



**U.S. Energy Information Administration**  
**Office of Oil, Gas and Coal Supply Statistics**

## **Supporting Statement for Survey Clearance**

**Natural Gas Data Collection Program Package**

**OMB No. 1975-0175**

**Background and Proposal**

**Part A**

Original Date: October 2014

Natural Gas Data Collection Program Package Supporting Statement, Part A

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## **INTRODUCTION**

Request is made for a 3-year extension of the following currently-approved (OMB no. 1905-1975) natural gas survey forms with proposed revisions listed below:

EIA-176, “Annual Report of Natural and Supplemental Gas Supply and Disposition,”

EIA-191, “Monthly and Annual Underground Natural Gas Storage Report,”

EIA-757, “Natural Gas Processing Plant Survey,”

EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers,”

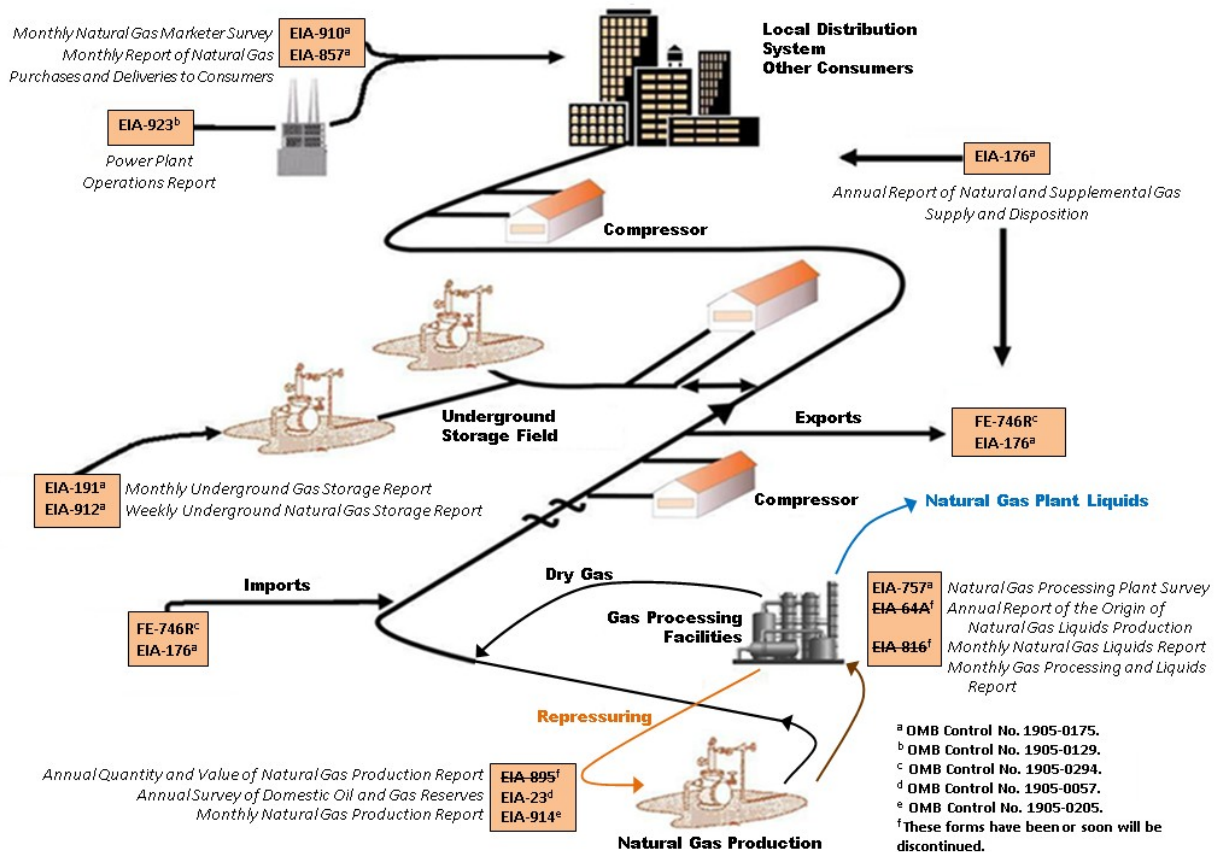
EIA-910, “Monthly Natural Gas Marketer Survey,” and

EIA-912, “Weekly Underground Natural Gas Storage Report.”

Forms EIA-176, EIA-191, EIA-757, EIA-857, EIA-910, and EIA-912 are all mandatory.

## Background of the Natural Gas Data Collection Package

Figure 1: Natural Gas Industry Data Collection



The data collected in 1905-1975 help determine the amount of natural gas stored and consumed in the United States, as shown above in Figure 1. The annual natural gas survey, the EIA-176, is used to collect data on the origin of natural gas supplies and the disposition of natural gas. Monthly natural gas surveys (Forms EIA-191, 857, and 910) are used to gather data on underground storage, purchases and deliveries to consumers, and sales from marketers. The weekly natural gas survey, the EIA-912, collects information on natural gas inventories held in U.S. underground storage facilities. These data provide input for the following publications:

- *Natural Gas Annual* (<http://www.eia.gov/naturalgas/annual/>)
- *Natural Gas Monthly* (<http://www.eia.gov/naturalgas/monthly/>)
- *Weekly Natural Gas Storage Report* (<http://ir.eia.gov/ngs/ngs.html>)

## **PROPOSED CHANGES TO NATURAL GAS DATA COLLECTION**

EIA is requesting a three-year extension of collection authority for each of the above-referenced surveys and will make minor changes to the forms and instructions to provide clarity. Data confidentiality procedures for protecting the identifiability of submitted data remain unchanged for all forms with the exception of a portion of Form EIA-191 as referenced below. In addition, EIA is proposing the following changes:

Form EIA-176, “*Annual Report of Natural and Supplemental Gas Supply and Disposition*”

- (1) Type of Request: Extension, with changes, of a currently approved collection.
- (2) Purpose: Form EIA-176, “*Annual Report of Natural and Supplemental Gas Supply and Disposition*,” collects data on natural, synthetic, and other supplemental gas supplies, disposition, and certain revenues by state. The data appear in the EIA publications, *Monthly Energy Review*, *Natural Gas Annual*, and *Natural Gas Monthly*. The proposed changes include:
  - In Part 3, EIA is proposing to collect information on the price of compressed natural gas (CNG) for natural gas local distribution companies that sell CNG to the public. This information will provide information on retail prices of CNG. CNG is a growing segment of the natural gas industry that is not represented in EIA’s natural gas retail price series.
  - In Part 4, EIA is proposing to collect costs associated with already-reported information on natural gas purchased and received at the city gate. EIA collects information on costs associated with purchases at the city gate on a monthly basis on Form EIA-857 for a sample of companies that report on Form EIA-176. However, the monthly city gate purchase information is frequently subject to monthly true-ups and having an annual benchmark for city gate purchase costs should result in a more accurate depiction of natural gas distributors’ cost of natural gas.
  - In Part 5, EIA is proposing to collect the capacity of liquefied natural gas (LNG)

marine terminals to gain a better understanding of the extent to which these storage assets are able to supply the market during periods of peak natural gas demand.

