

Supporting Statement:
U.S. Department of Energy
Clean Cities Workplace Charging Challenge
OMB Control Number 1910-NEW

This supporting statement provides additional information regarding the U.S. Department of Energy's (DOE) request for a new Information Collection. DOE has proposed to initiate an information collection that will enable DOE to measure the impact and progress of DOE's Workplace Charging Challenge (Challenge). 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."

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 Energy Policy Act of 1992 (EPAAct) authorized the U.S. Department of Energy's (DOE) to advance the nation's economic, environmental, and energy security by supporting local actions to reduce petroleum consumption in transportation. 42 U.S.C. § 13255 (EPAAct Section 505) DOE's Vehicle Technologies Office (VTO), within DOE's Office of Energy Efficiency and Renewable Energy, works to educate stakeholders in the public and private sectors regarding deployment of alternative and renewable fuels, idle-reduction measures, fuel economy improvements, and emerging technologies. DOE's Clean Cities Program is one of the principle means by which DOE undertakes this education effort. Under 42 U.S.C. § 13233 (EPAAct Section 407), DOE is authorized to establish a data collection program for the purpose of collecting data that would be useful to persons seeking to manufacture, convert, sell, own or operate alternative fueled vehicles or alternative fueling facilities. For example, the Clean Cities program uses these kinds of information to facilitate the deployment of alternative fueled vehicles and fueling infrastructure.

Workplace Charging Challenge

The current administration has established a goal of having one million plug-in electric vehicles (PEVs) on the road by 2015.¹ As of October 2013, since 2008, over 150,000 plug-in electric cars have been sold in the United States, a figure that does not include the number of plug-in medium and heavy duty vehicles and delivery vehicles sold.² To achieve this goal, PEVs must provide a practical substitute for conventional vehicles, which in turn requires that communities provide access to infrastructure, the proper regulatory environment, and necessary support services.

¹ One Million Electric Vehicles By 2015: February 2011 Status Report, U.S. Department of Energy, available at http://www1.eere.energy.gov/vehiclesandfuels/pdfs/1_million_electric_vehicles_rpt.pdf. Retrieved Dec. 17, 2013.

² Jeff Cobb (Nov. 5, 2013). "[US Plug-In Car Sales Ride Past 150,000 Mark](#)". HybridCars.com. Retrieved Dec. 17, 2013.

VTO's Clean Cities program disseminates information communities need to enable greater adoption of electric vehicles.

The ICR is critical to the Challenge's capacity, via the Clean Cities Program, to facilitate market transformation in the electric vehicle sector. DOE has developed a questionnaire tool to facilitate the routing of information regarding the availability of workplace charging. Employing a password protected web-based questionnaire of multiple-choice questions accessed through DOE's existing Alternative Fuels and Advanced Vehicles Data Center (AFDC), the tool will gather information participating employers submit and:

- o Assess progress towards the present administration's 2015 goal for EVs; and
- o Facilitate further progress for employers, PEV owners, and EVSE users/managers.

On a voluntary basis, respondents, who DOE expects will be employers, will supply the information via a user-friendly online interface to the questions they decide to answer. The answers provided will be collated and analyzed for trends and summarized in writing on an annual basis. The answers will also be assessed to determine if a particular employer might serve as a good case study or example of best practices, for other employers to learn from. DOE will gain an understanding of why workplace charging is attractive to employers, how employers successfully manage EVSE use, the market impact of workplace charging, and how best to enable progress toward the Challenge's overarching goal of achieving by 2018 a ten-fold increase in the number of U.S. employers offering workplace charging. Employers will gain from reading the annual reports that contain summaries of the information, and also accessing documents DOE drafts based in part on the data collected and that set forth case studies and best practices that they, in turn, might be able to replicate.

DOE may follow up with respondents if clarifications are needed. In addition, in a few instances, DOE may seek to visit with a participating employer on the phone regarding its activities in this realm and, with their approval and input, develop a best practices case study based on the given employer's activities.

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.

Information collected addresses information related to workplace electric vehicle charging infrastructure for plug-in electric vehicles.

DOE's Vehicle Technologies Office (VTO) has developed a voluntary initiative, the EV Everywhere Workplace Charging Challenge. This initiative, launched in January 2013, aims to increase the number of U.S. employers offering workplace charging for PEVs to their employees. Participating employers may sign on as Partners to signal their commitment to workplace charging and otherwise promote workplace charging. As designed, the initiative is intended to benefit both employees and employers.

