

SUPPORTING STATEMENT FOR COAL SURVEY FORMS  
(EIA-3, 6, 7A, 8A and 20)  
OMB number 1905-0167

## **Introduction**

The U.S. Energy Information Administration (EIA) of the U.S. Department of Energy (DOE) is requesting a three-year extension with revisions of these forms for the EIA Coal Program:

- EIA-3 “Quarterly Survey of Non-Electric Sector Coal Data”
- EIA-6 “Emergency Coal Supply Survey (Standby)”
- EIA-7A “Annual Survey of Coal Production and Preparation”
- EIA-8A “Annual Survey of Coal Stocks and Coal Exports”
- EIA-20 “Emergency Weekly Coal Monitoring Survey for Coal Burning Power Producers (Standby)”

The Coal Program also requests that these forms be discontinued:

- EIA-1 “Weekly Coal Monitoring Report – General Industries and Blast Furnaces”
- EIA-4 “Weekly Coal Monitoring Report – Coke Plants”
- EIA-5 “Quarterly Coal Consumption and Quality Report – Coke Plants”

The Coal Statistics Team (CST) in EIA’s Office of Oil, Gas, and Coal Supply Statistics is responsible for the collection of these forms. Together, these forms collect data on coal production, consumption, receipts, stocks, and prices, as well as the quality of coal. Aggregates of these data are used by the CST to conduct industry analyses, economic modeling, coal supply and demand studies, and forecasting.

## **Summary of Proposed Changes**

The CST proposes the following changes to Forms EIA-3, EIA-6 (formerly EIA-6Q), EIA-7A, EIA-8A, and EIA-20.

### **Form EIA-3: Quarterly Coal Consumption and Quality Report, Manufacturing and Transformation/Processing Coal Plants and Commercial and Institutional Coal Users**

- Change the title of the survey to “Quarterly Survey of Non-Electric Sector Coal Data”
- Modify the scope of the survey, as defined under the purpose section, to include coke plants
- Remove Secure File Transfer from Communication Method
- Re-categorize mail as an Unsecured Communication Method
- Request EIA-923 ID in the Company Contact Information Section
- Create “Part 5: Coking Plants Only” to accommodate respondents of discontinued Form EIA-5 and collect data regarding coke production
- No longer collect Synfuel data
- Minor revisions to instructions and definitions

### **Form EIA-7A: Coal Production and Preparation Report**

- Change title of survey to “Annual Survey of Coal Production and Preparation”
- Modify questions, response options, and instructions to provide respondents with more detail and to improve navigation
- Update Unsecured Communication Method(s) to include email, fax, and mail
- Create a field for adjustment to coal stocks to account for stocks held on- and off-site at the end of the reporting year
- Add new fields for metallurgical and non-metallurgical coal under sections on Open and Captive Market Sales to gather more accurate revenue data from each type of sale

EIA proposes adding the following questions to Form EIA-7A:

- *Did the company that owns the mining operation cease operations during the reporting year?* This question will be used to help maintain the EIA-7A frame and review data discrepancies as reported by respondents that answered “yes” to the question.
- *Report the county, state, and mining dates of the surface mining activity.* The Mine Safety and Health Administration assigns this location every quarter. Adding this question would track production by county more accurately.
- *What is the average heat content for all coal mined at this mine during the reporting year?* EIA’s State Energy Data System publishes heat content of coal produced by state. Currently, this production heat content data is estimated by EIA staff using coal-quality data collected, in relation to coal receipts, at end-use sectors as a proxy. This question would provide the actual production-based quality data needed to replace the estimation.
- *For any Captive Market Sales or transfer of coal to the parent company or a subsidiary of the parent company, what are their contact name, company name, email address, and telephone number?* This question helps verify the accuracy of captive market sales vs. open market sales data. This will also allow for improved frame maintenance on the EIA-8A, which covers coal traders, brokers, and terminals.
- *For any Export Coal Sales to coal brokers, coal traders, or coal terminals, what are their contact name, company name, email address, and telephone number?* This question will be used to run a cross-survey comparison with the EIA-8A in hopes of eliminating double-counting of export coal sales and improving export-related data.

