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Supporting Statement for Annual Survey of Alternative Fueled Vehicles

# Part A: Justification

**OMB No. 1905-0191**

Form EIA-886 *Annual Survey of Alternative Fueled Vehicles*



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*Independent Statistics & Analysis*

www.eia.gov

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## Introduction

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy (DOE). It collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding regarding energy and its interaction with the economy and the environment. EIA is required to publish, and otherwise make available independent, high-quality statistical data to federal government agencies, state and local governments, the energy industry, researchers, and the general public. To meet this obligation, EIA utilizes Form EIA-886 *Annual Survey of Alternative Fueled Vehicles* to collect data onalternative fueled vehicle and alternative transportation fuel usage within the United States.

EIA requests a three-year extension with changes to Form EIA-886 *Annual Survey of Alternative Fueled Vehicles*.

Form EIA-886 is a mandatory survey that collects information on the number and type of alternative fueled vehicles (AFVs) and other advanced technology vehicles (e.g., hybrid and fuel cell vehicles) that vehicle suppliers made in the previous year and plan to make in the current year; the number, type, and location of AFVs in use in the previous year; the amount and distribution of each type of alternative fuel consumed in the previous year; the number of miles traveled by AFVs in the previous year; and retirement of AFVs.

## Changes to Form EIA-886

* + - * EIA will collect more detailed weight classifications and vehicle type information from suppliers and users of AFVs. In the current Form EIA-886, Parts 2 and 3 collect data on the inventory and supply of alternative fueled vehicles. In Part 2, respondents are required to report the vehicle type, fuel type, engine configuration, application, quantity, miles traveled, and alternative fuel consumption for all AFVs in use. In Part 3, respondents are required to report the vehicle type, model, fuel type, engine configuration, and quantities made available and planned to be made available for all AFVs and advanced technology vehicles supplied. The current set of vehicle type codes for Vans, Trucks, and Pickup Trucks are defined by a range of gross vehicle weight rating (GVWR) classification.

EIA’s current weight classifications are based on the following GVWR range:

* + Light Duty: 8,500 lbs. or less
  + Medium Duty: 8,501 lbs. - 26,000 lbs.
  + Heavy Duty: 26,001 lbs. or more

To standardize weight classes reflecting industry standards and to align with EPA’s emissions inventory model (MOVES), EIA will simplify the list of vehicle type codes by removing weight class attributes and add a column for more detailed medium duty weight classifications (shown below).

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| Class | 2a | 2b | 3 | 4 | 5 | 6 | 7 | 8 |
| GVWR (lbs.) | <8,501 | 8,501-10,000 | 10,001-14,000 | 14,001-16,000 | 16,001-19,500 | 19,501-26,000 | 26,001-33,000 | >33,000 |

The Environment Protection Agency’s (EPA) Office of Transportation and Air Quality is responsible for the development of the official EPA emissions inventory model for highway and non-road mobile sources, MOVES (Motor Vehicle Emission Simulator). This model is also used by state, local, and regional governments for environmental analysis for official submissions to EPA required by the Clean Air Act, such as State Implementation Plans (SIPs) and transportation conformity analysis for roadway construction. MOVES is also used by universities for academic research on vehicle emissions. In addition, the MOVES model is instrumental in the development of national inventories used for evaluating the costs and benefits of EPA regulations, such as the second phase of the Greenhouse Gas Rule for Heavy-Duty Vehicles, currently underway, including the predictions of the effects of EPA regulations on air quality.

The use of MOVES to develop mobile source inventories depends not only on the development of emission rates for these sources, but also depends on the availability of detailed information on source populations and activity (use). Since emission rates can vary significantly by the fuel used and the type of vehicle, having reliable information about the kinds of vehicles in the fleet and what fuels they are using is important. Most EPA emission standards apply to vehicles in groups based on their gross vehicle weight rating (GVWR), which is why knowing vehicle weight of vehicles is important to EPA.

