**Supporting Statement:**

**U.S. Department of Energy**

Clean Cities Vehicle Programs

**OMB Control Number 1910-5171**

This supporting statement provides additional information regarding the U.S. Department of Energy’s (DOE) request to extend the Information Collection 1910-5171, under which the DOE Clean Cities program collects information in support of two initiatives, the Plug-in Electric Vehicle (PEV) Scorecard, and the National Clean Fleet Partnership. 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.”

1. **Justification**
2. **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.**

The Energy Policy Act of 1992 (EPAct) authorized the U.S. Department of Energy’s (DOE) creation of the Clean Cities program, through which DOE advances the nation’s economic, environmental, and energy security by supporting local actions to reduce petroleum consumption in transportation. 42 U.S.C. § 13255 (EPAct Section 505) The Clean Cities program operates within DOE’s Office of Energy Efficiency and Renewable Energy. As a national network of nearly 100 Clean Cities coalitions, the Clean Cities program brings together stakeholders in the public and private sectors to deploy alternative and renewable fuels, idle-reduction measures, fuel economy improvements, and emerging technologies. Under 42 U.S.C. § 13233 (EPAct Section 407), DOE is authorized to establish a data collection program for the purpose of collecting data which would be useful to persons seeking to manufacture, convert, sell, own or operate alternative fueled vehicles or alternative fueling facilities. The Clean Cities program uses these kinds of information to facilitate the deployment of alternative fueled vehicles and fueling infrastructure. The Clean Cities program has been in place for over 17 years, having encouraged the displacement of an estimated 5 billion gallons of petroleum fuel in the U.S. transportation sector.[[1]](#footnote-1)

PEV Scorecard:

The current administration has established a goal of having one million plug-in electric vehicles (PEVs) on the road by 2015.[[2]](#footnote-2) As of October 2013, since 2008, over 150,000 plug-in electric cars have been sold in the United States, a figure that does not include the number of plug-in medium and heavy duty vehicles and delivery vehicles sold.[[3]](#footnote-3) To achieve this goal, PEVs must provide a practical substitute for conventional vehicles, which in turn requires that communities provide access to infrastructure, the proper regulatory environment, and necessary support services. The Clean Cities program disseminates information communities need to enable greater adoption of electric vehicles.

The ICR is critical to the Clean Cities program’s capacity to facilitate market transformation in the electric vehicle sector. DOE has developed a “scorecard” tool to facilitate the routing of information regarding PEV readiness to communities. Employing a password protected web-based scorecard of multiple-choice questions accessed through DOE’s existing Alternative Fuels and Advanced Vehicles Data Center (AFDC), the tool will gather information communities submit and:

* + Assess progress towards a community’s readiness to host PEVs conveniently and efficiently; and
  + Facilitate further progress for participating communities, PEV owners, and EVSE users/managers.

On a voluntary basis, respondents, who DOE expects will be city/county/regional sustainability or energy coordinators, supply the information via a user-friendly online interface to the questions they decide to answer. The online tool translates the readiness measures across several weighted categories into numeric data to generate a “readiness score” depicted through a colored spectrum. The tool allows users to track progress over time. Communities can see their own rating and may be compared to other cities, for ranking purposes only.

National Fleet Partnership:

The National Fleet Partnership is critical to the Clean Cities program’s capacity to facilitate market transformation in the alternative vehicles sector. DOE has technical assistance it can provide large private sector fleets, and similarly, DOE can learn about effective strategies for development of alternative fueled vehicles.

On a voluntary basis, respondents, who DOE plans through the initiative will be targeting large, private-sector fleets that own or have contractual control over at least 50 percent of their vehicles and have vehicles operating in multiple States, supply the information voluntarily via a template spreadsheet and phone or in-person interview. Clean Cities Coordinators and Clean Cities staff from DOE Headquarters and national laboratories identify and submit to DOE candidate partners (potential respondents), and DOE determines whether candidate partners are appropriate (e.g., is the fleet sufficiently large) and then reaches out to these candidate partners through each candidate’s point of contact. If the candidate partner agrees to become a Partner, a phone interview is be scheduled. Phone or in-person interviews are be limited to a 1.5 hour maximum and both when scheduling the interview and at the beginning of the interview, DOE reminds respondents that: the estimated time is no more than 1.5 hours; their participation is voluntary; the information will be used to understand the contribution of Clean Cities to the fleet’s petroleum reduction activities and how that information might assist other fleets. The initiative also allows partner fleets to track their progress over time.

1. **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.**

Information collected addresses two streams of information, one related to plug-in electric vehicles and community readiness (PEV Scorecard), and one related to large private fleets (National Fleet Partnership).

