

**INFORMATION COLLECTION REQUEST  
for  
GREEN POWER PARTNERSHIP AND COMBINED  
HEAT AND POWER PARTNERSHIP**

**EPA ICR NUMBER 2173.06**

**OMB CONTROL NUMBER 2060-0578**

April 22 2015

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## **EXHIBITS**

### **ATTACHMENT A: Green Power Partnership Respondent Burden for Years 1 through 3**

A-1 Green Power Partnership Private Sector Respondent Burden for Year 1

A-2 Green Power Partnership Private Sector Respondent Burden for Year 2

A-3 Green Power Partnership Private Sector Respondent Burden for Year 3

A-4 Green Power Partnership Local & State Government Respondent Burden for Year 1

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C-1 Green Power Partnership Agency (EPA) Burden for Year 1

C-2 Green Power Partnership Agency (EPA) Burden for Year 2

C-3 Green Power Partnership Agency (EPA) Burden for Year 3

### **ATTACHMENT D: CHP Partnership Agency (EPA) Burden for Years 1 through 3**

D-1 CHP Partnership Agency (EPA) Burden for Year 1

D-2 CHP Partnership Agency (EPA) Burden for Year 2

D-3 CHP Partnership Agency (EPA) Burden for Year 3

## **SUPPORTING STATEMENT A**

### **1. IDENTIFICATION OF THE INFORMATION COLLECTION**

#### **1(a) Title and Number of the Information Collection Request**

Reporting Requirements under EPA's Green Power Partnership (GPP) and Combined Heat and Power (CHP) Partnership (Renewal) EPA ICR No. 2173.06, OMB Control No. 2060-0578.

#### **1(b) Short Characterization/Abstract**

In 2002, EPA launched two new partnership programs with industry and other stakeholders: the Green Power Partnership (GPP) and the Combined Heat and Power Partnership (CHPP). These voluntary partnership programs encourage organizations to invest in clean, efficient energy technologies, including renewable energy and combined heat and power. To continue to be successful, it is critical that EPA collect information from GPP and CHPP Partners to ensure these organizations are meeting their renewable energy and CHP goals and to assure the credibility of these voluntary partnership programs.

EPA has developed this ICR to obtain authorization to collect information from organizations participating in the GPP and CHPP. Organizations that join these programs voluntarily agree to the following respective actions: (1) designating a GPP or CHPP liaison and filling out a Partnership Agreement or Letter of Intent (LOI) respectively; (2) for the GPP, reporting to EPA, on an annual basis, their progress toward their green power commitment via a 2-page reporting form; (3) for the CHPP, reporting to EPA information on their existing CHP projects, new project development and other CHP-related activities. EPA uses the data obtained from its Partners to assess the success of these programs in achieving their national energy and greenhouse gas (GHG) reduction goals. Partners are organizational entities that have volunteered to participate in either Partnership program.

Finally, GPP partners that wish to receive additional recognition for their effort in green power use and promotion may submit an application for the Green Power Leadership Award.

### **2. NEED FOR AND USE OF THIS COLLECTION**

#### **2(a) Need/Authority for the Collection**

Section 103(a) of the Clean Air Act authorizes EPA to establish "a national research and development program for the prevention and control of air pollution." As part of such a program,

EPA is to “conduct and promote the coordination and acceleration of research, investigations, experiments, demonstrations, surveys, and studies relating to the causes, effects (including health and welfare effects), extent, prevention and control of air pollution.” Section 103(a) (1).

In addition, as a component of the program, section 103(g) directs the Administrator to “conduct a basic engineering research and technology program to develop, evaluate, and demonstrate non regulatory strategies and technologies for air pollution prevention.” The section calls on the Administrator to provide opportunities for industry, public interest groups, scientists, and other interested persons to participate in strategy development. Section 103(g) further directs EPA to include as elements in the program “improvements in non-regulatory strategies and technologies for preventing or reducing multiple air pollutants including sulfur oxides, nitrogen oxides, heavy metals, PM-10 (particulate matter), carbon monoxide, and carbon dioxide...” The strategies and technologies are to improve various air pollutant reduction and non-regulatory control strategies, including clean energy programs.

The Green Power Partnership and the Combined Heat and Power Partnership programs are part of the Administrator’s response. EPA needs to collect the information in the Partnership Agreement or LOI to formally establish participation in the GPP or CHPP program and to obtain general information about new Partners. Additional information collected through information forms is needed to allow EPA to track Partner progress toward meeting their commitments, and to enable the programs to facilitate and provide assistance to encourage green power purchases and the implementation of CHP projects, and to determine progress in meeting the programs’ national energy and GHG reduction goals. This information collection will assist the GPP in increasing demand for the use of qualifying renewable energy sources for power generation thereby reducing GHG emissions. The information will also help the CHPP to increase the use of more efficient, cleaner power generation and reduce GHG emissions.

Participation in the GPP and CHPP is voluntary. Program participants agree to provide EPA with the requested information. This information collection is designed to support and ensure the success of GPP AND CHP as a non-regulatory strategy for reducing greenhouse gas emissions

## **2(b) Practical Utility/Users of the Data**

EPA uses the information submitted in the Partnership Agreement or LOI to update its databases of GPP or CHPP Partners. The databases serve as a source of general information and

a contact list. EPA uses the information submitted in additional forms to monitor the progress of current participation and projects and identify new opportunities. EPA also uses the data to prepare reports on GPP and CHP projects and progress as well as to determine the GHG reductions achieved by the programs. EPA uses case studies of successful CHP projects to demonstrate to existing and potential Partners the cost savings and environmental benefits associated with more efficient energy production through CHP projects. General information on the Partners, green power, and CHP is also provided on the respective Web sites, making it available to other Partners as well as the public.