- (3) Estimated Number of Survey Respondents: 2,012 respondents.
- (4) Annual Estimated Number of Total Responses: The annual number of total responses is 2,012.
- (5) Annual Estimated Number of Burden Hours: The annual estimated burden is 24,144 hours.
- (6) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

Form EIA-191, “*Monthly Underground Gas Storage Report*”

- (1) Type of Request: Extension, with changes, of a currently approved collection.
- (2) Purpose: Form EIA-191, “*Monthly Underground Gas Storage Report*,” collects data on the operations of all active underground storage facilities. The data appear in the EIA publications *Monthly Energy Review*, *Natural Gas Annual*, and *Natural Gas Monthly*. EIA is proposing to make the following changes to the form:
  - To reduce reporting burden EIA is proposing to discontinue two categories regarding Field Status: “Depleting” and “Other.” EIA will use only two categories, “Active” and “Inactive.” The category “Inactive” is more descriptive and replaces the Field Status category label of “Abandoned.” The “Depleting” and “Other” categories are rarely used by reporting companies and collapsing these categories into “Inactive” will not cause a loss in data utility, as the same data will still be reported, albeit in a single category.
  - EIA is proposing to make public reported values for monthly base gas levels reported in Part 4. This would be a natural complement to already-reported information and a source of information to policymakers that can be important during times of peak natural gas demand.
  - This past winter, many underground storage operators depleted their working gas inventory and had to temporarily use part of their base gas to meet market demand.

While base gas is not intended for market use, last winter demonstrated that base gas can be used to meet market demand. Further public knowledge of base gas can help policymakers assess its availability and use, albeit temporarily, during periods of peak demand.

- Additionally, EIA currently reports total gas in storage and working gas capacity for all underground natural gas storage operators in a [query system](#) from form EIA-191. In the [instructions](#), the EIA-191 defines: *Total Storage Field Capacity*: The maximum volume of natural gas (including both base and working gas) that can be stored in an underground storage facility in accordance with its design specifications, the physical characteristics of the reservoir, installed compression equipment, and operating procedures particular to the site. *Working (top storage) gas*: The volume of natural gas in an underground storage facility available to and be withdrawn, not including base gas.

Put algebraically, Total Storage Field Capacity = Working Gas Capacity + Base Gas.

- Given that EIA already publically reports two out of the three components of this equation, we wanted to be able to show the complete picture since it is easily discernable from the information already available to the public. Many storage operators readily report this information on their public websites, as well.
- This information will enhance the utility of the underground storage information already available to the public pertaining to capacity and working gas capacity. Additionally, base gas can indicate another potential source of supply during times of sustained high demand as there have traditionally been some withdrawals of base gas, albeit small amounts, late during the heating season. The current confidentiality protection covering the other information reported in Part 4, including monthly working gas, total gas in storage, and injections and withdrawals into storage, will be retained. EIA will continue to publish, in disaggregated form, information collected in Part 3 of Form EIA-191, including storage field name and type, reservoir name, location, working gas and total storage field capacity, and maximum deliverability. On its website, EIA currently releases this information at the field level through its [Natural Gas Annual Respondent Query System](#). Estimated Number of Survey Respondents: There are approximately 135 respondents.

(3) Annual Estimated Number of Total Responses: The annual estimated number of total responses is 1,620.

(4) Annual Estimated Number of Burden Hours: The annual estimated burden is 4,212 hours.



- (5) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

Form EIA-757, “*Natural Gas Processing Plant Survey*”

- (1) Type of Request: Extension of a currently approved collection.
- (2) Purpose: Form EIA-757, “Natural Gas Processing Plant Survey,” collects information on the capacity, status, and operations of natural gas processing plants, and monitors constraints of natural gas processing plants during periods of supply disruption in areas affected by an emergency, such as a hurricane. Schedule A of the EIA-757 is collected no more than every three years to collect baseline operating and capacity information from all respondents and Schedule B is activated as needed and collected from a sample of respondents in affected areas as needed. Schedule A was most recently conducted in 2012 and Schedule B was most recently activated in 2012 for Hurricane Isaac with a sample of approximately 20 plants. EIA is proposing to continue the collection of the same data elements on Form EIA-757 Schedules A and B in their present form.
- (3) Estimated Number of Survey Respondents: Schedule A: 600; Schedule B: To be determined based on the number of processing plants that are within the proximity of the natural gas supply disruption, historically around 20.
- (4) Annual Estimated Number of Total Responses: Schedule A is used to collect information once every three years. Therefore, the annual estimated number of total responses is 200. Schedule B varies from year to year.
- (5) Annual Estimated Number of Burden Hours: The annual estimated burden for Schedule A is 100 hours. Schedule B is estimated to require 1.5 hours for each respondent to complete; the number of respondents varies but the most recent activation surveyed approximately 20 respondents.
- (6) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

Form EIA-857, “*Monthly Report of Natural Gas Purchases and Deliveries to Consumers*”

- (1) Type of Request: Extension, with change, of a currently approved collection.
- (2) Purpose: Form EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to

Consumers,” collects data on the quantity and cost of natural gas delivered to distribution systems and the quantity and revenue of natural gas delivered to end-use consumers by market sector, on a monthly basis by state. The data appear in the EIA publications, *Monthly Energy Review*, *Natural Gas Annual*, and *Natural Gas Monthly*. EIA is proposing the following change:

- EIA is proposing to add a new question to the form that asks whether the reporting company is including any adjustments to prior periods in their current monthly reporting. Reporting companies frequently make adjustments to correct data previously submitted in prior periods that skew the current month’s reporting and EIA would like to propose this mechanism to more easily identify this phenomenon and address it proactively with the reporting companies.
- (3) Estimated Number of Survey Respondents: 320 respondents each month.
  - (4) Annual Estimated Number of Total Responses: The annual estimated number of total responses is 3,840.
  - (5) Annual Estimated Number of Burden Hours: The annual estimated burden is 13,440 hours.
  - (6) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

Form EIA-910, “*Monthly Natural Gas Marketer Survey*”

- (1) Type of Request: Extension of a currently approved collection.
- (2) Purpose: Form EIA-910, "Monthly Natural Gas Marketer Survey," collects information on natural gas sales from marketers in selected states that have active customer choice programs. EIA is requesting information on the volume and revenue for natural gas commodity sales and any receipts for distribution charges and taxes associated with the sale of natural gas. EIA is proposing to continue Form EIA-910 in its present form with no changes to the elements collected or geographic coverage.
- (3) Estimated Number of Survey Respondents: There are approximately 210 respondents each month.
- (4) Annual Estimated Number of Total Responses: The annual estimated number of total

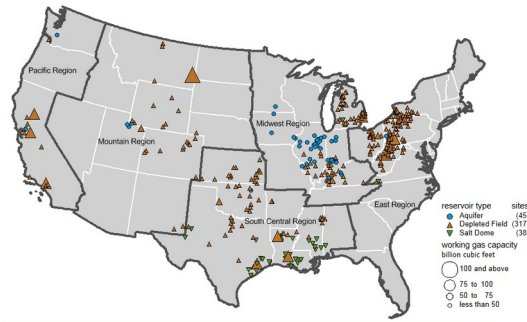
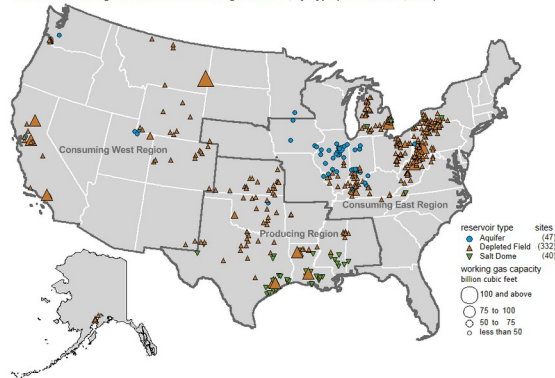
responses is 2,520.

