



U.S. Energy Information Administration
Office of Energy Statistics
Office of Energy Consumption and Efficiency Statistics

Supporting Statement for Survey Clearance

Form EIA-886, *Annual Survey of Alternative Fueled Vehicles*
OMB 1905-0191

Part A: Background and Proposal

Original Date: February 11, 2015

Table of Contents

INTRODUCTION.....1

A. JUSTIFICATION.....2

1. Legal Authority.....2

2. Needs for and Uses of the Data.....2

3. Use of Information Technology.....3

4. Efforts to Reduce Duplication.....4

5. Reducing Burden on Small Business.....6

6. Consequences of Collecting Data Less Frequently.....6

7. Compliance with 5CFR 1320.5.....6

8. Special Circumstances.....6

9. Summary of Consultations Outside the Agency.....6

10. Remuneration.....6

11. Disclosure of Information.....7

12. Justification for Sensitive Questions.....7

13. Reporting Burden Estimates.....7

14. Total Annual Cost to Respondents.....9

15. Estimate of Cost to the Federal Government.....9

16. Changes in Respondent Burden.....9

17. Schedule for Collecting and Publishing Data.....10

18. OMB Number and Expiration Date.....10

INTRODUCTION

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy (DOE). It collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding regarding energy and its interaction with the economy and the environment. The Form EIA-886, *Annual Survey of Alternative Fueled Vehicles* (OMB No. 1905-0191), discussed in this document, is part of this comprehensive mandatory energy data program. EIA requests a three year extension of Form EIA-886 with no changes.

The objectives of the Form EIA-886 data collection are to (1) comply with Section 503 of the Energy Policy Act of 1992 (EPACT92) that requires EIA to report on specific aspects of alternative fueled vehicles (AFVs) and alternative transportation fuels (ATFs); (2) respond to public requests for information on AFVs and ATFs; and (3) provide Congress with a measure of the extent to which the objectives of EPACT92 are being achieved.

An alternative fueled vehicle is defined as an on-road vehicle designed to operate on an alternative fuel (e.g., compressed natural gas, ethanol blend, electricity). The vehicle can be either a dedicated vehicle designed to operate exclusively on alternative fuel or a non-dedicated vehicle designed to operate on both alternative fuel and traditional fuel.

Alternative fuels for transportation applications include the following:

- Methanol
- Denatured ethanol, and other alcohols
- Fuel mixtures containing 85 percent or more by volume of methanol, denatured ethanol, and other alcohols with gasoline or other fuels
- Natural gas, including compressed and liquefied natural gas
- Liquefied petroleum gas (propane)
- Hydrogen
- Coal-derived liquid fuels
- Non-alcohol fuels derived from biological materials (e.g., biofuels, such as soy diesel fuel)
- Electricity, including electricity from solar energy

As a basis for estimating total AFV inventory and alternative fuel use in the United States, the Form EIA-886 is an annual survey that collects information about:

- The number and type of alternative fueled vehicles and other advanced technology vehicles that vehicle suppliers ‘made available’ in the reporting year and plan to make available in the current calendar year. The term “made available” means the vehicle

either was delivered for the first time to a dealer, leasing company, or end user; was available for delivery to a dealer, leasing company, or end user; or was otherwise placed “in use” during the reporting period. Advanced technology vehicles include hybrid electric vehicles, whose input fuel is gasoline or diesel, and fuel cell vehicles. Vehicle suppliers consist of original equipment manufacturers (OEM) and aftermarket vehicle converters. An OEM is an entity (company, organization, association, etc.) that markets and warrants an on-road vehicle for use in the U.S. OEMs include organizations that perform vehicle conversions before the vehicle is initially delivered to an end user, for use of the vehicle in the U.S. An aftermarket vehicle converter is an entity that converts, modifies, or repowers vehicles from one fuel or source of power to another, for use of the vehicle in the U.S. The conversion is performed after the vehicle's initial delivery to an end user;

- The number, type, miles traveled and geographic distribution of AFVs in use in the reporting year;
- The amount and distribution of each type of alternative fuel consumed in the reporting year (i.e., previous calendar year); and
- The number, type, and disposition of vehicle retirements in the reporting year.

A. JUSTIFICATION

1. Legal Authority

The legal authority for this mandatory data collection effort is provided by the following two provisions:

Energy Policy Act of 1992:

42 USC 13253(a) requires “estimates of (1) the number of each type of alternative fueled vehicle likely to be in use in the United States; (2) the probable geographic distribution of such vehicles; and (3) the amount and distribution of each type of replacement fuel [alternative fuel].” Additionally, 42 USC 13253(b) requires “suppliers of alternative fueled vehicles to report on the number of each type of alternative fueled vehicles that such supplier (a) has made available in the previous calendar year; and (b) plans to make available for the following calendar year.”