### **3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA**

#### **3(a) Non duplication**

For new Partners, the information to be collected has not previously been collected by EPA or any other Federal Agency. Existing GPP Partners provide updates to existing information through a Partner Yearly Report. Existing CHPP Partners with ongoing CHP project development activities review and update a CHPP Partners Project Data Form every year. Some CHPP Partners, such as certain end-users and city/state programs, have no annual reporting requirements.

For existing Partners with both programs, some of the information required is available in the existing databases from previous submittals. To avoid requesting information that has already been collected, forms sent to existing Partners are pre-populated with previously submitted information from the database. Recipients of the forms are asked to review the information provided. Only if the information is incorrect or out of date will the recipients be required to provide updated or additional information. To further reduce burden, EPA provides CHPP Partners who have ongoing project development activities with a simple spreadsheet of previously submitted project data that they can review and revise electronically rather than filling out a form.

#### **3(b) Public Notice Required Prior to ICR Submission to OMB**

In 2015, EPA will be soliciting public comments on the ICR through an announcement in the Federal Register contained in docket number EPA-HQ-OAR-2004-0501. EPA received one letter of support in response to the Federal Register proposed ICR posting.

#### **3(c) Consultations**

In 2015, EPA consulted with five GPP partners and three CHPP partners regarding the burden of information collection for the programs, as the agency did in 2004, 2008, and 2011. EPA followed the same consultation procedures as was conducted in 2004, 2008, and 2011.

In 2015, EPA consulted with five GPP Partners (three for general GPP programs, two for Green Power Leadership awards) and three CHPP Partners regarding the burden of this information collection. The contacted Partners were provided copies of the information collection forms, estimates of the labor burden derived from Partners responses in 2011, and labor wage rates from the Bureau of Labor Statistics (BLS). EPA requested comments on whether the labor burden estimates and labor rates were appropriate. Generally, the estimates provided by the Partners were similar and were consistent with the estimates provided by EPA. EPA averaged Partner responses for the labor burden estimates and labor rates for use in this ICR renewal.

### **3(d) Effects of Less Frequent Collection**

The Partnership Agreement or LOI are submitted once by organizations that choose to become Partners of the GPP or CHPP. To allow EPA to remain current on Partner participation and determine if green power purchase commitments are being met, GPP Partners will be asked to update an annual report. All CHPP Partners with ongoing project development activities, including all project developers, energy service companies, consulting engineers, equipment manufacturers, and approximately 33% of utility Partners will review their project information and provide updates every year. These differences in reporting requirements reflect the varying dynamics of the data contained in the reports for the different subcategories of Partners. Partners of both programs may also update company and contact information periodically via the respective partnership Web sites. EPA believes that any reduction in the frequency of this information collection would impede efforts by EPA to evaluate results of the programs, facilitate green power purchases and CHP project implementation, and respond in a timely manner to needs of the Partners.

### **3(e) General Guidelines**

This information collection request was prepared in compliance with OMB's and EPA's guidelines for ICR preparation.

### **3(f) Confidentiality**

Participation in the GPP and CHPP is voluntary. Participants are not asked to reveal Confidential Business Information (CBI). Additionally, participants will be given specific instructions not to provide any information that they consider confidential.

**3(g) Sensitive Questions**

No questions of a sensitive nature are asked in any of the forms or periodic information updates.

**4. THE RESPONDENTS AND THE INFORMATION REQUESTED**

**4(a) Respondent NAICS/SIC Codes**

This information collection will encompass a wide variety of respondents with most respondents specific to either the GPP or CHPP.

**(i) GPP Respondent NAICS/SIC codes**

The GPP Partners consist of company, institutional, and public sector organizations that pledge to purchase a proportion of their annual purchased electricity use from eligible renewable energy resources through one of three purchasing options. Companies include both service and goods providing industries, institutions are comprised of institutes of higher education and NGOs, and public sector Partners are local, state, or federal level government agencies.

NAICS	SIC	Description
<b>Full-scale Partners <sup>a</sup></b>		
611310	8221	Colleges, Universities, and Professional Schools
722110	5812 5461	Restaurants
423390	5093	Automobile Manufacturing
445110	5411	Grocery Stores
323110	2752	Print shops
621111	8093	Offices of Physicians
924	9511	Public Administration of Environmental Quality Programs
92411	9631	Public Administration of Air and Water Resource and Solid Waste Management Programs
928110	9711	Military bases and camps
927110	9661	Public Administration of Space Research and Technology

<sup>a</sup> Given the breadth of industries who are currently GPP Partners, only a subset of their NAICS/SIC codes is listed to provide examples.

**(ii) CHPP Respondent NAICS/SIC codes**

The CHPP classifies its Partners into ten categories. State, Local and Tribal Partners include state and local energy, environmental, and economic development agencies who will promote CHP development in their area. The remaining nine categories are included in the commercial and institutional Partner group. End-user Partners are comprised of a broad range of industrial, commercial, or institutional organizations who utilize CHP technology to provide heat



and electricity at their facilities. Equipment suppliers are involved in the manufacturing, supplying, or installation of CHP-related products. Other Partner categories can be classified as CHP project promoters and facilitators who work to create new CHP projects. These Partners include energy services companies (ESCOs), attorneys, CHP project developers, non-government organizations (NGOs), financiers, and engineering consultants. Utility Partners work to provide end-users with fuel for their CHP projects or work to distribute electricity from CHP sources. The following list provides the most common NAICS/SIC codes for the various different types of CHPP Partners:

<b>NAICS</b>	<b>SIC</b>	<b>Description</b>
<b>State/Local/Tribal Partners</b>		
92613	9631	Public Administration, Regulation and Administration of Communications, Electric, Gas, and Other Utilities
926130	9631	Public Administration, Energy development and conservation programs
9611	9611	Public Administration of General Economic Programs
924	9511	Public Administration of Environmental Quality Programs
<b>Equipment Manufacturers</b>		
333611	3511	Turbine and turbine generator manufacturing
335999	3699	Fuel cells, electrochemical generators, manufacturing
541512	7373	Information management computer systems integration design services
541614	8742	Manufacturing operations improvement consulting services
<b>CHP project promoters and facilitators</b>		
541110	8111	Offices of Lawyers
541690	8999	Energy consulting services
541330	8999	Engineering consulting services
523910	6153 6211 6799	Financial Investments and Related Activities, Miscellaneous Intermediation
<b>Utilities</b>		
221122	4911	Electric Power Distribution
221210	4923	Natural Gas Distribution
<b>End-Users<sup>a</sup></b>		
325415	2834	Pharmaceutical Preparation Manufacturing
611310	8221	Colleges, Universities, and Professional Schools
322121	2611 2621	Pulp and Paper Mills (Except Newsprint Mills)
336111	3711	Automobile Manufacturing
813110	8661	Religious Organizations
331111	3317	Steel Mills

<b>NAICS</b>	<b>SIC</b>	<b>Description</b>
721110	7011	Hotels (Except Casino Hotels) and Motels

<sup>a</sup> There is a wide variety of entities that could install CHP projects and become CHP end users. Any facility with a demand for both electricity and thermal energy (i.e., steam, heating, or cooling) during most of the year and with access to fuels is a potential candidate for a CHPP end-user Partner. For this reason, only a subset of the end-users is listed to provide examples.

#### **4(b) Information Requested**

##### **(i) Data Items, Including Recordkeeping Requirements**

**GPP**. Information will be collected through the Partnership Agreement, Partner Yearly Report, and the Green Power Leadership Awards application, as well as through clarification follow-ups and calls or e-mails as needed. Each activity is described below.

The Partnership Agreement requests the following information from all Partners:

- Organization name;
- Scope of entity/entities joining Partnership;
- Total purchased electricity use and green power purchase commitment;
- Signature and printed name and title of authorized organization representative;
- Contact information about the organizational liaison to the GPP, including name, title address, phone number, fax number and e-mail address;
- Purchase details such as retailer name, the type of green power product delivered (utility product, renewable energy certificates, or on-site generation), type of renewable resource; and
- Questions about product certification status and contract dates.

The GPP Partner Yearly Reports collect or update the following information:

- Updates to liaison information listed above;
- Updates to commitment details, including total annual energy consumption, annual green power commitment;
- Updates purchase details such as retailer name, the type of green power product delivered (utility product, renewable energy certificates, or on-site generation), type of renewable resource;
- Updates to product certification status and contract dates; and
- Short paragraph description of Partner's Green Power Commitment.

The GPP Green Power Leadership Awards collects information from all interested Partners interested in being further recognized for their green power purchasing and promotion activities:

- Identification of the type of award category;
- Partner's contact information and Communications point of contact;
- Confirmation of eligibility;
- Partner's Green Power usage update;
- Short paragraph description of Partner's Green Power Commitment; and
- Description of outreach communication activities;

A company profile is made available on the GPP Web site. Partners may submit corrections or updates to their profile via the Web site or electronically at any time. EPA will also place follow-up calls to clarify any unclear information submitted by Partners.

Occasionally, EPA may request technical information in addition to the standard forms. This information will be requested on a voluntary basis from a subset of GPP Partners. For instance, information may be requested from the twenty-five largest green power purchasers in order to feature them on the GPP Web site. Requested information may also be used to target communications and outreach efforts more effectively.

**CHPP.** Information will be collected through the LOI and the CHPP Partners Project Data Form, as well as through clarification follow-up calls or e-mails as needed. The LOI requests the following information from all new Partners:

- Organization name;
- Designated CHPP Partner Liaison's contact information;
- Organization CHP-related service or activity; and
- Organization web site address and/or CHP-related Web page.

CHPP Partners Project Data Forms are used to collect information on completed or planned CHP projects on a yearly basis, and will be completed by company or institutional Partners involved in planned or operational CHP projects. The requested information includes:

- Project Owner;
- Project Name and address;

- Project information including start-up date, fuel type, annual operating hours, average net power output, percentage of electricity sold offsite or to grid and percentage of thermal output sold offsite;
- List of each prime mover, including size, fuels and emission controls;
- Types and applications of thermal output;
- Contact information including the company name, contact name, phone number and date submitted; and
- Project team information including the engineer, prime contractor, project developer and thermal host.

After the first submittal, EPA will send the Partner spreadsheets containing all previously-submitted information on planned projects for the Partner to review annually.

A company profile and contact information will be available on the CHPP Partnership Web site. Partners may submit corrections or updates via the Web site at any time. EPA will also place follow-up calls to clarify any unclear information submitted by Partners.

Participation in GPP and CHPP does not require any records to be kept, although Partners will likely keep file copies of the LOI and CHPP Partner Projects Data information forms submitted to EPA.

The Partnership Agreement form will be updated by removing the approval expiration date, which is currently located in the top right corner of the form.

The Partnership Agreement form statement regarding the one year length of time the green power purchase must be completed by will be updated to read as follows: "Buy green power that meets or exceeds Partnership requirements within six months of signing this Partnership Agreement."

