualifying renewable energy sources for power generation, thereby reducing GHG emissions. The information also will help the CHPP to increase the use of more efficient, cleaner power generation and reduce GHG emissions.

Participation in the GPP and CHPP is voluntary. Program participants agree to provide EPA with the requested information.

## **2(b) Practical Utility/Users of the Data**

EPA uses the information submitted in the Partnership Agreement or LOI to update its databases of GPP and CHPP Partners. The databases serve as a source of general information and a contact list. EPA uses the information submitted in additional forms to monitor the progress of current participation and projects and to identify new opportunities. EPA also uses the data to prepare reports on GPP and CHP projects and progress as well as to determine the GHG reductions achieved by the programs. General information on the Partners, green power, and CHP also is provided on the respective program websites, making it available to other Partners as well as the public.

## **3. NON-DUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

### **3(a) Non-duplication**

For new Partners, the information to be collected previously has not been gathered by EPA or any other Federal Agency. Existing GPP Partners provide updates to existing information through a Partner Yearly Report. Existing CHPP Partners review and update a CHPP Partners Project Data Form every year.

For existing Partners with both programs, some of the information required is available in the existing databases from previous submittals. To avoid requesting information that already has been collected, forms sent to existing Partners are pre-populated with previously submitted information from the database. Recipients of the forms are asked to review the information provided. Only if the information is incorrect or out of date will the recipients be required to provide updated or additional information. To further reduce burden, EPA provides CHPP Partners who have CHP systems or ongoing project development activities with a CHPP Partners Project Data Form populated with previously submitted information that they can review and revise electronically rather than filling out a new form.

### **3(b) Public Notice Required Prior to ICR Submission to OMB**

On December 28, 2011, in compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register (Volume 76, Number 249). EPA received two comments. One comment suggested that the burden be reduced through use of on-line interactive reporting forms. EPA will investigate the

possibility of implementing this suggestion. The second comment suggested that EPA expand the information collected to include actual output of a subject boiler (instead of the design capacity as is now collected) and information about secondary fuel types, when applicable. EPA does not believe the benefit of collecting this information would justify the added burden on CHPP Partners.

### **3(c) Consultations**

In 2004 EPA consulted with three GPP Partners and three CHPP Partners regarding the burden of information collection for the programs. The contacted Partners were provided copies of the information collection forms and asked to provide estimates of the associated hourly labor burden. Labor wage rates from the Bureau of Labor Statistics (BLS) were provided for reference, and EPA requested comments on whether these labor rates were appropriate. The Partners all provided labor hour estimates of each activity and either provided labor rates or indicated that the BLS rates were representative. Generally, the estimates provided by the Partners were similar and were consistent with EPA expectations of the labor burden.

In 2008 EPA consulted with three GPP Partners and three CHPP Partners regarding the burden of this information collection. The contacted Partners were provided copies of the information collection forms, estimates of the labor burden derived from Partners responses in 2004, and labor wage rates from the Bureau of Labor Statistics (BLS). EPA requested comments on whether the labor burden estimates and labor rates were appropriate. Generally, the estimates provided by the Partners were similar and were consistent with the estimates provided by EPA. EPA averaged Partner responses for the labor burden estimates and labor rates for use in this ICR renewal.

In 2012 EPA consulted with four GPP Partners and four CHPP Partners regarding the burden of this information collection. The contacted Partners were provided copies of the information collection forms, estimates of the labor burden derived from Partners responses in 2008, and labor wage rates from the Bureau of Labor Statistics (BLS). EPA requested comments on whether the labor burden estimates and labor rates were appropriate. Generally, the labor rate estimates provided by the Partners were similar and consistent with the estimates provided by EPA, whereas the hourly burdens reported by Partners were lower than estimated. EPA averaged Partner responses for the labor burden estimates and labor rates for use in this ICR renewal.

### **3(d) Effects of Less Frequent Collection**

The Partnership Agreement or LOI are submitted once by organizations that choose to become Partners of the GPP or CHPP. To allow EPA to remain current on Partner participation and determine if green power purchase commitments are being met, GPP Partners are asked to update an annual report. All CHPP Partners review and update their existing project information, provide updates on new projects, and describe their CHP related activities every year. Partners of both programs may also update company and contact information periodically via the respective partnership websites. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the programs, facilitate green power purchases and CHP project implementation, and respond in a timely manner to needs of the Partners.

### **3(e) General Guidelines**

This information collection request was prepared in compliance with OMB's and EPA's guidelines for ICR preparation.

### **3(f) Confidentiality**

Participation in the GPP and CHPP is voluntary. Participants are not asked to reveal Confidential Business Information (CBI). Additionally, participants will be given specific instructions not to provide any information that they consider confidential or to notify EPA of specific information that should not be publicly released.

### **3(g) Sensitive Questions**

No questions of a sensitive nature are asked in any of the forms or periodic information updates.

