

**U.S. Department of Energy**  
**Supporting Statement**  
**50001 Superior Energy Performance (50001 SEP) Certification and 50001 Ready**  
**Recognition**  
**OMB Control Number – 1910-5177**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for information from participants in the voluntary ISO 50001 offerings: 50001 Superior Energy Performance® (SEP®) certification and 50001 Ready recognition. 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.” Note: SEP may be renamed “50001 SEP” or “SEP 50001” in 2018.

This request for information consists of a voluntary data collection process for 50001 SEP (hereinafter referred to SEP) and 50001 Ready participation: to enroll commercial, industrial, and institutional facilities, manage and track certification and participation cycles. Typical respondents are energy managers that have experience with compiling energy consumption data. SEP respondents are typically from facilities with mature energy programs, while 50001 Ready respondents are from facilities that may be new to energy management. 50001 Ready provides an on-ramp to SEP and can be used as implementation assistance prior to pursuing SEP participation.

SEP is an energy efficiency certification and recognition program for commercial, institutional, and industrial facilities demonstrating excellence in energy management as well as continual improvement in energy efficiency through third-party verified energy performance. To be certified under SEP, a facility must conform to the ISO 50001 international energy management standard and demonstrate energy performance improvement (reporting year to baseline year) and other requirements that have been codified under the American National standard, ANSI/MSE 50021. Companies have the flexibility in implementing energy saving actions that are cost-effective and that suit their business practices. More specifically, the facilities are not required to implement prescriptive, regulated energy efficiency technologies and equipment (e.g., energy efficient electric motors). SEP provides a rigorous, internationally-recognized business process for companies to continually improve their energy performance. The SEP third-party verification of energy performance improvement is unique in the marketplace, and helps differentiate certified companies from their competitors. SEP certified facilities pay for the third party SEP audit.

DOE’s 50001 Ready provides an on-ramp towards SEP certification. It is a self-guided approach for facilities to establish an energy management system and self-attest to the structure of ISO 50001. An organization submits information associated with their energy management system scope and basic information about how they analyzed their energy performance. No additional standards are required. DOE provides recognition for self-attested achievement, without the need for external audits.

DOE initially used the information from SEP to evaluate the costs and benefits of SEP certification, which is consistent with the Executive Order (EO) 13624—Accelerating Investment in Industrial Energy Efficiency (August 2012). EO 13624 asks Federal agencies to:

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

The March 28, 2017 EO on Promoting Energy Independence and Economic Growth does not revoke this order. SEP and 50001 Ready facilitate implementation of the ISO 50001 standard, which is proven to improve operational efficiency and reduce costs in American manufacturing and other sectors. Improving the competitiveness of American manufacturers—a priority for the current administration, can be achieved through controlling costs through improved energy management with implementation of the ISO 50001 standard.

This information will also help DOE identify strategies to streamline SEP participation.

## **A. Justification**

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

This data collection is necessary in order to administer SEP and 50001 Ready. The data collected for SEP provides information required to certify a facility to SEP (SEP Application and SEP Energy Performance Improvement Report). Further, the SEP Energy Performance Improvement Report will allow DOE to assess its impact on saving energy in the commercial, institutional, and industrial sectors.

For first-time recognition of 50001 Ready, reporting requirements are simple: facility-level energy consumption for operations included in their 50001 Ready energy management system. Users fill out the 50001 Ready Energy Consumption Baseline Report, which is a PDF fillable form. This form is a simplified and shorter version of the information collected under SEP. 50001 Ready designation is good for one year. To renew designation after the first year, facilities demonstrate positive energy performance improvement, measured on a year over year basis. DOE provides the Energy Performance Indicator (EnPI) Lite Output File as an option for facilities seeking to renew 50001 Ready designation, but facilities may choose other means to demonstrate energy performance improvement. For example, users that have already submitted data to DOE through the Better Buildings, Better Plants using the Annual Reporting Form (OMB control number 1910-5141) may re-submit this form for 50001 Ready, thereby mitigating any burden with reporting energy consumption/performance.