- (5) Annual Estimated Number of Burden Hours: The annual estimated burden is 5,040 hours.
- (6) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

Form EIA-912, “*Weekly Underground Natural Gas Storage Report*”

- (1) Type of Request: Extension, with changes, of a currently approved collection.
- (2) Purpose: Form EIA-912, "Weekly Underground Natural Gas Storage Report," collects information on weekly inventories of natural gas in underground storage facilities and serves as a Principal Federal Economic Indicator. The proposed changes include an additional data element as well as expanded geographic categories for working gas collection and publication in the Lower 48 states:
  - Instead of dividing the states into three regions, the East, West and Producing Regions, EIA is proposing to collect data in five regions by further breaking out the current regions. The states currently included in the Producing region will remain unchanged except for the removal of New Mexico. The region will now be referred to as the South Central region. The South Central region will continue to have two subcategories for the different storage technologies prevalent in the region, salt and non-salt facilities. Four additional regions that further break out the current East and West regions will be added in order to enhance the analysis and usability of the data. In going from the current three reporting regions to the proposed five regions, EIA does not see a disclosure issue. The EIA-912 uses a probability proportional to size sample design and the sample is thereby dominated by the larger storage operators. However, the number of respondents sampled would be large enough ( $\geq 7$ ) in all regions that no individual respondent's information could be reasonably estimated. In the proposed regions with the smallest number of respondents, the Mountain and Pacific, no single operator represents more than approximately 30% of the market share of working gas capacity. Accordingly, the risk of any one respondent's volumes being discernable from the regional estimates would be virtually zero.

U.S. Active Underground Natural Gas Storage Facilities, by Type (December 31, 2013)



The new geographic regions are defined in the following table:

Current EIA-912 Regions	Proposed EIA-912 Regions
Producing Region:	South Central Region:
Alabama, Arkansas, Kansas, Louisiana, Mississippi, New Mexico, Oklahoma, and Texas.	Alabama, Arkansas, Kansas, Louisiana, Mississippi, Oklahoma, and Texas.

<p>East Region:</p> <p>Connecticut, Delaware, District of Columbia, Florida, Georgia, Illinois, Indiana, Iowa, Kentucky, Massachusetts, Maryland, Maine, Michigan, Missouri, Nebraska, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Tennessee, Vermont, Virginia, Wisconsin, and West Virginia.</p>	<p>East Region:</p> <p>Connecticut, Delaware, District of Columbia, Florida, Georgia, Massachusetts, Maryland, Maine, New Hampshire, New Jersey, New York, North Carolina, Ohio, Pennsylvania, Rhode Island, South Carolina, Vermont, Virginia, and West Virginia.</p>
<p>West Region:</p> <p>Arizona, California, Colorado, Idaho, Minnesota, Montana, Nevada, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming.</p>	<p>Midwest Region:</p> <p>Illinois, Indiana, Iowa, Kentucky, Michigan, Minnesota, Missouri, and Tennessee, and Wisconsin.</p> <p>Mountain Region:</p> <p>Arizona, Colorado, Idaho, Montana, Nebraska, New Mexico, Nevada, North Dakota, South Dakota, Utah, and Wyoming.</p> <p>Pacific Region:</p> <p>California, Oregon, and Washington.</p>

- EIA is also proposing a new data element, inventory adjustments of working gas in storage, to better distinguish when adjustments to working gas inventories, such as reclassifications between working and base gas, occur. This data element would not be applicable to most respondents the majority of the time. However, when inventory adjustments do occur, they will most easily be discerned by being directly reported in a designated portion of the form instead of listed in the comments section as they are on the current version of the form. As the primary use of the *WNGSR*'s data is the net change in weekly inventory data, which serves as a proxy for natural gas flowing into and out of underground storage, clearer data on inventory adjustments that can obscure the nature of flows into and out of storage will be more easily distinguished and published.
- Finally, EIA is proposing two changes to its current *Weekly Natural Gas Storage Report* [revision policy](#). The first proposed change would reduce the threshold for

published revisions and reclassifications between working and base gas from 7 billion cubic feet (Bcf) to 4 Bcf. Under the proposed revision policy, revisions will be announced in the regularly scheduled release, when the sum of reported changes is at least 4 Bcf at either a regional or national level. Second, EIA is also proposing to amend the policy addressing the unscheduled release of revisions. Under the current policy, an unscheduled release of revised data will occur when the cumulative effect of respondent submitted data changes or corrections is at least 10 Bcf for the current or prior report week. Under the proposed policy, the unscheduled release of revisions to weekly estimates of working gas held in underground storage will occur when the cumulative sum of data changes or corrections to working gas and the net change between the two most recent report weeks is at least 10 Bcf. The proposed change leaves the 10-Bcf threshold, as well as the current out-of-cycle release procedures, intact but will further require that the revision have an impact of 10 Bcf or more on the reported net change between the two most recent reports weeks. For example, if one or more respondents submits changes totaling 10 Bcf to previously submitted data but the changes are the result of errors that have been accumulating over several weeks and do not affect flows of working natural gas into or out of storage in the most recent two reported weekly periods by more than 10 Bcf, the unscheduled data release will not occur and the revisions will be published with the next regularly scheduled release.

- (3) Estimated Number of Survey Respondents: There are approximately 85 respondents every week.
- (4) Annual Estimated Number of Total Responses: The annual estimated number of total responses is 4,420.
- (5) Annual Estimated Number of Burden Hours: The annual estimated burden is 4,420 hours.
- (6) Annual Estimated Reporting and Recordkeeping Cost Burden: Additional costs to respondents are not anticipated beyond costs associated with response burden hours.

## **JUSTIFICATION**

### **1. Legal Authority**

The authority for these data collections is provided by the following provisions:

15 U.S.C. §772(b), Section 13(b) of the Federal Energy Administration Act of 1974 (FEA Act), Public Law 93-275, outlines the types of individuals subject to the information collection authority delegated to the [Secretary] and the general parameters of the type of data which can be required. Section 772(b) 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 exercise of functions under the Act.”

The functions of the FEA Act are set forth in 15 U.S.C. §764(b), of the FEA Act, which states that the Administrator shall, to the extent he is authorized by Section 764(a) of the FEA Act,

“(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; ...

(4) ...develop plans and programs for dealing with energy production shortages;

(5) promote stability in energy prices to the consumer, promote free and open competition in all aspects of the energy field, prevent unreasonable profits within the various segments of the energy industry, and promote free enterprise;

(6) assure that energy programs are designed and implemented in a fair and efficient manner so as to minimize hardship and inequity while assuring that the priority needs of the Nation are met;...

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

As the authority for invoking Section 764(b), above, 15 U.S.C. §764(a), of the FEA Act, 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 Administrator by the Congress.”

Additional authority for this information collection is provided by 15 U.S.C. §790a of the FEA Act, which states that the Administrator:

“... [Shall] establish a National Energy Information System ... [which] shall contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption within and affecting the United States on the basis of such geographic areas and economic sectors as may be appropriate ...