PEV Scorecard:

DOE’s Clean Cities initiative has developed a voluntary scorecard to assist its coalitions and stakeholders in assessing the level of readiness of their communities for plug-in electric vehicles (PEVs). The principal objective of the scorecard is to provide respondents with an objective assessment and estimate of their respective community’s readiness for PEV deployment as well as understand the respective community’s commitment to deploying these vehicles successfully. DOE intends the scorecard to be completed by a city/county/regional sustainability or energy coordinator. As the intended respondent may not be aware of every aspect of local or regional PEV readiness, coordination among local stakeholders to gather appropriate information may be necessary.

The scorecard assessment effort relies on responses to questions the respondent chooses to answer. The multiple-choice questions address the following topic areas: (1) electric vehicle supply equipment permitting and inspection process; (2) PEV and EVSE availability and numbers; (3) laws, incentives, and financing; (4) education and outreach; (5) utility interaction; and (6) vehicle and infrastructure planning. Respondents provide answers through a user-friendly online interface. The answers are then translated through a simple algorithm that will establish appropriate quantitative criteria, translating the readiness measures across several weighted categories into numeric data. Using a numberless color spectrum, a community is rated against itself, with the colored spectrum results made available only to the respondent community. The total rankings are normalized into a “score”, and communities can see their own rating and may be compared to other cities, for ranking purposes only.

The scorecard uses one information collection system, an online system. No other data collection system is employed to support the scorecard. The online scorecard system DOE has developed provides several advantages. First, it avoids the need to download any forms or materials, though respondents may print out the full list of questions and answers, or a portion thereof if they wish. Second, avoiding downloads also limits potential security threats. Third, the designed system allows respondents to compare historical records, providing the opportunity to revisit the scorecard however often they like to track progress. Further, employing an online system also eliminates version control concerns, allowing for a single update to ensure that all scorecard users are using the current version.

The information collected is reviewed to ensure accuracy in terms of information reported. If this information is not collected, DOE will have no way of determining the readiness of a community for adoption of PEVs, undercutting the ability of the community and its many stakeholders (vehicle manufacturers, purchasers, businesses and fleets, among others) to have certainty as to the status of PEV readiness and whether the community has sufficient electric vehicle support equipment infrastructure to be considered ready for the deployment of PEVs. Certainty as to the PEV readiness of a community is important because it is believed to affect whether individuals and fleets, beyond early adopters of the technology, might acquire new or additional PEVs. In addition, such information and scoring is intended to help incentivize additional deployment of electric vehicle support equipment infrastructure and the PEVs as well, all toward the increased deployment of a previously nascent technology. Moreover, the information generated will be the foundation for future program development.

National Fleet Partnership:

DOE’s Clean Cities initiative has developed a voluntary National Clean Fleets Partnership effort that establishes strategic alliances with large private fleets to help them explore and adopt alternative fuels and fuel economy measures to reduce petroleum use. The Partnership does not endeavor to engage a large number of fleets, but rather works with select fleets committed to leading the way in reducing petroleum consumption. Under a voluntary agreement, Clean Cities commits to provide each fleet with a designated account manager for assistance and support; work with fleets to develop individual partner plans to reduce petroleum use; provide technical assistance, data, access to subject matter experts, analysis, and unbiased evaluation; provide education and outreach materials to recognize a fleet’s involvement with the Partnership and its accomplishments; supply mechanisms for fleet information exchange and networking; and identify and document progress related to petroleum savings, cost savings, and reductions in emissions. A participating fleet commits to appointing a primary contact; developing a petroleum use reduction plan; acting to work toward the goals set forth in the plan; tracking progress and provide baseline information and annual data on petroleum use; and participating as an active Clean Cities stakeholder.

The principal objective of collecting the information DOE seeks to gather through the Partnership effort is to allow DOE to develop an objective assessment and estimate of each fleet’s impact and progress. Information requested is used to establish a baseline of activities, vehicle inventories, and fuel use for each fleet, which is then used for future comparisons and analyses of instituted programs and policies. A designated representative for each participating fleet provides the requested information. The intended respondent is expected to be aware of relevant aspects of the company’s fleet management, such that the gathering of information is not expected to be very resource consuming.

The data and subsequent analyses allows DOE to compare historical records dynamically, and provide the opportunity for each fleet to determine annual progress.