## **4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

### **4(a) Respondent NAICS/SIC Codes**

This information collection will encompass a wide variety of respondents with most respondents specific to either the GPP or CHPP.

#### **(i) GPP Respondent NAICS/SIC codes**

The GPP Partners consist of company, institutional, and public sector organizations that pledge to purchase a proportion of their annual electricity use from eligible renewable energy resources through one of three options: a utility green power product, renewable energy certificates, or on-site generation. Companies include both privately- and publicly-held goods

and services industries; institutions are comprised of institutes of higher education and NGOs; and public sector Partners are local, state, or federal government agencies.

**Table 1. Sample GPP NAICS/SIC Industry Codes and Descriptions**

NAICS	SIC	Description
<b>Full-scale Partners <sup>a</sup></b>		
611310	8221	Colleges, Universities, and Professional Schools
722110	5812 5461	Restaurants
522110	6081	Commercial Banking
445110	5411	Grocery Stores
323110	2752	Print shops
621111	8093	Offices of Physicians
924	9511	Public Administration of Environmental Quality Programs
92411	9631	Public Administration of Air and Water Resource and Solid Waste Management Programs
531210	6531	Real Estate Agencies
541110	8111	Law Offices

<sup>a</sup>Given the breadth of industries who are currently GPP Partners, only a subset of their NAICS/SIC codes is listed to provide examples.

**(ii) CHPP Respondent NAICS/SIC codes**

The CHPP classifies its Partners into nine categories. State, Local and Tribal Partners include state and local energy, environmental, and economic development agencies who will promote CHP development in their area. The remaining nine categories are included in the commercial and institutional Partner group. End-user Partners comprise a broad range of industrial, commercial, or institutional organizations that utilize CHP technology to provide heat and electricity at their facilities. Equipment suppliers are involved in the manufacturing, supplying, or installation of CHP-related products. Other Partner categories can be classified as CHP project promoters and facilitators who work to create new CHP projects. These Partners include energy services companies (ESCOs), CHP project developers, non-government organizations (NGOs), financiers, and engineering consultants. Utility Partners work to provide end-users with fuel for their CHP projects or work to distribute electricity from CHP sources. The following list provides the most common NAICS/SIC codes for the various different types of CHPP Partners:

**Table 2. Sample CHPP NAICS/SIC Industry Codes and Descriptions**

NAICS	SIC	Description
<b>State/Local/Tribal Partners</b>		
92613	9631	Public Administration, Regulation and Administration of Communications, Electric, Gas, and Other Utilities
926130	9631	Public Administration, Energy development and conservation programs
9611	9611	Public Administration of General Economic Programs
924	9511	Public Administration of Environmental Quality Programs
<b>Equipment Manufacturers</b>		
333611	3511	Turbine and turbine generator manufacturing
335999	3699	Fuel cells, electrochemical generators, manufacturing
541512	7373	Information management computer systems integration design services
541614	8742	Manufacturing operations improvement consulting services
<b>CHP project promoters and facilitators</b>		
541690	8999	Energy consulting services
541330	8999	Engineering consulting services
523910	6153 6211 6799	Financial Investments and Related Activities, Miscellaneous Intermediation
<b>Utilities</b>		
221122	4911	Electric Power Distribution
221210	4923	Natural Gas Distribution
<b>End-Users<sup>a</sup></b>		
325415	2834	Pharmaceutical Preparation Manufacturing
611310	8221	Colleges, Universities, and Professional Schools
322121	2611 2621	Pulp and Paper Mills (Except Newsprint Mills)
336111	3711	Automobile Manufacturing
813110	8661	Religious Organizations
331111	3317	Steel Mills
721110	7011	Hotels (Except Casino Hotels) and Motels

<sup>a</sup> There is a wide variety of entities that could install CHP projects and become CHP end users. Any facility with a demand for both electricity and thermal energy (i.e., steam, heating, or cooling) during most of the year and with access to fuels is a potential candidate as a CHPP end-user Partner. For this reason, only a subset of the end-users is listed to provide examples.

#### **4(b) Information Requested**

##### **(i) Data Items, Including Recordkeeping Requirements**

**GPP.** Information will be collected through the Partnership Agreement and Partner Yearly Report, as well as through clarification follow-ups and calls or emails as needed. Each activity is described below.

The Partnership Agreement requests the following information from all Partners:

- Organization name;
- Scope of entity/entities joining the Partnership;
- Total electricity use and green power commitment;
- Signature and printed name and title of authorized organization representative;
- Contact information for the organizational liaison to the GPP, including name, title, address, phone number, fax number and email address;
- Purchase details such as provider name, the type of green power product and type of renewable resource;
- Questions about product certification status and contract dates; and
- Motivations for joining the Partnership.

