

**Supporting Statement:  
U.S. Department of Energy  
Better Buildings Challenge, Better Buildings Alliance 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 three Better Buildings voluntary programs: the Better Buildings Challenge; Better Buildings Alliance; and 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 voluntary data collection efforts from three related programs. The Better Buildings Challenge, a voluntary leadership partnership initiative, is supported by two programs the Better Buildings Alliance and the Better Buildings, Better Plants Voluntary Pledge Program. Since all three of these programs are part of the overarching Better Buildings platform, driving for a common goal of working with the market to drive energy efficiency, 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 and Better Buildings Alliance.

DOE currently seeks to revise the approved information collection by incorporating new In-Plant Training activities conducted under the Better Buildings, Better Plants Voluntary Pledge Program and integrating the Better Buildings Alliance under the Better Buildings platform to further support energy efficiency in the commercial building sector. Together, these collections result in a total hourly burden of 1,112.25 hours, with an average burden of 1.5 hours per response. This request for information was first approved by OMB as a new collection on April 22, 2009. A subsequent revision to the approved collection was approved by OMB on August 13, 2012.

In an effort to reduce burden, DOE consolidated initial and periodic reporting forms for Better Buildings Challenge financial allies, which resulted in a burden reduction of 110 hours. This revision also amends DOE’s estimate for the total annual cost burden to respondents resulting from the collection of information. The U.S. Department of Labor’s Bureau of Labor Statistics increased the mean hourly wage for industrial engineers from \$38.39 to \$39.47, May 2012. Full descriptions of the new data collections are described below and a summary of the changes to existing collection activities previously approved are referenced in Appendix A – Summary of Amended Information Collection Review Activities.

## **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 DOE intends to collect information for its Better Buildings Challenge, Better Buildings Alliance, and the Better Buildings, Better Plants Voluntary Pledge Program. Section 421 of the Energy Independence and Security Act of 2007 (EISA 2007) (42 U.S.C. § 17081) authorizes DOE to establish a national high-performance green building clearinghouse. Section 911 of the Energy Policy Act of 2005, as amended (42 U.S.C. § 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, Better Buildings Alliance, and Better Buildings, 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, Section 106 of the Energy Policy Act of 2005 (EPAAct 2005) (Pub. L. No. 190-58) permits the U.S. 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 U.S. Secretary of Energy is also authorized by the legislation to provide these companies with technical assistance.

The Act further directs the U. S. 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.

Other administrative requirements that necessitate this collection include the President's publicly stated goal of improving the energy efficiency of commercial and industrial buildings by 20% by 2020 (February 2011), the President's Executive Order—Accelerating Investment in Industrial Energy Efficiency (August 2012), which calls for an expansion of the Better Buildings, Better Plants Voluntary Pledge Program to help facilitate investments in industrial energy efficiency, as well as the President's Climate Action Plan (June 2013), which specifically calls for an expansion of the Better Buildings Challenge to help reduce greenhouse gas emissions that contribute to global warming, as well as reducing energy bills for American families and businesses.

**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 program, Better Buildings Alliance, and the Better Buildings, Better Plants 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 Alliance**

Better Buildings Alliance is a national initiative aiming to help meet the administration's goal of a 20% improvement in commercial building energy efficiency by 2020. Section 422 of EISA 2007 supports this initiative by setting a goal to help pave the way for net-zero energy commercial buildings.<sup>1</sup> The Better Buildings Alliance accomplishes this by encouraging members to commit to an energy efficiency improvement goal of 2% or more per year while deploying energy-saving technologies and solutions. Better Building Alliance members cover key market sectors: retail, food service, commercial real estate, hospitality, health care, education, and state and local buildings owners and managers.

The program's name was changed from the Commercial Buildings Energy Alliance to the Better Buildings Alliance in December of 2012, to better align it with the Better Buildings Challenge efforts. Along with the name change, several new programmatic requirements were instituted to provide more transparency to the program, as well as track success of the program overall and accurately report EISA 2007 progress to Congress, as mandated in Section 421, Subtitle B of EISA 2007.<sup>2</sup> These changes include requiring organizations to commit to a long-term energy reduction goal and annually submitting an aggregated data summary. Better Buildings Alliance members also submit a basic application to DOE when they first join the program.