(b) ...At a minimum, the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, and shall include, 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 and nonmineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;
- (2) the consumption of mineral fuels, nonmineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;...
- (5) ...industrial, labor, and regional impacts of changes and patterns of energy supply and consumption.”

## **2. Needs and Uses of Data**

The purpose of the Natural Gas Data Collection Program Package is to collect basic and detailed data to meet EIA’s mandates and energy data users’ needs. Adequate evaluation of the natural gas industry requires collection and processing of data related to natural gas production, processing, transmission, distribution, storage, marketing, consumption.

- (1) The data that EIA collects are used to address significant energy industry issues. In line with its mandated responsibility to collect data that adequately describe the natural gas marketplace, EIA evaluates the lifecycle of natural gas from its reserves and production to consumption and prices throughout the upstream and downstream market. The data collected by the Natural Gas Data Collection Program Package surveys are among those that are required to address the status and future of the role of natural gas in the energy mix and overall economy. Among the data series resulting from the information collected in these surveys is the rate, location and



source of natural gas produced and entering the market, the quantities being stored and the location of the storage, and the quantities being delivered to various consuming sectors. Prices are also reported on at various points in the production and distribution stream.

- (2) EIA must collect some data at the state level. Congressional and state Agency users have historically emphasized their need for such data. EIA's collection of these data is consistent with its mandated responsibilities to collect specific product information for appropriate geographic areas and economic sectors, to act as a central clearinghouse, and to disseminate relevant information to the states. At the same time, EIA is committed to operate its data collections in a manner that will minimize the industry's reporting burden to the extent possible.
- (3) Timely data are essential to policy makers and industry planners who make decisions affecting all aspects of the natural gas industry. Customer surveys have increased EIA's awareness of the need for data as quickly as reliable, accurate data can be released.
- (4) Alternative data sources do not adequately satisfy the needs of the EIA and its user communities. Accurate, meaningful, and independent price, supply and demand statistics are essential to describe and measure phenomena in the marketplace. It is necessary that this information be collected by an unbiased, independent source, if the data are to be credible.

The data collected by EIA on these forms are unique. While somewhat similar or related data may be available from private and/or industry sources, as well as from other Federal agencies, such data are not reasonable alternatives for the comprehensive data provided by the Natural Gas Data Collection Program Package survey forms.

Data from the forms in the Natural Gas Data Collection Program Package are published in the *Annual Energy Outlook*, *Natural Gas Annual*, *Natural Gas Monthly*, *Natural Gas Weekly Update*, *Weekly Natural Gas Storage Report*, *Monthly Energy Review*, *Short-Term Energy Outlook*, *State Energy Portal*, and numerous other EIA products.

EIA's natural gas data are published in papers, trade journals, and technical reports as well as cited and republished in reports by consulting firms, financial institutions, and numerous other entities. A number of state agencies republish EIA data in reports to the public.

## **2.1. Description of Individual Surveys in EIA's Natural Gas Data Collection Program**

## **Package**

Following is a listing of the survey forms across all OMB Collection Packages that comprise EIA's natural gas data collection program. For reference purposes, current OMB numbers of the surveys described in this section, as well as surveys referenced throughout this package, are described below:

EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition": OMB# 1905-0175,

EIA-191, "Monthly and Annual Underground Natural Gas Storage Report": OMB# 1905-0175,

EIA-757, "Natural Gas Processing Plant Survey": OMB# 1905-0175,

EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers": OMB# 1905-0175,

EIA-910, "Monthly Natural Gas Marketer Survey": OMB# 1905-0175, and

EIA-912, "Weekly Underground Natural Gas Storage Report": OMB# 1905-0175.

The following describes the natural gas forms included in this clearance, OMB# 1905-0175:

### **2.1.1. Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"**

Natural gas supply and disposition data collection was initiated in 1910 and was conducted as a voluntary annual natural gas supply and disposition survey by the Department of Interior, Bureau of Mines (BOM) until 1977. With the establishment of the Department of Energy (DOE) in 1977, responsibility for the survey was transferred to EIA within DOE. The voluntary survey was continued through 1979 by EIA using the BOM Forms 6-1340-A, "Supply and Disposition of Natural Gas," for non-producing distribution companies and 6-1341-A, "Supply and Disposition of Natural Gas," for all other respondents. EIA received approval to continue the survey using a slightly-modified mandatory survey Form EIA-176, "Supply and Disposition of Natural Gas," for report years 1980 and 1981. Approvals of the use of a substantially-revised form were granted for report years 1982 through 1986, and for the use of the form with minor revisions for report years 1987 through 2001. In 2002, EIA requested and received approval to revise the EIA-176 to collect data on natural gas deliveries to nonutility generators of electricity. In 2008, EIA requested and received approval to collect revenues collected from the deliveries of

gas delivered on behalf of third-parties. In 2012, EIA requested and approved the collection of information on service territory changes and participation in customer choice programs.

The Form EIA-176 provides EIA with the major elements of information required to combine and merge with data collected in other EIA surveys to develop gas supply and disposition balances and relevant cost, price, and related information at the state level. The data collected are necessary to continue a long-term consistent, but evolving, data series of basic summary information on natural gas. These data are essential to provide analysts with the tools necessary to make informed assessments of the variations in natural gas supply, demand, and prices over time and geography.

The information collected on the Form EIA-176 is needed and used by EIA for the following purposes:

- (1) to develop and make available to the Congress, the states, and the public an accurate quantified assessment of the supply of natural and supplemental gas available to each of the various states from all sources, both internal and external, and the manner in which such supply was used, consumed, or otherwise disposed of,
- (2) to determine the quantity of natural and supplemental gas consumed within each of the various states by market sector, the average prices for such gas, and the changes in consumption and price patterns over time from the first purchase through the final price paid by consumers,
- (3) to produce the *Natural Gas Annual (NGA)*,
- (4) to provide natural gas data for the *State Energy Portal*,
- (5) to provide natural gas input data to energy supply, demand, and price forecasting models especially EIA's National Energy Modeling System and Short-Term Integrated Forecasting System,
- (6) to supply the Federal Energy Regulatory Commission (FERC) with background and baseline information on the total natural gas market by state and groups of states,
- (7) to provide natural gas input data to the following EIA publications: *Annual Energy Outlook*, *Short-Term Energy Outlook*, and *Monthly Energy Review*, which are distributed to all members of Congress,

- (8) to respond to Congressional and internal departmental requests for analysis of policy and regulatory issues, and
- (9) to provide a frame for selecting respondents of the EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers” survey.
- (10) to provide a portal of company-level utility information collected on EIA-176 for external analytic purposes at <http://www.eia.gov/cfapps/ngqs/ngqs.cfm>.

### **2.1.2. Form EIA-191, “Underground Natural Gas Storage Report”**

Form EIA-191 requests monthly and annual data on the location, ownership, capacity, and operations of all active underground natural gas storage reservoirs in the United States. Substantial underground natural gas storage facilities are necessary because of fluctuating seasonal, daily, and even hourly market requirements. Natural gas is usually injected into storage when market requirements are below available gas flows in transmission lines, and then is withdrawn from storage when supplies from producing fields and/or the capacities of transmission systems are inadequate to meet peak requirements.