The GPP Partner Yearly Reports collect or update the following information:

- Updates to liaison information listed above;
- Updates to commitment details, including total annual energy consumption and annual green power commitment;
- Updates to purchase details such as provider name, the type of green power product delivered (utility product, renewable energy certificates, or on-site generation) and type of renewable resource;
- Updates to product certification status and contract dates; and
- Short profile paragraph addressing Partner's green power commitment.

The company profile is available on the GPP website. Partners may submit corrections or updates to their profile via the website or electronically at any time. EPA also will place follow-up calls to clarify any unclear information submitted by Partners.

Occasionally, EPA may request technical information in addition to the standard forms. This information will be requested on a voluntary basis from a subset of GPP Partners. For instance, information may be requested from the fifty largest green power purchasers in order to feature them on the GPP website and Top Partner Rankings, which are updated quarterly. Requested information may also be used to target communications and outreach efforts more effectively.



**CHPP**. Information will be collected through the LOI and the CHPP Partners Project Data Form as well as through clarification follow-up calls or emails as needed. The LOI requests the following information from all new Partners:

- Organization name;
- Designated CHPP Partner Liaison's contact information;
- Organization CHP-related service or activity;
- Organization website address and/or CHP-related web page; and
- Organization description.

CHPP Partners Project Data Forms are used to collect information on completed or planned CHP projects and other CHP-related activity on a yearly basis. The requested information includes:

- Project Owner;
- Project Name and address;
- Project information including market sector, start-up date, fuel type, annual operating hours, average net power output, percentage of electricity sold offsite or to grid and percentage of thermal output sold offsite;
- List of each prime mover, including size, fuels and emission controls;
- Types and applications of thermal output;
- Contact information including the company name, contact name, phone number and date submitted;
- Project team information including the engineer, prime contractor, project developer and thermal host; and
- Other CHP-related activity.

After the first submittal, EPA will send the Partner a CHPP Partner Project Data Form containing all previously-submitted information for the Partner to review and update annually.

Company profiles and contact information will be available on the CHPP website. Partners may submit corrections or updates via the website at any time. EPA also will place follow-up calls to clarify any unclear information submitted by Partners.

Participation in GPP and CHPP does not require any records to be kept, although Partners likely will keep file copies of the LOI and CHPP Partner Project Data Forms submitted to EPA.

**(ii) Respondent Activities**

The respondent activities depend on the aspect of the information collection to which they are responding. In completing the Partnership Agreement or LOI, respondents will:

- Review the form;
- Complete the form;
- Sign and submit the form electronically or via fax or mail to EPA; and
- File a copy of the form.

In completing the pre-populated GPP Partner Yearly Report or the pre-populated CHPP Partner Projects Data Form, respondents will:

- Read the forms and instructions;
- Update the pre-populated report or form with new information where necessary;
- Submit the yearly report (or CHP project form) electronically or via fax or mail to EPA; and
- File a copy of the form.

In replying to or initiating an information update or clarification, respondents will:

- Gather information; and
- Provide information to the GPP or CHPP via the website, an email, or a telephone interview.

**5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

**5(a) Agency Activities**

**(i) Agency Activities for the GPP's Partnership Agreements and CHPP LOIs**

Agency activities associated with this information collection depend upon the aspect of the information collection that the Agency has received. In receiving the Partnership Agreement or LOI for either the GPP or CHPP, the Agency will:

- Review the information provided;
- Enter the information into a database; and
- File the form.

**(ii) Agency Activities for GPP**

Agency activities specific to the GPP will depend upon the types of activities the Agency will initiate and receive. In requesting and receiving the information through a Partner Yearly Report Form sent to Partners one year after they join the Partnership and annually thereafter, the Agency will:

- Prepare pre-populated partner data and email the Partner Yearly Report annually;
- Receive and review the information provided on completed forms;
- Enter the information into a database; and
- File the form.

In initiating information updates and follow-ups, the Agency will:

- Call or email Partners;
- Request updated information or clarification on Partnership Agreements or Partner Yearly Report Forms by telephone or email;
- Request additional technical information, as needed, from a subset of GPP Partners; and
- Revise data in the database based upon these updates.

In receiving information updates via the website, the Agency will:

- Review the data received through the GPP website; and
- Revise data in the database based upon the updates.

***(iii) Agency Activities for CHPP***

Agency activities specific to the CHPP also will depend upon the types of activities the Agency will initiate and receive. In requesting and receiving the information on CHP projects through an information form sent to Partners within the same year they join the Partnership, the Agency will:

- Prepare and email the CHPP Partner Projects Data Forms;
- Receive and review the information provided on completed forms;
- Enter the information into a database; and
- File the form.

In requesting and receiving information on ongoing project development activities, updates of existing projects and other CHP-related activities through a CHPP Partner Projects

Data Form pre-populated with information provided on a Partner's initial project reporting form or most recent project, the Agency will, once a year:

- Populate the CHPP Partner Projects Data Form with previously-submitted information, which is contained in the CHP project database;
- Email the pre-populated CHPP Partner Projects Data Forms to the appropriate Partners;
- Receive and review any updates provided from the Partner on the Data Forms;
- Enter updated information into a database; and
- File the CHPP Partner Projects Data Form.