One important source of total vehicle miles traveled for EPA is the Highway Performance Monitoring System (HPMS) managed by the Federal Highway Administration (FHWA). HPMS obtains statistical measurements from each state to develop detailed estimates of annual vehicle miles travelled on highways over the entire nation. These measurements cannot determine the regulatory classification of vehicles (based on GVWR), but can differentiate vehicles into basic vehicle types (motorcycles, short- and long-wheelbase light-duty vehicles, buses, single unit, and combination trucks). Recently FHWA added a new parameter at 10,000 lbs. to distinguish between light-duty and heavy-duty vehicles. However, regardless of weight, FHWA now bundles six-tire vehicles in with other single unit trucks, so knowing the configuration of tires helps to properly place EIA survey vehicles in the proper activity group. Similarly, recent EPA regulations for greenhouse gases affect the emissions of single unit and combination trucks differently.

* + - * EIA also seeks to gather information about electric vehicle charging infrastructure. EIA will add the following two questions related to the charging of electric vehicles to Part 2 Section 2 of the form:

1. How do you charge your electric/plug-in hybrid electric vehicles?

2. Does your electric utility provide separate billing on kilowatt hours used for refueling vehicles?

Part 2 of the Form EIA-886 collects data from AFV users on the vehicle type, fuel type, engine configuration, application, quantity, miles traveled, and alternative fuel consumption for AFVs in use. Adding these questions allows EIA and its data users to gain a better understanding of the refueling/charging infrastructure for electric and plug-in hybrid electric vehicles.

## A.1. Legal Justification

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

* 15 U.S.C. §772(b) states:
  + All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the (Secretary) such information and periodic reports, records, documents, and other data, relating to the purposes of this Act, including full identification of all data and projections as to source, time and methodology of development; as the [Secretary] may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under this Act.
* 15 U.S.C. 764(b) states that to the extent authorized by Section 5(a), the Administrator shall:
  + (1) advise the President and the Congress with respect to the establishment of a comprehensive national energy policy in relation to the energy matters for which the Administration has responsibility, and, in coordination with the Secretary of State, the integration of domestic and foreign policies relating to energy resource management;
  + (2) assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public;
  + (3) develop effective arrangements for the participation of State and local governments in the resolution of energy problems;
  + (4) develop plans and programs for dealing with energy production shortages;
  + (5) promote stability in energy prices to the consumer, promote free and open competition in all aspects of the energy field, prevent unreasonable profits within the various segments of the energy industry, and promote free enterprise;
  + (6) assure that energy programs are designed and implemented in a fair and efficient manner so as to minimize hardship and inequity while assuring that the priority needs of the Nation are met;
  + (9) collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data;
  + (12) perform such other functions as may be prescribed by law.
* As the authority for invoking sub section (b), above, 15 U.S.C. §764(a) states:
  + Subject to the provisions and procedures set forth in this Act, the [Secretary] shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the Nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions...
    - (1) specifically transferred to or vested in him by or pursuant to this chapter;
    - (3) otherwise specifically vested in the Administrator by the Congress.
* Additional authority for this information collection is provided by 15 U.S.C. §790(a) which states;
  + It shall be the duty of the Director to establish a National Energy Information System… shall contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption within and affecting the United States on the basis of such geographic areas and economic sectors as may be appropriate to meet adequately the needs of -

(1) the Department of Energy in carrying out its lawful functions;

(2) the Congress;

(3) other officers and employees of the United States in whom have been vested, or to whom have been delegated energy-related policy decision-making responsibilities;

* + At a minimum, the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, and shall include, such energy information as is required to define and permit analysis of -

(1) the institutional structure of the energy supply system including patterns of ownership and control of mineral fuel and non-mineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;

(2) the consumption of mineral fuels, non-mineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;

(5) industrial, labor, and regional impacts of changes in patterns of energy supply and consumption;

(6) international aspects, economic and otherwise, of the evolving energy situation;

(7) long-term relationships between energy supply and consumption in the United States and world communities.