SEP was developed to support effective implementation of the ISO 50001 energy management system standard in the commercial, institutional, and industrial sectors. DOE

supported U.S. leadership in developing the ISO 50001 standard with involvement from 59 countries. SEP and 50001 Ready are the U.S. governmental policy mechanisms for driving voluntary ISO 50001 implementation in the United States. They are the chief mechanism used by DOE to promote continual improvement in energy performance, thereby maximizing sustained energy and cost savings impact in the commercial, institutional, and industrial sectors. SEP certification requires ISO 50001 implementation and adds energy performance improvement criteria that are not specified in ISO 50001. SEP program elements were designed, tested, and refined in close consultation with industrial companies and the U.S. Council for Energy-Efficient Manufacturing to ensure that SEP will be cost-effective, practical, and valuable. Industrial representatives continue to provide input on critical decisions to define the technical features of the program. 50001 Ready is intended to introduce ISO 50001 to organizations that are not ready to seek external audits, such as those new to energy management.

This collection will enable DOE to conduct the technical and financial analysis needed to substantiate the investment in SEP certification and 50001 Ready recognition. Data collection from SEP-certified and 50001 Ready recognized facilities will also provide insight into best practices that will be distributed to facilitate improvements in energy performance by other organizations.

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

DOE is currently the administrator for SEP and 50001 Ready. Report collection for SEP is conducted on the SEP Database ([https://www5.eere.energy.gov/amo\\_sep\\_database/](https://www5.eere.energy.gov/amo_sep_database/)), a web-based, password-protected system that is housed within a DOE data center and compliant with the Federal Information Security Management Act (FISMA). By housing the data in a FISMA compliant system, DOE is ensuring the same information security to the facility's data as it provides to the information and systems supporting DOE. Similarly, 50001 Ready report collection is conducted on the 50001 Ready Navigator (<https://navigator.industrialenergytools.com/>), which provides users with a single tool to access ISO 50001 implementation guidance and to submit documentation to request 50001 Ready recognition from DOE.

DOE collects information to report the progress of participants in SEP and 50001 Ready. SEP is a voluntary certification intended to drive greater energy efficiency in the commercial and industrial marketplace to create cost savings and thereby improve participants' competitiveness. SEP and 50001 Ready benefits include increased and sustained energy savings, the associated cost savings, and DOE recognition. SEP certification is valid for three years. 50001 Ready recognition is valid for one year. 50001 Ready does not require external audits and is intended to help organizations position themselves to achieve and sustain energy and cost savings through an ISO 50001 energy management system. 50001 Ready facilities are also positioned to pursue ISO 50001 or SEP certification if they choose.

**The following is an overview of the data collection forms for the SEP and 50001 Ready.**

<b>Summary of SEP and 50001 Ready Data Collection Uses</b>		
	<b>Who Submits the Form</b>	<b>How DOE Will Use the Information</b>
<b>SEP Application Form</b>	End-User Facility (with mature energy program)	Track basic information on SEP participants to administer program
<b>SEP Energy Performance Improvement Report</b>	SEP Verification Body	Manage and track certification cycles; track results of SEP participation; recognize achievements
<b>50001 Ready Energy Consumption Baseline Report</b>	End-User Facility (with less-experienced energy program) seeking <i>initial</i> 50001 Ready designation	Track basic information on 50001 Ready participants to administer program and recognize achievements for initial designation
<b>Energy Performance Indicator (EnPI) Lite Tool Output File</b>	End-User Facility <i>renewing</i> 50001 Ready designation	Recognize continued achievements, including energy performance improvement, and renew 50001 Ready designation after the first year

DOE, which administers SEP and 50001 Ready, collects the SEP Application Form and SEP Energy Performance Improvement Report because they are requirements of the ANSI/MSE 50028 standard. DOE collects the 50001 Ready Energy Consumption Baseline Report to provide initial recognition for self-attested achievements, and the EnPI Lite Tool Output File to renew 50001 Ready designation beyond the first year.

