Supporting Statement A

Electric Power Service Application

OMB Control Number 1076-0021

Terms of Clearance: None.

General Instructions

A completed Supporting Statement A must accompany each request for approval of a collection of information. The Supporting Statement must be prepared in the format described below, and must contain the information specified below. If an item is not applicable, provide a brief explanation. When the question "Does this ICR contain surveys, censuses, or employ statistical methods?" is checked "Yes," then a Supporting Statement B must be completed. OMB reserves the right to require the submission of additional information with respect to any request for approval.

Specific Instructions

Justification

1. **Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.**

The Bureau of Indian Affairs (BIA) owns, operates, and maintains three electric power utilities that provide a service to the end user, pursuant to 25 CFR 175 (Indian Electric Power Utilities). The BIA must collect customer information to identify the individual responsible for repaying the government its costs for delivering the service and bill for those costs. The BIA must also collect information to identify the location of the service delivery (i.e., electrical hook-up). In addition, the Debt Collection Improvement Act of 1996 (DCIA), 31 U.S.C. 3701-3733 requires that certain information be collected from individuals and businesses doing business with the government. This information includes the taxpayer identification number for possible future use to recover delinquent debt.

2. **Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

CFR Cite	Information Collection	BIA Use of Information

	Requirement	
25 CFR 175.125	**How do I request and receive service?** (a) If you need electrical service in an area where we provide service, you must contact our utility in that service area. (b) To receive service, you must enter into an Agreement with that utility after it has determined that you have met its requirements. The BIA provides customers with the Electrical Service Application Form.	The individual BIA power projects use the information from customers to identify the individual requesting electrical service, the site where electrical service is to be provided, the types of electrical service requested, and address to send bills.

The Electric Service Application form is a paper information collection tool that is presented to a prospective customer by the BIA facility in order to establish electrical power service for the customer's residence or business. The information that is collected is utilized to service the electrical power account, provide outage notifications, as well as perform billing, collections, and debt management functions. Name, telephone, and billing address are collected, along with telephone number in order to correspond with customer. The Taxpayer Identification Number (individual's Social Security Number or business's Employer Identification Number) is utilized for debt collection purposes per the Debt Collection Improvement Act. The legal description of the location for the service to be provided and the type of service is also collected in order to provision meter and power delivery facility infrastructure to the customer. The customer is requested to identify if they have been a customer previously and if they have been if there is an outstanding balance in order to satisfy 25 CFR 175. The date service is desired is gathered in order to schedule the electrical service start date. Lastly, the existing or new service information collected is to allow existing users to use the same form to change their name or billing address. The name of spouse was removed from the form because it isn't integral to identifying the person requesting services nor is it needed to extend services to the applicant. The removal of this information does not materially affect the burden estimates.

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. Also describe any consideration of using information technology to reduce burden and specifically how this collection meets GPEA requirements.**

Currently, no collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses. The program is exploring the possibility of allowing for electronic submission of information for this collection and is pursuing a secure public-facing platform in the near term. The form, once approved, will be electronically available at https://www.bia.gov/policy-forms/online-forms.

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.

The information collection is tied specifically to providing the electrical services that the public seeks at discrete locations. The individuals requesting electrical service do not provide this information to any other agency. No other sources can provide this information.

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

The information required is as minimal as possible. The burden is on individuals and is equivalent to what customers provide other electrical power service providers.

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

The consequences of non-collection would be lack of electrical service to the Indian and non-Indian customers served by the BIA. In most cases the collection of information is a one-time effort when electrical service is initially applied for by an electrical service applicant; therefore, reducing the frequency of the collection is not possible.

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

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

There are no special circumstances that will apply to this collection.

8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5 CFR 1320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and in response to the PRA statement associated with the collection over the past three years, and describe actions taken by the agency in response to these comments. Specifically address comments received on cost and hour burden.

A notice providing a 60-day comment period on this information collection was published in the Federal Register on April 19, 2019 (84 FR 16530). No public comments were received in response to this notice.

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, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

Consultation with representatives of those from whom information is to be obtained or those who must compile records should occur at least once every three years — even if the collection of information activity is the same as in prior periods. There may be circumstances that may preclude consultation in a specific situation. These circumstances should be explained.

BIA queried the following individuals to obtain their views on the availability of forms, frequency of collection, clarity of instructions, and relevance of data elements to be recorded as follows:

- **Individual customer, Florence, Arizona**

This respondent stated that the form is clear and concise; very self-explanatory.