### **Form EIA-8A: Coal Stocks Report**

- Change title of survey to “Annual Survey of Coal Stocks and Coal Exports”
- Simplify questions, response options, and instructions to provide respondents with more detail and to improve navigation
- Update Secure Communication Method to include the Internet Data Collections (IDC) System
- Modify Unsecured Communication Method(s) to include email, fax, and mail
- Require additional contact information when a company is sold or merges during the reporting year
- Amend the Required Respondents section of the survey to require respondents to report cumulative coal exported since prior reporting year
- Revise list of locations where U.S. originated stocks are held to include “OT – Other”

- Add new fields for metallurgical and non-metallurgical coal to various sections of the survey to gather more accurate revenue data about the metallurgical coal market

EIA proposes adding the following questions to Form EIA-8A:

- *Did the company for which you are reporting export coal that originated in the United States during the reporting year?* This is a screening question that will help ensure an accurate accounting of all coal brokers that also act as exporters.
- *What was the operational status of your company during the reporting year?* This question will be used to help maintain the EIA-8A frame and review data discrepancies as reported by respondents that answered “yes” to the question.

**Standby Forms EIA-6 (formerly EIA-6Q): Quarterly Coal Report (Standby) and EIA-20: Weekly Coal Monitoring Report, Coal Burning Utilities and Independent Power Producers (Standby)**

- Change standby form titles to “Emergency Coal Supply Survey” and “Emergency Weekly Coal Monitoring Survey for Coal Burning Power Producers,” respectively. Standby Form EIA-6Q will no longer be considered a quarterly survey and will be changed to EIA-6.
- Make minor revisions to instructions and definitions

**Eliminating Form EIA-5: Quarterly Coal Consumption and Quality Report--Coke Plants**

Eliminating Form EIA-5 and the proposed changes to Form EIA-3 will result in the absorption of all 19 EIA-5 respondents into the EIA-3 frame, reduce quarterly maintenance of two separate internet data collection systems with nearly identical layouts and edits, and create a single survey for all non-electric sector coal users.

**Eliminating Standby Forms EIA-1: Weekly Coal Monitoring Report – General Industries and Blast Furnaces and EIA-4: Weekly Coal Monitoring Report – Coke Plants**

Standby Forms EIA-1 and EIA-4 were intended to collect data from non-electric sector respondents in the event of a coal supply disruption. To date, these forms have never been deployed. Also, the possibility of such a disruption to non-electric sector respondents seems minimal. Eliminating these two survey forms would be optimal.

**Justification**

**1. Legal Authority**

The following provisions provide the authority for these mandatory data collections:

Section 13(b), 15 U.S.C., Section 772(b), of the Federal Energy Administration Act of 1974 (FEAA) Public Law 93-275 states:

"All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the [Secretary] such information and periodic reports, records, documents, and other data relating to the purposes of this Act, including full identification of all data and

projections as to source, time, and methodology of development, as the [Secretary] may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under the Act."

The functions of the Secretary are set forth in Section 5(b), 15 U.S.C., Section 764(b), of the FEAA, which states that the Secretary shall, to the extent he is authorized by Section 5(a) of the FEAA ... "

(2) assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public; ...

(9) collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data; ...

(12) perform such other functions as may be prescribed by law."

As the authority for invoking Section 5(b) above Section 5(a), 15 U.S.C., Section 764(a), of the FEAA in turn states:

"Subject to the provisions and procedures set forth in this Act, the [Secretary] shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions --

(1) specifically transferred to or vested in him by or pursuant to this Act; ...

(3) otherwise specifically vested in the [Secretary] by the Congress."

Authority for invoking Section 5(a) of the FEAA is provided by section 52, 15 U.S.C., Section 790a, of the FEAA, which states that the Administrator of EIA:

"...[Shall] establish a National Energy Information System...[which] shall contain such information as is required to provide a description of energy supply and consumption...

(b) ...the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, and such energy information as is required to define and permit analysis of--

(1) the institutional structure of the energy supply system including patterns of ownership and control of mineral fuel... energy resources and the production, distribution, and marketing of mineral fuels and electricity;

(2) the consumption of mineral fuels, non-mineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;

(3) the sensitivity of energy resource reserves, exploration , development, production, transportation , and consumption to economic factors, environmental constraints, technological improvements, and substitutability of alternate energy sources...

(5) industrial, labor, and regional impacts of changes in patterns of energy supply and consumption."

## 2. Data Uses and Applications

The information collected on EIA survey forms includes basic statistics concerning coal production, preparation, distribution, trade, and consumption. Coal prices, quality, and stocks are collected as well. EIA data are widely used for policy analysis, economic modeling, forecasting, coal supply and demand studies, and in guiding research and development programs.