In initiating information updates and follow-ups, the Agency will:

- Call or email Partners;
- Request updated information or clarification on CHPP Partner Projects Data Forms; and
- Revise data in the database based on the updates.

In receiving information updates via the website, the Agency will:

- Review the data received on the CHPP website; and
- Revise data in the database based on the updates.

#### **5(b) Collection Methodology and Management**

The methods selected for this information collection are chosen based on efficiency and minimization of burden for respondents and EPA. The respective Partnership Agreement and LOI can be downloaded from the respective websites and returned to EPA electronically or by fax or mail. General Partner information will be posted on the GPP or CHPP websites where it can be reviewed for accuracy by the Partners and revised if necessary. Annual reporting forms are available for Partners electronically on each website and can be returned electronically or by fax or mail. In addition, the GPP sends pre-populated Yearly Reports to Partners each year containing the information previously submitted. Partners need only to review the information for accuracy and submit any updates, thus minimizing the burden of the respondents. To further reduce burden, EPA will provide all CHPP Partners with a CHPP Partner Projects Data Form of previously submitted project data that they can review and revise electronically. All information

received through the forms (electronically or via hard copy) is reviewed by EPA before being entered into the database.

### **5(c) Small Entity Flexibility**

EPA expects that some GPP Partners and CHPP Partners are small entities. EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. The data requested include only the most critical information and may be submitted electronically. As discussed above, EPA pre-populates Yearly Report forms or CHPP Partner Projects Data Forms for both Partnership programs with information previously submitted to avoid duplication of effort and minimize the burden for respondents. Additionally, participation in GPP and CHPP is voluntary. Any small entity that finds the information collection overly burdensome is not required to participate.

EPA expects that some GPP partners are small entities. GPP determined whether Local Government Partners are small entities based on the population served by these government agencies. Approximately 33 percent of existing Local Government Partners are in cities or counties with populations less than 50,000, which is the threshold for small entities within the public administration sector. GPP assumed that all State Government Partners are not classified as small entities, since each State population is greater than 50,000. Likewise, GPP assumed that all Federal Government Partners are not small entities.

Given the large number of private sector and NGO GPP partners, EPA was not able to review the small entity status of each Partner individually. GPP assumed that all companies on Fortune magazine's list of the top 1,000 U.S. companies by revenue are not small entities. GPP also assumed that all non-profit organizations are classified as small entities. For the remaining private sector Partners, GPP determined the small entity status of a portion of Partners, following the U.S. Small Business Administration's 2010 Table of Small Business Size Standards Matched to North American Industry Classification System Codes. GPP reviewed company profiles and websites when available to help determine the selected company's small entity status. GPP then compared the company's small entity status to their total electricity use, a figure which EPA collects for all Partners. Using this information, EPA determined an approximate electricity baseload under which a company could reasonably be considered a small entity. The companies whose small entity status was not determined were assumed to follow a similar correlation to those reviewed. Following this assumption, EPA estimates that 60 percent of its private sector

Partners are small entities. Overall, 61 percent of all GPP Partners are estimated to be small entities.

EPA has designed its approach for this information collection to minimize the burden for all respondents while obtaining sufficient and accurate information.

EPA expects that some CHPP Partners are small entities. The CHPP consists of the following partner categories: project developer; consultant/engineering; energy service company (ESCO); financier; utility; non-governmental organization (NGO); government; equipment manufacturer; and end-user. The CHPP assumed that all utilities, government partners, equipment manufacturers, and end-users are not small businesses. Companies of these partner types are large in scale and scope and are most likely not small businesses.

The CHPP assumed that all NGO partners are small businesses given they typically have a small number of employees and typically do not work for profit. In all, the CHPP has 17 NGO partners.

For project developer partners, the CHPP reviewed websites and organization descriptions for 25 percent of the partners. The companies whose websites were not reviewed were assumed to contain a similar percentage of small businesses to those reviewed. For the 25 percent of partners reviewed, the CHPP evaluated the number of projects developed by these partners as an additional gauge of whether or not the project developer is a small business. In most cases, if the project developer reviewed by the CHPP had zero projects, it was assumed to be a small business. At the end of 2011, the CHPP had 133 project developer partners, so 33 were evaluated for small business applicability. Of the 33 project developers evaluated, six were categorized as small businesses, representing 18.18 percent. Applying this percentage to those companies not reviewed, the CHPP estimates that 24 project developer partners are small businesses.

