

2019
SUPPORTING STATEMENT
OMB Control No. 0572-0151
Rural Energy Savings Program

**Enacted and Funded by the 2018 Consolidated Appropriations Act, Title VII,
Section 741**

A. JUSTIFICATION

1. Explain the circumstances that make the collection of information necessary.

The Rural Utilities Service (RUS), a Rural Development agency of the United States Department of Agriculture (USDA), provides RESP loans to eligible entities that agree to, in turn, make loans to qualified consumers for energy efficiency measures, including cost effective energy storage and renewable energy systems. These loans are made available under the authority of Section 6407 of the Farm Security and Rural Investment Act of 2002, as amended, (Section 6407). Eligible energy efficiency measures must be for or at a property or properties served by a RESP borrower, using commercially available technologies that would allow qualified consumers to decrease their energy use or costs through cost-effective energy efficiency investments. Loans made by RESP borrowers under this program are repaid through a recurring bill to the qualified consumer for the property or properties for, or at which, the energy efficiencies measures are or will be implemented.

Since its inception in 2016, the Rural Energy Savings Program (RESP or the Program) has evolved. New and clarifying authorities have been added to the program including changes made by the Agriculture Improvement Act of 2018 (2018 Farm Bill) (Public Law 115-334) which reauthorized the implementation of the RESP. Title VI, subtitle C, Section 6303 of the Agriculture Improvement Act of 2018 introduced several amendments to Section 6407 of the Farm Security and Rural Investment Act of 2002 (7 U.S.C. 8107a). The amendments include an increase in the maximum amount RUS eligible borrowers may charge to their qualified consumers, streamlining the accounting requirements, and the use of a recurring bill to the qualified consumer as a repayment mechanism for the RUS borrowers.

The collection of information is essential: (1) to the mission of the Agency, (2) to the sustainability of the RESP program, (3) so RUS can establish applicant and project eligibility; and, (4) so the Agency can ensure that funds obtained from the Government under the program are used appropriately.

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

This collection receives information only from those RUS electric borrowers or eligible entities who submit letters of intent to apply for the Rural Energy Savings Program and those who subsequently are invited to submit applications. Several qualified entities will be invited to submit applications for a RESP loan after notifying the agency of their interest. The information required from the respondents is limited to essential criteria for screening to determine if proposed activities and investment are consistent with the purpose of the statute, determining eligibility, whether proposed activities and investment are consistent with purpose of the statute, evaluating the likelihood of fulfilling requirements of a complete application and to make a preliminary assessment of the feasibility of the business model contemplated by the applicant in order to protect the interests of the Government when making the loan. The information collected is consistent with requirements necessary to determine acceptable qualifications and evaluate applications. Some of the relending projects outlined in applications may vary substantially in complexity and administration and so, the individual respondent's burden may vary as well. The information submitted is used by RUS to determine public interest in the program, determine eligibility of applicants for loans under RESP and to ensure borrowers use the funds for purposes consistent with goals of RESP.

Eligible entities apply for RESP loans under a two-step process. Eligible entities interested in applying for RESP loans submit Letters of Intent by electronic mail only. By submitting the Letter of Intent, the eligible entity certifies to RUS that it has the intent to submit a complete loan application. Eligible entities are queued and, subsequently, invited in writing to proceed with the loan application. Letters of Intent contain the following criteria and the application process is also outlined below:

(NON-FORMS) STEP 1: LETTER OF INTENT –

Legal Status - Tax Identification Number and Legal name and organization status.

Verification of Rural Status - The letter must verify the rural nature of the area to be served by the eligible entity with RESP funds (counties to be served and populations).

Financial Status – The letter of intent must contain information concerning the financial status of the entity to determine the applicant's likelihood of meeting financial ratios required to complete the application process including: 1) A Dun and Bradstreet number; 2) Dollar amount of net assets; 3) Whether the entity has been in receivership or bankruptcy within the last three years; and 4) The anticipated loan amount.

Point of Contact – Identifying the entity's point of contact.

Description of the program including: 1) Service to be provided to residential consumers; 2) service to be provided to small business consumers; 3) Names and credentials of staff or contractors that will implement an energy efficiency program.

Implementation plan briefly addressing, marketing strategy, description of method of the relending process to be employed by the entity, a schedule with sources and uses of funds to implement the energy efficiency program, and, description of the processes, procedures, and capabilities to verify the reduction in energy consumption or decrease in energy costs.

