

**SUPPORTING STATEMENT FOR
EPA INFORMATION COLLECTION REQUEST NUMBER 1736.08
EPA'S NATURAL GAS STAR PROGRAM**

December 20, 2018

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title of the Information Collection

"Reporting and Recordkeeping Requirements Under EPA's Natural Gas STAR Program," ICR renewal number 1736.08, OMB Control No. 2060-0328.

1(b) Short Characterization/Abstract

Natural Gas STAR is a voluntary program implemented by the U.S. Environmental Protection Agency (EPA) since 1993 that encourages oil and natural gas companies to adopt cost effective technologies and practice that improve operational efficiency and reduce methane emissions. Methane is the primary component of natural gas and a potent greenhouse gas. The Program works with oil and natural gas companies in the production, gathering & processing, transmission, and distribution sectors to remove barriers that inhibit the implementation of technologies and practices that reduce methane emissions. The Program effectively promotes the adoption of emission reduction technologies and practices by helping Natural Gas STAR partners evaluate Best Management Practices (BMPs) in the context of their current operations, and implement them where cost effective. Implementation of the Program's BMPs saves participants money, improves operational efficiency, and enhances the protection of the environment.

Oil and natural gas companies become partners by completing and submitting a Partnership Agreement that outlines responsibilities of the partner company and EPA. The agreement commits a Natural Gas STAR partner to evaluate and implement voluntary activities that result in methane emissions and consider implementation of appropriate BMPs that reduce methane emissions, generate revenue, and improve operational efficiency.

The current Memorandum of Understanding used to join the partnership has not been updated in 25 years. EPA therefore proposes to replace it with a streamlined and more flexible Partnership Agreement which will more realistically reflect options companies have to engage with the Program. This change, in addition to updates to the annual report forms and increased flexibility regarding partner Implementation Plans, will reduce the total burden estimate for companies participating in Natural Gas STAR.

1(c) Terms of Clearance of the Information Collection

OMB noted the following "terms of clearance" when it renewed the Program's information collection request in 2015:

As stated in the previous terms of clearance: The data gathered under this collection represents estimates of emissions reductions associated with activities reported by participants in the Natural Gas STAR Program. Some of the activities and emissions

reductions may have been achieved in the absence of the Natural Gas STAR program. For this reason, the data is not appropriate for use as an aggregate summary of emissions reductions resulting from the program, but is instead correctly characterized as activities and reductions associated with Program partners' reported activities. The Agency should exercise care to ensure that the data not be characterized inappropriately in program effectiveness measures, on the Program website, or in other communications. When this ICR is resubmitted for renewal, EPA should continue to address the extent to which the partners would have reduced their emissions in the absence of this program.

The methane emission reductions reported by partners include reductions associated with the implementation of voluntary BMPs that result in methane emissions reductions. The methane emission reduction data that are submitted to EPA are used to determine partner emission reduction totals and measure the overall achievements of Natural Gas STAR companies in voluntarily reducing methane emissions.

EPA recognizes that some of the activities and emissions reductions reported by partners may have been achieved in the absence of the Program. EPA also recognizes that there are emissions reductions occurring in the industry that have been a direct or indirect result of the influence of the Program, but that are not being reported to EPA. EPA will continue to be clear in any Program-related communication that provides a summary or an aggregation of emission reductions that these reductions result from partners' reported activities.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need/Authority for the Collection

EPA has developed this ICR to obtain authorization to collect information from Natural Gas STAR partners. EPA needs to collect initial information as outlined in the Partnership Agreement. The Partnership Agreement provides general information on the Natural Gas STAR partner company and includes relevant points of contact.

Annual reporting is one key mechanism the Program uses to evaluate the partner companies' progress in implementing voluntary methane emission reduction activities and to assess overall Program results. The information shared also allows EPA to promote cost-effective BMPs by highlighting them on the Program's website, developing technical documents, and hosting technology transfer workshops.