For consultant/engineer partners, the CHPP reviewed websites and organization descriptions for 25 percent of the partners. The companies whose websites were not reviewed were assumed to contain a similar percentage of small businesses to those reviewed. For the 25 percent of partners reviewed, the CHPP evaluated the number of projects developed by these partners as an additional gauge of whether or not the consultant/engineer is a small business. In most cases, if the consultant/engineer reviewed by the CHPP had zero projects, it was assumed to be a small business. At the end of 2011, the CHPP had 79 consultant/engineer partners, so 20 were evaluated for small business applicability. Of the 20 consultants/engineers evaluated, four were categorized as small businesses, representing 20 percent. Applying this percentage to those

companies not reviewed, the CHPP estimates that 16 consultant/engineer partners are small businesses.

For ESCO partners, the CHPP reviewed websites and organization descriptions for all of the partners. At the end of 2011, the CHPP had nine ESCO partners. Of the nine ESCOs evaluated, one was categorized as a small business due to it employing only 60 employees.

For financier partners, the CHPP reviewed websites and organization descriptions for all of the partners. In most cases, if the financier had zero projects, it was assumed to be a small business. At the end of 2011, the CHPP had 14 financier partners. Of the 14 financiers evaluated, two were categorized as a small business because they employ fewer than 50 employees.

Table 3 summarizes the small entities affected per year according to partner category. The numbers in Table 3 reflect the CHPP’s assumption that the distribution of small entities within each new partner category over the years 2012-2014 will be similar to the distribution analyzed for each existing partner category.

**Table 3: CHPP Estimate of Small Entities for Each Respondent Category**

<b>Respondent Category</b>	<b>New</b>	<b>Existing</b>
Project Developer*	4	24
Consultant/Engineer*	4	16
ESCO**	0	1
Financier**	0	2
NGO**	0	17
Utility*	0	0
Government*	0	0
Equipment Manufacturer*	0	0
End-User*	0	0
<b>Total</b>	<b>9</b>	<b>60</b>

\* The CHPP ICR burden estimate assumes the following number of new partners for each of the years 2012-2014: project developer – 7; consultant/engineer – 7; utility – 6; government – 2; equipment manufacturer – 5; end-user – 5 (Note: the CHPP assumed that none of the existing or new utility, government, equipment manufacturer, or end-user partners are small businesses).

\*\* The CHPP ICR burden estimate assumes that there will be no new ESCO, financier, or NGO partners in years 2012-2014.

**5(d) Collection Schedule**

EPA will collect general information from all new Partners through either the GPP’s Partnership Agreement or CHPP’s LOI, which is completed and submitted by each Partner upon their agreement to participate in the program. In addition, GPP Partners will be asked to complete a Partner Yearly Report on an annual basis on the anniversary of EPA’s receipt of the Partner’s last information update. In addition, a subset of GPP Partners occasionally may be asked to provide additional information specific to their industry sector or to an aspect of the GPP program. Once a year, all CHPP Partners are asked to review and update a Partner Projects Data

Form that contains information about CHP projects in which they are involved (regardless of the state of development) and about other CHP-related activity.

## **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

### **6(a) Estimating Respondent Burden**

In order to obtain accurate hourly burden and cost estimates, EPA consulted with eight Partners (respondents) from the GPP and the CHPP. These responses were averaged to estimate the hourly burden for each activity and the labor rates. In consulting with Partners, EPA provided them with hourly burden estimates from the last submitted ICR as well as current labor rates from the Bureau of Labor Statistics. Respondents were asked if the hourly burden estimates and labor rates were appropriate and, if not, to provide estimates based on their experience.

The hourly burden for each activity was multiplied by the number of Partners (respondents) performing the activity each year to estimate the total respondent burden. In accordance with the Paperwork Reduction Act, Federal Partners were excluded from the burden estimate, although we summarize their burden in Table 7. Capital, operation and maintenance costs were also considered. Attachment A presents the estimated annual respondent burden and costs for information collection activities associated with the GPP for each year of the collection. Attachment A and Table 7 include burden estimates for Federal entities in the GPP, but these are not included as part of this Information Collection Request. Attachment B presents the estimated annual respondent burden and costs for information collection activities associated with the CHPP for each year of the collection. Table 5 in Section 6(e) of this supporting statement presents a summary of the overall respondent burden for both the GPP and CHPP for each of the three years as well as the total burden and the annual average burden.

### **6(b) Estimating Respondent Costs**

#### **(i) Estimating Labor Costs**

Respondent labor rates came from direct consultations with four current GPP Partners and four current CHPP Partners, as discussed in section 6(a). For GPP Partners loaded rates are \$58.44 for legal staff, \$56.94 for managerial staff, \$44.11 for technical staff, and \$23.01 for clerical staff. For CHPP Partners loaded rates are \$71.15 for legal staff, \$65.48 for managerial staff, \$47.74 for technical staff, and \$25.34 for clerical staff.