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

“All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the Administrator such information and periodic reports, records, documents, and other data, relating to the purposes of this chapter, including full identification of all data and projections as to source, time, and methodology of development, as the Administrator may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under this chapter.”

2. Needs for and Uses of the Data

The data are used to respond to public requests for information on AFVs and alternative transportation fuels and to provide Congress with a measure of the extent to which the objectives of the Energy Policy Act of 1992 (EPACT) are being achieved. Data from the Form EIA-886 are needed to determine if sufficient quantities of AFVs are available for purchase by federal and state agencies and fuel suppliers. While auto manufacturers and aftermarket vehicle converters are not required to manufacture AFVs, fleets such as the federal government, state governments, and fuel providers (e.g., electric and natural gas utilities, propane marketers) must meet regulatory requirements in petroleum reduction via AFV acquisitions. EIA's supplier data informs these parties as well as the public to the availability of AFVs in the marketplace. In addition, the data serve as market analysis tools for Congress, federal and state agencies, AFV suppliers, vehicle fleet managers, and other interested organizations and persons. These data are also used to respond to numerous public requests for detailed information on AFVs and ATFs--in particular, the number of AFVs distributed by state, as well as the amount and location of the ATFs consumed.

EIA publishes summary information from the Form EIA-886 database in the annual *Alternative Fuel Vehicle Data* report on EIA's website (<http://www.eia.gov/renewable/afv/>). This report covers historical and projected supplies of AFVs, as well as AFV usage by selected user groups, and estimates of total U.S. AFV counts and U.S. consumption of ATFs. These data provide a baseline for DOE's transportation sector energy models. They also provide the energy consumption measures for alternative transportation fuels in EIA's State Energy Data System. For example, EIA's National Energy Modeling System (NEMS) has a component model that forecasts transportation sector energy consumption and provides a framework for AFV policy and technology analysis. Data obtained from Form EIA-886 are used to improve the explanatory power of the NEMS Transportation Demand Model by allowing for greater detail in AFV type and characteristics.

3. Use of Information Technology

The Form EIA-886 Web-based data collection system helps meet the data requirements to evaluate how federal agencies meet guidelines for reducing petroleum consumption via the use of AFVs and ATFs, as outlined in EPACT92, Executive Order 13149, "*Greening the Government Through Federal Fleet and Transportation Efficiency*," and Executive Order 13423, "*Strengthening Federal Environmental, Energy, and Transportation Management*." Executive Orders 13149 and 13423 both set forth guidelines to ensure that the Federal Government exercises leadership in the reduction of petroleum consumption through improvements in fleet fuel efficiency and the use of alternative fuel vehicles and alternative fuels.

The Department of Energy's Federal Energy Management Program (FEMP) is responsible for tracking these regulatory requirements. In addition, the General Services Administration's (GSA) Office of Governmentwide Policy collects federal fleet data via the Form SF82, "*Agency Report of Motor Vehicle Data*."

To automate and reduce duplicative reporting by federal agencies, the Federal Automotive Statistical Tool (FAST) Web-based data collection system was developed jointly by FEMP, EIA and GSA to assist fleets in meeting all the aforementioned data reporting requirements. As a condition of approval for the Form EIA-886, OMB required EIA to address the duplicative reporting that existed for federal agencies during the 2000 Form EIA-886 clearance process. EIA consulted with FEMP and GSA to develop a unified data collection system that allows federal agencies to report once on all vehicle fleet characteristics requirements. EIA currently uses the FAST database to collect the information from approximately 45 federal agencies to satisfy the reporting requirements for Form EIA-886. The federal agencies that utilize FAST represent over 1,500 fleets of AFVs in 50 states.

EIA then implemented a Web-based data collection system to collect information from the remainder of the universe of respondents (i.e., state agencies, fuel providers, transit agencies, local governments and private organizations). This system enables respondents to electronically submit data, which reduces the respondents' burden of completing and mailing paper survey forms.

A significant benefit of the EIA Web-based system is that a respondent's survey form is pre-filled with certain data from the previous year, so the respondent needs only to verify and make updates, rather than keying in new data. The EIA electronic system also significantly reduces the time needed to complete the survey form by providing online instructions, drop-down menus, data validation rules, and auto-population of features.

Federal agencies report the data requirements of the Form EIA-886 via FAST, and the remaining EIA-886 respondents use the EIA-886 Web-based data collection system to comply with these reporting requirements. At the close of the survey cycle, data reported in FAST are transferred into the EIA-886 Web-based data collection system for processing.

EIA encourages all Form EIA-886 respondents to use the electronic data collection system. During the 2013 survey cycle, 90% of Form EIA-886 respondents reported through this system. The remaining respondents do not have Internet access and/or prefer to use another reporting method, such as fax or first class mail.