2(b) Practical Utility/Users of the Data

EPA uses the information provided in the Partnership Agreement to populate its list of contacts for partner companies (including information on current and past Natural Gas STAR partners). This serves as a source of general information and a mailing list for partner communication.

EPA uses the information submitted in the annual reports to document the progress of partner companies in implementing the Program and voluntarily reducing methane emissions. On an annual basis, EPA also aggregates the data and provides updated Program accomplishments information on its website and prepares partner summary reports.

With partner permission, EPA uses the reporting data to develop technical workshops, guidance documents on specific technologies and practices, and in some cases to prepare case studies on implementation experiences. These documents are publicly available and demonstrate the benefits that can be realized through the implementation of technologies and practices.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

EPA implements Subpart W of the Greenhouse Gas Reporting Program (GHGRP) that requires companies collect methane emissions data as of January 1, 2011. The first year of mandatory greenhouse gas data collection for the oil and natural gas industry was 2011. While the data collected for GHGRP is methane *emissions* (rather than methane emission *reductions*), this information complements and augments Natural Gas STAR data EPA has received from companies over the years.

The newly launched Methane Challenge Program also differs from Natural Gas STAR in that it expands on the existing Natural Gas STAR Program by creating a more transparent structure through which companies make specific, ambitious voluntary commitments covering their entire operations. Partners report annually, with select data elements submitted to Subpart W of the GHGRP and used in Methane Challenge reporting drawn from that system automatically; partners also submit additional data on voluntary actions taken to reduce methane emissions and meet their Methane Challenge commitments. All data submitted to Methane Challenge will be made publicly available at the company level, allowing transparent tracking of progress. This is a significant departure from Natural Gas STAR, where companies make a general commitment, participate at a range of levels (e.g., company-wide, or at a facility or regional level), and only report information on emission reduction actions. Thus, the reporting requirements are very different between the two programs.

The information to be obtained under this ICR is not collected by EPA or any other Federal agency.

3(b) Public Notice Required Prior to ICR Submission to OMB

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on the ICR through an announcement in the Federal Register on September 5,

2018 (83 FR 172). Two comments were received in response to the notice. Both comments expressed support for the Natural Gas STAR Program and noted that the burden associated with participation in the Program decreases over time as internal processes are established and that the burden is appropriate and necessary to advance the initiative. The Program has significantly contributed to methane emissions reductions at individual companies and across the oil and natural gas industry.

3(c) Consultations

Since the last ICR Renewal, all information collection procedures for Natural Gas STAR have remained largely the same. EPA consulted with the following Implementation Managers regarding the burden estimate for this information renewal request and the proposed Partnership Agreement:

Christina Fine
Iroquois Gas Transmission
One Corporate Drive, Suite 600
Shelton, CT 06484
(203) 944-7037

Teresa Marion
Seneca Resources
51 Zents Blvd.
Brookville, PA 15825
Phone: (814) 220-1591

Kelly Kinsman
Extraction Oil and Gas
8670 Wolff Court, Suite 135
Westminster, CO 80031
Phone: (970) 556-4712

Jim Haught
ONE Gas
15 E 5th St
Tulsa, OK 74103
Phone: (918) 947-7640

Trinh Tran
Cabot Oil & Gas Corporation
840 Gessner Road
Houston, TX 77210
Phone: (281) 589-4805

Kristen Osnick
UGI Utilities
2121 City Line Road
Bethlehem, PA 18017
Phone: (610) 807-3179

The feedback from the Implementation Managers, in general, confirmed the burden estimates associated with preparation and submission of annual reports and participation in the program were reasonable. They also voiced overall support for the proposed modifications to the Program.

3(d) Effects of Less Frequent Collection

The completion and submittal of the Partnership Agreement is a one-time activity for companies that voluntarily choose to become a partner in the Program. Partners agree to develop a company-specific approach for active participation in the Program and to submit annual reports. EPA believes that a reduction in the frequency of the information collection and submission of annual reporting data would impede efforts by EPA to evaluate the progress of partners in achieving their voluntary emission reductions.