**(ii) Respondent Activities**

The respondent activities depend on the aspect of the information collection to which they are responding. In completing the Partnership Agreement or LOI, respondents will:

- Review the form;
- Complete the form;
- Sign and submit the form electronically or via fax or mail to EPA; and
- File a copy of the form.

In completing the pre-populated GPP Partner Yearly Report or the pre-populated CHPP Partner Projects Data Form, respondents will:

- Read the forms and instructions;
- Update the pre-populated report or form with new information where necessary;
- Submit the yearly report (or CHP project spreadsheet) electronically or via fax or mail to EPA; and
- File a copy of the form.

In completing the awards application, respondents will:

- Read the forms and instructions;
- Complete the form;
- Sign and submit the form electronically or via fax or mail to EPA; and
- File a copy of the form.

In replying to or initiating an information update or clarification, respondents will:

- Gather information, and provide information to the GPP or CHPP via the Web site, an e-mail, or a telephone interview.

## **5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT**

### **5(a) Agency Activities**

#### ***(i) Agency Activities for the GPP's Partnership Agreements and CHPP LOIs***

Agency activities associated with this information collection depend on the aspect of the information collection that the Agency has received. In receiving the Partnership Agreement or LOI for either the GPP or CHPP, the Agency will:

- Review the information provided;
- Enter the information into a database; and
- File the form.

#### ***(ii) Agency Activities for GPP***

Agency activities specific to the GPP will depend on the types of activities the Agency will initiate and receive. In requesting and receiving the information through a Partner Yearly Report Form sent to Partners one year after they join the Partnership and annually thereafter, the Agency will:

- Prepare pre-populated partner data and mail the Partner Yearly Report annually;
- Receive and review the information provided on completed forms;
- Enter the information into a database; and
- File the form.

In initiating information updates and follow-ups, the Agency will:

- Call or email Partners;
- Request updated information or clarification on Partnership Agreements or Partner Yearly Report Forms by telephone or e-mail;
- Request additional technical information, as needed, from a subset of GPP Partners; and
- Revise data in the database based on these updates.

In receiving the information for the GPP Green Power Leadership Awards, the Agency will:

- Prepare the annual update to the Awards application and post it on the program's website.
- Announce the awards application period through a series of outreach mechanisms, email blasts, tweets, announcements in newsletters, and announcements in other program engagements.
- Receive and review the information provided on completed forms;
- Enter the information into a database;
- Review and Rank the applications based on posted criteria,
- Conduct compliance screen of proposed awardees, and
- File the form.

In initiating information updates and follow-ups, the Agency will:

- Call or email Partners;
- Request updated information or clarification on award forms by telephone or e-mail;
- Request additional technical information, as needed, from a subset of GPP Partners; and
- Send a letter of award or loss to applicant.

In receiving information updates via the Web site, the Agency will:

- Review the data received through the GPP Web site; and
- Revise data in the database based on the updates.

**(iii) Agency Activities for CHPP**

Agency activities specific to the CHPP will also depend on the types of activities the Agency will initiate and receive. In requesting and receiving the information on CHP projects through an information form sent to Partners within the same year they join the Partnership, the Agency will:

- Prepare and e-mail the CHPP Partner Projects Data Forms;
- Receive and review the information provided on completed forms;
- Enter the information into a database; and
- File the form.

In requesting and receiving information on ongoing project development activities through a CHP project spreadsheet already populated with information provided on a Partner's initial project reporting form or most recent project spreadsheet, the Agency will, once a year:

- Populate the Partners' spreadsheets with the project information from the most recent project forms or spreadsheets, which is contained in the CHP project database;
- Email the pre-populated spreadsheets to the appropriate Partners;
- Receive and review any updates provided from the Partner on the spreadsheet;
- Enter updated information from the spreadsheet into a database; and
- File the spreadsheet.

In initiating information updates and follow-ups, the Agency will:

- Call or email Partners;
- Request updated information or clarification on CHPP Partner Projects Data Forms; and
- Revise data in the database based on the updates.

In receiving information updates via the Web site, the Agency will:

- Review the data received on the CHPP Web site; and
- Revise data in the database based on the updates.

## **5(b) Collection Methodology and Management**

The methods selected for this information collection are chosen based on efficiency and minimization of burden for respondents and EPA. The respective Partnership Agreement and LOI can be downloaded from the appropriate Web site and returned to EPA either by fax or mail, or submitted electronically. General Partner information will be posted on the GPP or CHPP Web site where it can be reviewed for accuracy by the Partners and revised if necessary. Information forms will be available for Partners electronically on each Web site and can be returned by fax, mail, or e-mail. In addition, the GPP will send pre-populated Yearly Reports to Partners each year containing the information previously submitted. Partners need only review the information for accuracy and submit any updates, thus minimizing the burden of the respondents. To further reduce burden, EPA will provide CHPP Partners who have ongoing project development activities with a simple spreadsheet of previously submitted project data that they can review and revise electronically rather than filling out a form. The Green Power Leadership award application can be downloaded from the GPP Web site and returned to EPA either by fax or mail, or submitted electronically. All information received through the forms (electronically or via hard copy) will be reviewed by EPA before being entered into the database.

## **5(c) Small Entity Flexibility**

EPA expects that some GPP Partners and CHPP Partners are small entities. EPA has designed its approach for this information collection to minimize burden for all respondents while obtaining sufficient and accurate information. The data requested includes only the most critical information and may be submitted electronically. As discussed above, for both Partnership programs EPA pre-populates Yearly Report forms or spreadsheets with information previously submitted to avoid duplication of effort and minimize the burden for respondents. Additionally, participation in GPP and CHPP is voluntary. Any small entity that finds the information collection overly burdensome is not required to participate.