The following EIA publications/products use data supplied by one or more of the coal survey forms:

- Daily Energy Review
- Today in Energy
- Weekly Coal Production Report
- Monthly Energy Review
- Quarterly Coal Report
- Quarterly Coal Distribution Report
- Annual Coal Report
- Annual Coal Distribution Report
- Annual Energy Review
- State Energy Profiles

In addition, EIA uses the data in short-term and long-term models such as the Short-Term Integrated Forecasting System and the National Energy Modeling System (NEMS) Coal Market Module. The forecast data also appear in the *Short-Term Energy Outlook*, <http://www.eia.gov/forecasts/steo/>, and the *Annual Energy Outlook*, <http://www.eia.gov/forecasts/aeo/> publications.

The following U.S. government publications use EIA coal data:

- Monthly Industrial Production Report, Federal Reserve Board
- Annual Productivity Measures for Selected Industries, Department of Labor
- Annual Statistical Abstract of the United States, Bureau of the Census

Additionally, EIA coal data and analyses are used by Congress, Federal agencies, and State and local governments to reach decisions on national and local policies and a variety of important coal-related issues, including energy development and use, environmental protection, domestic welfare, and the health of the coal industry. EIA provides information essential to Presidential and Congressional commissions dealing with Federal coal leasing actions, assessing coal mine safety and health issues, and evaluating the potential for the DOE Clean Coal Technology program. EIA coal data are used for conducting non-utility power producer growth analysis,

evaluating electric utility responses to the Clean Air Act Amendments of 1990, determining appropriate changes to surface mining regulations, estimating Black Lung tax revenues, estimating coal export potential, and assessing transportation capabilities and rates.

Numerous Congressional committees, particularly those dealing with energy, the environment, public lands, health and safety, commerce, transportation, water resources, research and development, the Federal budget, and taxes need detailed coal supply and disposition data. Legislative analyses conducted by the Congressional Research Service of the Library of Congress also require reliable and comprehensive coal industry information.

Some of the regional and State agencies that use EIA coal data and statistics for economic and energy supply and demand analyses are: the Geological Survey of Alabama, the Kentucky Department of Mines and Minerals, the New Jersey Energy Department; the New York State Energy Office, the Southern Governors' Association, the Utah Energy Office, the Virginia Department of Mines, Minerals and Energy Administration, the West Virginia Department of Energy, Kentucky Governor's Office for Coal and Energy Policy, and Pennsylvania State University.

Trade associations also depend upon EIA coal data for economic, regulatory, and legislative analyses. Included in this group are: the Association of American Railroads, the Edison Electric Institute, the Indiana Coal Association, the Mining and Reclamation Council of America, the National Mining Association, the Mississippi Valley Coal Exporters Council, the West Virginia Coal Association, and the Wyoming Mining Association.

Additional users of EIA data are coal producers and distributors, coal-consuming companies, financial/analytic service firms, publishing organizations, the media (electronic and printed), transportation companies, law firms, academic researchers, and coal labor unions, all of which employ coal data for economic, financial, technical, and market analyses. EIA data also are used in provisions that support commercial contracts and labor agreements. The following are examples of studies conducted and models created using EIA data:

- 2009: The National Institute of Occupational Safety and Health began using EIA coal data and Mining Safety and Health Administration data as inputs to develop a model that generates predictions on mines that pose the highest statistical risk of serious injuries and fatalities.
- 2010: EIA coal data was used in a research study by Stanford University on the effect of unionization on coal mine safety. The findings were published by Cornell University's ILR Review in February 2013.
- 2012: Boston University accessed EIA data to study if utilizing contractors made mine work environments riskier.
- 2012: Harvard University used EIA data to examine and analyze the effects of energy diversification; the price of coal paid by power producers and decisions made by operators to comply with sulfur emission regulations.

Coal data collected by EIA is also utilized by international agencies, such as the International Energy Agency (IEA) and the Organization for Economic Cooperation and Development

(OECD), to produce the *Coal Information and Energy Statistics of OECD Countries* publications, respectively.

### **3. Use of Technology to Reduce Respondent Burden**

All EIA non-standby coal surveys, except for the EIA-8A, have been incorporated into an Internet Data Collection (IDC) system. This migration to an IDC system has reduced respondent burden as the system addresses edits and other errors while the survey is being completed. Further, it eliminates the respondent processing steps associated with sending the paper forms back to EIA by mail, as the respondent can now complete the form online by using the IDC. Our primary form of communication is email. This allows EIA to conduct timely communications with all respondents.