The collection of the SEP forms serves to enable the administration of the SEP program, ensure that SEP certifications are awarded in accordance with the ANSI/MSE 50021 and ANSI/MSE 50028 standards, and to provide recognition for achievements.

Collection through 50001 Ready is to provide recognition for self-attested achievements. Participants' information is also needed to gauge uptake of ISO 50001, track SEP certification cycles and 50001 Ready recognition, and determine the effectiveness of DOE's efforts to promote ISO 50001.

### SEP Application Form

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

This application is required by the ANSI/MSE 50028 standard so that a SEP Verification Body will have enough documentation to initiate an audit and determine if the facility meets SEP certification requirements. (50001 Ready participants do not fill out this form.)

### SEP Energy Performance Improvement Report

After a facility achieves SEP certification, the SEP Verification Body submits a SEP Energy Performance Improvement Report to the SEP Administrator via the SEP Database. The form collects basic information about the energy performance improvement, how it was achieved, how models were applied from the SEP Measurement and Verification Protocol, and verifies the accuracy of the claims made by the facility on the SEP Application form. The SEP Administrator and DOE use the information collected to manage and track certification cycles, maintain records of expired certifications, and determine and make public program impacts and energy savings. This report will be used by DOE to confirm if a facility should be certified. Without this form, the program would not be able to recognize SEP certification. This is a spreadsheet-based form that may be submitted electronically to the SEP Database. (50001 Ready participants do not fill out this form.)

### 50001 Ready Energy Consumption Baseline Report

This form enables organizations to report facility-level energy consumption for operations included in their 50001 Ready energy management system. The information collected in this form is a simplified version of the information collected in the SEP Application form. This form is intended for 50001 Ready participants seeking first-time designation only. (SEP participants do not fill out this form.)

### Energy Performance Indicator (EnPI) Lite Tool Output File

Facilities seeking re-designation for 50001 Ready demonstrate energy performance improvement, measured on a year over year basis. It is recommended that energy performance metrics be normalized through regression modeling that controls for key independent variables such as weather, production volume, building size, etc. However, this is not required, and facilities can submit their Better Plants or Better Buildings reports as proof of energy performance improvement. For facilities wishing to follow the DOE recommended approach, DOE has developed the EnPI Lite calculator to help facilities meet the energy performance reporting requirements. This tool performs regression-based modeling of energy performance through a simple-to-use, online platform and provides an output file to summarize the analysis. Use of the tool is not required, though it provides a convenient option for facilities that would like to take advantage of DOE's regression analysis tool. **DOE does not collect the inputs to the tool; DOE only collects the summary of the tool's analysis that is automatically generated in an output file.** The information collected in this form is a simplified version of the information collected in the SEP Energy Performance Improvement Report. (Neither first-time 50001 Ready participants nor SEP participants submit this output file.)

### **Use of Information Collection to Streamline SEP Participation**

The original SEP information collection request has enabled DOE to obtain stakeholder feedback and streamline participation. DOE has evaluated the SEP collection instruments in

an effort to reduce burden to end users. Steps taken to reduce the burden on SEP participants include the following:

- Combined the former SEP Enrollment Form and SEP Application into one streamlined form, retaining the title of SEP Application.
- Removed the SEP Voluntary Cost-Benefit Form from this collection. DOE used this collection instrument to conduct an analysis on the costs and benefits of SEP certification. This analysis has been completed.

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

SEP will rely on data provided in an automated, electronic format. DOE developed a web-based, password-protected system that is housed within a DOE data center compliant with the FISMA for submitting SEP and 50001 Ready forms. Report collection for SEP and 50001 Ready is conducted on the SEP Database ([https://www5.eere.energy.gov/amo\\_sep\\_database/](https://www5.eere.energy.gov/amo_sep_database/)).