#### **(ii) Estimating Capital and Operations and Maintenance Costs**

Because this information collection requires respondents to report only information that is already available to them, there are no capital costs. EPA does not expect that the operations and



maintenance (O&M) costs of these programs will be significant. The only O&M costs expected are for postage required to return any completed forms, long distance fax charges if the forms are faxed instead of mailed, and costs to copy the forms if Partners wish to retain them on file. A submittal cost of \$3 is attributed to all activities involving mailing materials to account for the use of trackable mail or long distance fax and copying. If Partners choose to submit forms electronically, their costs will be lower than estimated. The average annual O&M cost over three years is \$6,744.

**6(c) Estimating Agency Burden and Costs**

Attachments C and D present the estimated Agency burden hours and costs for the information collection activities associated with GPP and CHPP, respectively. Table 4 presents a summary of the total Agency burden for both programs. EPA estimates an average hourly labor cost of \$93.00 for managerial staff, \$78.00 for technical staff, and \$52.50 for clerical staff. To derive these estimates, EPA used the rates charged by its support contractors to perform the activities covered by this ICR.

**Table 4: Summary of Agency Burden**

	2012	2013	2014	Total	Annual Average
Hours	3,188	3,436	3,684	10,308	3,436
Cost	\$224,336	\$241,489	\$258,647	\$724,472	\$241,490

**6(d) Estimating the Respondent Universe**

**GPP.** GPP had a total of 1,335 Partners at the end of 2011. EPA expects future growth to be constant since the number of Partners that have joined in the past few years has been steady. EPA anticipates that 248 new Partners will join the program each year in 2012, 2013, and 2014. Of these new 248 Partners joining each year, EPA expects that 220 will be from the private sector (including NGOs) and 28 from local and state governments, as is consistent with the Partnership’s current makeup. Each new Partner is required to complete and submit a Partnership Agreement form, and all participating Partners are expected to fill out or update the Partner Yearly Report, starting the year after they join. Partners who fail to meet the program’s requirements are suspended, yielding an anticipated average net annual growth rate of 134 Partners.

The average annual number of respondents over three years is 1,702. The number of respondents in each of the three years of this information collection and the average over the 3-year period are shown in Table 5 in Section 6(e) of this supporting statement.

**CHPP.** CHPP had a total of 450 Partners at the end of 2011. EPA anticipates approximately 30 new Partners will join the program each year in 2012, 2013, and 2014. Of these new respondents, it is assumed that there are 5 or 6 new Partners per year in each of the following categories: end-users, project developers, consulting engineers, equipment manufacturers, and utilities, with up to an additional two Partners belonging to State/Local/Tribal governments per year. Each of the new Partners is expected to fill out an LOI. All of the new Partners will complete the CHPP Partner Projects Data Form within the same year they join the Partnership. All of the existing Partners will continue to review their project information and provide updates every year in a project CHPP Partners Project Data Form starting in the year they join the Partnership.

The average annual number of respondents over three years is 514. The number of respondents in each of the three years of this information collection and the average over the 3-year period are shown in Table 5.

#### **6(e) Bottom Line Burden Hours and Costs**

**GPP.** Attachments A and C show the detailed annual burden and cost to respondents and the Agency, respectively, for the information collection activities associated with GPP. The results are summarized in Tables 5 and 6. The total annual burden, averaged over the three-year period, is 2,896 hours and \$147,103 per year for respondents and 2,347 hours and \$156,455 per year for the Agency. (See Tables 5 and 6 for these average numbers). The bottom line burden for respondents will be the least in year 1 and will gradually increase in years 2 and 3. This is because there are more Partners responding in years 2 and 3. The burden per respondent is similar in all 3 years. In years 1, 2, and 3, new Partners will complete a Partnership Agreement. In years 1, 2, and 3, existing Partners will update information in the Partner Yearly Report Form as needed. After the first submittal, EPA will provide the information previously submitted by existing Partners and ask only for updates. Similarly, the Agency burden is the least in year 1 and will increase gradually in years 2 and 3 as EPA has more information submittals to review and enter into the database. See Tables 5 and 6 for respondent and Agency burdens in each of the three years.

Table 7 summarizes the total annual respondent burden for Federal Partners, although these are not included in Table 5 since, in accordance with the Paperwork Reduction Act, Federal respondents are excluded from Information Collection Requests. The total annual burden for Federal Partners, averaged over the three-year period, is 30 hours and \$2,038 per year.

***CHPP.*** Attachments B and D show the detailed annual burden and cost to respondents and the Agency, respectively, for the information collection activities associated with CHPP. The results are summarized in Tables 5 and 6. The total annual burden, averaged over the three-year period is 1,905 hours and \$108,950 for Partners, and 1,089 hours and \$85,036 for the Agency. (See Tables 5 and 6 for these average numbers). The bottom line burden for respondents will be the least in year 1 and will increase gradually in years 2 and 3. This is because there are more Partners responding in years 2 and 3. The burden per respondent is similar in all 3 years. In years 1, 2, and 3, new Partners will complete an LOI. New Partners also will report their CHP related activities including project data, if applicable. In years 1, 2, and 3, existing Partners will provide data on CHP projects and CHP related activity. EPA will provide the information previously submitted by the existing Partners in a CHPP Partners Project Data Form and ask only for updates. Similarly, the Agency burden is the least in year 1 and will gradually increase in years 2 and 3 as EPA has more information submittals to review and enter into the database. See Tables 5 and 6 for the respondent and Agency burdens in each of the three years.