The Partnership is targeted at large, private-sector fleets that own or have contractual control over at least 50 percent of their vehicles and have vehicles operating in multiple States. To a great degree, the participating fleets are the ones who gain from the voluntary sharing of information. The collection is voluntary on the part of participating fleets. Whether they participate depends on the respondents’ desire to submit the information and participate in an interview, and to receive subsequently technical assistance that provides each fleet with a designated account manager for assistance and support. Engaging with the initiative the fleets receive assistance in the development of individual partner plans to reduce petroleum use, technical assistance, data, access to subject matter experts, analysis, and unbiased evaluation; education and outreach materials recognizing the fleet’s involvement with the Partnership and its accomplishments; mechanisms for fleet information exchange and networking, and documentation of progress related to petroleum savings, cost savings, and reductions in emissions.

1. **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.**

The two streams of information being collected are different in small ways, as detailed below.

PEV Scorecard:

The scorecard uses one information collection system, an online system. No other data collection system is employed to support the scorecard. The online scorecard system DOE has developed provides several advantages. First, it avoids the need to download any forms or materials, though respondents may print out the full list of questions and answers, or a portion thereof if they wish. Second, avoiding downloads also limits potential security threats. Third, the designed system allows respondents to compare historical records, providing the opportunity to revisit the scorecard however often they like to track progress. Further, employing an online system also eliminates version control concerns, allowing for a single update to ensure that all scorecard users are using the current version.

One hundred percent of the information is reported electronically to a relational database (Oracle),which is accessible via the Internet and modem. The Oracle database is password protected. Reporting via Internet and modem reduces the respondents’ burden by allowing similar data to be entered with minimal changes on a computer form, instead of duplicating the majority of data on paper forms. The database system is an internal database that does not have a specific name.

National Fleet Partnership:

The Partnership effort relies on data provided in an electronic file, via a template spreadsheet, and responses to questions the respondent chooses to answer during a phone or in-person interview. The questions and data collection address several topic areas related to vehicle data, fuel data, fuel use, fuel infrastructure, fleet strategies, and fleet operations. No other data collection system is employed to support the Partnership. The electronic template spreadsheet DOE has developed provides several advantages. First, it avoids the need to download any forms or materials, though respondents may print out the full list of questions and answers, or a portion thereof if they wish. Second, avoiding downloads also limits potential security threats. Third, the designed spreadsheet allows respondents to compare historical records, providing the opportunity to revisit their information however often they like to track progress. In addition to the electronic template spreadsheet, other information is collected during an interview.

All of the data is entered and documented in a relational database (Oracle). Information on specific fleets is accessible only by DOE by the individual fleets (only to the information relevant to the individual fleet). The Oracle database is password protected. The database system is an internal database that does not have a specific name.

1. **Describe efforts to identify duplication.**

This collection of information is specific to DOE. While DOE also collects information under the *Alternative Fuel Vehicle Acquisition Report for State Government and Alternative Fuel Provider Fleets* ICR, OMB Control Number 1910-5101, the information collected under that ICR is different. Specifically, the information collected via OMB Control Number 1910-5101 involves entities subject to the Alternative Fuel Transportation Program (AFTP). The EPAct provisions authorizing the AFTP are also referred to as the mandated transportation provisions; fleets regulated under the AFTP are mandated to comply with EPAct requirements. The Clean Cities program, under which the information collections that are the subject of this document are derived, is a voluntary program; any entities participating in the Clean Cities program are doing so voluntarily. Moreover, while there may be some entities that are required to participate in the AFTP that also may voluntarily participate in Clean Cities’ initiatives, like those initiatives discussed in this document, the information collected under the AFTP and the Clean Cities initiatives does not overlap. The information collected under the AFTP is specific to regulatory requirements and ensuring compliance with those requirements. Thus, the information collected under the AFTP and the Clean Cities programs is similar only in that it relates to alternative fuels or AFVs. As a result, the information collected under the Clean Cities’ program is different in subject, form, and function from that collected under the AFTP. Hence there is no duplication.

Further, in making this determination, DOE has reviewed the extensive array of information available through the Clean Cities program and other EPAct programs. No existing information is available with any degree of specificity or completeness for any or all of the potential voluntary respondents. Also, to have DOE research and assemble any available information would render insignificant the opportunity the information collection affords respondent communities and Partnership entities to receive feedback on their submittals. Above all, the information collection also provides the unique ability for users to track their own progress over time.

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

Though small businesses may serve in the role of respondent for a given community, no small businesses are expected to have to provide information as a result of the scorecard, and the Partnership is an initiative through which DOE provides large private-sector fleets with technical assistance and expertise to incorporate alternative fuels and fuel saving measures into their operations successfully. Therefore, no small businesses or small entities are expected to be affected by this information collection request, and any small businesses that decide to participate in this voluntary information collection have the opportunity to limit the burden of the information collection by simply restricting the amount of effort they may undertake.