4. Efforts to Reduce Duplication

A thorough review of AFV-related surveys and regulatory programs reveals that, while data collection programs exist, the Form EIA-886 is the only survey that collects complete historical or short-term forecasts of the types and quantities of AFVs made available by AFV suppliers and collects the number, type, and geographical location of the AFVs, along with the consumption of alternative fuels by these vehicles. The below table outlines the other DOE program related to alternative fuels and provides a description of the coverage as compared to the coverage of the Form EIA-886.

Agency	Office	Form/Regulatory Requirement
<i>Department of Energy</i>	<i>Energy Efficiency & Renewable Energy</i>	<i>State & Alternative Fuel Provider Fleet Program</i> [10 CFR Part 490]
<p><u>Summary:</u></p> <p>This is a regulatory program that requires covered fleets either to acquire AFVs as a percentage of their annual light-duty vehicle acquisitions or to employ other methods to reduce petroleum consumption in lieu of acquiring AFVs.</p> <p><u>Reasons these data are not duplicative of data collected by the Form EIA-886:</u></p> <ul style="list-style-type: none"> • Order 20-CFR Part 490 requires the reporting of only vehicle acquisitions, and not vehicle inventory. These administrative data cannot be used to estimate fuel consumption because they only include data on acquisitions of AFVs. The database does not cover the entire fleet. Data on the composition of the entire fleet are needed to estimate the fuel consumption of a fleet. The reporting requirements apply only if a state government or fuel provider: 1) owns, operates, leases, or controls at least 50 light duty vehicles (LDVs) within the United States (excluding law enforcement vehicles, emergency motor vehicles and non-road motor vehicles); 2) 20 of those LDVs are used primarily within any Consolidated/Metropolitan Statistical Area; and 3) those same 20 LDVs are centrally fueled, or are capable of being centrally fueled. (The term “centrally fueled” means that a refueling infrastructure exists within reasonable traveling distance from the fleet.) The requirements for determining who is in scope to report result in inadequate market coverage for using these data to estimate fuel consumption. Those organizations that are not required to report to DOE are an important part of the market and result in a significant limitation of the use of these administrative data for estimating fuel consumption and for fulfilling the reporting requirements mandated under EPACT92. • Data on fleets exempt from the rulemaking are needed to accurately estimate total AFVs in use and ATF consumption and to satisfy many public requests for detailed information on AFVs and ATFs, (e.g., in determining where to locate a refueling facility). 		

5. Reducing Burden on Small Business

The *Annual Survey of Alternative Fueled Vehicles* collects data from AFV suppliers and users of AFVs. The small business response burden for this survey is minimal, because most of the data requested (the AFV and ATF information) are reported by fleet operators, who are considered 'large' businesses. The typical smaller respondent is a conversion company (i.e., an AFV supplier), and the number of conversion companies has declined in recent years. Respondents to the Form EIA-886 are given options concerning how data are to be submitted to EIA. Small businesses may use the electronic data submission system that reduces reporting burden by utilizing functions such as online instructions, drop-down menus, data validation rules, and auto-population of features.

6. Consequences of Collecting Data Less Frequently

Currently, EIA is the only resource for summary-level totals of AFV inventory and ATF consumption for the U.S. Because the Form EIA-886 is a mandatory annual survey of vehicle suppliers, it also provides the only comprehensive picture of the current and projected supply of alternative fueled and advanced technology vehicles in the U.S. Annual data are needed, as a minimum frequency of collection, to assess trends and evaluate the effectiveness of these statutory energy programs.

If EIA collected and reported data on the AFV/ATF industry less frequently, EIA would be in violation of Section 503 of EPACT92, which mandates the annual collection of this data. Furthermore, should monitoring the progress of AFV supply and alternative fuel consumption not occur on a minimum annual basis, the volatility and rapidly changing nature of the industry may not be captured, thus impairing the ability to effectively implement AFV and ATF policy mandates.

7. Compliance with 5CFR 1320.5

The data collection is in compliance with the guidelines to reduce the public's paperwork and reporting burden as outlined in 5 CFR 1320.5.

8. Special Circumstances

There are not any special circumstances that would require the *Annual Survey of Alternative Fueled Vehicles* to be conducted in a manner inconsistent with the guidelines in 5 CFR 1320.5.

9. Summary of Consultations Outside the Agency

EIA did not receive any response from the public to the March 17, 2015, (80 FR 13843) Federal Register notice soliciting comments on the extension request of the Form EIA-886.

10. Remuneration

Payments or gifts will not be given to respondents for completing the Form EIA-886 survey.

11. Disclosure of Information

The information reported on Form EIA-886 will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.