* 42 U.S.C. §13253 states that

(a) the Secretary shall estimate for the following calendar year:;

1) the number of each type of alternative fueled vehicle likely to be in use in the United States

2) the probable geographic distribution of such vehicles;

3) The amount and distribution of each type of replacement fuel;

(b)(1) fuel suppliers shall report to the Secretary on the amount of each type of replacement fuel that such supplier…

(A) has supplied on the previous calendar year; and…

(B) plans to make available for the following calendar year;

(b)(2) suppliers of alternative fueled vehicles to report to the Secretary on the number of each type of alternative fueled vehicle that such supplier…

(A) has made available in the previous calendar year; and

(B) plans to supply for the following calendar year; and

(3) such fuel suppliers to provide the Secretary information necessary to determine the greenhouse gas emissions from the replacement fuels used, taking into account the entire fuel cycle.

## A.2. Needs and Uses of Data

The purpose of Form EIA-886 is to collect information on the Alternative Fuel Vehicle industry and determine if sufficient quantities of AFVs are available for purchase by federal and state agencies and fuel suppliers, and to provide Congress with a measure of the extent to which the objectives of the Energy Policy Act of 1992 (EPACT92) are being achieved. While automotive manufacturers and aftermarket vehicle converters are not required to produce AFVs, fleets such as the federal government, state governments, and fuel providers must meet regulatory requirements in petroleum reduction via AFV acquisitions. EIA’s supplier data informs these parties as well as the public to the availability of AFVs in the marketplace. In addition, the data serve as market analysis tools for Congress, federal and state agencies, AFV suppliers, vehicle fleet managers, and other interested organizations and persons. These data are also used to respond to numerous public requests for detailed information on AFVs and Alternative Transportation Fuels (ATFs), the number of AFVs distributed by state, as well as the amount and location of the ATFs consumed.

EIA publishes summary information from Form EIA-886 database in the annual [*Alternative Fuel Vehicle Data*](http://www.eia.gov/renewable/afv/) report. This report covers historical and projected supplies of AFVs, AFV usage by selected user groups, and estimates of total U.S. AFV counts and U.S. consumption of ATFs. These data provide a baseline for DOE's transportation sector energy models. They also provide the energy consumption measures for alternative transportation fuels in EIA’s State Energy Data System (SEDS).

In addition, data collected on Form EIA-886 are used in EIA's National Energy Modeling System (NEMS), a component model that forecasts transportation sector energy consumption and provides a framework for AFV policy and technology analysis. Data obtained from Form EIA-886 are used to improve the NEMS Transportation Demand Model by allowing for greater detail in AFV type and characteristics. Similarly, EPA’s Office of Transportation and Air Quality’s Motor Vehicle Emission Simulator (MOVES) depends on the availability of detailed inventory and fuel use data at the vehicle type level to model national and regional estimates of AFV emissions, air quality, and environmental analysis. Specifically, EPA uses the data collected on Form EIA-886 to make modeling decisions when developing mobile-source emissions inventory for their MOVES model.

## A.3. Use of Technology

Form EIA-886 uses an Internet-based data collection system as the primary means of data collection from respondents (i.e., state agencies, fuel providers, transit agencies, local governments and private organizations. The Internet-based systems allow respondents to enter their data directly into EIA survey databases, which reduces the time needed for data collection and processing. The systems identify reported data that fail edit specifications prior to submission, which allow respondents to make necessary corrections or explain unusual situations impacting the reported data. This data editing process reduces respondent burden by reducing the number of times a respondent must resubmit forms prior to acceptance by EIA. It also improves the timeliness of reporting the information to the public. The only equipment and software a respondent requires is a connection to the Internet and a standard industry web browser.

EIA encourages all Form EIA-886 respondents to use the electronic data collection system. During the 2016 survey cycle, 90% of Form EIA-886 respondents reported through this system. The remaining respondents do not have Internet access and/or prefer to use another reporting method, such as fax or first class mail.