Table 7 summarizes the total annual respondent burden for Federal Partners, although these are not included in Table 5 since, in accordance with the Paperwork Reduction Act, Federal respondents are excluded from Information Collection Requests. The CHPP has no Federal Partners.

***Total.*** Considering both the GPP and the CHPP, the combined total annual burden (averaged over a 3-year period) is 4,800 hours and \$256,053 per year for respondents and 3,436 hours and \$241,490 per year for the Agency. Tables 5 and 6 show the breakout between labor costs and O&M costs. The burden estimates reflect an average of 2,216 respondents per year. The average annual burden per respondent is 2.17 hours and \$118 per year.

**TABLE 5.**  
**ESTIMATED TOTAL RESPONDENT BURDEN AND COST FOR GPP, CHPP, AND**  
**COMBINED**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents*	1,568	1,702	1,836	5,106	1,702
Number of Company/Institutional Respondents	1,392	1,511	1,630	4,533	1,511
Number of Local/State Respondents	176	191	206	573	191
Hours	2,681	2,896	3,111	8,688	2,896
Labor Costs	\$131,399	\$141,997	\$152,593	\$425,989	\$141,997
O&M Costs	\$4,704	\$5,106	\$5,508	\$15,318	\$5,106
TOTAL Costs	\$136,103	\$147,103	\$158,101	\$441,307	\$147,103
<b>CHP Partnership Program</b>					
Number of Respondents	482	514	546	1,542	514
Number of Company/Institutional Respondents	450	480	510	1,440	480
Number of State Respondents	32	34	36	102	34
Hours	1,790	1,904	2,019	5,714	1,905
Labor Costs	\$100,881	\$107,305	\$113,751	\$321,937	\$107,312
O&M Costs	\$1,542	\$1,638	\$1,734	\$4,914	\$1,638
TOTAL Costs	\$102,423	\$108,943	\$115,485	\$326,851	\$108,950
<b>Combined Totals for Both Programs</b>					
Number of Respondents	2,050	2,216	2,382	6,648	2,216
Hours	4,471	4,800	5,130	14,402	4,800
Labor Costs	\$232,280	\$249,302	\$266,344	\$747,923	\$249,309
O&M Costs	\$6,246	\$6,744	\$7,242	\$20,232	\$6,744
TOTAL Costs	\$238,526	\$256,046	\$273,586	\$768,158	\$256,053
Average annual hours per respondent	-	-	-	-	2.17
Average annual costs per respondent	-	-	-	-	\$115

\*In accordance with the Paperwork Reduction Act, Federal government respondents are not included in the burden estimate in Table 5 because, based on its experience, GPP assumes that participating Federal facilities are not run by contractors. The burden on Federal government respondents is shown separately in Table 7.

**TABLE 6.**  
**ESTIMATED TOTAL AGENCY BURDEN AND COST FOR GPP, CHPP and COMBINED**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents	1,585	1,7208	1,855	5,160	1,720
Hours	2,163	2,347	2,532	7,042	2,347
Labor Costs	\$144,232	\$156,455	\$168,677	\$469,364	\$156,455
O&M Costs	\$0	\$0	\$0	\$0	\$0
TOTAL Costs	\$144,232	\$156,455	\$168,677	\$469,364	\$156,455
<b>CHP Partnership Program</b>					
Number of Respondents	482	514	546	1,542	514
Hours	1,025	1,089	1,152	3,266	1,089
Labor Costs	\$80,104	\$85,034	\$89,970	\$255,108	\$85,036
O&M Costs	\$0	\$0	\$0	\$0	\$0

	Year 1	Year 2	Year 3	Total	Annual Average
TOTAL Costs	\$80,104	\$85,034	\$89,970	\$255,108	\$85,036
<b>Combined Totals for Both Programs</b>					
Number of Respondents	2,067	2,234	2,401	6,702	2,234
Hours	3,188	3,436	3,684	10,308	3,436
Labor Costs	\$224,336	\$241,489	\$258,647	\$724,472	\$241,490
O&M Costs	\$0	\$0	\$0	\$0	\$0
<b>TOTAL Costs</b>	<b>\$224,336</b>	<b>\$241,489</b>	<b>\$258,647</b>	<b>\$724,472</b>	<b>\$241,490</b>

\* The Agency burden calculations include the processing of forms submitted by Federal government respondents for GPP, increasing the total annual respondent community to 2,234 rather than the 2,216 listed in Table 5.