List of eligible energy efficiency measures to be implemented and a determination whether the proposed energy efficiency plan will be categorically excluded pursuant to Rural Development Environmental Policies and Procedures, 7 CFR 1970.55 and other applicable requirements.

(NON-FORMS) STEP 2: RESP APPLICATION –

After review of the letter of intent, RUS notifies the eligible entity if it is invited to submit the loan application. Information required in the application is used to determine a borrower's ability to meet financial obligations, includes analyses and document review by RUS regarding the applicant's historical, current, and projected costs, revenues, cash flows, assets, and other factors that may be relevant on a case by case basis. RUS recognizes that projects outlined by applicants may vary in size and financial complexity and the RUS Administrator maintains discretion to forego requirements for parts of the following information as required by the conditions among applicants.

The specific items of burden and their uses are as follows:

Transmittal letter

The letter is part of the application for a RESP loan and is a formal request by the eligible entity's General Manager or highest-ranking officer requesting a RESP loan.

Board Resolution

The entity must submit a resolution from the board of directors or applicable governing body as part of the application package. The resolution must approve and establish the Energy Savings Program that reflects an undertaking that funds collected in excess of the current amortization be redeployed for the Energy Savings Program purposes or used to prepay the RUS RESP loan.

Environmental Compliance Review

The applicant must provide a duly executed copy of the Multi-tier Action Environmental Compliance Review for Multi-tier Programs Agreement as required by Rural Development Environmental Policies and Procedures, 7 CFR 1970.55.

Energy Efficiency Program Implementation Work Plan

The applicant must provide an implementation work plan (IWP) as part of the proposed energy efficiency program. The IWP must be approved by the applicant entity's board of directors or applicable governing body, must comply with Rural Development Environmental Policies and Procedures regulations at 7 CFR 1970, and must contain the following information: 1) Description of the expected implementation schedule for the energy efficiency program; 2) Projections of the expected amount of loans made by the entity to the qualified consumer over the next 10 years; 3) Anticipated amount of special advance required for start-up costs and purposes over the expected schedule to drawdown the funds attributable to such purposes; 4) A description of the schedule and mechanism for funding the loan loss reserve, including how the eligible entity will use revenues from the interest rate charged to qualified consumers; and 5) must address elements identified in the program implementation plan.

Long Range Financial Forecast

The financial forecast must be approved by the applicant's board of directors or applicable governing body and cover a period of 10 years. The forecast must demonstrate that the applicant's operation is economically viable, and the proposed loan is financially feasible. Applicants may, but are not required, to use the format set forth in RUS Form 325, which may be obtained from the RUS General Field Representative. The financial forecast shall include: 1) Financial goals established for margins, debt service coverage, equity and levels of general funds to be invested in the program; 2) Pro forma balance sheet and statement of operations projected for each year during the forecast period; 3) Explanation of the assumptions, supporting data, and analysis used in the forecast; 4) Current and projected cash flows; 5) Projections of future borrowings and associated interest and principal expenses; 6) current and projected kW and kWh energy sales (if applicable); 7) Current and projected unit prices of significant variables such as retail and wholesale power prices, average labor costs, and interest (if applicable); 8) Current and projected revenues from sales of services, including sales of electric power (if applicable); 9) Current and projected system operating costs; 10) Current and projected non-operating income and expense; 11) A discussion of historical experience of applicant relative to the entity's market competitiveness; 12) Sensitivity analysis, as required on a case-by-case basis, taking into account number and type of loads (if applicable), projections of future borrowings, projected loads and revenues and probably future competitiveness of the applicant; 13) Itemized budget for activities to be implemented with RESP funds and a discussion on how loan loss reserve will be established.

Statements of Counsel

Statements from the applicant's legal counsel are required as part of the application. The statement must identify and certify that proposed collateral is clear to set a perfected lien in order to secure the Federal government's interest. If real property is intended as collateral for the transaction, counsel's statement shall include a listing of real property

owned by the applicant, location of real property and a certification that the schedule is complete and adequate to include in a security agreement between the applicant and RUS.

Articles of Incorporation and Bylaws

The applicant's articles of incorporation and bylaws currently in effect are required as part of the RESP application.

STATEMENT OF COMPLIANCE WITH OTHER FEDERAL REQUIREMENTS

Applicants must provide a statement of compliance or, where indicated below, complete a form indicating compliance with federal statutes including, but not limited to the following:

(Non-Form) Executive Order 13166, "Improving Access to Services for Persons with Limited English Proficiency."

