

**Supporting Statement:  
U.S. Department of Energy  
Superior Energy Performance® Certification Program  
OMB Control Number – 1910-NEW**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for information from participants in the voluntary Superior Energy Performance® (SEP™) certification program. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, “Instructions for Completing OMB Form 83-I.”

This request for information consists of a voluntary data collection process for SEP participation: to enroll industrial facilities, manage and track certification cycles, and relay the costs and benefits of SEP certification to industry. Typical respondents are expected to be energy managers that have experience with compiling energy use data. Participation in SEP is voluntary, and it is expected that respondents would already have access to the information requested in this collection.

DOE currently seeks to use the four forms as part of the information collection within the SEP certification process. This collection is expected to result in a total hourly burden of 650 hours from 475 forms submitted annually.

SEP is an energy efficiency certification and recognition program for industrial facilities demonstrating excellence in energy management as well as continual improvement in energy efficiency through third-party verified energy performance. To be certified under SEP, a facility must conform to the ISO 50001 energy management standard and demonstrate additional energy performance improvements of at least 5% over a three year period (reporting year to baseline year) and other requirements that have been codified under the ANSI/MSE 50021 standard. Companies meet the energy performance improvement criteria through a combination of operational or behavioral energy saving improvement actions and installation of more energy efficiency equipment. They have the flexibility in implementing energy saving actions that are cost-effective and that meet their facility’s productivity requirements. More specifically, the facilities are not required to implement prescriptive, regulated energy efficiency technologies and equipment (e.g., energy efficient electric motors). SEP provides a rigorous, internationally-recognized business process for companies to continually improve their energy performance. The SEP third-party verification of energy performance improvement is unique in the marketplace, and helps differentiate certified companies from their competitors by demonstrating conformance to the ISO 50001 energy management system standard, complying with the SEP Measurement and Verification (M&V) Protocol and achieving a defined energy performance improvement criteria. SEP certified facilities pay for the third party SEP audit themselves.

DOE will use this information collection to recognize SEP-certified facilities for their accomplishments by listing them on the SEP website in the listing of “Certified Facilities” (<http://www.energy.gov/eere/amo/certified-facilities>). The listing on the website will include: the facility’s name, location (city and state), certification achievement level (silver, gold or platinum), certification date (month and year), and their SEP energy performance improvement

(%) over a time period (3 to 10 years) - as well as other non-confidential information (see response with #16). In addition, DOE will use this information to evaluate the costs and benefits of SEP certification, which is consistent with the Executive Order #13624—Accelerating Investment in Industrial Energy Efficiency (August 2012). Executive Order 13624 asks Federal agencies to:

- “provide public information on the benefits of investment in industrial energy efficiency”,
- “(i) provide(ing) general guidance, technical analysis and information, and financial analysis on the value of investment in industrial energy efficiency”
- “(ii) improve(ing) the usefulness of Federal data collection and analysis”

This information will also help DOE identify strategies to reduce the cost of SEP participation. No confidential data provided by the company to the DOE will be shared publicly. DOE will inform each SEP certified facility how DOE will use the information, what data will be shared publicly, and what data will be kept confidential. See response in number 16 below.