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

Currently, SEP is a national certification program offering a high level of rigor and credibility to commercial, institutional, and industrial facilities through accredited third-party verification of sustained energy performance improvements. It is the only national certification program offering third-party verification of ISO 50001 compliance and energy performance improvements. 50001 Ready complements SEP by providing technical tools and guidance to users that are not ready for external audits.

Other voluntary reporting programs were investigated for duplication, including the Environmental Protection Agency's Climate Leaders Program and ENERGY STAR building and plant certification, the Energy Information Agency's (EIA) Manufacturing Energy Consumption Survey and its voluntary reporting of greenhouse gasses, and DOE's Better Buildings, Better Plants. The EPA has since discontinued the Climate Leaders program. ENERGY STAR building and plant (synonymous with "facility") certification compares a facility to similar facilities in its sector, whereas SEP compares a facility's energy performance to a baseline of its own past performance. EIA requires reports on total energy use for entire industry sectors. The Better Buildings, Better Plants Program requests information about a baseline energy intensity number and the annual change in energy intensity relative to the baseline at the *corporate* level. SEP collects information pertaining to energy performance—a measurement of energy intensity normalized over production—over a 3 year period at a *facility* level.

50001 Ready collects energy consumption data for the first year and energy performance data for subsequent years, but on a self-reported basis. For facilities participating in SEP, Better Plants, or Energy Star, 50001 Ready will allow re-submission of forms used for those programs without any additional data collected.

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

The collection of information is not mandatory so it does not impact small businesses or other small entities unless they choose to participate voluntarily. SEP and 50001 Ready are voluntary, and small businesses may choose not to participate.

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

DOE is requesting the minimum level of information required to fully support and implement SEP and 50001 Ready. To be successfully administered, the SEP and 50001 Ready require the collection of some unique and specific participant information. DOE cannot administer the program or track participation and outcomes without the information gathered by the collection instruments described in Question 2 above. DOE is the only possible administrator at this point because of its unique engagement with past and present participants in the program.

DOE conducted demonstrations to test SEP at 40 industrial facilities throughout the United States. Results demonstrate that SEP is a cost-effective mechanism for manufacturing facilities to achieve energy savings. Continued collection of this data is essential to make a stronger case about the benefits of ISO 50001 and SEP as to sustaining energy savings of previous energy efficiency investments, to improve the effectiveness of the SEP program through refinements to program elements, and to create enduring value of ISO 50001 in the commercial, institutional, and industrial sectors. ISO does not collect this information on ISO 50001 certified facilities, furthering the need for DOE to collect the information in this request.

The SEP Application Form is necessary for DOE to gather basic information about the building or facility wishing to implement SEP program requirements and eventually pursue certification. Without the SEP Application Form, the SEP Verification Body would be unable to conduct the audit to determine certification. Without the Energy Performance Improvement Report, DOE would not have a systematic way to collect implementation data or attribute energy performance improvements to ISO 50001.

The 50001 Ready Baseline Reporting Form is necessary for DOE to provide first-time recognition to facilities that self-attest implementation of an ISO 50001 system. For future 50001 Ready re-designations, facilities demonstrate improvement in energy performance. The EnPI Lite Tool output file provides facilities with a simple means to show energy performance improvement if they do not already have methods to compile this information and/or if they have not reported their energy performance already through an existing OMB-approved pathway (e.g., Better Buildings, Better Plants).

**7. Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines. (a) requiring respondents to report**

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

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

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

The Department published a Notice and Request for Comment concerning this collection in the *Federal Register* on January 10, 2018 at FR Doc. 2018-00361. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received as a result of that notice.

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

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

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

Data that SEP and 50001 Ready participants submit through the SEP Database and 50001 Ready Navigator will not be able to be seen by other facilities. Users can only see their own data.

Participants agree to provide the information identified in this supporting statement in order to apply for and receive recognition for SEP certification or 50001 Ready. Additionally for SEP, participants provide the information to help DOE inform the broader marketplace of commercial and industrial facilities and companies about successful implementation models that generate significant energy savings and quantify the results of those models. SEP participants are informed that DOE will make the following information public upon achieving SEP certification: company name, certified facility's name and location, certification date, certification level (silver, gold, platinum), and verified energy performance improvement percentage (optional starting in 2018). 50001 Ready does not require any public reporting of policies or outcomes. DOE will list only company names and the location (city) of 50001 Ready facilities in its online listing of recognized facilities.