3(e) General Guidelines

None of these reporting or record keeping requirements violate any of the regulations established by OMB in 5 CFR 1320.5.

3(f) Confidentiality

Participation in the Natural Gas STAR Program is voluntary. In the Partnership Agreement, the Program requests that partners only share non-Confidential Business Information (CBI) to fulfill Gas STAR Program requirements.

3(g) Sensitive Questions

No sensitive questions are asked in the Partnership Agreement or the annual report forms. As stated in the Partnership Agreement, partners agree to only share non-Confidential Business Information (CBI) to fulfill Natural Gas STAR Program requirements, and understand that information submitted to the Program is subject to the Freedom of Information Act.

Regarding privacy of the information provided, any contact information for company representatives is used to identify the point of contact for implementation of the Natural Gas STAR Program. Such information will only be used to communicate and coordinate with partner companies about their participation, such as annual reporting, attending

upcoming Program workshops, and progress on their Program commitments. However, some information may be made available to the public as required by the Freedom of Information Act, 5 U.S.C. § 552.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents/NAICS Codes

The following is a list of North American Industry Classification System (NAICS) Codes and associated industries that may be affected by information collection requirements covered under this ICR:

2111	Oil and Gas Extraction
2212	Natural Gas Distribution
4862	Pipeline Transportation of Natural Gas

4(b) Information Requested

EPA's Natural Gas STAR Program specifies requirements for partners. The following identifies the partnership forms contained in this ICR. A detailed justification for each reporting requirement immediately follows. Burden estimates are summarized in Exhibit A.

Partnership Agreement

Companies that wish to become Natural Gas STAR partners sign and submit a Partnership Agreement that will replace the current Memorandum of Understanding (MOU) with EPA that describes the terms of participation in the Program. This Partnership Agreement replaces the previous four industry segment versions of the MOU.

The Partnership Agreement identifies company points of contact and initiates participation in the Program. Existing partners may opt or be requested to re-sign the Partnership Agreement. The form that will be covered under this ICR is:

- Natural Gas STAR Partnership Agreement: EPA Form No. 5900-105

(i) Data items:

Partners provide the following information in the Partnership Agreement:

- The name, title, address, telephone, and e-mail address of a Natural Gas STAR Program Implementation Manager.
- The name and signature of the partners' Authorized Company Representative.

(ii) Respondent activities:

In signing the Partnership Agreement, companies agree to perform the following activities:

- Download (from the Natural Gas STAR website) and review the Partnership Agreement;
- Gather requested information and complete the agreement; and
- Sign the agreement and submit it to EPA.

Implementation Plan

Partners can develop a company-specific approach for active participation in the Program, including identifying expected activities and scope of implementation. The approach could include a plan for how partners will identify non-regulatory methane emission reduction activities they intend to undertake, plan for new activities, and develop mechanisms for tracking methane emission reduction data and activities. Partners may prepare their own template for documenting their company-specific approach, or if desired, they may use the Program's Implementation Plan forms covered under this ICR. The Implementation Plan forms covered under this ICR include:

- Production Partners: EPA Form No. 5900-103
- Transmission Partners: EPA Form No. 5900-109
- Distribution Partners: EPA Form No. 5900-97
- Gathering and Processing Partners: EPA Form No. 5900-100

(i) Data items:

The Implementation Plan form requests the following information:

- General company information (e.g., company name and contact, position, mail and e-mail addresses, telephone and facsimile numbers, etc.);
- Summary of activities that the partner intends to implement;
- Information on applicable BMPs that the partner might implement; and
- Plans to inventory past methane emission reductions as the Program encourages partners to report past emission reduction activities not previously reported to EPA.