## **A. Justification**

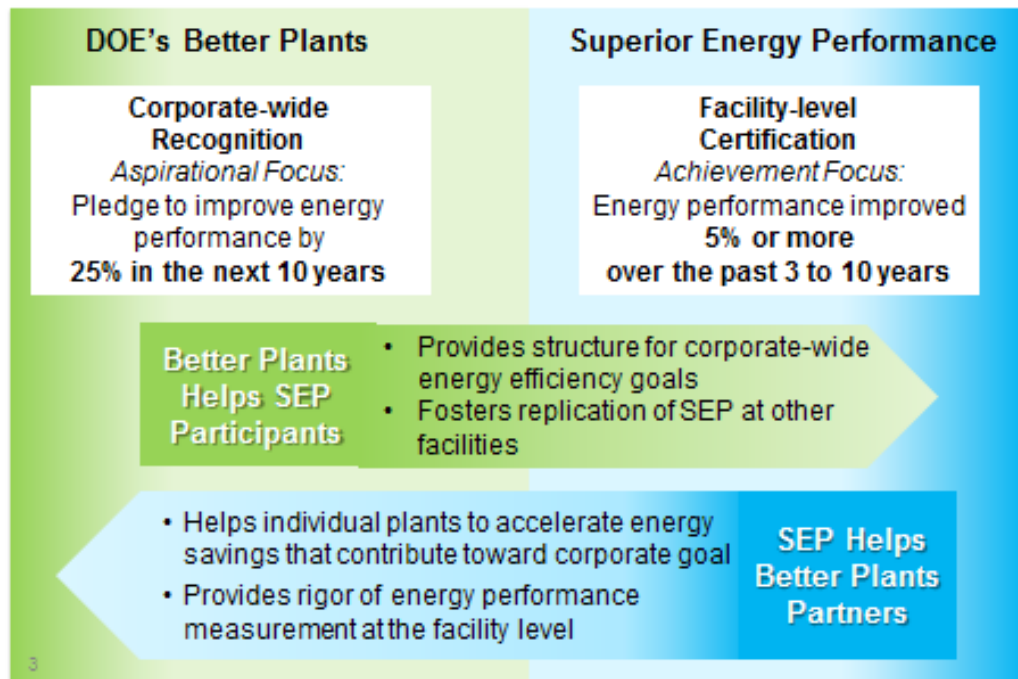
### **1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

This data collection is necessary in order to administer the Superior Energy Performance® (SEP™) program. The data collected identifies facilities seeking certification (SEP Enrollment Form), and provides information required to certify a facility to SEP (SEP Application and SEP Energy Performance Improvement Report). The additional voluntary information (SEP Voluntary Cost Benefit Forms) will allow DOE to develop strategies for increasing participation in the program, thus increasing SEP program impact and delivering more energy savings. Further, both the SEP Energy Performance Improvement Report and the SEP Voluntary Cost Benefit Forms will allow DOE to assess its impact on saving energy in the industrial sector.

SEP was developed to support effective implementation of the ISO 50001 energy management system standard in the industrial sector. DOE supported U.S. leadership in developing the ISO 50001 standard with involvement from 59 countries. SEP is the U.S. governmental policy mechanism for driving ISO 50001 implementation in the United States. It is the chief mechanism used by DOE to promote continual improvement in energy performance thereby maximizing sustained energy and cost savings impact in the industrial sector. SEP certification requires ISO 50001 implementation and adds energy performance improvement criteria that are not specified in ISO 50001. SEP program elements were designed, tested, and refined in close consultation with industrial companies and the U.S. Council for Energy-Efficient Manufacturing to ensure that SEP will be cost-effective, practical, and valuable. Industrial representatives guided critical decisions to define the technical features of the program.

An administrative requirement that necessitates the SEP program and by extension this data collection includes the President’s Executive Order 13624—Accelerating Investment in Industrial Energy Efficiency (August 2012). Section 2 specifically calls for an expansion of the Better Buildings, Better Plants Voluntary Pledge Program (“Better Plants”). Better Plants and SEP are two distinct but complementary programs that are administered by the DOE Advanced Manufacturing Office (AMO) – see figure 1 below. Companies that sign the Better Plants Partners Pledge agree to pursue a *prospective, corporate-wide* goal to improve energy performance by 25% in the next 10 years. SEP certifies *retrospective* achievements at the *facility level*: verified improvements in energy performance attained in the past 3–10 years. SEP encourages Better Plants Partners to accelerate energy savings at individual plants that contribute toward the corporate-wide goal.

Figure 1 – Complementary DOE Programs: Better Plants and Superior Energy Performance



Section 1 of the Executive Order 13624 calls for DOE and other federal agencies to facilitate investment in energy efficiency at industrial facilities by convening stakeholders, providing technical assistance, providing public information on the benefits of such investments, and using existing Federal programs to support these investments. SEP develops a framework to continually identify and prioritize potential energy reduction measures, enabling corporate managers to make energy efficiency investment decisions. SEP also requires the facility to adopt targets, which will motivate facilities to invest in energy efficiency in order to meet the target.