To automate and reduce duplicative reporting by federal agencies, the Federal Automotive Statistical Tool (FAST) Web-based data collection system was developed jointly by FEMP, EIA, and GSA in 2000 to assist federal fleets in meeting all the aforementioned data reporting requirements. Federal agencies report the data requirements of Form EIA-886 via FAST, and the other Form EIA-886 respondents use a web-based data collection system to comply with these reporting requirements. At the close of the survey cycle, data reported in FAST are transferred into Form EIA-886 Web-based data collection system for processing.

## A.4. Efforts to Identify Duplication

EIA reviews and evaluates Alternative Fuel Vehicles industry information available from a variety of sources, including other federal agencies, industry trade associations, state governments, and commercial information services, to identify instances of duplication. Additionally, in the public notices and consultations associated with the triennial re-clearance of Form EIA-886, EIA encourages respondents and data users to identify alternate sources of AFV information EIA proposes to collect. Instances of potential data duplication identified by EIA are evaluated in terms of data coverage, level of aggregation, frequency of collection, data reliability, and statutory requirements to determine whether alternate data sources represent a suitable substitute for EIA data.

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

|  |  |  |
| --- | --- | --- |
| **Agency** | **Office** | **Form/Regulatory Requirement** |
| ***Department of Energy*** | ***Energy Efficiency & Renewable Energy*** | ***State & Alternative Fuel Provider Program*** [***[10 CFR Part 490]***](http://www.access.gpo.gov/nara/cfr/waisidx_10/10cfr490_10.html) |
| Summary:  Requires covered fleets either to acquire AFVs as a percentage of their annual light-duty vehicle acquisitions or to employ other petroleum reducing methods in lieu of acquiring AFVs.  Reasons these data are not duplicative of data collected by Form EIA-886:   * Order 10-CFR Part 490, Alternative Fuel Transportation Program, requires the reporting of only vehicle acquisitions, and not vehicle inventory. Attempting to estimate vehicle inventory from this acquisitions data, as needed by EIA to determine fuel consumption, cannot be performed with statistical confidence. * The reporting requirements apply only if a state government or fuel provider: 1) owns, operates, leases, or controls at least 50 light duty vehicles (LDVs) within the United States (excluding law enforcement vehicles, emergency motor vehicles and non-road motor vehicles); 2) 20 of those LDVs are used primarily within any Consolidated/ Metropolitan Statistical Area; and 3) those same 20 LDVs are centrally fueled, or are capable of being centrally fueled. (The term “centrally fueled” means that a refueling infrastructure exists within reasonable traveling distance from the fleet.) The void left by those organizations that are not required to report to DOE, or whose vehicles are exempted, make it cumbersome, expensive, and detrimental to the overall quality of fulfilling EPACT92’s mandates by attempting to supplement these data from other sources. * Data on fleets exempt from the rulemaking are needed to accurately estimate total AFVs in use and ATFs consumption and to satisfy many public requests for detailed information on AFVs and ATFs, (e.g., in determining where to locate a refueling facility). | | |