The Federal Energy Administration Act requires EIA to provide company-specific data to other Federal agencies when requested for official use. The information reported on the Form EIA-886 may also be made available, upon request, to another component of the Department of Energy (DOE) and to any Committee of Congress, the Government Accountability Office, or other federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

Disclosure limitation methods are applied to the statistical data published from the Form EIA-886 survey regarding alternative fuel vehicles "planned to be made available in the following calendar year," to ensure that the risk of disclosing identifiable information is very small.

For all other data published from the Form EIA-886, disclosure limitation methods are not applied. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, a knowledgeable person may be able to estimate the information reported by a specific respondent.

12. Justification for Sensitive Questions

Sensitive questions are not asked on the *Annual Survey of Alternative Fueled Vehicles*.

13. Reporting Burden Estimates

The average annual respondent burden for Form EIA-886 is approximately four hours, calculated as follows:

AFV Suppliers			
Supplier Type	Respondents	Average Burden	Total Hours
Original Equipment Manufacturer	30	2.5	75
Aftermarket Vehicle Converters	20	2	40
Total Suppliers	50	-	115
AFV Users by Type – Complex Fleets*			
User Type	Respondents	Average Burden	Total Hours
Federal Government	20	24	480
State Government	20	24	480
Local Government	30	24	720
Tribal Government	0	0	0
Fuel Provider	25	24	600
Transit Agency	0	24	0
Private (corporate fleet)	5	24	120
Total Complex fleets	100	24	2,400
AFV Users by Type – Simple Fleets*			
Federal Government	25	3	75
State Government	100	3	300
Local Government	775	3	2,325
Tribal Government	0	0	0
Fuel Provider	675	3	2,025
Transit Agency	150	3	450
Private (corporate fleet)	175	3	525
Total Simple fleets	1,900	3	5,700

*A complex fleet is a fleet of AFVs in multiple states and with a varied fleet of vehicles, i.e., multiple vehicle types, fuel types, engine configurations and application (vehicle use such as passenger or freight transport, maintenance vehicle, etc.). Simple fleets have AFVs in only one state and most vehicles are of similar type, fuel, and application. Federal agencies that report in the FAST database are in both the complex fleet and simple fleet categories.

Reporting Burden Estimates - Summary		
Respondent Type	Number of Respondents	Hours
Federal Government	45	555
State/Local/Tribal Governments	1,075	4,275
Private Sector (Corporate Fleets) and AFV Suppliers (OEM & Converter)	930	3,385
Totals	2,050	8,215

Total Annual Respondent Cost:

Based on (1) the time needed to retrieve the requested information from existing information systems and (2) the time needed to report that data to EIA via a Web reporting system, the average annual respondent cost for Form EIA-886 is approximately \$288, calculated as follows:

Original Equipment Manufacturers (\$71.97 per hour x 75 hours = \$5,398)

Conversion Companies (\$71.97 per hour x 40 hours = \$2,879)

Users of AFVs and ATFs (\$71.97 per hour x 8,100 hours = \$582,957)

Total Cost = \$591,234

An average cost per hour of \$71.97 is used because this is the average loaded (salary plus benefits) cost for an EIA employee. EIA assumes that the survey respondent workforce completing surveys for EIA is comparable with the EIA workforce.

14. Total Annual Cost to Respondents

There are not any costs other than burden hours associated with this data collection.

15. Estimate of Cost to the Federal Government

The annual cost to the Federal Government for Form EIA-886 is estimated at \$300,000. This cost estimate includes funds for data collection, follow-up for non-response, data processing, estimation, survey documentation, data analysis, and preparation of data reports.

16. Changes in Respondent Burden

There is no change in the burden hours of 8,215 for operating this survey. However, EIA expects a decrease in respondent burden based on the widespread use of electronic data collection methods. With increasing use of automated fleet management information systems in most organizations, EIA estimates a reduction in the amount of time organizations need to compile and report data to EIA. Automation of fleet information into databases allows for quicker information gathering, collection and reporting, especially when the data are then entered via a

Web-based data collection system, such as the Form EIA-886 Internet data collection system. EIA may conduct usability testing to revise burden estimates for Form EIA-886 in the future.

17. Schedule for Collecting and Publishing Data

The time schedule for data collection and related analysis activities for the 2015 Report is summarized, below. (Similar schedules will be followed in subsequent years.)

Schedule for Data Collection, Analysis and Publication

<u>Activity</u>	<u>Estimated Completion Date</u>
Mail Form EIA-886 Survey for 2015 Report Year	February 28, 2016
Survey Response Due to EIA	April 30, 2016
Begin Follow-up Contact with Respondents	May 1, 2016
End Follow-up Contact with Respondents	July 15, 2016
Complete Data Collection	September 15, 2016
Perform Data Analysis and Prepare Preliminary Data Report	December 15, 2016
Publish Survey Results on EIA Website	January 30, 2017

18. OMB Number and Expiration Date

The OMB Number (1905-0191) and data collection expiration date will be displayed on the data collection form.