(Non-Form) 2 CFR part 418, Lobbying for Grants, Loans, Contracts and Cooperative Agreements.

(Non-Forms) (7 CFR 1710.126- Federal Debt Delinquency Requirements) - The Federal Debt Collection Procedure Act, 28 U.S.C. 3201(e) provides that an organization that is indebted to the United States, and has a judgment lien filed against it, is ineligible to receive a Federal loan. RUS regulations concerning Federal debt delinquency requirements are found at 7 CFR 1710.126. Federal Debt Delinquency Requirements. Prior to loan approval or advance of funds, the applicant must provide the following documents:

- 1) A report to RUS on federal debt delinquency indicating whether or not the entity is delinquent on any federal debt (non-form)
- 2) Certification that they have been informed of the collection options of the federal government (non-form)

(Non-Form) Review and Acceptance of Condition Letter – The agency will issue a Conditional Commitment Letter to a successful RESP loan applicant whose loan application has been approved. The Conditional Commitment Letter will contain the approved loan amount and will include specific terms and conditions depending on the risk profile of the successful RESP loan applicant and nature of the proposed business model that are necessary to assure that federal government interest is protected. Prior to award, the successful RESP loan applicant must review the Conditional Commitment Letter and accept terms and conditions.

(Non-Form) Execution of loan agreement - The burden includes the time required to review and execute the documents required for loan closing.

Post Award

(Non-Form) - Financial Report

(Non-Form) - Request for Reimbursement or Advance of Funds

BURDEN ACCOUNTED FOR UNDER THIS PACKAGE – FORM ACCOUNTED FOR UNDER OTHER OMB CONTROL NUMBERS

Form AD-1049, “Certificate Regarding Drug-Free Workplace Requirements”

(Burden hours are accounted for under this package-Form accounted for under OMB Control No. 0505-0027.)

Form AD-1047 or AD-1048, “Certification Regarding Debarment, Suspension”

(Burden hours are accounted for under this package-Form accounted for under OMB Control No. 0505-0027.)

BURDEN AND FORMS ACCOUNTED FOR UNDER OTHER OMB CONTROL NUMBERS

RUS Form 266 – Assurance Agreement –RUS Bulletin 1790–1 - (0572-0032).

SF 100, “Equal Employment Opportunity Employer Report” – (3048-0007).

RD Form 400-4 Assurance agreement (OMB No. 0575-0018). Assures USDA that the recipient is in compliance with Title VI of the Civil Rights Act of 1964, 7 CFR part 15 and other Agency regulations.

RD Form 400-1 – Equal Opportunity Agreement - (OMB No. 0575-0018)

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, and the basis for the decision for adopting this means of collection.

RUS is committed to complying with the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, for other purposes. RUS encourages RESP applicants to use the most advanced technology to prepare the required information and requires that eligible entities submit the Letter of Intent described in response to

Question only in electronic form in order to establish a queue. RUS recognizes that computer capabilities may differ among potentially diverse eligible entities and will work to accommodate eligible entities and applicants through the RUS GFR network and headquarters staff. RUS encourages applicants to submit information electronically, however, there may be no feasible alternative other than receiving some of the information in hard copy, in response to the anticipated variance in proposed project complexity.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

In this collection there is no duplication of information collection because required information is specific to each applicant involved. The information to be requested is that which would be collected and analyzed by any prudent business in the course of its operations. In cases where the necessary information already exists, RUS will accept, whenever possible, copies of current relevant information an entity may have prepared for another purpose.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 82-I), describe any methods used to minimize burden.

Information to be collected is in a format designed to minimize the paperwork burden on small businesses and other small entities. The information collected is the minimum needed by the Agency to approve loans and monitor borrower performance. Approximately all of the potentially eligible 17 respondents are considered small businesses according to the U. S. Small Business Administration Table of Small Business Size Standards under the category of (221122) Electric Power Distribution. RUS will make every effort to ensure the information collected is in the format that will minimize the paperwork burden on small businesses. RUS believes the information requested is the minimum necessary for RUS to meet statutory requirements with respect to both large and small entities. RUS headquarters and field staff will be available to assist eligible entities in preparing documents.

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

This information is collected only from those entities who submit letters of intent and from the eligible entities who subsequently are invited to submit applications. Information necessary for evaluating the loan applications is required only once for each application. Information that is necessary to monitor loan security and compliance with legislative purposes is required periodically. Less frequent collection would not allow RUS to accomplish the goals of the program.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

a. Requiring respondent to report information more than quarterly.