The goal of the Workplace Charging Challenge is to increase to over 500 the number of employers offering workplace charging to their U.S. employees by 2018, the scheduled end of the program. Individual employers that make available at least one electric vehicle supply equipment (EVSE), or charger, to their employees at one employer location will count towards this goal, regardless of whether or not the employer is a partner in the Workplace Charging Challenge.

As part of this program, DOE will be conducting outreach to deploy workplace charging, provide technical assistance to support employers' workplace charging programs, and identify specific success stories, lessons learned, and best practices employers have deployed, thereby increasing the value and facilitating the deployment of additional workplace charging programs. The effort is part of the larger EV Everywhere Grand Challenge, and as the Grand Challenge by necessity incorporates a deployment component, DOE will be able to use its experience and expertise through the VTO Clean Cities Program to educate the public about PEVs, as well as help identify potential workplace charging barriers and the means to remove such barriers. Presently DOE does not anticipate any other information collections associated with the Grand Challenge.

The Challenge does not endeavor to engage an exhaustive number of employers, but rather will work with self-identified employers committed to leading the way in reducing petroleum consumption through the deployment of PEVs and associated charging infrastructure.

In January 2013, relying on employers' public records and communications, DOE began identifying employers that might be interested in becoming voluntary partners to the Workplace Charging Challenge Program. To measure progress towards the Workplace Charging Challenge goal of more than 500 employers through 2018, DOE will be monitoring some employers directly and others through data DOE can gather from available online resources, including the Alternative Fuels Data Center. For those employers DOE is monitoring directly, DOE will develop an annual progress update and will publish the generalized results gathered. To generate this annual update, DOE will collect annually from these Workplace Charging Challenge Partners, or employers, data and narratives associated with their PEV charging program and infrastructure.

The principal objective of collecting the information DOE seeks to gather through the Challenge is to allow DOE to develop an objective assessment and estimate of the number of U.S. employers that have established a workplace charging program or otherwise installed EVSE, and to document specific information associated with the offering of such a program to employees. Information requested would be used to establish basic information for Partner employers, which will then be used for future comparisons and analysis of instituted programs and policies. A designated representative for each participating Partner will provide the requested information. The intended respondent is expected to be aware of relevant aspects of the company's charging infrastructure and program if such exists, such that the gathering of information is not expected to be very resource consuming. DOE will compile and make available to the public an annual progress update that would provide an update on the Workplace Charging Challenge program partners' activities, as well as report on metrics DOE is evaluating related to energy

consumption, costs, numbers of employers in the program, and best practices that can be identified for the purpose of helping others take steps to deploy charging infrastructure.

The Challenge effort will rely on data the Partners will provide via an online response tool. The data collection would address the following topic areas: (1) charging infrastructure and use; (2) employee PEV ownership; and (3) feedback on the Challenge.

The data will be compiled for the purpose of assessing and setting forth in the annual progress updates the Workplace Charging Challenge program's impact in terms of increasing both the number of employers offering workplace charging and the deployment of EVSEs and PEVs.

The data and subsequent analyses will allow DOE to compare historical records dynamically, and provide the opportunity for DOE to determine annual progress toward Workplace Charging Challenge goals. Calculation of progress and impacts will be undertaken on an annual basis.

If this information is not collected, DOE will have no way of determining the capacity of PEV owners to charge their vehicles away from their residence, during the work day, and what steps if any may be needed to incentivize the deployment of additional PEV charging infrastructure. The information is necessary to ensure the capacity of many stakeholders (vehicle manufacturers, purchasers, businesses and fleets, among others) to have certainty as to the expanded deployment of PEVs. Understanding the volume of employees who have access to and regularly use workplace charging provides useful information for stakeholders investing in growing the PEV market appropriately. Moreover, because DOE is interested in data that will allow examination and consideration of the impact workplace charging can have on PEV adoption rates and decreasing range anxiety, the information is expected to serve as a foundation for future program development.

The effort is targeted at employers that own or have on-site PEV charging infrastructure. To a great degree, the participating entities are the ones who will gain from the voluntary sharing of information. The collection is voluntary on the part of participating employers. Whether they participate will depend on the respondents' desire to submit the information, and to receive subsequently additional information that may be helpful to them regarding the infrastructure they have deployed, and potential plans for deploying additional infrastructure.

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 Challenge will use one information collection system, an online system. No other data collection system will be employed to support the Challenge except, due to a need to clarify responses submitted or, in the event DOE seeks to develop a case study based on the particular employer's efforts, phone contact may be initiated. DOE expects phone contact to be needed in not more than a handful of instances. The online Challenge questionnaire system DOE has developed provides a few advantages. First, it avoids the need to download any forms or materials, though respondents may print out the full list of questions and answers, or a portion

thereof if they wish. Second, avoiding downloads also limits potential security threats. Further, employing an online system also eliminates version control concerns, allowing for a single update to ensure that all respondents are using the current version.