Section 2 also calls for policies that “encourage investment in industrial energy efficiency in order to reduce costs for industrial users.” Mechanisms to accomplish this end include providing “general guidance, technical analysis and information, and financial analysis on the value of investment in industrial energy efficiency.” This collection will enable DOE to conduct the technical and financial analysis needed to substantiate the investment in SEP certification. Data collection from SEP-certified facilities will also provide insight into best practices that will be distributed to facilitate improvements in energy performance by other manufacturing organizations.

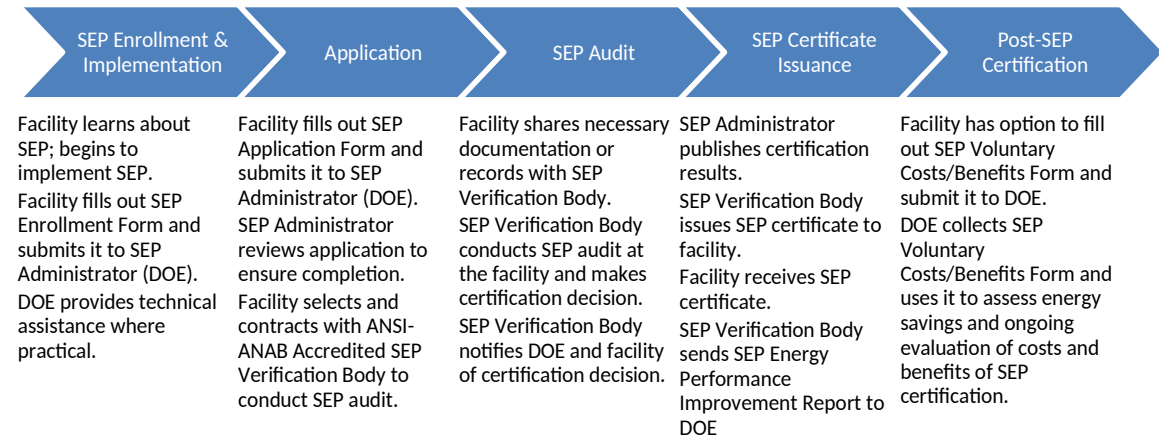
**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection**

DOE is currently the SEP Administrator and developing, testing, and refining the administrative processes for U.S. industrial facilities to enroll in SEP and submit applications for certification. Report collection will be conducted on a web-based, password-protected system that is housed within a DOE data center and compliant with the Federal Information Security Management Act (FISMA). By housing the data in a FISMA compliant system, DOE is ensuring the same information security to the facility’s data as it provides to the information and systems supporting DOE.

The information being collected will be used to report the progress of participants in the SEP program. SEP is a voluntary certification intended to drive greater energy efficiency in the industrial marketplace to create cost savings and thereby improve participants’ competitiveness. SEP benefits include third party verification of energy savings, the associated cost savings, and DOE recognition. SEP certification is valid for three years.

**The following figure summarizes the SEP data collection process.**

**New Collection: SEP data collection process**



**Forms collected at each step**



**The following is an overview of the data collection forms for the Superior Energy Performance® certification program.**

Summary of SEP Data Collection Uses		
	Who Submits the Form	How DOE Will Use the Information
SEP Enrollment Form	Industrial Facility	Identify where technical assistance is needed and will provide it where practical
SEP Application Form	Industrial Facility	Track basic information on SEP participants to administer program
SEP Energy Performance Improvement Report	SEP Verification Body	Manage and track certification cycles; track results of SEP participation
SEP Voluntary Costs/Benefits Form	Industrial Facility	Conduct and refine analysis on the costs and benefits of SEP participation, as called for in President’s Executive Order 13624—Accelerating Investment in Industrial Energy Efficiency (August 2012)

SEP aims to help meet the administration’s goal to facilitate investment in energy efficiency at industrial facilities. SEP accomplishes this by encouraging participants to seek certification for successfully implementing the ISO 50001 energy management standard and by meeting and verifying energy performance improvement targets set by the SEP program. Information is collected throughout various stages of a facility’s participation in SEP.