(ii) Respondent activities:

Partners conduct the following activities in preparing the Implementation Plan:

- Review the instructions;
- Gather the requested information and develop the Implementation Plan;
- Complete the form(s);
- Sign and submit the plan to EPA; and
- Update the plan as priorities shift over time. The Plan is revised or updated by submitting a new form to EPA.

Annual Report

Annual reporting is a key feature of the Program, but not the only mechanism for companies wishing to engage as members of the Natural Gas STAR Program. After one full year of participation in the Program, partners can submit an annual report documenting the previous year's methane emission reduction activities. The report documents voluntary (non-regulatory driven) methane emission reduction activities that partner companies have implemented in the previous year, including corresponding methane emissions reductions achieved, and to the extent available, the economics associated with each activity. Annual reports are submitted by partners to EPA through e-mail. EPA is preparing a simplified electronic Excel-based reporting format and the forms covered under this ICR include

- Production Partners: EPA Form No. 5900-104
- Transmission Partners: EPA Form No. 5900-95
- Distribution Partners: EPA Form No. 5900-99
- Gathering and Processing Partners: EPA Form No. 5900-102

(i) Data items:

The annual report form requests the following information:

- General company information (e.g., company name and contact, position, mail and e-mail addresses, telephone number, period covered by report, etc.);
- Annual report summary;
- Information on Best Management Practices implemented; and
- Information on additional program accomplishments that a partner wishes to share. This might include efforts to strengthen program participation (e.g., training/education, innovative technologies or activities, pilot projects, employee incentive programs) and/or efforts to communicate participation (e.g., newsletters, press releases, external website).

(ii) Respondent activities:

Partners conduct the following activities in preparing their annual report:

- Review the instructions;
- Gather the requested information for the initial report;
- Complete the initial form(s);
- Sign and submit the initial report to EPA; and
- Prepare and submit a subsequent annual report.

Other Activities

During participation in the Program, partners agree to notify EPA within two weeks if there is a change to the Natural Gas STAR Program Implementation Manager or operating circumstances of a company. Partners will also identify ways the company intends to engage with the Program in years where they are not able to report methane emission reductions data to the Program.

(i) Data items:

As points of contact may change over time, partner companies agree to provide EPA with updated contact information for the designated Implementation Manager for the Program and updates regarding the way the company intends to engage with Program.

(ii) Respondent activities:

Notify EPA within two weeks of any change in Natural Gas STAR Implementation Manager.

5. THE INFORMATION COLLECTED - AGENCY ACTIVITIES: COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

The Natural Gas STAR Program performs various activities after a partner submits a Partnership Agreement, Implementation Plan, or annual report.

Partnership Agreement

EPA performs the following activities upon receipt of a Partnership Agreement:

- Review the agreement to ensure completeness and accuracy, and conduct follow up, if necessary;
- Countersign the agreement;
- Develop a cover letter and welcome packet with relevant program information;
- Copy the cover letters and agreements;
- Send cover letter, original agreement and welcome packet to partner;
- File copies of cover letters and agreements; and
- Enter agreement information into tracking database.

Implementation Plan

EPA performs the following activities upon receipt of an Implementation Plan:

- Review the plan to ensure completeness and accuracy, and conduct follow-up, if necessary;
- Make copies of the plan for the program files;
- File copies of the plan; and

- Enter information into a tracking database.

Annual Report

EPA performs the following activities upon receipt of an annual report:

- Review the report to ensure completeness and accuracy, and conduct follow-up, if necessary;
- Save email and electronic copy (Excel) of annual report;
- Save hardcopies if needed; and
- Enter information into an emissions reduction data management database and review the entered data to ensure correctness (quality assurance and/or quality control).

Additional Activities

EPA also tracks changes to partner's contact information (e.g., Implementation Manager's responsibility and updates to the mailing list) or changes in operating circumstances of a company.

