

U.S. Department of Energy
Supporting Statement: Office of Energy Efficiency and Renewable Energy (EERE)
Environmental Questionnaire (EQ)
OMB Control Number 1910-5175

This supporting statement provides additional information regarding the Department of Energy's (DOE) extension request for the Office of Management and Budget's processing of the proposed information collection, Office of Energy Efficiency and Renewable Energy (EERE) Environmental Questionnaire (EQ). The numbered questions correspond to the order shown on Form 83-I, "Instructions for Completing OMB Form 83-I."

A. Justification

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

DOE's EERE Program provides financial assistance to awardees in the form of cooperative agreements, grants, congressionally directed projects, and technology investment agreements to support energy efficiency and renewable energy projects. The awardees include institutions of higher education, non-profits, for-profits, and State, local, and tribal governments. The National Environmental Policy Act (NEPA) of 1969 (42 U.S.C. § 4321 *et seq.*) requires that an environmental analysis be completed for all major federal actions significantly affecting the environment, including projects entirely or partly financed by Federal agencies. To effectively perform environmental analyses, DOE requires specific environmental information from Federal financial assistance awardees. EERE has developed an EQ to obtain the required information about a project from the prospective awardees. The EQ will ensure decision-making processes are consistent with NEPA as it relates to renewable energy and energy efficiency research, development, and demonstration projects.

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

Each year, EERE provides and/or administers Federal funds to support renewable energy and energy efficiency research, development, demonstration, education, and outreach projects. Prior to providing funding to an awardee, EERE is required to perform an environmental analysis. Because EERE does not have access to project-specific information, it must rely on the awardees to provide the necessary information. Without this information, EERE would not be able to perform required NEPA analyses, and hence, would not be able to meet its mission to support renewable energy and energy efficiency research, development, demonstration, education, and outreach projects, including congressionally directed projects.

EERE has used the information provided in EQs to conduct NEPA analyses of 865 projects since the EQ was approved on August 13, 2014.

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

The awardees will use an electronic system to complete the EQ online. EERE has designed the online EQ to be user-friendly and less burdensome to complete.

4. Describe efforts to identify duplication.

The project specific environmental information required by DOE to perform NEPA reviews is not available through another source, such as another Federal agency, because the information required is unique to the project activities DOE is funding. It is unlikely that another agency would be funding and/or involved in the exact same activities for every project. Moreover, most Federal agencies have promulgated their own NEPA regulations and guidance tailored to their specific missions and activities. Therefore, there are no duplicative efforts associated with this collection.

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

Small businesses and other small entities are typically eligible to apply for EERE funding opportunities. In order to minimize the burden on all applicants, including small businesses and other small entities, EERE only requests that applicants selected to negotiate for a financial assistance award complete the EQ once selections are made (instead of at the application stage). This will reduce the number of collections by at least 50 percent, which will minimize the burden on all applicants, including small businesses and other small entities.

The EQ also has a short-version form option for projects that are limited to certain types of activities, such as intellectual, academic, and analytical activities. For this option, the respondent would answer three questions and then skip to the end of the form and sign it. Since many applicants selected for award are small businesses or other small entities with projects that fall into these categories, their burden would be minimized because they would be able to complete the short-version EQ.

Additionally, in limited circumstances, EERE has identified ways to eliminate the need for awardees to complete the EQ. For example, if all projects in a particular Funding Opportunity Announcement (FOA) fall within certain NEPA categories, the respondents with projects selected within this FOA would not have to complete the EQ. EERE would complete an environmental review of the projects at the time the FOA is issued and prepare a NEPA determination for the entire FOA. This will substantially reduce the burden to these awardees, including any small businesses and small entities that EERE selects under the FOA.

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

EERE would not be able to meet its statutory and regulatory obligations under NEPA and the DOE NEPA implementing regulations, which requires EERE to perform environmental impact analyses prior to making a decision to provide Federal funding in support of an awardee's proposed project. Hence, EERE would not be able to meet its mission to support renewable energy and energy efficiency research, development, demonstration, education, and outreach projects, including congressionally directed projects. Awardees will complete one EQ for each project EERE approves for DOE funding at the time that the funds are awarded.