DOE, as the SEP Administrator, collects the Enrollment Form, Application Form, and SEP Energy Performance Improvement Report because they are requirements of the ANSI/MSE

50028 standard. Facilities have the option of submitting the SEP Voluntary Costs/Benefits Form to DOE. DOE is collecting costs and benefits information to meet the President's Executive Order 13624 to demonstrate the benefits of investments in energy efficiency.

The collection of these forms serves to enable the SEP Administrator to oversee the SEP program and ensure that SEP certifications are awarded in accordance with the ANSI/MSE 50021 and ANSI/MSE 50028 standards. Participation information is also needed to gauge uptake of the program, track certification cycles, and determine the effectiveness of DOE's efforts to promote the program.

### Enrollment Form

Enrollment refers to the period of time that a facility communicates its interest in implementing SEP to DOE as the SEP Administrator—before the facility is ready to apply for an SEP audit. The facility fills out the Enrollment Form. Basic facility and contact information is initially collected to provide participants with technical assistance while they are in the process of implementing SEP, such as email updates about the program and access to phone support. The SEP Enrollment Form is currently a fillable PDF form that may be submitted electronically.

Enrollment information is collected separately from the Application Form in order to help DOE provide technical assistance to facilities that need it. The Application Form is for facilities that have already completed the SEP implementation process, are ready for their certification audit, and are past the point of needing technical assistance.

### Application Form

After a facility has implemented SEP and is ready to pursue a verification audit, the facility fills out the SEP Application Form, which is also a fillable PDF form that may be submitted electronically. The SEP Application gathers data pertaining to the facility's preliminary estimation of its energy performance improvement and how it was achieved. The respondent will have already developed the requested information as part of their use of the SEP Measurement and Verification Protocol to meet SEP program requirements. No new energy models or calculations are required to fill out the Application form, and the burden to the respondent will be minimal.

This application is required by the ANSI/MSE 50028 standard so that an SEP Verification Body will have enough documentation to initiate an audit and determine if the facility meets SEP certification requirements.

### SEP Energy Performance Improvement Report

- After a facility achieves SEP certification, the SEP Verification Body submits a SEP Energy Performance Improvement Report to the SEP Administrator. The form collects basic information about the energy performance improvement, how it was achieved, how models

were applied from the SEP Measurement and Verification Protocol, and verifies the accuracy of the claims made by the facility on the SEP Application form. The SEP Admin and DOE would use the information here to manage and track certification cycles, maintain records of expired certifications, determine and make public program impacts and energy savings. This report will be used by DOE to confirm if a facility should be certified. Without this form, the program would not be able to recognize SEP certification. This is a spreadsheet-based form that may be submitted electronically.

### SEP Voluntary Costs/Benefits Form

This optional form collects additional data about the costs and benefits of SEP. A facility electing to provide this information fills out this form after achieving SEP certification. The SEP Voluntary Costs/Benefits Form is a spreadsheet-based and may be submitted electronically. The data collected contains additional data entry fields beyond the SEP Enrollment and Application forms: 1) asking for levels of investment in implementing the SEP-compliant energy management system (effort and costs), and 2) requesting a breakdown of energy performance improvement actions at the facility level. This form does not collect non-energy benefits. This information is not collected in the SEP Enrollment Form, Application Form, or SEP Energy Performance Improvement Report. Information provided in the SEP Voluntary Cost/Benefits Form will help DOE meet the President's Executive Order 13624 to demonstrate the benefits of investments in energy efficiency. DOE cannot determine the costs and benefits of SEP from the SEP Enrollment and Application forms alone.