Currently, Form EIA-8A is collected using a Secure File Transfer (SFT). EIA plans to transition to an IDC system for the EIA-8A in the near future, depending on available resources.

Standby Forms EIA-6 and EIA-20 are not in an IDC, and depending on the circumstances of the coal disruption, EIA may require only a subset of the plants that meet these criteria to submit the survey. EIA will request that respondents utilize email to expedite the survey collection process.

#### **4a. Efforts to Identify Data Duplication**

As part of a continuing effort to avoid data duplication, EIA routinely reviews and evaluates coal industry information available from a variety of sources, including other Federal agencies, industry trade associations, State governments, and commercial information services, to identify instances of duplication. Additionally, in the public notices and consultations associated with the triennial re-clearance of the Coal Program Package, EIA specifically encourages respondents and data users to identify alternate sources of the coal information EIA proposes to collect.

Instances of potential data duplication identified by EIA are evaluated in terms of data coverage, level of aggregation, frequency of collection, data reliability, and statutory requirements to determine whether alternate data sources represent a suitable substitute for EIA data.

#### **4b. Why Similar Existing Information Cannot Be Used**

EIA has identified potential areas of duplication among Federal forms collecting coal production and related data, specifically the Form EIA-7A, "Coal Production Report," the MSHA Form 7000-2, "Quarterly Mine Employment and Coal Production Report," the Form OSM-1, "Production and Reclamation Fee Report," the Minerals Management Service's Form MMS-4293, "Product Valuation and Associated Allowances – Coal," and the Department of Justice's Form ATR-139, "Federal Coal Lease Review."

To make data collection and processing more efficient, EIA works closely with MSHA to reduce redundancy. While MSHA collects coal production and employment information, EIA collects information on the type and status of coal operations, characteristics of coalbeds mined,

recoverable reserves, productive capacity, and the disposition of coal mined. EIA applies quality checks to all production data before it is released.

The EIA-846, “Manufacturing Energy Consumption Survey” and EIA-923, “Power Plant Operations Report,” each collect data similar to the information collected on Form EIA-3, but the first is conducted every four years and the latter is used to collect data from entities that have a 1 megawatt nameplate capacity to generate electricity. The EIA-923 survey collects sample data on a monthly basis and data from their complete frame on an annual basis. Not all EIA-3 respondents have the capacity to generate electricity.

## **5. Provisions for Reducing Burden on Small Businesses**

EIA recognizes the need to minimize the reporting burden on small businesses and designs data surveys so that small operations are not unduly affected. Additionally, EIA has established reporting thresholds for surveys likely to affect small businesses. These thresholds either eliminate the reporting requirement for small businesses or limit the amount of information they are asked to supply.

Reporting on the proposed Form EIA-3, “Non-Electric Sector Coal Data,” is limited to non-electric sector sites (i.e. manufacturers, hospitals, universities, and correctional facilities) that consume more than 1,000 short tons of coal annually. However, all companies operating coke plants within the United States must submit Form EIA-3.

Reporting on the proposed Form EIA-7A, “Annual Survey of Coal Production and Preparation,” is limited to U.S. coal mining companies that produce 25,000 or more short tons of coal during the reporting year, except for anthracite mines. All anthracite mines that produced 10,000 or more short tons during the reporting year must submit form EIA-7A. Standalone facilities (e.g., preparation plant/tipple/loading dock/train load-out) that worked 5,000 or more hours must submit form EIA-7A.

Reporting on the proposed Form EIA-8A, “Annual Survey of Coal Stocks and Coal Exports,” is limited to coal brokers, coal traders, and coal terminals in the 50 United States and the District of Columbia that own stocks of 10,000 or more short tons of coal originating in the United States on December 31st of the reporting year or exported coal originating in the United States during the reporting year. Companies that take custody (physical possession) of the coal and transport, but never own, the coal need not report. Companies that report coal stocks on the EIA-923, *Power Plant Operations Report*, need not report.

## **6. Results of Collecting Data Less Frequently**

In keeping with its mandate, EIA is recognized as the major collector of comprehensive and reliable U.S. energy supply and demand data. The Federal Government, State governments, as well as the private sector, rely on EIA for energy statistics and consider its publications reliable and timely indicators of current energy conditions and trends. The non-standby coal forms proposed in this package represent one quarterly survey (EIA-3) and two annual surveys (EIA-



7A and EIA-8A). Less frequent reporting on any of these three forms would prevent EIA from meeting its mandate of providing timely, essential, and reliable information.