4. Describe efforts to identify duplication.

This collection of information is specific to DOE. While DOE also collects information under the *Alternative Fuel Vehicle Acquisition Report for State Government and Alternative Fuel Provider Fleets* ICR, OMB Control Number 1910-5101, the information collected under that ICR is different. DOE also collects information under the *U.S. Department of Energy: Clean Cities Vehicle Programs*, ICR, OMB Control Number 1910-5171, but again, the information collected under that ICR is different. Specifically, the information collected via OMB Control Number 1910-5101 involves entities subject to the Alternative Fuel Transportation Program (AFTP). The EPAAct provisions authorizing the AFTP are also referred to as the mandated transportation provisions; fleets regulated under the AFTP are mandated to comply with EPAAct requirements. The Clean Cities program, under which the information collection that is the subject of this document is derived, is a voluntary program; any entities participating in the Clean Cities program are doing so voluntarily. Moreover, while there may be some entities that are required to participate in the AFTP that also may voluntarily participate in Clean Cities' initiatives, like the initiatives discussed in this document, the information collected under the AFTP and the Workplace Charging Challenge initiative does not overlap. The information collected under the AFTP is specific to regulatory requirements and ensuring compliance with those requirements. Thus, the information collected under the AFTP and the Workplace Charging Challenge is similar only in that it relates to alternative fuels or AFVs. Also, DOE is authorized to use information collected via OMB Control Number 1910-5101 only for the purpose of ensuring compliance with the AFTP; the information may not be used for any other purpose, including any initiative of the Clean Cities program. As a result, the information collected under the Clean Cities' program is different in subject, form, and function from that collected under the AFTP. Hence there is no duplication.

In addition, the information collected via the OMB Control Number 1910-5171, which includes the EV Readiness Scorecard and the National Clean Fleets Partnership, involve different entities and are different in form and function as well as substance. The EV Readiness Scorecard involves community respondents (not individual employers), contains different questions, and has a different scope. In particular, with regard to the latter item, the EV Readiness Scorecard looks at an entire community's EV readiness and at more than only EVSE. In addition, an employer participating in the Challenge may not be included in the participating community's response to the EV Scorecard, and some may be in a community that is not responding to the EV Scorecard. The National Fleet Partnership is focused on large employers and at that, a much smaller group of companies with significant sized fleets that may or may not have any focus on electric vehicles and charging infrastructure. Moreover, it is focused on fleet operation, as opposed to charging of personal vehicles at a workplace.

Further, in making this determination, DOE has reviewed the extensive array of information available through the Clean Cities program and other EPAAct programs. No existing information

is available with any degree of specificity or completeness for any or all of the potential voluntary respondents. Also, to have DOE research and assemble any available information would render insignificant the opportunity the information collection affords respondent employers.

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

Small businesses may serve in the role of respondent in participating in the Challenge. Nonetheless, any small businesses that decide to participate in this voluntary information collection have the opportunity to limit the burden of the information collection by simply restricting the amount of effort they may undertake in addressing the short questionnaire.

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.

The ICR is critical to the Program because in the absence of the requested information collection, DOE would have no means of compiling information key to assessing and setting forth in the annual progress updates for the Workplace Charging Challenge program's impact in terms of increasing both the number of employers offering workplace charging and the deployment of EVSEs and PEVs. The data and subsequent analyses will allow DOE to compare historical records dynamically, and provide the opportunity for DOE to determine annual progress toward Workplace Charging Challenge goals. Calculation of progress and impact of the Challenge is critical to DOE carrying out its statutorily-mandated responsibility to collect and provide information useful to persons seeking to manufacture, convert, sell, own, or operate alternative fueled vehicles or alternative fueling facilities.

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 stature of 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 information collection is consistent with 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 5 CFR 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 ICR was initially announced and detailed in a 60-day Federal Register Notice and Request for Comments the Department published on November 22, 2013, volume 78, number 226, and page number 70026, and a 30-day Federal Register Notice published January 30, 2014, volume 79, number 20, and page number 4893. The notices described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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

There is no remuneration given for submission of any of the information.