EPA expects that some GPP partners are small entities. GPP determined whether Local Government Partners are small entities based on the population served by these government agencies. Approximately 30 percent of existing Local Government Partners are in cities or counties with populations less than 50,000, which is the threshold for small entities within the public administration sector. GPP assumed that all State Government Partners are not classified as small entities, since each State population is greater than 50,000. Likewise, GPP assumed that all Federal Government Partners are not small entities.



Given the large number of private sector GPP partners, EPA was not able to review the small entity status of each Partner individually. GPP assumed that all companies on Fortune magazine's list of the top 1,000 U.S. companies by revenue are not small entities. GPP also assumed that all non-profit organizations are classified as small entities. For the remaining private sector Partners, GPP determined the small entity status of a portion of Partners, following the U.S. Small Business Administration's 2007 Table of Small Business Size Standards Matched to North American Industry Classification System Codes. GPP reviewed company profiles and Web sites when available to help determine the selected company's small entity status. GPP then compared the company's small entity status to their total electricity use, a figure which EPA collects for all Partners.

Using this information, EPA determined an approximate electricity base load under which a company could reasonably be considered a small entity. This base load was different for companies in manufacturing industries than for companies in non-manufacturing industries. The companies whose small entity status was not determined were assumed to follow a similar correlation to those reviewed. Following this assumption, EPA estimates that 65 percent of its private sector Partners are small entities. Overall, 60 percent of all GPP Partners are estimated to be small entities.

EPA has designed its approach for this information collection to minimize the burden for all respondents while obtaining sufficient and accurate information. Since the previous ICR, GPP has strived to lessen the reporting burden on Partners by introducing reporting efficiencies, such as a writeable Portable Document Format (PDF) version of the Partnership Agreement that improves readability, and thereby reduces the frequency of Agency follow up with Partners.

EPA expects that some CHPP Partners are small entities. The CHPP consists of the following partner categories: project developer; consultant/engineering; energy service company (ESCO); financier; utility; non-governmental organization (NGO); government; equipment manufacturer; and end-user. The CHPP assumed that all utilities, government partners, equipment manufacturers, and end-users are not small businesses. Companies of these partner types are large in scale and scope and are most likely not small businesses.

The CHPP assumed that all NGO partners are small businesses given they typically have a small number of employees and typically do not work for profit.

For project developer partners, the CHPP reviewed Web sites and organization descriptions for 25 percent of the partners. The companies whose Web sites were not reviewed

were assumed to contain a similar percentage of small businesses to those reviewed. For the 25 percent of partners reviewed, the CHPP also evaluated the number of projects developed by these partners as an additional gauge of whether the project developer is a small business or not. In most cases, if the project developer reviewed by the CHPP had zero projects, it was assumed to be a small business. The CHPP estimates that 20 percent of the project developer partners are small businesses.

For consultant/engineer partners, the CHPP reviewed Web sites and organization descriptions for 25 percent of the partners. The companies whose Web sites were not reviewed were assumed to contain a similar percentage of small businesses to those reviewed. For the 25 percent of partners reviewed, the CHPP also evaluated the number of projects developed by these partners as an additional gauge of whether the consultant/engineer is a small business or not. In most cases, if the consultant/engineer reviewed by the CHPP had zero projects, it was assumed to be a small business. CHPP estimates that 23 percent of the consultant/engineer partners are small businesses.

For ESCO partners, the CHPP reviewed Web sites and organization descriptions for all of the partners. CHPP estimates at 15 percent of the ESCO partners are small businesses.

For financier partners, the CHPP reviewed Web sites and organization descriptions for all of the partners. CHPP estimates at 18 percent of the financier partners are small businesses.

Table 1 summarizes the small entities affected per year according to partner category. The numbers in Table 1 reflect the CHPP’s assumption that the distribution of small entities within each new partner category over the years 2009-2011 will be similar to the distribution analyzed for each existing partner category.

**Table 1: CHPP Estimate of Small Entities for Each Respondent Category**

<b>Respondent Category</b>	<b>New</b>	<b>Existing</b>
Project Developer*	4	12
Consultant/Engineer*	5	12
ESCO**	0	1
Financier**	0	2
NGO**	0	19
Utility*	0	0
Government*	0	0
Equipment Manufacturer*	0	0
End-User*	0	0
<b>Total</b>	<b>9</b>	<b>46</b>

\* The CHPP ICR burden estimate assumes the following number of new partners for each of the years 2009-2011: project developer – 7; consultant/engineer –7; utility – 6; government – 2; equipment manufacturer – 6; end-user – 6

(Note: the CHPP assumed that none of the existing or new utility, government, equipment manufacturer, or end-user partners are small businesses).

\*\* The CHPP ICR burden estimate assumes that there will be no new ESCO, financier, or NGO partners in years 2009-2011.

#### **5(d) Collection Schedule**

EPA will collect general information from all new Partners through either the GPP's Partnership Agreement or CHPP's LOI, which is completed and submitted by each Partner upon their agreement to participate in the program. In addition, GPP Partners will be asked to complete a Partner Yearly Report on an annual basis on the anniversary of EPA's receipt of the Partner's last information update. In addition, a subset of GPP Partners may occasionally be asked to provide additional information specific to their industry sector or to an aspect of the GPP program. Annually, EPA announces the application schedule for the Green Power Leadership Awards. Company and institutional CHPP Partners with operational projects will fill out a Partner Projects Data Form one time for each operational project. Certain CHPP Partners with ongoing project development activities will be asked to review and update a project data spreadsheet every year.