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| --- | --- | --- |
| **Agency** | **Office** | **Form/Regulatory Requirement** |
| ***Department of Energy*** | ***Energy Efficiency & Renewable Energy*** | ***Private & Local Government Fleet*** [***Determination***](http://www1.eere.energy.gov/vehiclesandfuels/epact/pdfs/alt_fuel_final_rule_3-14-08.pdf) |
| Summary:  Under the Energy Policy Act of 1992, DOE was directed to determine whether private and local government fleets should be subject to DOE’s Alternative Fuel Transportation Program and associated requirements. In March 2008, DOE determined not to require that private and local government fleets acquire AFVs, because such a requirement is not currently necessary to achieve the Replace Fuel Goal (a statue to replace 30% of U.S. motor fuel with non-petroleum fuels by 2030).  Reasons these data are not duplicative of data collected by Form EIA-886:   * As stated in the summary above, private and local government fleets are not subject to regulatory requirements that AFVs routinely be acquired. As a result, Form EIA-886 is the best source of comprehensive AFV inventory and alternative fuel consumption data. | | |
| **Agency** | **Office** | **Form/Regulatory Requirement** |
| ***Department of Energy*** | ***Energy Efficiency & Renewable Energy***  ***Federal Energy Management Program*** | ***Executive Order 13149 –*** [***Greening the Government Through Federal Fleet & Transportation Efficiency***](http://ceq.hss.doe.gov/nepa/regs/eos/eo13149.html) |
| Summary:  The purpose of this April 2000 order was to ensure that the Federal Government exercise leadership in the reduction of petroleum consumption through improvements in fleet fuel efficiency and the use of AFVs and ATFs . Agencies were required to develop performance strategies to meet goals, and DOE was directed to establish a data collection and reporting system for collecting annual agency performance data on meeting the goals of this order and other applicable statutes and policies.  Reasons these data are not duplicative of that collected by Form EIA-886:   * EIA, GSA, and FEMP coordinated all AFV data requirements and developed the Federal Automotive Statistical Tool (FAST) to capture compliance and EPACT92 mandates in one Web-enabled data collection system. EIA, GSA, and FEMP gathered all its individual mandated requirements and consolidated them into one data collection for federal agencies. After the implementation of FAST in 2001, EIA merged its online data collection for federal AFVs with FAST and federal agencies now report their Form EIA-886 data through this system. Form EIA-886 is not duplicative as it collects data for the remainder of the universe of respondents (i.e., state agencies, fuel providers, transit agencies, local governments and private organizations). | | |
| **Agency** | **Office** | **Form/Regulatory Requirement** |
| ***Department of Energy*** | ***Energy Efficiency & Renewable Energy***  ***Federal Energy Management Program*** | ***Executive Order 13423 –*** [***Strengthening Federal Environmental, Energy & Transportation Management***](http://www.gpo.gov/fdsys/pkg/FR-2007-01-26/pdf/07-374.pdf) |
| Summary:  The purpose of this January 2007 order was to ensure that federal agencies conduct their environmental, transportation, and energy-related activities under the law in support of their respective missions in an environmentally, economically and fiscally sound, integrated, continuously improving, efficient, and sustainable manner. Goals were established to (1) reduce the fleet’s total consumption of petroleum products by 2 percent, annually, through the end of fiscal year 2015; (2) increase the total fuel consumption that is non-petroleum-based by 10 percent, annually, relative to agency baselines for fiscal year 2005; and (3) use plug-in hybrid vehicles when commercially and economically available.  Reasons these data are not duplicative of that collected by Form EIA-886:   * All AFV-related inventory and fuel consumption data relevant to this Executive Order were incorporated into FAST. EIA, as a co-sponsor of the Web system, is not duplicating efforts to capture data for Form EIA-886. The data requirements from this Executive Order do not duplicate the questions asked on Form EIA-886. | | |

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| --- | --- | --- |
| **Agency** | **Office** | **Form/Regulatory Requirement** |
| ***General Services Administration (GSA)*** | ***Office of Government Wide Policy*** | ***Federal Management Regulation*** [***Part 102-34 Motor Vehicle Management Subpart J – Federal Fleet Report***](http://www.gsa.gov/portal/ext/public/site/FMR/file/Part102-_34.html/category/21858/#wp2024098) |
| Summary:  The Federal Fleet Report ([FFR](http://www.gsa.gov/vehiclepolicy)) is an annual summary of federal motor vehicle fleet statistics based upon fleet composition at the end of each fiscal year and vehicle use and cost during the fiscal year. The FFR is compiled by GSA from information submitted by federal agencies. The FFR is designed to provide essential statistical data for worldwide federal motor vehicle fleet operations. Review of the report assists federal agencies, including the GSA, in evaluating the effectiveness of the operation and management of individual fleets and to identify high cost areas where fleet expenses can be reduced. The reporting categories of data included in the FFR are inventory, acquisitions, operating costs, miles traveled and fuel used.  Reasons these data are not duplicative of that collected by Form EIA-886:   * Prior to the development of FAST, GSA fielded Form SF-82 *Agency Report of Motor Vehicle Data* (now obsolete) to gather information on motor vehicles in the federal fleet. At one time, Form EIA-886 and Form SF-82 collected duplicative data from federal agencies; however, after 2001, EIA and GSA no longer fielded the individual survey instruments. Instead, they both utilized the FAST system to gather their required vehicle data from federal agencies. | | |