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

DOE will not share employer-specific information with outside sources other than in response to a Freedom of Information Act request, and even then DOE would take precautions to respect the potential confidentiality of important data. In responding to requests under the Freedom of Information Act, DOE relies on its regulations at 10 CFR Part 1004. DOE's attention to potential confidentiality concerns usually arises not with regard to information submitted but rather with regard to any potential compliance issues that may be related to requirements associated with the deployment of alternative fuel infrastructure or alternative fuel vehicles. Most often, requests for data pertain to broader program figures for classes of entities that participate in the voluntary Clean Cities initiatives.

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

There are no collections in this package that involve questions of a sensitive, personal, or private nature.

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

The following total includes the burden associated with Workplace Charging Challenge information collection, which is then followed by a break down for the information collection.

The estimate of hour burden is as follows:

Total number of unduplicated respondents: 400
Reports filed per person: 1.00
Total annual responses: 400
Total annual burden hours: 2000

Average Burden Per Collection: 5 hours
 Per Applicant: 5 hours

The values for number of unduplicated respondents and total annual responses, set forth above, are based on the following:

- a. The total number of unduplicated responses (400) represents the number of online questionnaires expected to be submitted to DOE under this voluntary program.
- b. The Reports filed per person (1.00) represents the one online questionnaire to be submitted voluntarily on an annual basis. The number of total annual responses (400) represents the sum of the number of on-line questionnaires that might be submitted on an annual basis
- c. The total annual burden hours (2000) represents the following: the product of the number of total responses by the number of hours for each reporting component (400 (on-line questionnaires) * 1.5) + (400 (maximum number of phone conversations follow up) * 3.5) = 2000. The quantity of time DOE has estimated for the potential burden is based on DOE's expertise in the subject matter and knowledge regarding

the availability of the subject information, and the understanding the individuals completing the submittals will, by virtue of the subject matter, themselves be well versed in the subject matter. Moreover, DOE has designed the questionnaire questions in a manner specifically designed to limit the potential burden. The total estimate is extremely conservative, given that the simplicity of the questionnaire renders the need for follow up phone conversations unlikely, and that DOE is likely to undertake only several case studies, if that many, in any given year in which the Challenge is operating (i.e., the Challenge Program ends in 2018).

Average Maximum Burden

Per Collection: 5 hours

Per Applicant: Each respondent would spend no more than 1 hour researching and collecting information that would allow the respondent to complete the online response, which itself would take 0.5 hours. This estimate is based on estimates from DOE subject matter experts.. Once the initial submittal has been completed, a subsequent follow-up by DOE with the respondent might be undertaken. This step would be undertaken only once and only if necessary, for example, to obtain clarifications to ensure accurate analyses. In addition, DOE may develop case studies on several employers annually, and this may require additional telephone time. Therefore, for some employers, a follow up may be undertaken, and it might amount to no more than 3.5 hours.

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

Beyond costs associated with undertaking the work, there are no additional costs to respondents other than the burden hours for reporting and recordkeeping. Costs to undertake the work for the collection are approximated at \$48.51/hr of effort (<http://www.bls.gov/oes/current/oes119199.htm>), for a total of \$242.55 in labor to research, collect, and respond to the collection. The hourly wage used to calculate this value is based on a conservative estimate that each respondent works at the manager level. The total estimated annual cost for all respondents is \$9,702 (400 (# of respondents) x \$48.51 (median wage/hr)) to respond to the voluntary collection.

All information collection can be undertaken using a computer, telephone, and internet, for which each respondent is believed to have one currently. There is no special software required or other capital investment required to undertake this work.

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

The cost of ongoing effort on the part of DOE to undertake this work is approximately \$15,000 annually, involving roughly 120 hours annually.

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

This is a new Information Collection, and hence there are no changes being made to an existing information collection, and hence no adjustments or changes included and reported in Items 13 and 14 of OMB Form 83-I.

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

With regards to publication of information, the stream of information collected will be managed, as follows:

For those employers DOE is monitoring directly, DOE will develop an annual progress update and will publish the generalized results gathered. DOE will compile and issue an annual progress update that would provide an update on the Workplace Charging Challenge program partners' activities, as well as report on metrics DOE is evaluating related to energy consumption, costs, numbers of employers in the program, and best practices that can be identified for the purpose of helping others take steps to deploy charging infrastructure. The Office of Vehicle Technologies intends to publish or otherwise make available online aggregate statistics gathered from the responses without relating specific answers to specific respondents. Key highlights or best practices may be detailed, serving as case studies, with explicit permission from entities. No responses or information from individual participating entities will be published without express permission.

This survey effort of the volunteer respondent entities is not being done by random sampling. DOE will not be extrapolating the results of this survey effort to estimate progress at the national level.

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. Expiration date display is not inappropriate.

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 on OMB Form 83-I.