Regarding privacy of the information provided, any contact information for company representatives is used to identify the point of contact for implementation of the Natural Gas STAR. Such information will only be used to communicate and coordinate with partner companies about their participation in the Natural Gas STAR Program, such as annual reporting, attending upcoming Program workshops, and progress on their Program commitments. However, some information may be made available to the public as required by the Freedom of Information Act, 5 U.S.C. § 552.

Service Provider Directory

As a service to partners, EPA proposes to create a "service provider directory" to share information on services and technologies available to oil and natural gas companies seeking to reduce methane emissions from their operations. Third-party vendors (service providers) will complete an on-line form providing contact information and a short description of their technology, product, or service to be added to the directory listing. EPA does not endorse any company or product in the directory. This contact information is provided to foster the exchange of information.

5(b) Collection Methodology and Management

In collecting and analyzing the information associated with this ICR, EPA uses typical office equipment such as telephones, computers, and database and word processing software systems.

The Natural Gas STAR Partnership Agreement and Implementation Plan templates are both available on the Program website in PDF format. Partners complete annual reporting spreadsheets that are submitted to EPA electronically via e-mail.

EPA ensures the accuracy and completeness of collected information by reviewing each submission. EPA enters the information obtained from the Partnership Agreement, Implementation Plan, and annual reports into a database and aggregates data obtained from annual reports to track the progress of partners in reducing methane emissions.

5(c) Small Entity Flexibility

EPA has designed and streamlined its Program forms to minimize respondent burden while obtaining sufficient and accurate information; the estimated burden cannot be further reduced for small entities. It should be noted that the estimated burden associated with the Natural Gas STAR Program is reduced over the course of a partner's participation based on the familiarity of the process partners gain over time.

5(d) Collection Schedule

EPA collects initial partner information in the Partnership Agreement, which is completed and submitted by each partner upon their decision to participate in the Program. Each spring, EPA collects information in the annual report to monitor methane emissions reductions progress. EPA may also collect other Program information on a periodic basis, such as notification of a change in Implementation Manager or changes in the operating circumstances of a company (change in ownership, assets, etc.).

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION**6(a) Estimating Respondent Burden**

Exhibit 1 presents the estimated annual respondent burden and costs for information collection activities associated with the Natural Gas STAR Program.

6(b) Estimating Respondent Costs**(i) Estimating Labor Costs**

EPA used a national average hourly labor rate including an hourly rate plus 60% overhead of \$113.81 for legal staff, \$109.06 for managerial staff, \$84.88 for technical staff, and \$46.38 for clerical staff. Legal, managerial, technical, and clerical labor rates were obtained from the Bureau of Labor and Statistics average rates for NAICS Code

541100 and 221200. Legal rates were based on lawyers, management wages were based on general and operations managers, technical wages were based on environmental engineers, and clerical rates were based on executive secretaries and administrative assistants.

(ii) Estimating Capital and Operations and Maintenance Costs

EPA consulted with members of the oil and gas industry and believes that the capital or operations and maintenance costs of this Program are insignificant. Most Natural Gas STAR partners use e-mail to submit annual reports. Also, partners submit Partnership Agreements via e-mail as scanned PDFs.

(iii) Capital/Start-up vs. Operating and Maintenance (O&M) Costs

There are no capital/start-up costs or O&M costs associated with this information collection.

(iv) Annualizing Capital Costs

There are no capital costs associated with this information collection.

6(c) Estimating Agency Burden and Costs

Exhibit 2 presents the estimated Agency burden hours and costs for the information collection activities associated with this ICR. EPA estimates an average hourly labor cost (labor plus overhead) of \$103.34 for legal staff, \$96.64 for managerial staff, \$70.85 for technical staff, and \$28.45 for clerical staff. To derive these estimates, EPA used the “Hourly Salary Table 2018 - GS” from the Department of Personnel Management. For purposes of this ICR, EPA assigned staff the following government service levels:

–	Legal Staff	GS-15, Step 1
–	Managerial Staff	GS-14, Step 4
–	Technical Staff	GS-12, Step 5
–	Clerical Staff	GS-05, Step 1

To derive the loaded hourly estimates, EPA multiplied hourly rates by the standard government overhead factor of 1.6.