## A.5. Provisions for Reducing Burden on Small Businesses

EIA recognizes the need to minimize the reporting burden on small businesses and designs data surveys so that small operations are not unduly affected. Additionally, EIA has established reporting thresholds for survey likely to affect small businesses. These threshold either eliminate the reporting requirement for small businesses or limit the amount of information they are asked to supply.

The *Annual Survey of Alternative Fueled Vehicles* collects data from AFV suppliers and users of AFVs. The small business response burden for this survey is minimal, because most of the data requested (the AFV and ATF information) are reported by fleet operators, who are considered ‘large’ businesses. The typical smaller respondent is a conversion company (i.e., an AFV supplier), and the number of conversion companies has declined in recent years.

Respondents to Form EIA-886 are given options concerning how their data are to be submitted to EIA. Small businesses may use the electronic data submission system that reduces reporting burden. Additionally, small business are only required to provide estimates of their planned AFV supply amounts, based on available information at the time of report completion, thus not requiring small businesses to apply the rigorous forecasting methods that large businesses typically are required of them.

## A.6. Consequences of Less-Frequent Reporting

Form EIA-886 is the only resource for summary-level totals of AFV inventory and ATF consumption. Form EIA-886 provides the only comprehensive picture of the current and projected supply of alternative fueled and advanced technology vehicles in the U.S.

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

## A.7. Compliance with 5 CFR 1320.5

Form EIA-886 data collection complies with the guidelines in CFR 1320.5.

## A.8. Summary of Consultations Outside the Agency

EIA consulted with EPA in the preparation of the 2018 renewal of Form EIA-886 to identify elements in the collection of data that could be modified to gather more applicable data for use by EPA. Prior to the renewal of this ICR, EIA reached out to EPA to solicit suggestions on modifications to the *Annual Survey of Alternative Fueled Vehicles.*

The EPA uses the information collected on Form EIA-886 to produce national and regional statistics on air quality, which are then used to evaluate the costs and benefits associated with newly implemented EPA’s regulations. In order to produce these estimates, EPA which relies on detailed vehicle information collected on this survey for use of their MOVES model to produce mobile-source emission inventories, suggested the following changes to Form EIA-886:

* + Collect van and truck data by FHWA weight class or gross vehicle weight rating (GVWR).
  + At least distinguish between Class 2b (8,500-10,000 lb) and Class 3 (10,000-14,000 lbs) vehicles.
  + For light duty trucks (such as pickup trucks and vans), identify if they have six tires or more.
  + Differentiate between heavy-duty straight (single unit) trucks and tractor or tractor-trailer combinations.
  + For flexible fuel vehicles, ask how much conventional fuel is used versus alternative fuel.

EIA, with approval from OMB, completed a cognitive research study on these proposed changes, with a concentration on the ability of respondents to report their AFV data under the newly designated weight and vehicle categories suggested by EPA. As part of this research project, EIA conducted 51 cognitive interviews with Form EIA-886 respondents between February 2017 and March 2017. The companies interviewed varied in their size and location of their operation. These companies spanned the spectrum of sizes from small businesses having two AFVs to companies with fleets over a 1,000 AFVs. Participants interviewed included state governments, local governments, fuel providers, transit agencies, private fleets, and Original Equipment Manufacturers (OEM). The interviews conducted lasted approximately 30 minutes.