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<sup>1</sup> Section 422 of EISA 2007 specifically calls for "the development and establishment of net-zero energy commercial buildings for:

- (1) any commercial building newly constructed in the United States by 2030;
- (2) 50 percent of the commercial building stock of the United States by 2040; and
- (3) all commercial buildings in the United States by 2050."

<sup>2</sup> Section 421, Subtitle B of EISA 2007 requires the submission of a biennial report detailing activities and accomplishments in support of the High-Performance Green Building Initiatives and other government initiatives that affect commercial buildings.

## Data Form

The Better Buildings Alliance will collect basic energy usage data for each organization's portfolio of buildings on an annual basis through a standardized form (attached). Data will be submitted at an aggregated level, along with a short description of significant energy reduction efforts and impacts. This information will help DOE assess the effectiveness of partnering with the commercial sector through voluntary programs, as well as determine the impact of technical assistance offered through the program.

## Application Form

Better Buildings Alliance members must provide basic enrollment information to the program. The application form (see attached) includes information on the partner's building portfolio, current energy reduction goal and data tracking process, contact information, and project teams it may want to participate in through the Better Buildings Alliance. This information is collected in a web form and submitted electronically.

## **Existing Collection: Better Buildings, Better Plants**

Better Buildings, Better Plants Voluntary Pledge Program 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 LEADER 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 Better Buildings Challenge collection and the collection's title 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 its level of expertise in energy management. Companies participating in the program report annual energy intensity data to DOE. EPA 2005 defines energy intensity as the "primary energy consumed for each unit of physical output in an industrial process." 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 former Save Energy Now Voluntary Pledge—now the Better Buildings, Better Plants Program—Report collection through a web-based, password-protected system, and via e-mail. DOE has used this information to recognize partners for their accomplishments as well as to draft a required progress report to Congress. 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 EAct 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.

### **New Collection Under Better Buildings, Better Plants**

#### **In-Plant Training Forms**

Section 106 of EAct 2005 states that manufacturers entering into voluntary agreements with DOE to reduce energy intensity are eligible to receive technical assistance from the Energy Department. In-Plant Trainings are one way DOE delivers this technical assistance.

Through these trainings, companies participating in Better Buildings, Better Plants have an opportunity to receive hands-on training on how to conduct energy assessments, use DOE tools, develop energy management systems, and implement and replicate energy projects. The training includes an assessment of common energy systems such as steam, process heating, or motor-driven systems. Personnel from other facilities within the company, as well as from other companies in the area and suppliers, may be invited to attend. Companies apply to host these on-site, three-day training sessions at their facilities.

As part of the trainings, DOE is proposing to collect information from participants through the following mechanisms:

- **Application Form:** Program Partners must apply to host In-Plant training. The application form (attached) includes information on the size and location of the facility, number of invited participants, the type of training desired and the intended cost-share ratio. DOE selects applications based on the information submitted, with the Department typically selecting applicants with high energy use, large numbers of invited attendees, and significant cost share commitments.
- **In-Plant Training Evaluation:** Training participants will be asked to complete a voluntary evaluation form (attached) upon completion of the in-plant training session. Respondents will provide feedback on the relevance, effectiveness and

quality of teachings, training methods and objectives. DOE will use the information to assess and improve the program.

- **Host Plant Implementation Data Survey:** Twelve months after completing the in-plant training, DOE will follow-up with the host plant in a phone survey to determine whether and to what extent the energy saving opportunities identified during the training session were implemented.

DOE will use the information to improve and measure the impacts of the Better Buildings, Better Plants Voluntary Pledge Program.

Specifically, DOE will use the data collected to assess the effectiveness of its efforts to partner with industry to drive a 2.5% per year improvement in industrial energy intensity, as well as the effectiveness of its technical assistance offerings, as called for in EPA Act 2005. This will serve as an input to the report DOE is required to submit to Congress in June of 2017.