6(d) Estimating the Respondent Universe and Total Burden and Costs

Currently, there are 92 Natural Gas STAR Program partners. These oil and natural gas firms are a mix of large and relatively small companies. Based on recent trends, EPA anticipates an average of five companies will join the Program annually. This number is expected to remain constant or potentially fall as more companies join the Methane Challenge Program.

The average annual cost and burden estimates during the next 3-year ICR period are based on the average number of partners as shown in Table 1.

TABLE 1
Estimated Number of Program Partners in Calendar Years 2019-2021

Type of Partner	2019	2020	2021	Average
New Partners	5	5	5	5
Total Program Partners	92	97	102	97

Partnership Agreement

Each partner completes and submits a Partnership Agreement to join the Program. EPA anticipates that five new partners will complete and submit an agreement each year. In addition, existing partners will be required to conduct a one-time re-signing of the new, streamlined Partnership Agreement form. EPA anticipates that 30 existing partners will re-sign the Partnership Agreement each year and that 2 partners will choose not to re-sign it.

Implementation Plan

Each new partner agrees to develop a company-specific approach for active participation in the Program, including identifying expected activities and scope of implementation. EPA anticipates that three new partners will use the Program's Implementation Plan form to develop their approach. EPA also estimates that three existing partner companies will update their Implementation Plan form and submit it to EPA each year.

Annual Report

Existing partners agree to complete and submit an annual report after one full (calendar) year of joining the Program, and annually in subsequent years. EPA anticipates that 5 new Program partners will join each year and complete and submit an annual report for the first time, and that 70 existing partners will complete and submit subsequent reports, for a total of 75 report submissions annually.

Additional Activities

EPA estimates that approximately 15 Natural Gas STAR partners experience changes in their Implementation Manager each year or changes in the operating circumstances of the company. Thus, EPA estimates that 15 partners will notify EPA of such changes.

Service Provider Directory

EPA estimates that approximately 50 companies will complete the on-line form to promote the services and technologies they provide to oil and natural gas companies seeking to reduce methane emissions from their operations.

EXHIBIT 1 – ESTIMATED ANNUAL RESPONDENT BURDEN AND COST

INFORMATION COLLECTION ACTIVITY ¹	Hours and Costs Per Respondent/Activity								Total Hours and Costs		
	Leg. \$113.81 Hour	Mgr. \$109.06 Hour	Tech. \$84.88 Hour	Cler. \$46.38 Hour	Respon. Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year
Partnership Agreement											
Receive and review the Partnership Agreement	2	8	16	4	30	\$2,643.70	\$0	\$0	5	150	\$13,218.50
Gather information and fill out Partnership Agreement data sheet	1	23	0	2	26	\$2,714.95	\$0	\$0	5	130	\$13,574.75
Sign and submit Partnership Agreement to EPA	0	0.5	0	0.5	1	\$77.72	\$0	\$0	5	5	\$388.60
One-time re-signing of agreement for existing partners	0.5	1	0.5	0	2	\$208.41	\$0	\$0	30	60	\$6,252.15
SUBTOTAL										345	\$33,434.00
Implementation Plan											
Review instructions	0	2	0	0	2	\$218.12	\$0	\$0	3	6	\$654.36
Gather information and develop the Implementation Plan	0	10	10	0	20	\$1,939.40	\$0	\$0	3	60	\$5,818.20
Complete the form(s)	0	1	0	1	2	\$155.44	\$0	\$0	3	6	\$466.32
Sign and submit plan to EPA	0	0.5	0	0.5	1	\$77.72	\$0	\$0	3	3	\$233.16
Update Implementation Plan, as necessary and Submit to EPA	0	6.5	4	1.5	12	\$1,117.98	\$0	\$0	3	36	\$3,353.94
SUBTOTAL										111	\$10,525.98
Annual Report											
Review instructions for the initial report	0	5	0	0	5	\$545.30	\$0	\$0	75	375	\$40,897.50
Gather the requested information for the initial report	0	10	30	0	40	\$3,637.00	\$0	\$0	5	200	\$18,185.00
Complete the initial form(s)	0	4	0	1	5	\$482.62	\$0	\$0	5	25	\$2,413.10
Sign and submit the initial report to EPA	0	0.5	0	0.5	1	\$77.72	\$0	\$0	5	5	\$388.60
Prepare and submit a subsequent Annual Report	0	8	16	1	25	\$2,276.94	\$0	\$0	70	1,750	\$159,385.80
SUBTOTAL										2,355	\$221,270.00
Additional Activities											
Notify EPA within two weeks of any change in Natural Gas Star Implementation Manager responsibility	0	1	0	0.5	1.5	\$132.25	\$0	\$0	15	22.5	\$1,983.75
TOTAL PARTNER ACTIVITIES										2,833.5	\$267,213.73
Other Activities – Complete Service Provider Directory Form	0	0.25	0	0	0.25	\$27.27	\$0	\$0	50	12.5	\$1,363.25