## **7. Compliance with 5 CFR 1320.5 Controlling Paperwork Burden on the Public**

All EIA coal surveys are operated in accordance with the guidelines in 5 CFR 1320.5. In the event of a coal supply disruption, information could be collected weekly on proposed Forms EIA-6 and EIA-20. This weekly frequency is justified by the need to provide rapid response during such a supply disruption to prevent adverse national economic impacts or to alleviate potential human suffering.

## **8. Summary of Consultations outside the Agency**

On October 28, 2013, EIA published Federal Register notice 78 **FR 53135** outlining proposed changes to the Coal Program Package and inviting interested parties to comment. All comments filed and EIA responses are provided. Comments were received from Georgia Pacific Savannah River Mill, Kapstone Paper and Packaging, and The National Lime Association. Please see below for the actual comments and EIA's response to these comments.

Comment 1: Received from Kapstone Paper and Packaging

For the EIA-3, what does it mean when you state that you will "re-categorize mail as unsecured communication method"? Kapstone's concern is that we are sharing sensitive information.

*EIA's Response:*

*This respondent is unaffected by this change as they submit data using the internet data collections system, which is secure. Using the Internet Data Collections system, EIA provides one username and one password per reporting entity. EIA recommends that these tools for system access not be shared by respondent.*

Comment 2: Received from Georgia Pacific Savannah River Mill

On the new EIA-3 survey form page 2, does the Respondent ID# replace the company ID or the plant ID on the old EIA-3 form?

*EIA's Response:*

*The Respondent ID# is the same as the plant ID. EIA is not asking for any new information.*

Comment 3: Received from National Lime Association

Unless I am missing something, I don't see any changes involving disclosure or confidentiality, which were the issues that mostly concerned us.

*EIA's Response:*

*There aren't any changes to disclosure in the 60-day. Mostly new questions, instruction changes, etc.*

## **9. Remuneration**

Respondents will not be paid or provided any gifts in return for responding to EIA coal data surveys.

## **10. Provisions for Confidentiality of Information**

For **Form EIA-3**, the information reported will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

Disclosure limitation procedures are applied to the cost data reported in Parts 3 and 4 to ensure that the risk of disclosure of identifiable information is very small. Disclosure limitation procedures are not applied to the other aggregate statistical and quantity data published from this survey. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.

For **Form EIA-7A**, the name and address of the responding company, the mine type or plant type, and location is considered public information and may be released in company identifiable form. All other information reported on this form will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

Disclosure limitation procedures are applied to the "Total Revenue" from "Open Market Sales," "Captive Market Sales," and "Export Coal Sales" reported in Part 5 to ensure that the risk of

disclosure of identifiable information is very small. Disclosure limitation procedures are not applied to the other aggregate statistical data published from this survey. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.

For **Form 8A**, the information reported will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

Disclosure limitation procedures are applied to the total revenue of coal exported from each origin state, reported in Part 3, to ensure that the risk of disclosure of identifiable information is very small. Disclosure limitation procedures are not applied to the other aggregate statistical data published from this survey. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.

For standby **Form EIA-6**, the name and address of the responding company, the mine type or plant type, and location reported is considered public information and may be released in company identifiable form. All other information reported on this form will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

For standby **Form EIA-20**, the information reported in Part 1, Question 1 and Part 2, Questions 1 and 4 is considered public information and may be released in company identifiable form. All other information reported on this form will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

For both standby Form EIA-6 and Form EIA-20 the following statement is included:

Disclosure limitation procedures are applied to the statistical data published from survey information to ensure that the risk of disclosure of identifiable information is very small.

The following paragraph is included in Forms EIA-3, 6, 7A, 8A, and 20:

The Federal Energy Administration Act requires the U.S. Energy Information Administration to provide company-specific data to other Federal agencies when requested for official use. The information reported on these forms may also be made available, upon request, to another component of the Department of Energy (DOE); to any Committee of Congress, the U.S. Government Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an

order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

**11. Justification for Sensitive Questions**

There are no questions of a sensitive nature on the coal survey forms.

**12. Burden Estimates**

**a. New Estimates of Hour Burden**

The new total annual burden is estimated to be **3,764 hours**, a decrease from the 4,530 hours stated in the previous clearance package. Together, the non-standby coal surveys collect data from **1788 respondents**. The number of total EIA-3 respondents decreased from 516 because of a decline in coal consumption by non-electric institutional entities that report on Form EIA-3. Coal consumption for synthetic coal production also disappeared after U.S. government incentives expired.