**3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.**

SEP will primarily rely on data provided in an electronic format. The SEP Enrollment and Application forms may be downloaded from the SEP website at [energy.gov/betterbuildings/superior-energy-performance](http://energy.gov/betterbuildings/superior-energy-performance). DOE is developing a web-based, password-protected system that will be housed within a DOE data center compliant with the Federal Information Security Management Act for submitting all four forms. No other data collection systems will be employed to support SEP.

**4. Describe efforts to identify duplication.**

Currently, SEP is a national certification program offering a high level of rigor and credibility to industrial facilities through accredited third-party verification of sustained energy performance improvements. It is the only national certification program offering third-party verification of ISO 50001 compliance and energy performance improvements.

Other voluntary reporting programs were investigated for duplication, including the Environmental Protection Agency's Climate Leaders Program and ENERGY STAR plant

certification, the Energy Information Agency’s Manufacturing Energy Consumption Survey and its voluntary reporting of greenhouse gasses, and DOE Better Buildings, Better Plants. The EPA has since discontinued the Climate Leaders program. ENERGY STAR plant (synonymous with “facility”) certification compares a plant to similar plants in its industry, whereas SEP compares a facility’s energy performance to a baseline of its own past performance. EIA requires reports on total energy use for entire industry sectors. The Better Buildings, Better Plants Program requests information about a baseline energy intensity number and the annual change in energy intensity relative to the baseline at the *corporate* level. Better Plants does not collect facility level information. SEP collects information pertaining to energy performance—a measurement of energy intensity normalized over production—over a 3–10 year period at a *facility* level. No other existing programs collect this type of energy performance metric to quantify the impact of the implementation of the ISO 50001 standard.

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

The collection of information is not mandatory so it does not impact small businesses or other small entities unless they choose to participate voluntarily. SEP is a voluntary program and small businesses may choose not to participate.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

DOE is requesting the minimum level of information required to fully support and implement SEP. To be successfully administered, the SEP program requires the collection of some unique and specific participant information. DOE cannot administer the program or track participation and outcomes without the information gathered by the collection instruments described in Question 2 above. DOE is the only possible administrator at this point because of its unique engagement with past and present participants in the program.

As of February, 2015, DOE has conducted demonstrations to test SEP at 40 industrial facilities throughout the United States. Initial results indicate that SEP is a cost-effective mechanism for manufacturing facilities to achieve energy savings. Continued collection of this data is essential to make a stronger case to demonstrate costs and benefits of ISO 50001 and SEP, improve the effectiveness of the SEP program through refinements to program elements, and to create enduring value of ISO 50001 in the industrial sector. ISO does not collect information on ISO 50001 certified facilities furthering the need for DOE to collect the information in this request.

The SEP Enrollment Form is necessary for DOE to provide technical assistance to industrial facilities wishing to implement SEP program requirements and eventually pursue certification. Without the SEP Application Form, the SEP Verification Body would be unable to conduct the audit to determine certification. Without the Energy Performance



Improvement Report, DOE would not have a systematic way to collect implementation data or attribute energy performance improvements to ISO 50001.

Additionally, without the information requested in the SEP Voluntary Costs/Benefits Form, DOE will not be as effective in responding to the 2012 Executive Order 13624 that calls for agencies to encourage investments in industrial energy efficiency and to provide public information on the benefits of these investments. Losing details on the costs and benefits would hinder DOE's ability to share best practices of energy efficiency with other partners and the public, or to support SEP-certified facilities in setting additional energy performance goals through recertification.

DOE invested in the development of ISO 50001 and SEP and has great interest in showing the return on its investment for both.

7. **Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study; (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB; (g) that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

The collection will be conducted in a manner consistent with all OMB guidelines.

8. **If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a Notice and Request for Comment concerning this collection in the Federal Register on June 27, 2014 at FR Doc. 2014-15065. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received as a result of that notice.

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

There will be no payment or gift of any kind to respondents. The programs are voluntary and participants will not receive any payment or gift in return for involvement.