EXHIBIT 2 – ESTIMATED ANNUAL AGENCY BURDEN AND COST

INFORMATION COLLECTION ACTIVITY	Hours and Costs for Agency Per Activity								Total Hours and Costs		
	Leg. \$103.34 Hour	Mgr. \$96.64 Hour	Tech. \$70.85 Hour	Cler. \$28.45 Hour	Agency Hours/ Activity	Labor Cost/ Activity	Capital/ Startup Cost	O & M Cost	Respon. or Activities	Number of Total Hours/ Year	Total Cost/ Year
Partnership Agreement											
Review agreement and follow up, if necessary	0	0	1	0	1	\$70.85	\$0	\$0	5	5	\$354.25
Sign the agreement	0	0.05	0	0	0.05	\$4.83	\$0	\$0	5	0.25	\$24.16
Develop a cover letter	0	0	0	0.1	0.1	\$2.85	\$0	\$0	5	0.5	\$14.23
Copy cover letters and agreements	0	0	0	0.08	0.08	\$2.28	\$0	\$0	5	0.4	\$11.38
Send cover letters and original agreement back to partner	0	0	0	0.1	0.1	\$2.85	\$0	\$0	5	0.5	\$14.23
File copies of cover letters and agreements	0	0	0	0.1	0.1	\$2.85	\$0	\$0	5	0.5	\$14.23
Enter agreement information into a data base	0	0	0	0.25	0.25	\$7.11	\$0	\$0	5	1.25	\$35.56
Review agreement for existing partners doing 1-time re-signing	0	0.05	0	0.25	0.3	\$11.94	\$0	\$0	30	9	\$358.34
Subtotal										17.4	\$826.36
Implementation Plan											
Review plan and follow up, if necessary	0	0	2	0	2	\$141.70	\$0	\$0	6	12	\$850.20
Make copies of plan	0	0	0	0.08	0.08	\$2.28	\$0	\$0	6	0.48	\$13.66
File copies of plan	0	0	0	0.1	0.1	\$2.85	\$0	\$0	6	0.6	\$17.07
Enter information into data base	0	0	0	0.25	0.25	\$7.11	\$0	\$0	6	1.5	\$42.68
Subtotal										14.58	\$923.60
Annual Report											
Review report and follow up, if necessary	0	0	4	0	4	\$283.40	\$0	\$0	75	300	\$21,255.00
Make copies of electronic report	0	0	0	0.08	0.08	\$2.28	\$0	\$0	75	6	\$170.70
File copies of report (electronic or hardcopy)	0	0	0	0.1	0.1	\$2.85	\$0	\$0	75	7.5	\$213.38
Enter information into database	0	0	0	0.5	0.5	\$14.23	\$0	\$0	75	37.5	\$1,066.88
Subtotal										351	\$22,705.95
Additional Activities											
Enter updated information into data base	0	0	0	0.25	0.25	\$7.11	\$0	\$0	15	3.75	\$106.69
Service Provider Directory Requests											
Review forms	0	0	0.25	0	0.25	\$17.71	\$0	\$0	50	12.5	\$885.63
TOTAL										399.23	\$25,448.23