7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report information to the agency more often than quarterly; (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it; (c) requiring respondents to submit more than an original and two copies of any document; (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years; (e) in connection with a statistical survey, that is not designed to 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 confidentiality 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 collection is consistent with all OMB guidelines.

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

EERE published a 60-day Federal Register Notice, Vol. 82, No. 82, on May 1, 2017 on page 20332. The notice: 1) indicated EERE intends to extend the information collection for three years; 2) described the collection; 3) indicated that EERE made minor changes to clarify certain

questions; and 4) invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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

EERE is not providing any payment or gifts to respondents.

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

EERE does not request confidential information from respondents who complete the EQ.

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

The EQ does not contain any questions of a sensitive nature.

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

The estimate of the annual burden hours of the information collection is 1 hour per collection. The total number of unduplicated respondents average 300 per year.

The EQ was designed to cover a wide range of projects that EERE could potentially fund; therefore, it consists of many questions. The time it takes to complete the EQ will vary because respondents only have to complete questions that apply to their respective project.

The EQ has a limited response option for projects that are limited to certain types of activities, such as intellectual, academic, and analytical activities. For this option, the respondent would answer three questions and then skip to the end of the form and sign it. This option takes approximately 30 minutes to complete. Approximately 35 percent of EERE projects fall into this category.

If the proposed project involves other types of activities, such as physical experiments, prototypes, pilot-scale projects, demonstration projects, field tests, land-disturbing activities, construction, or similar activities, the respondent must complete the entire questionnaire. However, all questions do not apply to all projects. The EQ for these projects may take the respondent 60-120 minutes to complete depending on the nature of the project and the number of

questions they have to answer. The remaining 65 percent of the projects fall into this category. In all cases, a minimum of five questions must be answered; the other questions are answered only if applicable.

Forty-five percent of questions take an average of 60 minutes to complete and the other 20 percent take an average of 120 minutes to complete because respondents would have to answer questions that may involve information gathering for multiple project sites and more extensive documentation. Below is a table showing the calculation of the annual burden hours per respondent.

Calculation of Annual Burden Hours Per Respondent			
Percentage of 300 Projects	Average Time to Complete EQ	# of Projects	Total Collection Time/Project Type
35% respond to 3 questions only	30 minutes	105	3,150
45% respond to all questions without detailed answers	60 minutes	135	8,100
20 % respond to all questions with detailed responses required for majority of questions	120 minutes	60	7,200
Total Collection Time			18,450 minutes
Average Time to Complete EQ Per Respondent (18,450/300)			~60 minutes

Total number of unduplicated respondents: 300
 Reports filed per person: 1
 Total annual responses: 300
 Total annual burden hours: 300

Average Burden Per Collection: 1 hour
 Per Applicants: 1 hour

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

The typical respondent completing the EQ would be an environmental scientist or engineer with a mean salary of \$47/hour according to the Bureau of Labor Statistics. Therefore, the estimate of annualized cost to respondents for the annual burden hours for information collection is shown below:

Total Annual Cost: \$47/hour x 1 hour = \$47.00 per applicant
 Total Annual Collection Cost: 300 respondents x \$47.00 = \$14,100

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

All EERE costs will be associated with the review and use of the information provided in the EQ. An EERE Project Manager, a subject matter expert, initially reviews the information for accuracy and completeness. The EERE Project Manager would typically be a GS-12 or 13 General Engineer or Physical Scientist with an average salary of \$45/hour. The average review time is approximately 30 minutes.

Once the EERE Project Manager has determined that the EQ is accurate and complete, a NEPA Specialist, typically a GS 12 or 13 Physical Scientist with an average salary of \$45/hour, uses the information in the EQ to make a NEPA determination per the DOE implementing regulations contained in 10 CFR §1022. The average time it takes them to use the information is approximately 60 minutes.

The annual cost to the Federal Government is summarized below.

\$45 (Average General Engineer or Physical Scientist at EERE GS-12/13) x .5 hour x 300 = \$6,750

\$45 (Average Physical Scientist at EERE GS-12/13) x 1 hour x 300 = \$13,500

Total Annual Cost to Federal Government: \$20,250

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

There are no program changes or adjustments.

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

EERE does not intend to publish the information collected.

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

EERE will display the expiration date for OMB approval of the information collection.

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

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