Energy consumption and savings data reported to DOE through SEP and 50001 Ready is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. DOE will aggregate the energy data for pledging entities to ensure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

DOE will ensure that the audits will not be performed by a party with a conflict of interest by overseeing the selection of the auditor and allowing the facility to choose their own auditor. Avoiding conflict of interest by the SEP verification bodies with SEP certified facilities is a requirement of ANSI 50028 – SEP auditing standards.

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

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

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

As of 2018, there are 52 SEP-certified facilities. DOE estimates that 100 facilities will apply for certification annually by 2020. The accompanying reporting steps are:

- In order to certify to SEP:
  - The facility submits the SEP Application Form, and
  - The SEP Verification Body submits the Energy Performance Improvement Report to the SEP Administrator (DOE) post SEP audit.

As of 2018, there are 6 recognized 50001 Ready facilities. To receive 50001 Ready recognition from DOE, the reporting steps include submission of the 50001 Ready Energy Consumption Baseline Report OR the EnPI Lite output form and a simple attestation to affirm completion of the 50001 Ready participation process. The attestation entails no other burden other than to identify the respondent and confirm the respondent's request for 50001 Ready recognition.

DOE estimates that the burden to complete the forms will be:

- SEP Application form- 1.5 hours
- SEP Energy Performance Improvement Report - 1.5 hours
- 50001 Ready Energy Consumption Baseline Report - 1 hour (not required if submitting EnPI Lite Output form)
- EnPI Lite Output Form - 1 hour (not required if submitting 50001 Ready Energy Consumption Baseline Report)

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

- Each facility receiving SEP certification has implemented a robust and well documented energy management system supported by facility energy use and consumption data. As such, a SEP certified facility is much more advanced than a "typical" manufacturing facility in terms of its ability to quantify and track its historic and current energy performance.
- The data required for the SEP Application Form is within the scope of the facility's data collection abilities and the data will already exist within the documentation for their energy management system.
- Similarly, the data requested on the SEP Energy Performance Improvement Report is already being collected by the Verification Body for certification purposes. The SEP Energy Performance Improvement Report has been developed to mirror the statistics collected by the Verification Body to determine the facility's certification status.
- Similarly, for 50001 Ready users, the data asked on the 50001 Ready Energy Consumption Baseline Report or the EnPI Lite output form will have already been compiled as part of implementing a 50001 Ready EnMS.
- The SEP Database and 50001 Ready Navigator facilitate submission of the forms by providing a secure web-based platform for accessing, completing, and submitting forms in an automated manner.
- Responses from previous forms submitted by the facility for the current certification will be pre-filled in other forms wherever and whenever applicable (*i.e.*, facility location, contact information, etc.)

It is estimated that there will be 233 forms submitted annually to DOE for the Superior Energy Performance and 50001 Ready programs by 2020. The corresponding burden is estimated to be 333 hours annually. Respondents from the industrial, commercial, and institutional sectors will include the facilities seeking or achieving SEP certification or 50001 Ready recognition and SEP Verification Bodies conducting the SEP audits. The attachment

to this supporting statement (SEP and 50001 Ready Summary of Annual Burden Hours) provides a detailed synopsis of annual burden hours for this information collection.

It is estimated that 100 facilities will seek 50001 Ready first-time recognition or re-designation annually by 2020. Of these 100, 67 will be able to meet data submission requirements using existing forms such as the Better Buildings, Better Plants Annual Reporting Form. This is based on the initial 6 recognitions where 4 have submitted their Better Buildings, Better Plants Annual Reporting Form in lieu of the 50001 Ready Energy Consumption Baseline Report. The corresponding burden is estimated to be 33 hours annually. Respondents include the facilities seeking recognition for 50001 Ready implementation. The attachment to this supporting statement (SEP and 50001 Ready Summary of Annual Burden Hours) provides a detailed synopsis of annual burden hours for this information collection. The following outline provides estimates of the reporting burden for all respondents to the Superior Energy Performance Program and 50001 Ready.