### **Existing 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. For Better Buildings Challenge Partners, DOE will collect the following information:

- **Website Profiles.** 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.
- **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 standard template.

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 (see attachment).

- 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.

DOE has used the information collected through the Better Buildings Challenge to recognize partners for their success, build web pages that educate the public on successful energy efficiency strategies, and draft publically available progress reports.

**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.**

The Better Buildings Challenge, Better Buildings Alliance and the Better Buildings, Better Plants voluntary pledge programs primarily rely on data provided in an electronic format via software tools, electronic files and a variety of template spreadsheets. There is a limited number of data collection responses received in writing, over the telephone, or in-person for verification purposes. Each data collection instrument is designed to support the respective voluntary pledge program that the respondent participates in with DOE. No other data collection systems will be employed to support these programs.

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.<sup>3</sup> 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.

The Better Buildings, Better Plants Program and Better Buildings Alliance use a one page reporting form (also attached). The data collected for both of these programs is largely similar to the Better Buildings Challenge; however, the Better Buildings Challenge form 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 facility level. The additional reporting requirements for the Better Buildings Challenge Partners are consistent with that program's goals for greater transparency of energy savings data. In efforts to reduce burden, the reporting document 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.

The In-Plant Training forms can be submitted via e-mail, fax or postal mail. The application form is provided in Excel, which allows some calculations to be automated, though applicants and participants are free to print the forms out and fill them out by hand. Hard copies of the course evaluation forms will be distributed at the training events, filled out by hand, and manually collected by DOE representatives.

#### **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 EAct 2005 as "the primary energy consumed for each unit of physical output in the industrial process," is not collected by any other existing program.

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<sup>3</sup> 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."



To ease the reporting burden on the Better Buildings Challenge 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 Better Buildings Challenge partners have already submitted the facility-level energy data using this EPA tool.

Better Buildings Alliance and Better Buildings, Better Plants members who also participate in the Better Buildings Challenge will be exempt from Better Buildings Alliance or Better Buildings, Better Plants reporting requirements. DOE will use the information collected from the Better Buildings Challenge in lieu of the Better Buildings Alliance or Better Buildings, Better Plants reporting form.

In addition, DOE conducts periodic reviews of energy efficiency programs to align national initiatives and reduce the annual reporting burden for respondents. As part of this process, DOE:

- Consolidated initial and periodic reporting forms for Better Buildings Challenge financial allies, which resulted in a burden reduction of 110 hours;
- Reduced the reporting frequency regarding the collection of facility-level energy performance data in the Better Buildings Challenge from four reports to two reports filed per year, and the estimated time to complete facility-level energy performance data from one hour to 0.42 hours per response, resulting in a burden reduction of 66.36 hours; and
- Adjusted the Better Buildings, Better Plants Annual Reporting Form reporting frequency for industrial partners participating in the Better Building Challenge from semiannually to annually, which resulted in a burden reduction of 15 hours.

DOE will continue to evaluate the Better Buildings Challenge, Better Building Alliance and Better Buildings, Better Plants Programs for opportunities to minimize duplication of effort.

**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.

The In-Plant Training forms are necessary to carry out Congress’ directive for DOE to provide technical assistance to manufacturers entering into voluntary agreements with DOE to reduce their energy intensity. Without the application form, DOE would not have a systematic way of selecting technical assistance recipients, and without the evaluation form and process to collect implementation data, DOE would lack a mechanism to track the effectiveness of the training.

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 U.S. 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.

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 60-day Federal Register Notice on Thursday, April 11, 2013, Vol.78, No. 70, and a 30-day Federal Register Notice on Tuesday, November 12, 2013, Vol. 78, No. 218, requesting public comment on an amendment to this approved agency information collection. No comments were received. Previously, the Department published a Notice and Request for Comments concerning the Better Buildings, Better Plants Voluntary Pledge Report collection in the Federal Register on Monday, March 19, 2012, Volume 77, F.R. No. 53. 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, Vol. 76, No. 216. The notices described the information 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.**

Energy consumption and savings data reported to DOE through the Better Buildings, Better Plants Voluntary Pledge Program and the Better Buildings Alliance is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. 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.