**TABLE 7.**

**ESTIMATED RESPONDENT BURDEN FOR FEDERAL GOVERNMENT PARTNERS**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents	17	18	19	54	18
Hours	28	30	31	89	30
Labor Costs	\$1,928	\$2,038	\$2,148	\$6,114	\$2,303
O&M Costs	\$51	\$54	\$57	\$162	\$54
TOTAL Costs	\$1,979	\$2,092	\$2,205	\$6,276	\$2,092
<b>CHP Partnership Program</b>					
Number of Respondents	0	0	0	0	0
Hours	0	0	0	0	0
Labor Costs	0	0	0	0	0
O&M Costs	0	0	0	0	0
TOTAL Costs	0	0	0	0	0
<b>Combined Totals for Both Programs</b>					
Number of Respondents	17	18	19	54	18
Hours	28	30	31	89	30
Labor Costs	\$1,877	\$1,984	\$2,091	\$5,952	\$1,984
O&M Costs	\$51	\$54	\$57	\$162	\$54
<b>TOTAL Costs</b>	<b>\$1,928</b>	<b>\$2,038</b>	<b>\$2,148</b>	<b>\$6,114</b>	<b>\$2,038</b>
Average annual hours per respondent					1.65
Average annual costs per respondent					\$113

**6(f) Reasons for Change in Burden**

Under this renewal ICR, the total annual respondent burden is 4,800 hours. The 2008 ICR average annual respondent burden was 5,823 hours per year.

Since the last ICR renewal, both the GPP and CHPP have introduced program efficiencies to reduce program burden; and Partners have become more familiar with the annual reporting forms. As a result of these changes, the average number of hours per Partner has decreased from 3.25 to 2.17 hours; and consequently the total hourly burden for Partners decreased despite an increase in the total number of Partners.

**6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2 hours per respondent. The average number of annual burden hours per type of response is: 1.96 hours for a Partnership Agreement (a one-time burden for GPP Partners), 2.14 hours for a Letter of Intent (a one-time burden for CHPP Partners), 1.38 hours for the Partner Yearly Report for the GPP, and 3.51 hours for the Partner Projects Data Form for the CHPP.

Partners from both programs also may submit voluntary updates of simple information, such as contact information or company profiles, via the website. These updates take from 15 minutes to 0.5 hours per response. A subset of Partners may participate in brief (i.e., 10-15 minute) telephone calls with EPA to clarify questions pertaining to the Partnership Agreement or LOI, GPP Partner Yearly Report, or CHPP Partners Project Data Form. All of these activities are included in the annual burden estimate.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2004-0501, which is available for public viewing at the Air and Radiation Docket and Information Center in EPA's Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC. EPA's Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include EPA's Docket ID No. EPA-HQ-OAR-2004-0501 and OMB Control Number 2060-0578 in any correspondence.

**ATTACHMENT A: Green Power Partnership Respondent Burden for Years 1 though 3**

A-1 Green Power Partnership Private Sector Respondent Burden for Year 1

A-2 Green Power Partnership Private Sector Respondent Burden for Year 2

A-3 Green Power Partnership Private Sector Respondent Burden for Year 3

A-4 Green Power Partnership Local & State Government Respondent Burden for Year 1

A-5 Green Power Partnership Local & State Government Respondent Burden for Year 2

A-6 Green Power Partnership Local & State Government Respondent Burden for Year 3

A-7 Green Power Partnership Federal Government Respondent Burden for Year 1

A-8 Green Power Partnership Federal Government Respondent Burden for Year 2

A-9 Green Power Partnership Federal Government Respondent Burden for Year 3

**ATTACHMENT B: CHP Partnership Respondent Burden for Years 1 through 3**

B-1 CHP Partnership Private Sector Respondent Burden for Year 1

B-2 CHP Partnership Private Sector Respondent Burden for Year 2

B-3 CHP Partnership Private Sector Respondent Burden for Year 3

B-4 CHP Partnership State & Local Government Respondent Burden for Year 1

B-5 CHP Partnership State & Local Government Respondent Burden for Year 2

B-6 CHP Partnership State & Local Government Respondent Burden for Year 3

**ATTACHMENT C: Green Power Partnership Agency (EPA) Burden for Years 1 through 3**

C-1 Green Power Partnership Agency (EPA) Burden for Year 1

C-2 Green Power Partnership Agency (EPA) Burden for Year 2

C-3 Green Power Partnership Agency (EPA) Burden for Year 3

**ATTACHMENT D: CHP Partnership Agency (EPA) Burden for Years 1 through 3**

D-1 CHP Partnership Agency (EPA) Burden for Year 1

D-2 CHP Partnership Agency (EPA) Burden for Year 2

D-3 CHP Partnership Agency (EPA) Burden for Year 3