**Burden hour summary for SEP Facilities**

Total number of unduplicated respondents: 100  
Reports Filed per Person: 1 response/unduplicated respondent  
Total Annual Responses: 100 (100 SEP Application Forms)  
Total Annual Burden Hours: 150 hours  
Average Burden per Collection: 1.5 hours  
Average Burden per Applicant: 1.5 hour  
Average burden per facility per year during 3 year SEP cycle: 0 hr 30 min

**Burden hour summary for SEP Verification Body**

Total number of unduplicated respondents: 100  
Reports Filed per Person: 1 response/unduplicated respondent  
Total Annual Responses: 100 (100 SEP Energy Performance Improvement Reports)  
Total Annual Burden Hours: 150 hours  
Average burden per Collection: 1.5 hours  
Average Burden per Applicant: 1.5 hours  
Average burden per Verification Body per facility per year during 3 year SEP cycle: 0.5 hrs

**Burden hour summary for 50001 Ready Facilities**

Total number of unduplicated respondents: 33  
Reports Filed per Person: 1 response/unduplicated respondent  
Total Annual Responses: 33 (33 50001 Ready Energy Consumption Baseline Reports or EnPI Lite Output Forms)  
Total Annual Burden Hours: 33 hours  
Average Burden per Collection: 1 hour  
Average Burden per Applicant: 1 hour  
Average burden per facility per year during 1 year 50001 Ready recognition cycle: 1 hour

**Combined totals**

Total number of unduplicated respondents: 233  
Reports Filed per Person: 1 response/unduplicated respondent

Total Annual Responses: 233  
 Total Annual Burden Hours: 333  
 Average Burden per Collection: 1.43 hours  
 Average Burden per Applicant: 1.43 hours

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

While there are no capital, start-up, operation & maintenance, or purchase of services costs to these collections, the respondent will have sunk-personnel (i.e., labor) costs.

**Labor cost summary for SEP Facilities**

Total annual cost associated with total annual burden hours: \$6,080<sup>1</sup>

**Labor cost summary for SEP Verification Body**

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

**Labor cost summary for 50001 Ready Facilities**

Total annual cost associated with total annual burden hours: \$1,337<sup>3</sup>

**Combined totals**

Total annual cost associated with total annual burden hours: \$18,667

The estimated total annual cost burden to respondents completing forms for the SEP or 50001 Ready programs is about \$18,667. For SEP, the cost per certification is spread evenly over the three year SEP certification cycle, therefore, the cost per facility per year is approximately \$20.27. For SEP, the cost per Verification Body per certification is spread evenly over the three year SEP certification cycle, therefore, the cost per Verification Body per certification is approximately \$37.50. For 50001 Ready, the cost per recognition per year is \$40.53, all of which is incurred by the facility.

The table below summarizes the costs for SEP and 50001 Ready.

	Cost/year for all certifications or recognitions/year	Cost/certification or recognition/year <sup>4</sup>

<sup>1</sup> Total annual cost associated with total annual burden hours to facilities calculated by multiplying the total burden hours to facilities (150 hours) by the average hourly labor rate for an Industrial Engineer per the US Department of Labor Bureau of Labor Statistics (\$40.53), or 150 hours x \$40.53/hour = \$6,080

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

<sup>3</sup> Total annual cost associated with total annual burden hours to facilities calculated by multiplying the total burden hours to facilities (33 hours) by the average hourly labor rate for an Industrial Engineer per the US Department of Labor Bureau of Labor Statistics (\$40.53), or 33 hours x \$40.53/hour = \$1,337

To facility(ies)	\$7,417	\$114.03
To Verification Body(ies)	\$11,250	\$37.50
Total	\$18,667	\$60.80

The cost numbers for facilities are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$40.53) for industrial engineers, compiled by the U.S. Department of Labor’s Bureau of Labor Statistics. (See <https://www.bls.gov/ooh/architecture-and-engineering/industrial-engineers.htm>) The cost numbers for the Verification Body are calculated similarly, but use \$75/hr for the hourly wage rate (based on audit costs from the SEP Verification Bodies).