Better Building Challenge Program 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.



### **Burden hour summary for BBA**

Total number of unduplicated respondents: 245  
Reports filed per person: 2  
Total annual responses: 490  
Total annual burden hours: 1,041.25

Average Burden Per Collection: 2.1 hours  
Per Applicants: 4.25 hours

### **Combined totals**

Total number of unduplicated respondents: 550  
Total annual responses: 2,333  
Total annual burden hours: 4,651.89

DOE estimates that 130 organizations will participate in the Better Buildings Challenge, 175 industrial companies will participate in the Better Buildings, Better Plants program and 245 organizations will participate in the Better Buildings Alliance. Each organization will respond to an annual data request. Although each organization may represent multiple buildings which may track their own progress, organizations submit one aggregate report for all of their buildings and/or plants.

DOE data on its existing Better Buildings, Better Plants partners indicates that each company has on average about 14 plants enrolled in the program. Most Better Buildings, Better Plants Partner plant-level data are 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 four hours annually to review and report their data. Additionally, completing the In-Plant Training forms results in another 71 hours per year for a total time burden of 3,014 hours associated with the Better Buildings, Better Plants Voluntary Pledge Program.

A small number of participating Better Buildings, Better Plants partners 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 six 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. This burden estimate is based on a weighted average from companies that use an existing data collection system versus those companies that do not have a data collection system to capture energy consumption information.

DOE will perform a one-time verification effort on approximately 25% of participating Better Buildings, Better Plants companies prior to submitting the report to Congress in 2017.

DOE estimates that the one-time verification effort will require approximately 10 hours per company, or approximately two 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 130 Better Buildings Challenge organizations and 175 companies participating in the Better Buildings, Better Plants program. DOE will develop the web profiles in-house based on data companies provide through a standardized template. Companies will update their web profiles once a year using the template. Pertaining to Better Buildings Challenge Partners and Allies, DOE estimates the annual data and web profile template reporting result in a total time burden of approximately 197 hours. Respectively, the annual data and web profile template reporting result in a total time burden of 2,943 hours for Better Buildings, Better Plants Partners.

DOE estimates that it will require 30 minutes to one hour annually for each Better Buildings Challenge and Better Buildings, Better Plants organization to provide their data through the template. Organizations that join Better Buildings Alliance will not be subject to additional required reporting for purposes of developing web profiles or building-level verification. Therefore, DOE estimates the annual data reporting total time burden of 980 hours for Better Buildings Alliance Partners.

**13. Provide an estimate for the total annual cost burden to respondents or record-keepers 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 \$118,963, while the estimated annual cost for the Better Buildings Alliance is \$41,098, and the estimated annual cost for the Better Buildings Challenge is \$23,549, for a total cost of approximately \$183,610. The per respondent cost for the Better Buildings, Better Plants Voluntary Pledge Reports is about \$680, the Better Buildings Alliance per respondent cost is approximately \$168, and the approximate per respondent cost for the Better Buildings Challenge is \$181, for a combined total of approximately \$1,029.

These numbers are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$39.47) 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.

Better Buildings, Better Plants 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

Better Buildings, Better Plants In-Plant Training Collection Costs  
20 hours per year to collect and review In-Plant Training applications  
20 hours @ \$150 per hour = \$3,000

6 hours per year to collect implementation data from host plant  
6 hours @ 150 per hour = \$900

Better Buildings Alliance Data 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

Better Buildings Challenge 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 Better Buildings, Better Plants and Better Buildings Challenge  
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 these collection efforts will be \$94,000.

**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 Section 106 of EAct 2005. Changes have been made to the estimated burden time that increase the total projected hourly burden from the 2,943 hours per year cited in the most recent information collection request (ICR), to the 3,014 hours cited in this request. The current estimates include program changes in Items 13 and 14 associated with additional collection forms. Also, the annual reporting and recordkeeping cost burden in Item 14 is adjusted to reflect occupational employment and wages for industrial engineers based on May 2012 employment statistics. The mean hourly wage rate was increased from \$38.39 to \$39.47. The total annualized cost requested from the current OMB inventory is adjusted from \$143,251 to \$183,610, resulting in an increase of \$40,359 for the total collection.