In addition, estimated annual burden for Form 8A will decrease once the survey is implemented in the IDC system.

Note: EIA-5 respondents will now be grouped under Form EIA-3.

<b>Coal Program Burden Estimates</b>					
Form	Individual Response Burden	Annual Reporting Frequency	Respondents	Total Number of Annual Responses	Total Burden
EIA-3	1.25	4	494	1976	2470
EIA-7A	1.00	1	1208	1208	1208
EIA-8A	1.00	1	86	86	86
<b>Total</b>			<b>1788</b>	<b>3270</b>	<b>3764</b>

**b. Estimates of Annualized Cost to Respondents**

Based on the estimated rate of \$69.33 per hour for employees who would complete these forms, the total annual respondent cost for all forms is estimated to be:

$$\$69.33/\text{hour} \times 3,764 \text{ hours/year} = \$260,958.12$$

An average cost per hour of \$69.33 is used because that is the average loaded (salary plus benefits) cost for an EIA employee assigned to data survey work. EIA assumes that the survey respondent workforce completing surveys for EIA is comparable with EIA workforce.

**13. Estimate of Total Annual Cost Burden to Respondents**

EIA estimates that there are no capital, start-up, or operating costs to respondents beyond the cost of the hours described in Item 12.

#### **14. Estimated Annualized Costs to the Federal Government**

Federal Government activities and costs associated with the surveys included in the Coal Program Package are included in the Annual Operating Plans for the Office of Oil, Gas, and Coal Supply Statistics of EIA. The estimated annualized cost to the government, including personnel, forms development, maintenance, data collection, and processing is \$511,000. The overall annual costs to the Federal Government have fallen from about \$586,000 estimated for the last year of the current authorization cycle, representing a 13.7% savings in Federal costs.

The Federal Government coal forms cost estimate for FY 2012 is shown below:

##### **ANNUAL COST TO THE FEDERAL GOVERNMENT, COAL FORMS (ESTIMATED)**

Data Collection & Processing	\$317,000
Maintenance and System Enhancement	194,000
Total	\$511,000

#### **15. Changes in Respondent Burden**

The estimated difference in annual burden is 766 burden-hours (decrease of approximately 17%).

The proposed changes will reduce respondent burden on all three non-standby forms and are necessary to adapt to changes in the coal market and to provide improved information, in terms of both coverage and quality, about the coal industry. In addition, the proposed changes will permit additional quality checks, and cross-survey quality reviews between coal surveys and electricity surveys. The result will be improvements in both coal and electricity data provided by EIA.

#### **16. Schedule for Collecting and Publishing Data**

Plans to tabulate and publish data collected by the coal data collection forms are described below.

##### **a. Weekly Forms**

Weekly Forms EIA-6 and EIA-20 will be used to collect data during coal supply disruptions from a sample of respondents. Forms EIA-6 and EIA-20, if and when activated, will include mines and power producers, respectively.

During supply disruptions, the forms must be submitted no later than 5pm eastern time each Monday after the seven-day reporting period. The reporting period is Saturday midnight to Saturday midnight.

## **b. Quarterly Forms**

Quarterly Form EIA-3 will be used in the compilation of aggregated statistical reports to provide Congress with basic statistics concerning coal receipts, consumption, stocks, and prices at reporting facilities. Coal quality data, coal origin, and transport mode employed will be collected for coal shipments as well.

The quarterly forms are due approximately one month after the close of each quarter. The quarters are:

Q1	January 1 – March 31
Q2	April 1 – June 30
Q3	July 1 – September 30
Q4	October 1 – December 31

Form EIA-3 data will appear in the following reports:

- Monthly Energy Review
- Quarterly Coal Report
- Quarterly Distribution Report
- Annual Coal Report
- Annual Distribution Report

## **c. Annual Forms**

Annual Form EIA-7A collects information on coal production and related information from U.S. coal mining operations. Form EIA-8A collects coal stocks and export data from U.S. coal brokers, coal traders, and coal terminals.

Data collected will appear in the following reports:

- Weekly Coal Production Report
- Quarterly Coal Report
- Annual Coal Report
- State Energy Profiles

## **17. Expiration Date Exception**

The expiration date will be included on the forms.

## **18. Certification**

There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.