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

DOE is currently developing, testing, and refining the administrative processes for U.S. industrial facilities to enroll in SEP and submit applications for certification. During this period, participants download the SEP Enrollment Form or Application Form and email the completed form to a secure DOE email address. DOE is currently developing an online version of the application form that participants can fill out and submit through a secured website. This information will be stored within a system that has already obtained compliance with the Federal Information Security Management Act. Data that SEP certified facilities submit online will not be able to be seen by other certified facilities; they can only see their own data.

SEP participants agree to provide the information identified in this supporting statement in order to apply for and receive SEP certification. Also, SEP participants provide the information to help DOE inform the broader marketplace of industrial facilities and companies about successful implementation models that generate significant energy savings and quantify the results of those models. SEP participants are informed that DOE will make the following information public upon achieving SEP certification: company name, certified facility's name and location, certification date, certification level (silver, gold, platinum), and verified energy performance improvement percentage.

Energy consumption and savings data reported to DOE through the SEP certification program is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. DOE will aggregate the energy data for pledging entities to ensure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

DOE will ensure that the audits will not be performed by a party with a conflict of interest by overseeing the selection of the auditor and allowing the facility to choose their own auditor.

Avoiding conflict of interest by the SEP verification bodies with SEP certified facilities is a requirement of ANSI 50028 – SEP auditing standards.

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

The information collected for this project is energy consumption and conservation efforts of partner organizations and contains no personal data.

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

DOE estimates that 200 facilities will register for SEP and another 100 will apply for certification and get certified to SEP annually by 2017. The accompanying reporting steps are:

- Upon registering, a facility submits the SEP Enrollment Form.
- In order to certify,
  - The facility submits the SEP Application Form, AND
  - The SEP Verification Body submits the Energy Performance Improvement Report
- After certifying, the facility is asked but not required to submit two of the four SEP Voluntary Cost/Benefit Forms. DOE's target is for 75% of certifying facilities to submit the SEP Voluntary Cost/Benefit Forms.

DOE estimates that the burden to complete the:

- SEP Enrollment form will be 0.5 hours
- SEP Application form will be 1 hour
- SEP Energy Performance Improvement Report will be 1.5 hours
- SEP Voluntary Cost/Benefit Forms will be 4 hours

When estimating the burden hours for each form, the following was taken into consideration:

- Each facility receiving SEP certification has implemented a robust and well documented energy management system supported by facility energy use and consumption data. As such, an SEP certified facility is much more advanced than a "typical" manufacturing facility in terms of its ability to quantify and track its historic and current energy performance.

- The data required for the SEP Enrollment Form, SEP Application Form, and SEP Voluntary Cost/Benefit Form is within the scope of the facility's data collection abilities and the data will already exist within the documentation for their energy management system.
- Similarly, the data requested on the SEP Energy Performance Improvement Report is already being collected by the Verification Body for certification purposes. The SEP Energy Performance Improvement Report has been developed to mirror the statistics collected by the Verification Body to determine the facility's certification status.
- The SEP Database will facilitate submission of the forms by providing a secure web-based platform for accessing, completing, and submitting the forms.
- Responses from previous forms submitted by the facility for the current certification will be pre-filled in other forms wherever and whenever applicable (i.e., facility location, contact information, etc.)

It is estimated that there will be 475 respondents annually, all from the private sector, to the forms associated with the Superior Energy Performance program by 2017. The corresponding burden is estimated to be 650 hours. Respondents include the facilities seeking or achieving SEP certification and SEP Verification Bodies. The attachment to this supporting statement (SEP Summary of Annual Burden Hours) provides a detailed synopsis of annual burden hours for this information collection. The following outline provides estimates of the reporting burden for all respondents to the Superior Energy Performance Program.