### **6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**

#### **6(a) Estimating Respondent Burden**

In 2015, EPA consulted with eight Partners (respondents) from the GPP and the CHPP to obtain accurate hourly burden and cost estimates. These responses were averaged to estimate the hourly burden for each activity and the labor rates. In consulting with Partners, EPA provided them with hourly burden estimates from the last submitted ICR, as well as current labor rates from the Bureau of Labor Statistics. Respondents were asked if the hourly burden estimates and labor rates were appropriate and, if not, to provide estimates based on their experience.

The hourly burden for each activity was multiplied by the number of Partners (respondents) performing the activity each year to estimate the total respondent burden. In accordance with the Paper Reduction Act, Federal Partners were excluded from the burden estimate although we summarize their burden in Table 5. Capital, operation and maintenance costs were also considered. Attachment A presents the estimated annual respondent burden and costs for information collection activities associated with the GPP for each year of the collection. Attachment A and Table 5 include burden estimates for Federal entities in the GPP, but these are not included as part of this Information Collection Request. Attachment B presents the estimated annual respondent burden and costs for information collection activities associated with the CHPP

for each year of the collection. Table 3 in Section 6(e) of this supporting statement presents a summary of the overall respondent burden for both the GPP and CHPP for each of the three years as well as the total burden and the annual average burden.

**6(b) Estimating Respondent Costs**

**(i) Estimating Labor Costs**

Respondent labor rates came from direct consultations with GPP Partners and CHPP Partners, as discussed in section 6(a). For GPP Partners, the base rates are \$53.94 for legal staff, \$44.07 for managerial staff, \$40.92 for technical staff, and \$19.13 for clerical staff. These loaded rates are \$143.84 for legal staff, \$117.52 for managerial staff, \$109.12 for technical staff, and \$51.01 for clerical staff. For CHPP Partners, the base rates are \$71.15 for legal staff, \$63.47 for managerial staff, \$47.74 for technical staff, and \$25.34 for clerical staff. The loaded rates are \$189.73 for legal staff, \$169.25 for managerial staff, \$127.31 for technical staff, and \$67.57 for clerical staff.

For public sector respondents (Local and State Partners), EPA used the same labor rates used for EPA personnel (see Section 6(c)). The Labor rates for management staff of public-sector respondents were used to represent labor rates for legal staff of public-sector respondents.

**(ii) Estimating Capital and Operations and Maintenance Costs**

Because this information collection requires respondents only to report information that is already available to them, there are no capital costs. EPA does not expect that the operations and maintenance (O&M) costs of these programs will be significant. The only O&M costs expected are for postage required to return any completed forms, long distance fax charges if the forms are faxed instead of mailed, and costs to copy the forms if Partners wish to retain them on file. A submittal cost of \$3 is attributed to all activities involving mailing materials to account for the use of traceable mail or long distance fax and copying. If Partners choose to submit forms electronically, their costs will be lower than estimated. The average annual O&M cost over three years is \$7,695.

**6(c) Estimating Agency Burden and Costs**

Attachments C and D present the estimated Agency burden hours and costs for the information collection activities associated with GPP and CHPP, respectively. Table 2 presents a summary of the Agency burden for both programs and the total burden. EPA estimates an average hourly labor cost (labor plus 60% for overhead) of \$88.30 for managerial staff, \$56.04 for technical staff, and \$21.46 for clerical staff. To derive these estimates, EPA used the “Salary

Table 2015 - GS Salary Table of Annual Rates by Grade and Step” dated January 2015, from the Department of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

- Managerial Staff - GS-15, Step 5 \$88.30 (\$55.19 +60% OH)
- Technical Staff - GS-13, Step 1 \$56.04 (\$35.03+60% OH)
- Clerical Staff - GS-5, Step 1 \$21.46 (\$13.41+60% OH)

**Table 2: Summary of Agency Burden**

	2016	2017	2018	Total	Annual Average
Hours	3,806	4,208	4,947	12,961	4,320
Cost	\$201,811	\$222,237	\$261,739	\$685,787	\$228,596

**6(d) Estimating the Respondent Universe**

**GPP.** A total of 1,571 GPP Partners is expected by the end of 2015. These are broken out as 1,339 from the private sector, 202 from local and state governments, and 30 from Federal Government. EPA expects future growth to be constant since the number of Partners that have joined in the past few years has been steady. EPA anticipates that 250 new Partners will join the program each year in 2016, 2017, and 2018. Of these new 250 Partners joining each year, EPA expects that 219 will be from the private sector, 27 from local and state governments, and 4 from Federal Government as is consistent with the Partnership’s current makeup. Each new Partner is required to complete and submit a Partnership Agreement form, and all participating Partners are expected to fill out or update the Partner Yearly Report, starting the year after they join. Only a small percentage of GPP partners apply for the Green Power Leadership awards, EPA expects that only 4% of the current eligible partners will apply for the Green Power Leadership awards.

The average annual number of respondents over three years is 2,030. The number of respondents in each of the three years of this information collection and the average over the 3-year period is shown in Table 3 in Section 6(e) of this supporting statement.