1. **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.**

The frequency of collection is dependent on the respondents’ desire to submit the information, as it is a voluntary submittal. Respondents may choose to re-submit information more often if they have additional information to provide. The initial submittal carries the greatest burden, after which any updates are significantly less of a burden, as it is relatively simple to re-submit the same information plus any updates to the information on an annual basis, or less frequent, as determined by the respondent. Reporting the information less frequently than annually, particularly if there is not an abundance of new information to report, does not have a consequence to the Clean Cities program’s efforts to facilitate the deployment of alternative fuel vehicles. Nonetheless, the ICR is critical to the Program because in the absence of the requested information collection, DOE would have no means of carrying out its statutorily-mandated responsibility to collect and provide information useful to persons seeking to manufacture, convert, sell, own, or operate alternative fueled vehicles or alternative fueling facilities.

Respondents participating in this program submit only their responses to the questions.

1. **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 product 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 confidentially that is not supported by authority established in stature of 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 information collection is consistent with OMB guidelines.

1. **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 5 CFR 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 ICR was cleared for use under OMB No. 1910-5171. Information regarding the request to extend the ICR was detailed in a 60-day Federal Register Notice and Request for Comments the Department published on September 8, 2015, volume 80, number 173, and page number 53789, and a 30-day Federal Register Notice published December 11, 2015, volume 80, number 238, and page number 76966. The notices described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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

There is no remuneration given for submission of any of the information.

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

DOE will not share community-specific information with outside sources other than in response to a Freedom of Information Act request, and even then DOE would take precautions to respect the potential confidentiality of important data. In responding to requests under the Freedom of Information Act, DOE relies on its regulations at 10 CFR Part 1004. DOE’s attention to potential confidentiality concerns usually arises not with regard to information submitted but rather with regard to any potential compliance issues that may be related to requirements associated with the deployment of alternative fuel infrastructure or alternative fuel vehicles. Most often, requests for data pertain to broader program figures for classes of entities that participate in the voluntary Clean Cities initiatives.

1. **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.**

There are no collections in this package that involve questions of a sensitive, personal, or private nature.

1. **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.**

The following total includes the currently approved burden associated with the PEV Scorecard and the National Fleet Partnership, which is then followed by a break down for each information collection.

The estimate of hour burden is as follows:

Total number of unduplicated respondents: 1,300

Reports filed per person: 1.00

Total annual responses: 1,300

Total annual burden hours: 25,750

PEV Scorecard:

The estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 1,250

Reports filed per person: 1.00

Total annual responses: 1,250

Total annual burden hours: 25,625

The values for number of unduplicated respondents and total annual responses, set forth above, are based on the following:

* + - 1. The total number of unduplicated responses (1,250) represents the number of online scorecards expected to be submitted to DOE under this voluntary program. This total number of completed online scorecards represents the expected number of participating communities, which is based on the number of existing Clean Cities Coalitions, and includes others communities as well that might potentially participate, to ensure all Clean Cities coordinators and leaders of other communities are able to access the PEV Scorecard.
      2. The Reports filed per person (1.00) represents the one online scorecard to be submitted voluntarily on an annual basis. DOE expects one person to be completing only one online scorecard, and for only one community.
      3. The number of total annual responses (1,250) represents the sum of the number of on-line scorecards that might be submitted on an annual basis
      4. The total annual burden hours (25,625) represents the following: the product of the number of total responses by the number of hours for each reporting component (1,250 (on-line scorecards) \* 20.00) + (1,250 (number of total responses) \* 0.5) = 25,625. The research needed to compile the information needed to answer the on-line scorecard, as well as compiling the information, is estimated to take no more than 20.00 hours to complete. Completing the on-line scorecard is estimated to take no more than 0.5 hours to complete. Each Notice of intent to Apply for a Waiver for Alternative Compliance takes no more than. 0.1 hours to complete. The quantity of time DOE has estimated for the potential burden is based on DOE’s expertise in the subject matter and knowledge regarding the availability of the subject information, and the understanding the individuals completing the submittals will, by virtue of the subject matter, themselves be well versed in the subject matter. Moreover, DOE has designed the scorecard questions in a manner specifically designed to limit the potential burden.
      5. Also noteworthy, once the initial submittal has been completed, any subsequent voluntary updating of the information, which might be undertaken on an annual basis is estimated to take no more than 10 hours.