The objectives of this cognitive research project were to determine whether respondents are able to provide more detailed “Vehicle Type” information on Form EIA-886; determine whether respondents are able to provide more detailed information on their fuel use; and estimate any changes in reporting burden associated with collecting this information. The research results show that respondents are able to report their AFVs using weight categories proposed by EPA. Reporting detailed vehicle information would not require any substantial changes to their record keeping practices and data systems to report AFVs under new weight ranges. Additionally, respondents are able to report AFV fuel consumption in conventional and alternative fuel categories. Similar to the new weight range categories, reporting consumption would require minimal changes to the respondents’ record keeping practices. Electric vehicle information is not as available from the respondents’ records as information on non-electric AFVs. Information pertaining to electric vehicles such as battery consumption, battery life, and charge rate is limited. Most participants that have electric vehicles do not track consumption. Regarding overall burden, information gathered from the interviews estimated a response burden increase from 4 hours to 5.44 hours, an increase of 1.44 hour from the previously approved burden estimate. The increase in the burden per response is from collecting more detailed information on weight class, vehicle attributes, and fuel consumption.

EIA contacted EPA following the conclusion of the cognitive research project on Form EIA-886 to inform them of the findings, the subsequent changes to the survey, and ensure that the changes to the survey were adequate to EPA. EPA provided positive comments to EIA regarding these changes and highlighted the additional utility these changes provide to the data collected on the survey.

## A.9. Payments or Gifts to Respondents

There will be no gifts or payments given to respondents as an incentive for completing Form EIA-886.

## A.10. Provisions for Protection of Information

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

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

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

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

## A.11. Justification for Sensitive Questions

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

## A.12. Estimate of Respondent Burden Hours and Cost

The sample size from the last clearance of Form EIA-886 decreased since the last clearance of this ICR. A breakdown for the total respondent burden is shown below.

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If all 1,334 respondents completed the survey as indicated above, the total annual burden would be 7,257 hours. The annual cost to the respondents is estimated to be $549,282 (7,257 annual burden hours multiplied by $75.69 per burden hour)

An average cost per hour of $75.69 is used because this is the average loaded (salary plus benefits) cost for an EIA employee. EIA assumes that the survey respondent workforce completing surveys for EIA is comparable with EIA workforce.

## A.13. Annual Cost to the Federal Government

The total annualized cost to the government for Form EIA-886 is approximately $286,104. The annualized costs includes the contactor costs (shown in Table A2) and the costs for one federal employee (shown in Table A3). These two tables show a breakdown of the costs and the labor hours for each activity.

|  |  |  |  |
| --- | --- | --- | --- |
| Table A2 Contractor Costs (Annual) | | | |
| **Activity** | **Labor hours** | **Rate** | **Cost** |
| Survey frame and maintenance | 60 | $ 136.36 | $ 8,182 |
| Data collection and processing | 800 | $ 136.36 | $ 109,091 |
| Data dissemination | 30 | $ 136.36 | $ 4,091 |
| Data systems maintenance and enhancements | 320 | $ 136.36 | $ 43,636 |
| **Total Annual Cost** | 1,210 | $ 136.36 | **$ 165,000** |

|  |  |  |  |
| --- | --- | --- | --- |
| Table A3 Federal Employee Costs (Annual) | | | |
| **Activity** | **Labor hours** | **Rate** | **Cost** |
| Survey frame and maintenance | 280 | $ 75.69 | $ 21,193 |
| Data collection and processing (QA) | 920 | $ 75.69 | $ 69,635 |
| Data dissemination | 240 | $ 75.69 | $ 18,166 |
| Data systems maintenance and enhancements | 160 | $ 75.69 | $ 12,110 |
| **Total Annual Cost** | 1,600 | $ 75.69 | **$ 121,104** |

## A.14. Changes in Burden and

The estimated change in annual burden is 958 hours (a decrease of approximately 12%) shown in Table A4 below.