#### **Burden hour summary for SEP Facilities**

Total number of unduplicated forms submitted annually: 375 (200 SEP Enrollment Forms, 100 SEP Application Forms and 75 SEP Voluntary Cost/Benefit Forms)

Total annual burden hours: 500 (100 hours for SEP Enrollment Forms, 100 hours for SEP Application Forms and 300 hours for SEP Voluntary Cost/Benefit Forms)

Total annual cost associated with total annual burden hours: \$20,045<sup>1</sup>

Average Burden per form: 1 hr 20 min

Average burden per facility per year during 3 year SEP cycle: 1 hr 50 min

#### **Burden hour summary for SEP Verification Body**

Total number of unduplicated forms submitted annually: 100 (100 SEP Energy Performance Improvement Reports)

Total annual burden hours: 150 (150 hours for SEP Energy Performance Improvement Report)

Total annual cost associated with total annual burden hours: \$11,250<sup>2</sup>

Average burden per form: 1 hour 30 min

Average burden per Verification Body per facility per year during 3 year SEP cycle: 0.5 hrs

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<sup>1</sup> Total annual cost associated with total annual burden hours to facilities calculated by multiplying the total burden hours to facilities (500 hours) by the average hourly labor rate for an Industrial Engineer per the US Department of Labor Bureau of Labor Statistics (\$40.09), or 500 hours x \$40.09/hour = \$20,045

<sup>2</sup> Total annual cost associated with total annual burden hours to Verification Bodies calculated by multiplying the total burden hours to Verification Bodies (150 hours) by the average hourly labor rate for an auditor based on Verification Body audit costs (\$75/hr), or 150 hours x \$75/hour = \$11,250

**Combined totals**

Total number of unduplicated forms submitted annually: 475

Total annual burden hours: 650

Total annual cost associated with total annual burden hours: \$31,295

The estimated total annual cost burden to respondents completing forms for the SEP program is about \$31,295. The cost per certification is spread evenly over the three year SEP certification cycle, therefore, the cost per facility per year is approximately \$73.50. The cost per Verification Body per certification is spread evenly over the three year SEP certification cycle, therefore, the cost per Verification Body per certification is approximately \$37.50.

The table below summarizes the costs.

	Cost/year for all certifications/year	Cost/certification/year <sup>3</sup>
To facility(ies)	\$20,045	\$73.50
To Verification Body (ies)	\$11,250	\$37.50
Total	\$31,295	\$111

The cost numbers for facilities are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$40.09) for industrial engineers, compiled by the U.S. Department of Labor’s Bureau of Labor Statistics. (See <http://www.bls.gov/oes/current/oes172112.htm>) The cost numbers for the Verification Body are calculated similarly, but use \$75/hr for the hourly wage rate (based on audit costs from the SEP Verification Bodies).

**13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information. The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component.**

(a) There are no capital and start-up cost components associated with any of these data collections. All costs associated with these data collections are personnel costs. It is assumed that the level of effort and cost by the facility and/or Verification Body in achieving SEP certification is a sunk cost to them. The incremental level of effort for the facility and the SEP Verification Body to report to DOE for four forms (3 for the facility and 1 for the SEP Verification Body) benefits from data already gathered for SEP certification.

<sup>3</sup> Calculated by summing burden hours for each entity (facility or Verification Body) for responding to their respective forms over the course of the certification cycle. For example, a facility will fill out and submit the SEP Enrollment form (1/2 hr burden at an estimated cost to the facility of \$20.05), SEP Application form (1 hr burden at an estimated cost of \$40.09), and the SEP Voluntary Cost/Benefit form (4 hrs burden at an estimated cost of \$160.36). The total cost will to the facilities to fill out all three forms over the three year period is \$220.50. Annualized over a three year certification cycle, this equates to \$73.50/yr (\$220.50/3 years).

- (b) There is no operation and maintenance and purchase of services component with any of these data collections. All costs associated with these data collections are personnel costs.

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

DOE will require contractor support to process and analyze the data being reported by recipients and prepare an annual summary of energy savings achieved. The following estimate reflects the DOE and contractor resources needed to process and analyze the data being reported by participants.