Average Maximum Burden:

Per Collection: 20.5 hours

Per Applicant: Each respondent would spend no more than 20 hours research and collecting information that would allow the respondent to complete the online scorecard, which itself would take 0.5 hours. Once the initial submittal has been completed, any subsequent voluntary updating of the information, which might be undertaken on an annual basis, is estimated to take no more than 10 hours.

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DOE expects there to be as many as 1000 entities participating in the program. This equates with 1000 respondents, and then 1000 responses, one for each entity/respondent. DOE expects that on a voluntary basis each of these respondents will respond once per year. DOE does not believe the number of respondents will increase, because the respondents will be representing geographic regions or areas that are tied to Clean Cities Coordinator regions and interested communities, for which there estimated to be approximately 1000. DOE does not expect to shut down this information collection at the end of three years, but rather hopes to continue the program as its relevance is expected to continue to be viable as communities continue to grow their PEV readiness.

National Fleet Partnership:

The estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 50

Reports filed per person: 1.00

Total annual responses: 50

Total annual burden hours: 125

The values for number of unduplicated respondents and total annual responses, set forth above, are based on the following:

* + - 1. The total number of unduplicated responses (50) represents the number of national partner fleets expected to be engaged in this voluntary program. This total number of completed responses represents the expected number of participating fleets, which is based on the number of national partner fleets DOE seeks to work with.
      2. The Reports filed per person (1.00) represents the combination of one template spreadsheet and one phone or in-person interview, to be undertaken voluntarily on an annual basis. DOE expects one person to be completing only one spreadsheet, and be involved in one interview, and for only one partner fleet.
      3. The number of total annual responses (50) represents the sum of the number of combined spreadsheet and interviews that might be conducted annually.
      4. The total annual burden hours (125) represents the following: the product of the number of total responses by the number of hours for each reporting component ((50 (spreadsheets) \* 1 (hr)) + (50 (total number of interviews) \* 1.5 (hrs)) = 125. Completing the spreadsheet is estimated to take no more than 1.00 hour to complete. Completing the follow up interview is estimated to take no more than 1.5 hours to complete.

Average Maximum Burden Per Collection: 2.5 hours

Per Applicant: Each respondent would spend no more than 2.5 hours total. Completing the spreadsheet is estimated to take no more than 1.00 hour to complete. This estimate is based on review and practice input by a cooperating participating fleet. Completing the follow up interview is estimated to take no more than 1.5 hours to complete.

1. **Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.**

Beyond costs associated with undertaking the work, there are no additional costs to respondents other than the burden hours for reporting and recordkeeping. Costs to undertake the work for the PEV Scorecard are approximated at $45.06/hr of effort (<http://www.bls.gov/oes/current/oes_nat.htm#11-0000> – (other management occupations)), for a total of $924 in labor to research, collect, and respond to the voluntary collection. Costs to undertake the work for National Fleet Partnership are approximated at the same rate for a total of $113 in labor to respond to the voluntary collection.

All information collection can be undertaken using a computer, telephone, and internet, for which each respondent is believed to have one currently (all clean cities coordinators operate using this basic technology). There is no special software required or other capital investment required to undertake this work.

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

The cost of ongoing effort on the part of DOE to undertake the Scorecard and the National Fleets Partnership is approximately $48,000, involving roughly 200 hours.

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

No changes or adjustments are proposed.

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

With regards to publication of information, the two streams of information collected are managed differently, as follows:

PEV Scorecard:

The Office of Vehicle Technologies intends to publish or otherwise make available online aggregate statistics gathered from the responses without relating specific answers to specific communities. Key highlights or ideal scores may be detailed, serving as case studies, with explicit permission from communities.

National Fleet Partnership:

The Office of Vehicle Technologies does not intend to publish or otherwise make available online statistics gathered from the responses because they involve information specific to individual private fleets.

1. **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. Expiration date display is not inappropriate.

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

There are no exceptions to the certification statement on OMB Form 83-I.

1. See Clean Cities Goals and Accomplishments, at <http://www1.eere.energy.gov/cleancities/accomplishments.html>. Retrieved Dec. 17, 2013. [↑](#footnote-ref-1)
2. One Million Electric Vehicles By 2015: February 2011 Status Report, U.S. Department of Energy, available at <http://www1.eere.energy.gov/vehiclesandfuels/pdfs/1_million_electric_vehicles_rpt.pdf>. Retrieved Dec. 17, 2013. [↑](#footnote-ref-2)
3. Jeff Cobb (Nov. 5, 2013). ["US Plug-In Car Sales Ride Past 150,000 Mark"](http://www.hybridcars.com/total-us-plug-in-car-sales-ride-past-150000-mark/). HybridCars.com. Retrieved Dec. 17, 2013. [↑](#footnote-ref-3)