- (a) There are no capital and start-up cost components associated with any of these data collections. All costs associated with these data collections are personnel costs. It is assumed that the level of effort and cost by a SEP or 50001 Ready facility and/or SEP Verification Body is a sunk cost to them. The incremental level of effort for the facility and the SEP Verification Body to report to DOE for two forms (1 for the facility and 1 for the SEP Verification Body) benefits from data already gathered for SEP certification. Similarly, the incremental effort for 50001 Ready participants to assemble either the 50001 Ready Baseline Reporting Form or the EnPI Lite output form is minimal due to the data gathering and analysis conducted during ISO 50001 implementation.
- (b) There is no operation and maintenance and purchase of services component with any of these data collections. All costs associated with these data collections are personnel costs.

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

DOE will require contractor support to process and analyze the data being reported by recipients and prepare an annual summary of energy savings achieved. The following estimate reflects the DOE and contractor resources needed to process and analyze the data being reported by participants. All hourly wages used below are taken from the Bureau of Labor Statistics: [https://www.bls.gov/oes/current/oes\\_nat.htm#11-0000](https://www.bls.gov/oes/current/oes_nat.htm#11-0000). The mean hourly wage for Database and Systems Administrators (\$44.26) is to calculate the cost for the Data Management of the Superior Energy Performance collection database. For all other costs, the mean wage for an Architecture and Engineering Manager are used (\$70.33/hr).

SEP Application Form Collection Costs

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

100 forms submitted per year

200 hours per year to review and process SEP Application Form

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

200 hours @ \$70.33 per hour = \$14,066

SEP Energy Performance Improvement Report Costs

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

100 forms submitted per year

50 hours per year to collect implementation data from host plant

50 hours @ \$70.33 per hour = \$3,517

Data Management for Superior Energy Performance collection database

144 hours per year to store the data in a centralized database and manage the database

(approximately 12 hours per month). Estimate based on similar databases.

144 hours @ \$44.26 per hour = \$6,373

50001 Ready Energy Consumption Baseline Report and EnPI Lite Output File

Approximately 0.5 hours per form to review for completeness

33 forms per year

16.5 hours per year to collect energy data from facility

16.5 hours @ \$70.33 per hour = \$1,164

Therefore, total costs to the Federal government for these collection efforts will be \$25,120.

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

DOE adjusted the program by expanding its ISO 50001 offerings to facilities in more sectors and of different levels of experience with energy management. Based on feedback from industrial end users, DOE recognized a market need for more introductory level ISO 50001 offering. 50001 Ready was created to provide more basic guidance for end users that are not ready to consider third-party SEP certification.

In addition, DOE streamlined the SEP collection instruments to reduce burden to industrial facilities. The number of SEP forms was reduced from four in 2015 to two. This was accomplished by discontinuing the SEP Enrollment Form and combining relevant content into the existing SEP Application Form. The SEP Voluntary Cost/Benefit Form, which was part of the original collection, has also been discontinued.

Collection instruments were created to enable participation in 50001 Ready. These forms collect only a subset of the information that was previously approved for the SEP collection.

These program adjustments enable DOE to reduce the annual hour burden by 317 hours from the previous collection (650 hours in the original collection to 333 hours in current collection). The annual cost burden was reduced by \$12,168 compared to the previous collection (\$31,295 in original collection to \$18,677).

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

Information collected through this effort will be used to publicize the achievements, efforts, and strategies of SEP-certified facilities and 50001 Ready recognized facilities via the DOE website as a means to encourage other organizations to learn from their successes and adapt their implementation models to achieve similar improvements in energy performance. DOE will list only company names and the location (city) of 50001 Ready facilities in its online listing of recognized facilities.