The information collected on Form EIA-191 is used by EIA for the following purposes:

- (1) to provide state-level data on underground natural gas storage with respect to injections, withdrawal capabilities, inventories, type of storage facility, location of facilities, and capacity for EIA's *Natural Gas Monthly*. State-level storage data are comparable to state-level production and consumption data published in the *Natural Gas Monthly*. This monthly data collection also provides reliable baseline data on storage operations necessary for analyses, modeling, and comparison with normal industry operations in case of severe weather, natural disaster, or other extreme circumstances. The data are also used in natural gas industry deliverability studies as described in item (6);
- (2) to serve as the universe from which the sample for the weekly survey EIA-912 is drawn;
- (3) to provide data on underground natural gas storage injections, withdrawals, and inventories for EIA's *Natural Gas Weekly Update*, and *Monthly Energy Review*.
- (4) to provide data on underground natural gas storage inventories for the forecasts contained in the *EIA Short-Term Energy Outlook*;

- (5) to provide data on all aspects of underground natural gas storage to enable EIA, FERC, and other elements of the DOE to identify and assess the supplies of gas in storage by geographic location on a timely basis;
- (6) to provide data for system deliverability studies undertaken by EIA as a part of its analysis tasks. Capacity information is collected at the reservoir level to allow comparisons of the utilization of the individual reservoirs. Storage data are a critical link in understanding the peak day deliverability of the natural gas system and overall system operations;
- (7) to produce the *Natural Gas Annual (NGA)*; and
- (8) to provide a portal of storage field-level capacity and deliverability information collected on EIA-191 for external analytic purposes at [http://www.eia.gov/cfapps/ngqs/ngqs.cfm?f\\_report=RP8&f\\_sortby=&f\\_items=&f\\_year\\_start=&f\\_year\\_end=&f\\_show\\_compid=&f\\_fullscreen=](http://www.eia.gov/cfapps/ngqs/ngqs.cfm?f_report=RP8&f_sortby=&f_items=&f_year_start=&f_year_end=&f_show_compid=&f_fullscreen=)

### **2.1.3. Form EIA-757, “Natural Gas Processing Plant Survey”**

The purpose of Form EIA-757 is to collect data on the operational status and capacity of natural gas processing plants to understand their production levels and characteristics, as well as to monitor constraints resulting from natural gas supply emergencies. The information is used to develop periodic reports presenting aggregate information on processing plant capacity and operations. In an emergency situation that disrupts natural gas supplies, the information collected from Schedule B of this form is used to assess the severity of the disruption to market conditions. The location of natural gas processing plants in the supply chain, between production and consumption, allows quick collection of relatively low-cost information about the impact of a natural gas supply disruption. This information is crucial during a natural gas supply disruption, for informed decision and policy making. The information collected through this survey is used widely by Federal and state agencies, Congress, industry analysts and the general public to understand the operational capabilities and characteristics of natural gas processing plants. In the event of a natural gas supply emergency, it is used to understand the plant constraints and expected recovery from an emergency.

Using information reported on Form EIA-757, EIA can publish periodic reports on the operational characteristics, status, and constraints of natural gas processing plants, providing aggregate statistics. EIA will report aggregate information from Schedule A each time Schedule A is fielded, at most every three years. EIA will determine the frequency of reporting aggregate

information from Schedule B at the time the schedule is activated. Aggregate statistics, based on the Form EIA-757, would be published every three years or less frequently depending on resources. In the case of a natural gas supply disruption, aggregate statistics may be published either daily or weekly, in emergency status reports prepared by EIA and DOE, and used in the production of several other EIA information products. It is used:

- (1) to develop and make available to the Congress, the states, other Government agencies and the public a timely and accurate quantified assessment of current natural gas processing plant operations and operational capacity;
- (2) to develop and make available to the Congress, the states, other Government agencies and the public a timely and accurate quantifiable assessment of natural gas processing plant outages and operational constraints;
- (3) as an input to other EIA and DOE information products, such as DOE Situation Reports;
- (4) to provide an input to supply, demand, and price forecasting models, such as the Short-Term Integrated Forecasting System; and
- (5) to respond to Congressional, internal Departmental and inter-Agency requests for analysis of natural gas supply constraints and operating levels in the United States, as well as policy and regulatory issues.

#### **2.1.4. Form EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers”**

Form EIA-857 was designed to collect monthly natural gas data at the state level consisting of average natural gas purchase prices, consumption of natural gas by sector, and average price by sector from a sample of the respondents reporting on the EIA-176. These data are necessary to provide timely information needed to measure the combined impact of government, industry, and consumer actions; geographic location; fuel competition; climatic or seasonal conditions; and a host of other factors upon the natural gas industry and natural gas consumers.

The purchased gas data collected on the Form EIA-857 are needed to develop average delivered, or city gate, prices to provide analysts and decision-makers with information on the levels and rates of change in “wholesale” prices to distribution systems and the differences in such prices across the Nation. This information provides direct measures of the combined effect of producer prices, transportation costs, and pipeline-provided services upon distributors’ purchased gas costs

and the variations geographically, seasonally, and under changing market conditions. The information also enables analysts to monitor the effects of Public Utility Commission actions at the state level.

The consumer price information collected enables EIA to provide information on the prices by major consumer class on a monthly basis. Consumer prices provide analysts and decision-makers with direct measures of average consumer prices and price changes, geographically, seasonally, among consumer classes, and under changing market conditions.

Collection of revenue data associated with gas distributed to end users for the account of others is used by EIA to analyze changes in distribution tariffs and for projections of future natural gas prices in EIA's *Short-Term Energy Outlook* and *Annual Energy Outlook*. Specifically, EIA calculates the average cost of distribution services charged by local natural gas utilities to end-use consumers. EIA exempts pipeline companies in the EIA-857 sample from reporting transportation revenues that are outside the scope of the reporting requirement.

EIA currently collects information about the number of customers, for each of the end-use sectors for gas sold and transported to residential, commercial, industrial, electric power, and other customers. Having this data enables EIA to better monitor fluctuations in monthly volume reporting which are commonly the result of changes to the number of customers being served.

Current data on consumption by the major consumer classes by state are necessary to enable EIA to provide timely information on any changes in the levels of consumption at the state level by sector, analyze the patterns of change over time and the underlying drivers, and develop projections of future usage patterns for inclusion in the *Short-Term Energy Outlook* and *Annual Energy Outlook*.

State-level data are necessary, as indicated above, to enable EIA to provide information on the frequently substantial differences in prices and consumption patterns among the various states. The cumulative effect of location relative to supply sources, climatic conditions, regulatory agency policies, fuel competition, industrial activities, sources of supply, storage and peak shaving requirements, and location of transmission facilities result in significantly different price and consumption profiles across the Nation. Information on consumption profiles is necessary to enable analysts and decision-makers to assess ultimate impacts of various legislative or industry actions upon particular areas or regions.

The information collected on the Form EIA-857 is used to estimate:

- (1) monthly average price by state of natural gas delivered by local distribution

companies;

- (2) monthly average price of natural gas billed to residential, commercial, and industrial consumers in each of the various states; and
- (3) total quantity of natural gas for which residential, commercial, industrial, electric power, and vehicle fuel consumers used each month in each of the various states.

State and national level aggregate data are published in EIA's *Natural Gas Monthly*, *Monthly Energy Review*, and *Winter Fuels Report*, and made available to the Executive Branch, Congress, state governments, industry, and the public.