SEP Enrollment Form Collection Costs

Approximately ½ hour per form to review completeness and respond to requests for technical assistance

200 forms submitted per year

100 hours per year to collect and review SEP Enrollment Forms

100 hours @ \$75 per hour = \$7,500

SEP Application Form Collection Costs

Approximately 2 hours per form to review completeness, corresponding with applicant to clarify submission, conduct technical review to determine readiness for SEP certification audit, and facilitate interaction with SEP Verification Body.

100 forms submitted per year

200 hours per year to review and process SEP Application Form

200 hours @ \$75 per hour = \$15,000

SEP Energy Performance Improvement Report Costs

Approximately ½ hour per report to conduct recordkeeping and track certification cycle

100 forms submitted per year

50 hours per year to collect implementation data from host plant

50 hours @ \$75 per hour = \$3,750

SEP Voluntary Costs/Benefits Form

Approximately 2 hours per form

75 forms per year

150 hours per year to collect and review annual reports (approximately ½ hour per report)

150 hours @ \$100 per hour = \$15,000

Data Management for Superior Energy Performance collection database, once built

144 hours per year to store the data in a centralized database and manage the database (approximately 12 hours per month). Estimate based on similar databases.

144 hours @ \$100 per hour = \$14,400

Therefore, total costs to the Federal government for these collection efforts will be \$41,250.

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

Not applicable. This supporting statement is related to a new collection request.

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

Information collected through this effort will be used to publicize the achievements, efforts, and strategies of SEP-certified facilities via the program's websites as a means to encourage other organizations to learn from their successes and adapt their implementation models to achieve similar improvements in energy performance. SEP participants are asked to voluntarily share information, such as completing the SEP cost-benefits form, to allow DOE to create public case studies about a facility's SEP implementation experience. For all SEP certified facilities, the following information from the SEP Energy Performance Improvement Report will be publicized through mediums such as the DOE website to recognize the achievements of the certified facilities:

1. Facility name
2. Facility location (city, state)
3. Verified Achievement Level (e.g., Silver, Gold, or Platinum)
4. Verified Reporting Period Energy Performance Improvement
5. Certification date (month/year)

Beyond the public information shared about specific SEP certified facility results, DOE will use information from four SEP program forms submitted to DOE: Enrollment Form, Application Form, SEP Energy Performance Improvement Form, and SEP Voluntary Cost-Benefit Form. The information collected in all four forms may be used internally by DOE to produce high-level summaries and analyses of aggregated data of the SEP program, including determining the SEP program wide energy savings, estimating the costs and benefits of implementing SEP to the facility, and developing strategies to increase program participation. Results of the analyses and summaries may be published at industry conferences, publications, and the DOE website. However, aside from the 5 items listed above, no information that could potentially relate the data to a specific facility will be published. Further, raw data will not be published.

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

On all four SEP program forms requested to be completed by the end user or SEP Verification Body, the following statement will be provided to disclose the information that will be disclosed publicly and how DOE will protect confidential business information:

“DOE maintains the confidentiality of proprietary energy and production related data as proprietary that is submitted to the Superior Energy Performance (SEP) program by SEP certified facilities, to the fullest extent of the law. Data included within the SEP Enrollment and Application forms, SEP Energy Performance Improvement Report and SEP Voluntary Cost Benefit Form will not be released publicly. DOE will make public the following information about each SEP certified facility:

1. Facility name
2. Facility location (city, state)
3. Verified Achievement Level (e.g., Silver, Gold, or Platinum)
4. Verified Reporting Period Energy Performance Improvement
5. Certification date (month/year)

DOE will, from time-to-time, publicly share aggregate, program-wide metrics, such as number of SEP certified plants, and annual and cumulative SEP program energy savings.

All data provided to DOE is subject to the Freedom of Information Act (FOIA), however, DOE will notify partners if a FOIA request has been submitted for which their data might be responsive. DOE will consult with the partner and ensure the partner has an opportunity to inform DOE what data they view is proprietary. DOE will review the partner’s suggestions and will not release to the public any data DOE deems proprietary.”

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

DOE is not seeking approval to not display the expiration date for OMB approval of the information collection.

**18. Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.