For all SEP certified facilities, the following information from the SEP Energy Performance Improvement Report will be publicized through the DOE website to recognize the achievements of the certified facilities:

1. Facility name
2. Facility location (city, state)
3. Verified Achievement Level (e.g., Silver, Gold, or Platinum)
4. Verified Reporting Period Energy Performance Improvement – to be optional starting in 2018.\*

\* In 2018 SEP certified facilities sharing the verified energy performance improvement will be optional

5. Certification date (month/year)

Beyond the public information shared about specific SEP certified facility results, DOE will use information from two SEP program forms submitted to DOE: Application Form and SEP Energy Performance Improvement Form. The information collected in these forms may be used internally by DOE to produce high-level summaries and analyses of aggregated data of the SEP program, including determining the SEP program wide energy savings, and developing strategies to increase program participation. (One strategy to increase program participation was the launch of 50001 Ready to introduce ISO 50001 to end users in a more basic manner.) Results of the analyses and summaries may be published at industry conferences, publications, and the DOE website. However, aside from the items listed above, no information that could potentially relate the data to a specific facility will be published. Further, raw data will not be published.

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

## **Burden Statement on SEP Application and SEP Energy Performance Improvement Report**

On the SEP program forms requested to be completed by the end user or SEP Verification Body, the Burden Disclosure Statement will be included.

“Public reporting burden for this collection of information is estimated to average 1.5 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to the Office of the Chief Information Officer, Enterprise Policy, Portfolio Management & Governance Division, IM-22, Paperwork Reduction Project (OMB control #1910-5177), U.S. Department of Energy, 1000 Independence Ave SW, Washington, DC, 20585-1290; and to the Office of Management and Budget (OMB), OIRA, Paperwork Reduction Project (OMB control #1910-5177), Washington, DC, 20503.

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

1. Facility name
2. Facility location (city, state)
3. Verified Achievement Level (e.g., Silver, Gold, or Platinum)
4. Verified Reporting Period Energy Performance Improvement – optional, starting in 2018\*

\* SEP certified facilities have the option of sharing the verified energy performance improvement or not

5. Certification date (month/year)

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

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

### **Burden Statement for 50001 Ready Baseline Reporting Template and EnPI Lite Output File**

On the 50001 Ready forms requested to be completed by the end user, the following statement will be provided to disclose the information that will be disclosed publicly and how DOE will protect confidential business information:

“Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden, to Office of the Chief Information Officer, Enterprise Policy, Portfolio Management & Governance Division, IM-22, Paperwork Reduction Project (OMB control #1910-5177), U.S. Department of Energy, 1000 Independence Ave SW, Washington, DC, 20585-1290; and to the Office of Management and Budget (OMB), OIRA, Paperwork Reduction Project (OMB control #1910-5177), Washington, DC 20503.

The US DOE, as the 50001 Ready Program Administrator within the United States, maintains the confidentiality of proprietary energy data that is submitted to the 50001 Ready program by facilities seeking 50001 Ready recognition, to the fullest extent of US federal law. Data included within the 50001 Ready Baseline Energy Consumption Report and any other forms or data shared with the US DOE will not be released publicly. The US DOE will make public the following information about each 50001 Ready recognized facility:

1. Facility name
2. Facility location (city, state)
3. Recognition date (month/year)

US DOE will, from time-to-time, publicly share aggregate, program-wide metrics, such as number of 50001 Ready recognized facilities, and annual and cumulative energy information of 50001 Ready recognized facilities without revealing data or analysis that could lead to the identification of specific facilities.

US DOE may use data to study the effectiveness and impact of the 50001 Ready program. Results from such analysis will be made public only if participating organization anonymity can be ensured. The participating organization may be asked if they wish to voluntarily participate in the formation of case studies and other activities regarding the 50001 Ready program.”

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

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

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

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