**CHPP.** A total of 475 Partners is expected by the end of 2015. EPA anticipates 30 new Partners will join the program each year in 2016, 2017, and 2018. Of these new respondents, it is assumed that there are 6 to 7 new Partners per year in each of the following categories: end-users, project developers, consulting engineers, equipment manufacturers, and utilities, with up to an additional two Partners belonging to State/Local/Tribal governments per year. Each of the new Partners is expected to fill out an LOI. All of the new end-users, project developers, consulting

engineers, and equipment manufacturers and 33% of new utility Partners will complete the CHPP Partner Projects Data Form within the same year they join the Partnership. New State/Local/Tribal Agency Partners do not fill out project forms. All of the existing project developers, ESCOs, consulting engineers and equipment manufacturers, and 33% of the existing utilities will continue to review their project information and provide updates every year in a project spreadsheet starting in the year they join the Partnership.

The average annual number of respondents over three years is 535. The number of respondents in each of the three years of this information collection and the average over the 3-year period are shown in Table 3.

#### **6(e) Bottom Line Burden Hours and Costs**

**GPP.** Attachments A and C show the detailed annual burden and cost to respondents and the Agency, respectively, for the information collection activities associated with GPP. The results are summarized in Tables 3 and 4. The total annual burden, averaged over the three-year period, is 4,132 hours and \$460,820 per year for respondents and 2,676 hours and \$136,161 per year for the Agency. (See Tables 3 and 4 for these average numbers.) The bottom line burden for respondents will be the least in year 1 and will gradually increase in years 2 and 3. This is because there are more Partners responding in years 2 and 3. The burden per respondent is similar in all 3 years. In years 1, 2, and 3, new Partners will complete a Partnership Agreement. In years 1, 2, and 3, existing Partners will update information in the Partner Yearly Report Form as needed. After the first submittal, EPA will provide the information previously submitted by existing Partners and only ask for updates. In years 1, 2, and 3, only a small subset of new and existing Partners will submit an application for the Green Power Partnership awards. Similarly, the Agency burden is the least in year 1 and will gradually increase in years 2 and 3 as EPA has more information submittals to review and enter into the database. See Tables 3 and 4 for respondent and Agency burdens in each of the three years.

Table 5 summarizes the total annual respondent burden for Federal Partners, although these are not included in Table 3 since, in accordance with the Paperwork Reduction Act, Federal respondents are excluded from Information Collection Requests. The total annual burden for Federal Partners, averaged over the three-year period, is 38 hours and \$8,088 per year.

**CHPP.** Attachments B and D show the detailed annual burden and cost to respondents and the Agency, respectively, for the information collection activities associated with CHPP. The results are summarized in Tables 3 and 4. The total annual burden, averaged over the three-year period is 2,492 hours and \$361,639 for Partners, and 1756 hours and \$99,336 for the Agency. (See Tables 3 and 4 for these average numbers). The bottom line burden for respondents will be the least in year 1 and will gradually increase in years 2 and 3. This is because there are more Partners responding in years 2 and 3. The burden per respondent is similar in all 3 years. In years 1, 2, and 3, new Partners will complete an LOI. If a new Partner has direct involvement in CHP projects, they will submit project forms in the year they join. In years 1, 2, and 3, existing Partners will be updating information only as needed. For Partners with ongoing project development activities, EPA will provide the information previously submitted by the existing Partners in a spreadsheet and only ask for updates. Similarly, the Agency burden is the least in year 1 and will gradually increase in years 2 and 3 as EPA has more information submittals to review and enter into the database. See Tables 3 and 4 for the respondent and Agency burdens in each of the three years.

The CHPP has no Federal Partners so no burden is calculated in Table 5.

**Total.** Considering both the GPP and the CHPP, the combined total annual burden (averaged over a 3-year period) is 6,624 hours and \$822,459 per year for respondents and 4,432 hours and \$235,497 per year for the Agency. Tables 3 and 4 show the breakout between labor costs. The burden estimates reflect an average of 2,565 respondents per year. The average annual burden per respondent is 3.58 hours and \$320.65 per year.

**Table 3. Estimated Total Respondent Burden and Cost for GPP, CHPP, and Combined**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents*	1,784	2,030	2,276	6,090	2,030
Number of Company/Institutional Respondents	1,555	1,774	1,993	5,322	1,774
Number of Local/State Respondents	229	256	283	768	256
Hours	3,665.25	4,132.49	4,599.76	12,397.50	4,132.50
Labor Costs	\$405,984	\$457,245	\$500,963	\$1,364,192	\$454,730
O&M Costs	\$5,352	\$6,090	\$6,828	\$18,270	\$6,090
TOTAL Costs	\$411,336	\$463,335	\$507,791	\$1,382,462	\$460,820
<b>CHP Partnership Program</b>					
Number of Respondents	505	535	565	1605	535
Number of Company/Institutional Respondents	503	533	563	1599	533

Number of State Respondents	2	2	2	6	2
Hours	2,353	2,492	2,634	7,477	2,492
Labor Costs	\$335,682	\$362,066	\$382,354	\$1,080,102	\$360,034
O&M Costs	\$1,515	\$1,605	\$1,695	\$4,815	\$1,605
<b>TOTAL Costs</b>	<b>\$337,197</b>	<b>\$363,671</b>	<b>\$384,049</b>	<b>\$1,084,917</b>	<b>\$361,639</b>
<b>Combined Totals for Both Programs</b>					
Number of Respondents	2,289	2,565	2,841	7,695	2,565
Hours	6,015	6,624	7,234	19,874	6,624
Labor Costs	\$741,666	\$819,311	\$883,317	\$2,444,294	\$814,764
O&M Costs	\$6,867	\$7,695	\$8,523	\$23,085	\$7,695
<b>TOTAL Costs</b>	<b>\$748,533</b>	<b>\$827,006</b>	<b>\$891,840</b>	<b>\$2,467,379</b>	<b>\$822,459</b>
Average annual hours per respondent					3.58
Average annual costs per respondent					\$320.62

\*In accordance with the Paperwork Reduction Act, Federal government respondents are not included in the burden estimate in Table 3 because, based on its experience, GPP assumes that participating Federal facilities are not run by contractors. The burden on Federal government respondents is shown separately in Table 5.