Part of this is driven by the expansion of the Better Buildings, Better Plants Program to include In-Plant Training activities that help DOE meet its obligation to provide technical assistance under Section 106 of EAct 2005.

DOE is now including the time required by training participants to apply for and evaluate the training sessions. DOE plans to host 12 In-Plant Trainings per year and expects a maximum of 15 participants per training. DOE estimates that approximately 40 companies will incur the additional burden of applying to host the training at their facility. The 12 companies that choose to host the training will also report the implementation data to DOE following the training. In all, DOE estimates that training participants will spend on average approximately 71 hours per year submitting related in-plant training information to the department.

The Better Buildings Alliance is actively being redesigned to further support the commercial market and be integrated into the Better Buildings platform. As such, two annual forms are being requested to help track the effectiveness of the program.

**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 Buildings, Better Plants, Better Buildings Alliance, 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 annual impact of the DOE program and in reports to Congress, no later than June 30, 2012, and June 30, 2017. DOE will perform a one-time verification effort on approximately 25% of participating Better Buildings, Better Plants companies prior to the report to Congress in 2017.

DOE will take all necessary precautions to ensure that the sharing of respondent information does not contain National Security information or other information/data that is protected by other statute, practice, or legal precedent. DOE will maintain compliance with current privacy requirements including OMB guidance and will ensure that data made available has any required Privacy Impact Assessments or System of Records Notices available on DOE's websites. DOE will also maintain currency with public disclosure requirements as well as ensure the required confidentiality, integrity, and availability controls are corroborated prior to release.

**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.

Appendix A – Summary of Amended Information Collection Review Activities

Program	Information Collection Description	Status	Average Burden Hours per Responder	Notes
BBC	Website Profile Page Template	Approved	0.5	
	Website Profile Page Template-- Financial Allies			
BBC	Showcase Project	Approved	2	
BBC	Implementation Model	Approved	2	New form included for OMB approved collection
BBC	Organization-Wide Plan	Approved	0.5	
BBC	Facility-Level Energy Performance Data	Approved	0.25	No DOE information collection form required; Companies share access to EPA Portfolio Manager tool reports
BBC	Better Buildings Facility-Level Energy Reporting Form	Approved	0.84	
BBC	Better Buildings Better Plants Annual Reporting Form	Approved	1	Form updated after previous OMB approval
BBC	Financial Allies Product Description and Periodic Updates	Approved	1.5	Form updated after previous OMB approval; reporting burden reduced by 110 hours due to consolidation of product description and periodic reporting forms
BBBP	Annual Data Collection	Approved	15.3 <sup>4</sup>	Form updated after previous OMB approval, reporting burden remains the same. This burden estimate is based on a weighted average from companies that use an existing data collection system and those that do not
BBBP	Web Profile Development	Approved	1	New form included for OMB approved collection
BBBP	Report Data Verification	Approved	2	No form necessary; data verification will occur via email and conference calls
BBBP	In-Plant Trainings Application Form	New	0.5	New form
BBBP	In-Plant Trainings Course Evaluation	New	0.25	New form
BBBP	In-Plant Trainings Post Follow-up with Host Plant	New	0.5	New form
BBA	Data Collection	New	4	New form
BBA	Application Form	New	0.25	New form

BBC, Better Buildings Challenge  
 BBBP, Better Buildings, Better Plants Program  
 BBA, Better Buildings Alliance

<sup>4</sup>The following method was used to calculate burden hours of annual data reporting for Better Plant partners based on a weighted average:  $[130 \text{ (partners with collection systems)} \times 4 \text{ burden hours}] + [45 \text{ (partners without collection systems)} \times 48 \text{ burden hours}] / 175 \text{ (total partners)} = 15.3 \text{ burden hours per partner.}$