There is no requirement to respond more than quarterly.

b. Requiring written response in less than 30 days.

There is no requirement to respond in less than 30 days.

c. Requiring more than an original and two copies.

There are no requirements to submit more than original and two copies.

d. Requiring respondent to retain records for more than 3 years.

There is no such requirement.

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.

This collection is not a survey.

f. Requiring the use of a statistical data classification that has not been reviewed and approved by OMB.

This collection does not employ statistical sampling.

g. Requiring 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.

There is no requirement of a pledge of confidentiality.

h. Requiring respondents to submit proprietary trade secret, 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.

There is no requirement to submit propriety trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the

agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

As required by 5 CFR 1320.8(d), a Notice to request comments was published on May 16, 2019 at 84 FR 22106. No public comments were received.

The Agency works cooperatively with national and/or statewide associations representing RUS electric program borrowers such as: National Rural Electric Cooperative Association; American Public Power Association; Rural Community Assistance Program, National Association of State Energy Officials, among others, and is always ready to provide information concerning the RESP program.

Applicants, Borrowers, and any other party interested in the RESP program may contact the headquarters staff at any time with questions, comments, or suggestions about the program. Consultations take place on an individual basis, by telephone, e-mail, regular mail, and during or after any Webinars that RUS has offered or participated in concerning the RESP Program. RUS maintains a website containing general information about the agency, specific information about the RESP program, administered by the electric program, and a directory of program staff. RUS maintains close contact with borrowers through RUS' general field representatives (GFR), field accountants, and headquarters staff.

Agency staff contacted three borrowers (listed below) to query them on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported. The borrowers consisted of long-term existing RUS Electric Program borrowers and one newly formed subsidiary of a number of existing borrowers. The responses to questions was consistent across all three. Basically, the RESP program provided adequate data to submit a qualified complete Letter of Intent and complete application, the required information was appropriate and not burdensome, and the collection frequency was appropriate. The recordkeeping, disclosure, reporting, and the data elements to be recorded or reported was also appropriate. Generally, RESP borrowers are existing long-term borrowers who are familiar with RUS requirements. RESP requirements are less burdensome than requirements for the existing loan programs.

The following RESP Borrowers were contacted for their input:

Mr. Lindsey Smith
Chief Operating Officer
KW Savings Co.
808 Knox Abbott Drive
Cayce, South Carolina 29033
Tel: (803) 739-3046
Email: lindsey.smith@ecse.org

Mr. Michael Keyser
Chief Operating Officer
Reliable Energy
84 High Street
Millboro, VA 24460
Tel (800) 846-2272
Email: Mkeyser@barcelectric.com

Mr. Tracy Neal
Comptroller
Orcas Power and Light Company
183 Mount Baker Road
Eastsound, WA 98245
Tel (360) 376-3504
Email: Tneal@opalco.com

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

Payments or gifts are not provided to respondents.

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

No assurance of confidentiality is provided.

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

This information does not contain questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

The total estimated hour burden for this collection is estimated to be 1,046. This is a decrease of 376 hours from the original submission of 1,422. The decrease is an agency adjustment due to a decrease in the number of respondents submitting letters of intent. RUS originally estimated that 33 respondents annually would submit letters of intent in response to the NOFA, however 17 respondents submitted letters of intent. The burden estimate was derived as follows: Number of respondents: On average for FY2017, FY2018 and FY2019, RUS received 17 letters of intent in response to the notice of funding availability. It is estimated that the letters of intent require 5 hours to prepare. Of the respondents submitting letters of intent, an average of 9 respondents have been invited to submit applications for funding under the RESP program. Each application submission requires an estimated 104.75 hours to prepare. The components of the information collection package are described in detail in response to Question 2 and the

calculation of hours is shown below and, in the spreadsheet, included with this information collection package:

Description	No. of Respondents	Total Average Annual Responses	Hours per Response	Total Hours
Step 1: Letter of Intent	17	17	5.00	85.00
Step 2: RESP Application		0		
Transmittal Letter (Request for RESP loan from Gen. Mgr)	9	9	1.00	9.00
Board Resolution	9	9	1.00	9.00
Environmental Compliance Review	9	9	10.00	90.00
Energy Efficiency Program Implementation Work Plan	9	9	40.00	360.00
Long Range Financial Forecast and Board Resolution	9	9	40.00	360.00
Statement of Counsel	9	9	1.00	9.00
Articles of Incorporation and Bylaws	9	9	0.50	4.50
Statements of Compliance				
Ex. Order 13166, Limited English Proficiency Initiative	9	9	0.25	2.25
Certificate Regarding Drug-Free Workplace Requirement Form (AD-1049) OR	9	9	0.25	2.25
Certification Regarding Debarment, Suspension Form (AD- 1048) or (AD 1047)	9	9	0.25	2.25
Lobbying for Grants, Loans, Contracts certification	9	9	0.25	2.25
Federal Debt Delinquency Requirements	9	9	0.50	4.50
Review and Acceptance of Condition Letter	9	9	8.00	72.00
Review and Execution of RESP Loan Agreement	9	9	1.00	9.00
Step 3: Post Award				
Financial Report	5	5	4.00	20.00
Request for Reimbursement or Advance of Funds	5	5	1.00	5.00
Total Hours	17	153		1046

Annualized cost to respondents is estimated to be \$64,127. RUS estimates that a Senior Manager will be required to prepare 20 percent of the responses related to this collection; an attorney will be required to prepare 10 percent of the response; an Engineer will be required for 30 percent and Accountant for 30 percent and 10 percent of the response will be prepared by clerical/administrative personnel. The wage rates for the five wage categories are selected from the Department of Labor, Bureau of Labor Statistics, May 2018 National Occupational Employment and Wage Estimates located at

http://www.bls.gov/oes/current/oes_stru.htm. The professional category is Senior Manager (Occupation Code 11-1021) at \$59.56 per hour and the legal category is Attorneys (23-1011) \$69.34 per hour; Engineering category is Electrical Engineer (17-2071) \$48.85, Accounting category is Accountants/Auditors (13-2011) \$37.89 and clerical is for Bookkeeping, Accounting, and Auditing Clerks (Occupational Code 43-3031) at \$20.25 per hour. Data provided by the Bureau of Labor Statistics indicates that employer cost for employee benefits for the private industry was 29.9% of wages. See; Bureau of Labor Statistics Employer Costs for Employee Compensation – June 2018, <http://www.bls.gov/news.release/ecec.nr0.htm>. After calculating employer cost for employee benefits, total wage rates for Senior Manager are \$77.37 per hour; for Attorney the total hourly cost is \$90.07; Electrical Engineer is \$63.46; Accountants/Auditors are \$49.22 per hour; and Bookkeeping, Accounting and Auditing Clerk hourly wage is \$26.30. The calculation for annualized estimated respondent cost is shown below:

Wage Category	Percent of Total Hours	Hours Required	Hourly Wage	Benefit (29.9%)	Total Wage Rate (E + F)	Cost (D * G)
Senior Manager	20	210.55	\$59.56	\$17.81	\$77.37	\$16,289.93
Attorney/Legal	10	105.275	\$69.34	\$20.73	\$90.07	\$9,482.40
Electrical Engineer	30	315.825	\$48.85	\$14.61	\$63.46	\$20,041.04
Accountant/Auditor	30	315.825	\$37.89	\$11.33	\$49.22	\$15,544.63
Clerk	10	105.275	\$20.25	\$6.05	\$26.30	\$2,769.23
Total Respondent Cost						\$64,127.22

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

There are no capital/start-up or operation/maintenance costs associated with the collection. Of the three borrowers contacted, none stated they were overly burdened by the information collection. All did most of the information collection and application development in house, with minimal use of outside consultants. One borrower used outside legal counsel at a cost of \$37,000, where the other two did most work in house (one employed a technical consultant for 2 hours at \$65 per hour and legal counsel for 1 hour at \$100 per hour to review the letter of intent). All borrowers stated they expect their use of consultants would drop significantly or disappear now that they understand the program application requirements. None of the borrowers captured their internal staff hours and did not provide an estimate of the time required by staff except to say the time spent was reasonable.

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

The estimated annualized cost to the Federal Government for collection and evaluation of this information is \$335,101.56. In response to the NOFA, thus far 17 Letters of Intent have been submitted to the agency expressing interest in submitting a RESP application and the agency invited 9 eligible entities through an Invitation to Proceed to submit

applications. Review of Letters of Intent, pre-application reviews, and application review and loan approval requires the time of the staff positions listed at the wage rates shown in Table 1. Time required and cost calculation is illustrated in Table 2. Calculation of the total cost to the Federal Government is shown in Table 3.