**Table 4. Estimated Total Agency Burden and Cost for GPP, CHPP and Combined**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents	1,818	2,068	2,318	6,204	2,068
Hours	2,345.8	2,676.4	3,007.1	8,029.3	2,676.4
Labor Costs	\$119,618	\$136,161	\$152,704	\$408,483	\$136,161
O&M Costs	\$0	\$0	\$0	\$0	\$0
<b>TOTAL Costs</b>	<b>\$119,618</b>	<b>\$136,161</b>	<b>\$152,704</b>	<b>\$408,483</b>	<b>\$136,161</b>
<b>CHP Partnership Program</b>					
Number of Respondents	505	535	563	1,603	534
Hours	1,558	1,644	2,067	5,269	1,756
Labor Costs	\$88,169	\$92,977	\$116,862	\$298,008	\$99,336
O&M Costs	\$0	\$0	\$0	\$0	\$0
<b>TOTAL Costs</b>	<b>\$88,169</b>	<b>\$92,977</b>	<b>\$116,862</b>	<b>\$298,008</b>	<b>\$99,336</b>
<b>Combined Totals for Both Programs</b>					
Number of Respondents	2,323	2,603	2,881	7,807	2,602
Hours	3,903.8	4,320.4	5,074.1	13,298.3	4432.7
Labor Costs	\$207,787	\$229,138	\$269,566	\$706,491	\$235,497
O&M Costs	\$0	\$0	\$0	\$0	\$0
<b>TOTAL Costs</b>	<b>\$207,787</b>	<b>\$229,138</b>	<b>\$269,566</b>	<b>\$706,491</b>	<b>\$235,497</b>

**Table 5. Estimated Respondent Burden for Federal Government Partners**

	Year 1	Year 2	Year 3	Total	Annual Average
<b>Green Power Partnership Program</b>					
Number of Respondents	34	38	42	114	38
Hours	66.72	74.04	81.35	222.11	74.04
Labor Costs	\$7,296	\$8,089	\$8,881	\$24,266	\$8,088.67
O&M Costs	0.00	0.00	0.00	0.00	0.00
<b>TOTAL Costs</b>	<b>\$7,296</b>	<b>\$8,089</b>	<b>\$8,881</b>	<b>\$24,266</b>	<b>\$8,088.67</b>
<b>CHP Partnership Program</b>					



Number of Respondents	0	0	0	0	0
Hours	0	0	0	0	0
Labor Costs	0	0	0	0	0
O&M Costs	0	0	0	0	0
TOTAL Costs	0	0	0	0	0
<b>Combined Totals for Both Programs</b>					
Number of Respondents	34	38	42	114	38
Hours	66.72	74.04	81.35	222.11	74.04
Labor Costs	\$7,296	\$8,089	\$8,881	\$24,266	\$8,088.67
O&M Costs	0.00	0.00	0.00	0.00	0.00
<b>TOTAL Costs</b>	\$7,296	\$8,089	\$8,881	\$24,266	\$8,088.67
Average annual hours per respondent					1.95
Average annual costs per respondent					\$212.86

### **6(f) Reasons for Change in Burden**

Under this renewal ICR, the average annual total respondent burden is 6,624 hours. The 2011 ICR average annual respondent burden was 5,823 hours per year.

Since the last ICR renewal, both the GPP and CHPP have introduced program efficiencies to reduce program burden and simplified collection forms into pre-populated spreadsheets or documents. In previous ICR submittals, the Green Power Partnership application was not included as the majority of the effort was managed by independent third party entity. Since then, the award process has been internalized and EPA is solely managing the process. While the burden is low based on a small percentage of partners applying, it is a new effort that was not accounted for in previous ICR submittals.

As a result of these changes, the average number of hours per Partner has increased slightly from 3.25 hours to 3.58 hours. For perspective on the magnitude of Partner growth, the number of Partners at the end of 2008 was 1,308, whereas by year-end 2018 there will be an estimated 2,565 (2,030 for GPP, 535 for CHPP).

### **6(g) Burden Statement**

The annual public reporting and recordkeeping burden for this collection of information is estimated to average 2.59 hours per respondent. The average number of annual burden hours per type of response is:

2.6 hours for a Partnership Agreement (a one-time burden for GPP);

2.25 hours for a Letter of Intent (a one-time burden for CHPP Partners),

1.6 hours for the Partner Yearly Report for the GPP,

5.17 hours for the Partner Yearly Report for the CHPP.

Partners from both programs may also submit voluntary updates of simple information, such as contact information or company profiles, via the Web site. These updates would take from 15 minutes to 0.5 hours per response. A subset of Partners may participate in brief (i.e., 15 minute) telephone calls with EPA to clarify questions pertaining to the Partnership Agreement or LOI, GPP Partner Yearly Report, or CHPP Partner project reporting. All of these activities are included in the annual burden estimate.

To comment on the Agency's need for this information, the accuracy of the provide burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. EPA-HQ-OAR-2004-0501, which is available for public viewing at the Air and Radiation Docket and Information Center in EPA's Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, DC. EPA's Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available at [www.regulations.gov](http://www.regulations.gov). This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Officer for EPA. Please include EPA's Docket ID No. EPA-HQ-OAR-2004-0501 and OMB Control Number 2060-0578 in any correspondence.