If the collection of information on the Form EIA-857 were not conducted, EIA would be unable to provide information on the actual effects upon the natural gas market of current or future legislation and regulation in the detail and time frame necessary to adequately monitor and evaluate the market. Seasonality of the market is an important driver of the price and supply. Monthly data are the minimum level of reporting that will allow for assessment of the impacts of weather and other seasonal factors on the consumption and price patterns.

#### **2.1.5. Form EIA-910, “Monthly Natural Gas Marketers Survey”**

To ensure the coverage of all natural gas sales to residential and commercial consumers in its natural gas price data, EIA is requesting continued use of the Form EIA-910, “Monthly Natural Gas Marketers Survey.” This survey was first approved for use in May 2001, under ICR 1905-0202. The survey collects state-level monthly data on sales to residential and commercial customers by companies that market natural gas but are not involved in the physical final deliveries of gas to customers. Form EIA-857, “Monthly Report of Natural Gas Purchases and Deliveries to Consumers,” collects information on direct sales and gas transported for others from companies making deliveries of natural gas. Combining information from the EIA-910 and EIA-857 helps ensure complete price coverage of natural gas deliveries in the states surveyed.

In 2012, the OMB granted permission for EIA to continue data collection activities of natural gas marketers in Georgia, Ohio and New York, with the option to collect in an additional six states based on market coverage and EIA resources to expand the survey. EIA is not proposing to collect the EIA-910 in any additional states at this time.

EIA compiles and incorporates the EIA-910 data collected from marketers who sell natural gas to residential and commercial customers into EIA’s monthly and annual natural gas databases to improve the completeness and accuracy of EIA’s price estimates. Data from the EIA-910



supplements information already tabulated and published in EIA's publications. The data are used in EIA's modeling and analytical efforts, and to answer questions from Federal policymakers, Congress, and the general public. These data are needed for policy making; for assessing supply, demand and price developments within the industry; and for assessing the competitiveness of the industry. The data are not intended to be collected for regulatory purposes and no rulemaking is involved.

#### **2.1.6. Form EIA-912, "Weekly Underground Natural Gas Storage Report"**

The EIA-912, "Weekly Underground Natural Gas Storage Report," provides a data series for natural gas in underground storage similar to that formerly published by the American Gas Association (AGA). AGA began data collection in 1994 and discontinued its data collection on May 1, 2002. EIA initiated data collection on March 15, 2002 under an emergency clearance (ICR 1905-0202). The emergency clearance allowed EIA to survey a sample of underground storage operators on a weekly basis to continue the data series.

The *Weekly Natural Gas Storage Report (WNGSR)* is EIA's only report designated a Principal Federal Economic Indicator (PFEI). The *WNGSR* was designated as PFEI in January 2008, because it is a key source of weekly natural gas volumetric data, a market signal of readily available natural gas supply. Each week, EIA collects data about the amount of working natural gas in underground storage facilities as of 9 a.m. Central Standard Time Friday. EIA compiles and processes these data for release on its website the following Thursday at 10:30 a.m. Eastern Time. Summary totals are presented for the United States broken into three regions: the West, the East, and the Producing Region with the current proposal to expand the geographic coverage into five regions. The total volume of natural gas in underground storage reservoirs is classified as either base gas or working gas. Underground storage facilities may be reservoirs in depleted oil and gas fields, aquifers, or salt caverns.

Respondents are also instructed to submit revisions to data for previous weeks if those revisions were greater than 500 million cubic feet and to include notes explaining any unusual activity. Examples of unusual activity might include inventory adjustments such as reclassification of working and base gas, or changes in ownership or operation of storage fields. In practice, respondents do not often have need to provide notes on unusual activity. In the proposed Form EIA-912, inventory adjustments will be reported in Part 4, broken out by geographic region.

The EIA-912 data are used to respond to requests from industry to provide weekly measures of natural gas underground storage operations. EIA uses the data to prepare analytical products assessing storage operations in the three geographical regions of the survey and the impact of those operations on supplies available for the winter heating season.

### **3. Use of Information Technology**

In an effort to reduce respondent burden and to provide for more timely processing of filings, automated reporting of natural gas data is accepted, provided such reports are prepared and transmitted to EIA in the same format as in the data collection form. Data are submitted by the Internet using secure file transfer and by facsimile and email. In addition, companies reporting on Form EIA-176 may use an Electronic Filing System that can be downloaded from EIA's web site. Due to time constraints on the weekly survey, EIA-912 respondents are required to file by e-mail or facsimile. More than 98% of natural gas survey forms are submitted electronically.

### **4. Technical Considerations to Reduce Burden**

In addition to the filing options listed in the previous section, EIA is currently engaged in work to upgrade data submission options, including electronic transfer of data from respondents' systems to EIA's collection system. The EIA-912 will begin to use this technology in 2015.

### **5. Efforts to Identify Duplication and Analysis of Similar Existing Information**

A discussion of similar data items is provided below.

#### **5.1. Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition"**

Certain data elements similar to those reported on the Form EIA-176 are collected and compiled or estimated from other EIA surveys. Data on electric power sector consumption and price available from Form EIA-923, "Power Plant Operations Report," is used for electric power sector consumption and price summaries to maintain consistency in published consumption information. Electric power data collected on the Form EIA-176 are for internal balancing of individual reports and for cross-checking data collected on the Form EIA-923. This cross-check enables EIA to identify misreporting or double reporting by electric power consumers, a benefit that far outweighs the negligible burden involved. The inclusion of lines for reporting deliveries to electric power generators and volumes transported to electric power generators for the account of others allows the respondent to account for all volumes of natural gas delivered to end users. The respondent then can perform reasonableness checks on the supply/disposition balance and for unaccounted volumes. This internal check is designed to eliminate some follow-up calls and reduce reporting burden for the respondent.

Certain data collected in the Form EIA-176 survey are similar to data reported by interstate natural gas pipeline companies on FERC Form 2, “Annual Report of Major Natural Gas Companies.” However, the content and format of the FERC Form 2 are not directly comparable to the data requirements of the Form EIA-176 survey, particularly in terms of state specific, physical custody data. state-by-state data necessary to develop individual state gas balances, compatible with data collected from respondents other than interstate pipeline companies on the Form EIA-176, cannot be extracted from the FERC Form 2 report. The tracking of movements of natural gas across state lines and tracking of flows of natural gas from production areas to end users are two of the essential purposes of the EIA-176 survey. Transport of natural gas across state lines is performed almost entirely by interstate pipeline companies and the volumes transported state-to-state are not reported on the FERC Form 2.

Each of the above mentioned systems collect data that are similar in some respects to data collected on the Form EIA-176. However, with the exceptions noted, data collected cannot be reasonably substituted, in whole or in part, for data collected on the Form EIA-176.

### **5.2. Form EIA-191, “Monthly and Annual Underground Natural Gas Storage Report”**

Data similar to the underground storage information on the monthly Form EIA-191 are collected on the weekly Form EIA-912, “Weekly Underground Natural Gas Storage Report.” However, the weekly survey is collected from a sample of the monthly survey respondents in order to provide more timely measures of this market information. The EIA-191 is collected from the universe of underground storage operators and is used as the benchmark for adjustments to EIA-912 data.

### **5.3. Form EIA-757, “Processing Plant Survey”**

Data similar to the capacity and design of gas processing plants collected on the Form EIA-757 are not currently gathered by EIA or any other organization. EIA investigated alternative ways to obtain timely and precise natural gas processing plant information for use in assessing processing plant operations, damage and expected restoration during a supply emergency. The alternatives considered were use of monthly data from natural gas processors, Form EIA-816, “Monthly Natural Gas Liquids Report,” and a new survey of natural gas processing plants.