Table 1-Staff Positions and wage rates:

Staff Position	Wage rate[1]	Benefits[2]	Hourly Rate
Policy Advisor (GS 15/ Step 5)	\$74.86	\$27.14	\$102.00
Senior Level Engineer (GS 15/Step 5)	\$74.86	\$27.14	\$102.00
Senior Loan Specialist (GS 13/Step 5)	\$53.85	\$19.52	\$73.37
Engineer (GS 13/Step 5)	\$53.85	\$19.52	\$73.37
General Field Representative (GS 13/Step 5)	\$53.85	\$19.52	\$73.37
Deputy Ass't Admin. (OLOA) (GS 15/Step 5)	\$74.86	\$27.14	\$102.00
Financial Branch Chief (GS 15/Step 5)	\$74.86	\$27.14	\$102.00
Ass't Administrator (SES)	\$77.05	\$27.93	\$104.98
RUS Administrator (ES)	\$88.94	\$32.24	\$121.18

[1] Wage rates are selected from the Office of Personnel Management (OPM) General Schedule (GS) Salary Table 2019-DCB.

[2] Cost of total benefits as a percentage of total hourly compensation for Federal Government employees has been calculated by multiplying 36.25% by the hourly OPM wage in accordance with OMB Memorandum M-08 13.

Table 2-Time and Cost Calculation:

Step 1 Letter of Intent Review			
Staff Position	Total Hourly Wage	Hours Required	Cost
Policy Advisor	\$102.00	2	\$204.00
Senior Level Engineer	\$102.00	3	\$306.00
Senior Loan Specialist	\$73.37	6	\$440.22
Engineer	\$73.37	5	\$366.85
Ass't Admin. (Electric)	\$104.98	2	\$209.96
Cost Each			\$1,527.03
Step-2 Pre-Application			
Policy Advisor	\$102.00	45	\$4,590.00
Senior Level Engineer	\$102.00	30	\$3,060.00
Senior Loan Specialist	\$73.37	30	\$2,201.10
General Field Representative	\$73.37	64	\$4,695.68
Deputy Ass't Admin (OLOA)	\$102.00	5	\$510.00
Ass't Admin. (Electric)	\$104.98	5	\$524.90
Cost Each			\$15,581.68
Step 3: Application Review & Loan Approval			

Policy Advisor	\$102.00	16	\$1,632.00
Senior Level Engineer	\$102.00	40	\$4,080.00
Senior Loan Specialist	\$73.37	80	\$5,869.60
Financial Branch Chief	\$102.00	20	\$2,040.00
Consultant	\$85.22	15	\$1,278.30
Deputy Ass't Admin. (OLOA)	\$102.00	10	\$1,020.00
Ass't Admin. (Electric)	\$104.98	10	\$1,049.80
Ass't Admin. (WEP)	\$104.98	1	\$104.98
Ass't Admin. (TELECOM)	\$104.98	1	\$104.98
RUS Administrator	\$121.18	2	\$242.36
Cost Each			\$17,422.02
Step 4: Post Award			
Senior Level Engineer	\$102.00	5	\$510.00
Senior Loan Specialist	\$73.37	5	\$366.85
Financial Branch Chief	\$102.00	5	\$510.00
Deputy Ass't Admin. (OLOA)	\$102.00	5	\$510.00
Ass't Admin. (Electric)	\$104.98	5	\$524.90
Cost Each			\$2,421.75

Table 3-Total Cost Calculation:

Stage	Cost of Each	Number of Entities	Total Cost
Step 1: Letter of Intent Review	\$1,527.03	17	\$25,959.51
Step 2: Pre-Application	\$15,581.68	9	\$140,235.12
Step 3: Application Review & Loan Approval	\$17,422.02	9	\$156,798.18
Step 4: Post Award	\$2,421.75	5	\$12,108.75
Total Cost to Federal Government	\$36,952.48		\$335,101.56

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

This is a request for regular extension, with a revised burden, of a currently approved collection. In the previous cycle, 1,422 burden hours were approved, with 1,046 burden hours requested for this collection package. This program adjustment is based on empirical data gathered from the program having been implemented vs. estimates given in the previous cycle when the program was new and non-operational.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

There are no plans to publish this information collection.

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

The agency is not requesting an exemption to not display the OMB expiration date.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

There are no exceptions requested.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.