6(e) Bottom Line Burden Hours and Costs

Exhibits 1 and 2 show the aggregate annual burden and cost to respondents and the government, respectively, for the information collection activities covered under this ICR.

(i) Respondent Tally

The total burden for Partner respondents is estimated to be approximately 2,833.5 hours per year with an annual cost of approximately \$267,214. For vendors completing the Service Provider Directory form, the annual burden is estimated to be 12.5 hours and \$1,363.

(ii) The Agency Tally

The total annual burden to the Agency is approximately 399 hours with a cost of approximately \$25,448 per year.

(iii) Variations in The Annual Bottom Line

EPA anticipates minimal variation in the annual respondent reporting/recordkeeping burden over the three-year period covered by this ICR.

6(f) Reasons for Change in Burden

The overall annual reporting burden for Partner respondents decreased from 6,995 hours in the previous ICR to 2,833.5 hours in the current ICR. This change is attributed to several factors including a decrease in the estimated number of partners submitting reports annually, and the streamlining of the Partnership Agreement and annual reporting forms. Specifically, updates to the annual report forms reduced burden through:

- Simplifying instructions for completing the forms;
- Streamlining forms to remove unnecessary fields; only key data is being requested from Partners;
- Consolidating forms/activities into segment-specific spreadsheets that allow partners to complete only one spreadsheet; and
- Updating submission method (i.e., to emailing Excel forms) so Partners no longer need to log into an online system.

The average burden per partner decreased to approximately 29.2 hours per partner (2,833.5 / 97 [the average number of partners during the 3-year ICR period]).

Since the last ICR renewal, the overall annual cost for Partners decreased from \$390,185 to \$267,214.

6(g) Burden Statement

The average annual burden for information collection requirements associated with this ICR is estimated to be 29.2 hours per partner respondent (2,833.5 / 97 [the average number of partners during the 3-year ICR period]). For vendors completing the Service Provider Directory form, the average annual burden is estimated to be .25 hours (12.5 / 50).

For new partners, the average reporting burden per partner for information collection requirements associated with completing the Partnership Agreement is estimated to be 57 hours. The burden estimate includes time to receive and review the agreement; gather information and fill out the data sheet; and sign and submit the agreement to EPA.

For new partners, the average reporting burden per partner for information collection requirements associated with completing the Implementation Plan form is estimated to be 25 hours. The burden estimate includes time to review the plan form; gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

For existing partners, the average per partner reporting burden for information collection requirements associated with updating the Implementation Plan is estimated to be 12 hours. The burden estimate includes time to review, update (if necessary), complete, sign and submit the form to EPA.

The average per partner reporting burden for information collection requirements associated with completing the initial annual report is estimated to be 51 hours. The average per partner reporting burden for information collection requirements associated with completing subsequent annual reports is estimated to be 25 hours. The burden estimate includes time to review the reporting package (forms and any Program updates); gather the requested information; complete the form; sign and date the form; and submit the form to EPA.

For Natural Gas STAR partners, the average per partner reporting burden for information collection requirements associated with additional activities is estimated to be 1.5 hours. The reporting burden includes time to notify EPA of changes in Natural Gas STAR Program Implementation Manager or changes in the operating circumstances of a company.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable

instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR part 9 and 48 CFR chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2004-0082, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is 202-566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2004-0082 and OMB Control Number 2060-0328 in any correspondence.