## A.15. Reasons for Changes in Burden

The overall decrease of 958 annual burden hours associated with this survey is due to multiple factors:

First, the number of respondents required to complete Form EIA-886 decreased by 716 respondents, from 2,050 in the previous clearance to 1,334 annual respondents requested in this clearance. EIA requested 2,050 respondents in the last clearance because that is the estimated number of potential respondents for this form that EIA could identify that are not currently reporting on this form. However, due to budget constraints, EIA was not been able to identify and survey these potential respondents. EIA’s request of 1,334 respondents for this clearance is based on the number of respondents that reported to EIA on this form in the previous two survey cycles plus potential new respondents in the state and local government category. The number of respondents that completed this form in 2016 was 1,113 and in 2017 there were 1,022 respondents. EIA is requesting 1,334 respondents in this information collection request to continue surveying the respondents currently reporting on the form and to allow for an increase from respondents representing local governments in the EIA-886 survey frame to collect data on the growing AFV industry.

Second, EIA conducted a cognitive research study of Form EIA-886 respondents and determined that the previously used burden hours for select groups (e.g., AFV users with complex and simple fleets, OEMs and AVCs) were no longer correct.

Lastly, the changes to Part 2 of Form EIA-886, which will collect more detailed weight class data, GVWR class data, and electric and/or plug-in hybrid vehicle information, will increase burden per response. The cognitive research showed that the addition of these data elements increases the time burden required by respondents categorized as Simple AFV fleets and Complex AFV fleets by 2.31 and .54 hours respectively. Additionally, the new reporting requirements for respondents classified as AVCs and OEMS will slightly increase the burden per response. This study revealed that AFV supplier respondents maintain detailed vehicle records on weight, fuel type used, and consumption information in the normal course of their activities and that gathering and reporting these data would create a small increase in burden. These increases in burden plus the adjustments to the current response burden, results in a total increase of average burden per response for Form EIA-886 from 4 hours to 5.44 hours. The changes to the average burden per response for the different respondent categories are shown in Table A5.

**Table A5 Estimated Respondent Burden (Hours)**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **User Type** | **Current Burden** | **Actual Burden (Based on Interviews)** | **Additional Questions Burden Increase** | **New Burden** | **Total Burden Change** |
| OEMs | 2.5 | 3.75 | 0.1 | 3.85 | 1.35 |
| AVCs | 2 | 3.75 | 0.1 | 3.85 | 1.85 |
| Simple AFV Fleets | 3 | 3.2 | 2.31 | 5.51 | 2.51 |
| Complex AFV Fleets | 24 | 4.68 | 0.54 | 5.22 | -18.78 |
| Average Burden | 4 |  |  | 5.44 | 1.44 |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Table A6 ICR Summary of Burden** | | | | |
|  | **Requested** | **Program Change Due to Agency Discretion** | **Change Due to Adjustment in Agency Estimate** | **Previously Approved** |
| Annual Number of Responses | 1,334 | -716 | 0 | 2,050 |
| Annual Time Burden (Hr) | 7,257 | -2864 | 1921 | 8,215 |

## A.16. Collection, Tabulation, and Publication Plans

Plans to tabulate and publish data collected by Form EIA-886 are described below.

The time schedule for data collection and related analysis activities for the 2018 Report is summarized, below. (Similar schedules will be followed in subsequent years.)

**Schedule for Data Collection, Analysis and Publication**

Activity Estimated Completion Date

Mail Form EIA-886 Survey for 2017 Report Year February 15, 2018

Survey Response Due to EIA April 15, 2018

Begin Follow-up Contact with Respondents April 15, 2018

End Follow-up Contact with Respondents July 15, 2018

Complete Data Collection September 15, 2018

Perform Data Analysis and Prepare Preliminary Data Report December 15, 2018

Publish Survey Results on EIA Website January 1, 2019

## A.17. OMB Number and Expiration Date

The OMB Number (1905-0191) and data collection expiration date will be displayed on all data collection forms and instructions.

## A.18. Certification Statement

There are no exceptions to the certification statement identified in Item 19, “certification for Paperwork Reduction Act Submissions,” of OMB Form 83-I. This information collection request complies with 5 CFR 1320.9.