A summary of the review of the alternatives to the Form EIA-757 follows: EIA has collected monthly data from operators of natural gas processing plants on Form EIA-816, “Monthly Natural Gas Liquids Report” (OMB No. 1905-0165) for many years. The survey collects information on the supply and disposition of natural gas liquids from operators of natural gas

processing plants (which extract liquid hydrocarbons from a natural gas stream) and fractionators (which separate a liquid hydrocarbon stream into its component products.) EIA considered revising the form to collect additional information, in order to assess processing plant operations and capabilities during a natural gas supply emergency. EIA found that, in addition to not being sufficiently timely to provide information about emergency operations and constraints, certain aspects of the survey would result in undue burden and, further, would prevent the generation of reliable information about processing plant operations, capabilities and recovery during a supply emergency. The current reporting lag for data collected on Form EIA-816 is 60 days after the end of the month and this is insufficient for EIA to satisfy the need for information during a supply emergency. For instance, if a supply emergency happened on September 4, data from the Form EIA-816 would not be available until the end of December. The use of Form EIA-816 would not satisfy EIA's need for timely information during a natural gas supply emergency.

#### **5.4. Form EIA-857, "Monthly Report of Natural Gas Purchases and Deliveries to Consumers"**

Certain elements of data similar to these collected on the Form EIA-857 are available to EIA from other surveys or sources but none that could be used or modified for the purposes described above.

Monthly information on the average price of natural gas to residential consumers is available from the Bureau of Labor Statistics (BLS) but the price is only for given quantities of gas in major metropolitan areas. Volume information is not available. The data cannot be presented by state and do not represent average prices of quantities actually consumed.

Annual information is available by state on purchased gas prices, consumer prices by market sector, and consumption by market sector from the Form EIA-176, "Annual Report of Natural and Supplemental Gas Supply and Disposition." The Form EIA-857 complements the Form EIA-176 by providing current information reflecting monthly and seasonal variations. The Form EIA-176 information is used to develop the Form EIA-857 sample frame and provides an annual control for testing and adjusting the Form EIA-857 estimation procedures.

#### **5.5. Form EIA-910, "Monthly Natural Gas Marketer Survey"**

The data elements collected on the EIA-910 are not duplicated in other surveys or sources known to EIA.

#### **5.6. Form EIA-912, "Weekly Underground Natural Gas Storage Report"**

Data similar to the underground storage information on the monthly Form EIA-912 are collected on the monthly Form EIA-191, “Monthly Underground Natural Gas Storage Report.” However, the monthly survey is collected from the universe of underground storage operators and is used as the benchmark for adjustments to EIA-912 data. The EIA-912 is collected from a sample of the monthly survey respondents in order to provide more timely measures of this market information.

## **6. Burden Reduction for Small Businesses and Small Entities**

Data requested provide the minimum information necessary to fulfill EIA's responsibility to provide meaningful, timely, objective, and accurate energy data. Respondents to the survey complete only those data elements applicable to their operations. For small firms, fewer data elements are generally applicable and are easily obtained from generally existing records. EIA staff members are also available during normal business hours to provide assistance by telephone.

EIA encourages electronic reporting on all natural gas surveys.

Companies responding to the Form EIA-191 and EIA-912 are not small businesses.

The EIA-176 is required of all companies with natural gas deliveries to end-use customers regardless of size. However, the majority of the small-sized respondents only have to fill out a small percentage of the data elements on the form as the majority of the questions asked are not applicable to small-sized respondents. Therefore, the burden to small businesses on the EIA-176 is the minimum necessary to gather the information required.

The Form EIA-910 survey burden is the minimum necessary to gather the information required. Similarly, the natural gas processing plant operators that complete Form EIA-757 are not small businesses or other small entities.

## **7. Consequences of Less Frequent Reporting**

Data are required at requested frequency in order to satisfy EIA's programmatic needs as described in A2 above. Requested frequency of reporting is: EIA-176, annually; and EIA-191, EIA-857, and EIA-910 monthly. The EIA-912 is filed weekly. The EIA-757 baseline survey, Schedule A, is filed no more than once every 3 years. Without these data, natural gas market participants, including local distribution companies, producers, traders, importers, gas purchasers, Federal and state agencies providing income assistance for energy, and the gas

trading community, would not have timely information about natural gas supply and demand. The importance of timely information and the fact that there are no other sources are the basis for the requested report frequency.

If the Form EIA-757 collection is not conducted, EIA could not provide essential natural gas processing plant information prior to and during a supply emergency. Less frequent reporting would prohibit EIA from meeting its mandate of providing timely and reliable energy information. The frequency of reporting on Schedule B will be determined at the time the survey is activated in response to a supply emergency.

## **8. Special Circumstances**

There are not any special circumstances for these collections.

## **9. Summary of Consultation Outside the EIA**

A request for comments from interested persons was solicited in a notice describing the proposed extension of the forms and proposed modifications to each form. The notice was published May 8, 2014 in the Federal Register, pp. 26419-26422. An announcement of the Federal Register notice was sent to a list of trade groups, current respondents, and others interested in natural gas data programs. In addition, the notice and proposed versions of the survey forms were posted on EIA's website.

### ***Summary of Responses to Federal Register Notice of May 8, 2014:***

Comments were received regarding the Weekly Natural Gas Storage Report. Industry was supportive of the new WNGSR regions. This section includes comments received and the EIA responses:

#### *1) American Gas Association*

AGA supports this change with the following suggestions. AGA encourages the EIA to evaluate placing Minnesota in the Midwest Region and New Mexico in the Mountain Region. AGA members believe these placements would better align with actual operating conditions and practices that are unique to each region.

#### **EIA Response:**

EIA has moved New Mexico into the Mountain Region and Minnesota to the Midwest Region in the final proposed version of EIA-912. EIA is also proposing to move Kentucky and Tennessee from the East to Midwest regions.

2) *DRW Commodities*

In regards to the proposal to change the EIA-912 regions by further subdividing the East and West regions, we are supportive of this change, as we would be for any change which increases the transparency and granularity of storage reporting.

**EIA Response:**

None needed.

3) *Mercuria Energy*

With regard to the proposed changes on the EIA-912 form, we favor the proposed segregation of the current East and the West regions into two separate regions, and we believe the current producing region should also be divided into two or three regions, whereby at a minimum, Texas natural gas inventories are reported separately from the other southern states.

**EIA Response:**

EIA does not plan to report any weekly storage statistics at a state-level. However, the additional regions should provide additional insights into regional storage movements.

4) *Southern Star*

Southern Star is not opposed to the proposal related to Form EIA-912 to utilize five reporting regions rather than the current three regions. Under both the current and proposed regional structure, Southern Star will be reporting data in three regions.

**EIA Response:**

None needed.

Additionally, the Energy Metro Desk, an industry publication that focuses on natural gas storage, has written several stories supportive of the new regions. From Energy Metro Desk 7/11/14 p. 10 "...We think the new changes being (hopefully) implemented by EIA will go a long way in shoring up storage forecasting, like redrawing the storage regions and redefining the revision

policy. Added transparency and consistency on the part of pipeline operators and storage facilities would also help accuracy.”