- **Individual customer, Coolidge, Arizona**

This respondent stated that he did not have any issues filling out the form. He also stated that all information was clear and self-explanatory.

- **Accounting Technician, San Carlos Irrigation Project, Coolidge, Arizona**

This respondent works closely with numerous electrical power users, and stated that customers did not have issues with the form, as it is similar to other utility service application forms. It is primarily a one-time form, and the instructions are clear. Only relevant data items are being requested.

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

Respondents will not receive any payment, gift, or other remuneration for providing the information collection requirements.

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 to respondents; however, BIA maintains files containing personally identifiable information in accordance with the Privacy Act system of record notice Electrical Utility Management System, BIA-26.

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

We do not request any information of sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

- **Indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, agencies should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample (fewer than 10) of potential respondents is desirable. If the hour burden on respondents is expected to vary widely because of differences in activity, size, or complexity, show the range of estimated hour burden, and explain the reasons for the variance. Generally, estimates should not include burden hours for customary and usual business practices.**
- **If this request for approval covers more than one form, provide separate hour burden estimates for each form and aggregate the hour burdens.**
- **Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under "Annual Cost to Federal Government."**

We estimate that 1,300 new users submit information requesting electrical hook-up each year and that it takes ½ hour for the new users to provide the information. Each user will only need to provide the information once. Based on these figures, we estimate that the total annual hourly burden is 650 hours.

We estimate the salary of respondents at $36.32 per hour*. Including a multiplier of 1.5 for benefits, the total salary of respondents is estimated to be $54.48 per hour. The total hour burden is therefore estimated to be $35,412.

The information they submit is for the purpose of obtaining a benefit, namely electricity connection.

Respondents, annually	Responses per respondent, annually	Hours per response	Total annual hour burden (respondents x responses x hours)	Total cost burden (Total annual hour burden x cost per hour)
1,300	1	0.5	650	$35,412

* BLS news release USDL-19-0449, Employer costs per hour worked for employee compensation and costs as a percent of total compensation: civilian workers, by occupational and industry group– December 2018 (Table 2 – All Workers – Compensation): https://www.bls.gov/news.release/pdf/ecec.pdf.

13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)

- **The cost estimate should be split into two components: (a) a total capital and start-up cost component (annualized over its expected useful life) and (b) a total operation and maintenance and purchase of services component. The estimates should take into account costs associated with generating, maintaining, and disclosing or providing the information (including filing fees paid for form processing). Include descriptions of methods used to estimate major cost factors including system and technology acquisition, expected useful life of capital equipment, the discount rate(s), and the time period over which costs will be incurred. Capital and start-up costs include, among other items, preparations for collecting information such as purchasing computers and software; monitoring, sampling, drilling and testing equipment; and record storage facilities.**
- **If cost estimates are expected to vary widely, agencies should present ranges of cost burdens and explain the reasons for the variance. The cost of purchasing or contracting out information collection services should be a part of this cost burden estimate. In developing cost burden estimates, agencies may consult with a sample of respondents (fewer than 10), utilize the 60-day pre-OMB submission public comment process and use existing economic or regulatory impact analysis associated with the rulemaking containing the information collection, as appropriate.**
- **Generally, estimates should not include purchases of equipment or services, or portions thereof, made: (1) prior to October 1, 1995, (2) to achieve regulatory compliance with requirements not associated with the information collection, (3) for reasons other than to provide information or keep records for the government, or (4) as part of customary and usual business or private practices.**

There are no non-hour or start-up costs associated with this information collection.

14. Provide estimates of annualized cost to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The cost to the Federal government assumes the collecting, recording, and filing of information is performed by a GS-4 assistant. It is estimated that the assistant will be a GS 4, Step 5, with an hourly salary of $14.25*. Including a multiplier of 1.6 for benefits results in a total salary cost of $22.80. By law, the cost of providing this service by the Federal government is recovered in the rates charged the consumers. The estimated total annualized cost to the Federal government is $7,410.

Submissions annually	Hours per submission	Total burden hours	Total Cost (submissions x hours x cost per hour)
1,300	0.25	325	$7,410

* Salary Table 2019- FS, Effective January 2019. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/19Tables/html/RUS_h.aspx

15. Explain the reasons for any program changes or adjustments in hour or cost burden.

The name of spouse was removed from the form because it isn't integral to identifying the person requesting services nor is it needed to extend services to the applicant. The removal of this information does not materially affect the burden estimates.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

No results will be published.

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 OMB Control Number and expiration date will be displayed on the form.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

No exceptions are necessary to the certification statement.