Additionally, EIA met with industry and trade groups to further discuss EIA’s natural gas forms clearance proposals as described below:

On July 21, 2014, EIA met with the American Gas Association and the Interstate Natural Gas Association of America. Both trade groups had submitted comments expressing opposition to several of EIA’s initial proposed changes to the natural gas survey forms and clarified their position with EIA. Based on discussions at this meeting, other public comments received and further discussions with current respondents who provided comments, EIA revised and/or rescinded several initial proposals to the initial form changes included in the Federal Register notice on May 8, 2014, as described in Supporting Statement A, Appendix A.

## **10. Remuneration**

No payments or gifts are made to the survey respondents.

## **11. Provisions For Confidentiality of Information**

EIA considers information collected on Forms EIA-176, EIA-757, and certain data elements collected on EIA-191 to be public information.

The following statement is included in the instructions to Forms EIA-176 and EIA-757:

*“Information reported on this survey form is considered public information and may be publicly released in company or individually identifiable form.”*

The following statement of the confidential provisions is included in the instructions of the proposed version of Form EIA-191:

*Information collected in Parts 1, 2, and 3 on Form EIA-191, as well as Base Gas, is considered public information and may be publicly released in company or individually identifiable form. Information collected in Part 4 (including Base Gas, Working Gas and Total Gas in Storage data), however, 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. The Energy Information Administration (EIA) will protect your monthly gas storage information in accordance with its confidentiality and security policies and procedures.*

Forms EIA-910 and EIA-912 collect confidential data under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). These data are considered confidential and will be used exclusively for statistical purposes. The instructions to Forms EIA-910 and EIA-912 contain the following data confidentiality notice:

*The information you provide on Form EIA-xxx will be used for statistical purposes only. All the information the U.S. Energy Information Administration (EIA) collects for this survey about your company is confidential by law. In accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 (Title 5 of Public Law 107-347) and other applicable Federal laws, your responses will not be disclosed in identifiable form without your consent. By law, every EIA employee, as well as every agent, is subject to a jail term, a fine, or both if he or she makes public ANY identifiable information you reported.*

EIA will protect information reported on Form EIA-857. The instructions to Form EIA-857 contain the following provision:

*Information reported on Form EIA-857 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..*

*The Federal Energy Administration Act requires EIA to provide company-specific data to other Federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of the Department of Energy (DOE); or 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 nonstatistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.*

*Disclosure limitation procedures are not applied to the statistical data published from EIA-857 survey information. 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.*

## 12. Justification for Questions of a Sensitive Nature

The forms contain no questions of a sensitive nature.

## 13. Estimates of Respondent Burden (Hours and Cost)

Table 1. Estimate of Respondent Burden

Form	Number of Respondents	Number of Reports Annually	Number of Annual Responses	Burden Hours per Response	Annual Burden Hours
EIA-176	2,012	1	2,012	12.0	24,144
EIA-191	135	12	1,620	2.6	4,212
EIA-757 Sch. A	600	0.33	200	0.5	100
EIA-757 Sch. B*	20	0.33	7	1.5	10.5
EIA-857	320	12	3,840	3.5	13,440
EIA-910	210	12	2,520	2.0	5,040
EIA-912	85	52	4,420	1.0	4,420
<b>Total</b>	<b>3,382</b>	<b>90</b>	<b>14,619</b>	<b>n/a</b>	<b>51,367</b>

\* EIA-757 Schedule B will be collected only in response to a significant disruption in natural gas supply. 20 respondents will be accounted for over a three-year period (7 per year) for Schedule B based on the most recent activation of the survey in 2012, which was in response to Hurricane Isaac.

## 14. Estimates of Cost Burden to Respondents

See above table for the estimates of respondent burden for the individual forms contained in this package. The overall annual respondent burden is estimated to be 51,367 hours. The estimated costs to respondents for the burden hours are estimated to be \$3,561,274 (51,367 hours times \$69.33 per hour). EIA estimates that there are no additional costs to respondents associated with the surveys in the Natural Gas Data Collection Program Package other than the costs associated

with the burden hours as set forth in Table 1 above.

## **15. Estimates of Annual Cost to the Government**

The six surveys in the clearance package are included in the Annual Operating Plan for the Office of Oil, Gas and Coal Supply Statistics. The annualized costs for this data program are estimated to be \$2,400,000 in FY14.

## **16. Changes in Burden to Respondents**

The overall burden for the Natural Gas Data Collection Program Package is estimated to be 51,367 hours annually for all the forms included in this clearance package. The information collections in this request are currently approved under OMB control number ICR 1905-0175 for a total existing burden of 50,429 hours. This request will result in a net increase of 938 hours for all the forms in this clearance package. The changes are due to an increase in the number of respondents for the EIA-176, EIA-191, EIA-757, and EIA-857.

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

The data collected, reviewed, and tabulated by EIA from the Form EIA-176 will be merged with data collected on the Forms EIA-857 and EIA-910 to develop quantitative overviews of gas available to each of the various states and the sources of such gas; gas used or otherwise disposed of in each of the various states; the number of consumers; total and average quantities consumed; and total and average prices paid by consumers by market sector in each of the various states. The data will be used as input to the State Energy Data System, the Short-Term Integrated Forecasting System, the National Energy Modeling System, and other supply, demand, and price forecast models. They are published in the *Natural Gas Annual* and provide input to the *Natural Gas Monthly*, *Annual Energy Outlook*, *Monthly Energy Review*, *Short-Term Energy Outlook* and State Energy Profiles.

### **17.1 Annual Survey**

The time schedule for the *Natural Gas Annual* data collection, tabulation, and publication is shown in the table below.

Table 2: Time Schedule for the *Natural Gas Annual*

EIA Form	Due date	Extension Date	Processing completion	Posted on website
EIA-176	March 1	April 1	September 30	November 20

The *Natural Gas Annual* publication is typically released by December 31 of each year.

## 17.2. Monthly Surveys

Data gathered monthly on the Forms EIA-191, EIA-857, and EIA-910 will be reviewed, verified, and aggregated to be used as input for the *Natural Gas Monthly* and the *Monthly Energy Review*. In addition, data from the Form EIA-191 will be used in specific studies of peak day supplies to major market areas, utilization of storage capacity, and the load leveling function of storage in the market.

Individual company reports will be checked for reasonableness by comparing current reports with prior responses. Mathematical calculations will be checked for accuracy and all data will be checked for internal consistency. Respondents will be required to resubmit reports containing any inconsistencies or errors.

A typical time schedule for the monthly EIA-191, EIA-857, and EIA-910 data collection tabulation and publication is shown below using August data release for the example:

Table 3: *Natural Gas Monthly – August 20xx Issue*

EIA Form	Data report month	Due Date	Processing complete	Posted on website
EIA-191	June	July 20	August 20	August 31
EIA-857	June	July 30	August 20	August 31
EIA-910	June	July 30	August 20	August 31

A typical time schedule for the weekly EIA-912 data collection, tabulation and publication is shown below using the first several weeks of August as example:

Table 4: *Weekly Natural Gas Storage Report – August 20xx Issues*

EIA Form	Data report for week ending	Due Date	Processing complete	Posted on website
EIA-912	August 1	August 4	August 6	August 7

EIA-912	August 8	August 11	August 13	August 14
EIA-912	August 15	August 18	August 20	August 21

### **18. Display of Expiration Date and OMB Number**

The OMB Number (1905-0175) and expiration date will be displayed on all the data collection forms and instructions.