

**Supporting Statement:  
U.S. Department of Energy  
Better Buildings Challenge, Better Buildings Alliance and the Better Buildings, Better  
Plants Voluntary Pledge Program  
OMB Control Number – 1910-5141**

This supporting statement provides additional information regarding the Department of Energy (DOE) request for information from participants in three Better Buildings voluntary programs: the Better Buildings Challenge; Better Buildings Alliance; and Better Buildings, Better Plants Voluntary Pledge Program. The numbered questions correspond to the order shown on the Office of Management and Budget (OMB) Form 83-I, “Instructions for Completing OMB Form 83-I.”

This request for information combines voluntary data collection efforts from three related programs. The Better Buildings Challenge, a voluntary leadership initiative, is supported by two programs: the Better Buildings Alliance and the Better Buildings, Better Plants Voluntary Pledge Program. Since all three of these programs are part of the overarching Better Buildings platform, driving for a common goal of working with the market to drive energy efficiency, a combined collection is the clearest approach for the public. Although some questions are similar between these programs, the Better Buildings Challenge requires a greater level of transparency, and thus a greater variety of information collection instruments. However, the respondents in the Better Buildings Challenge are typically more sophisticated energy managers and the corresponding data burden is estimated to be less, on a per entity basis, relative to the data burden of respondents in the Better Buildings, Better Plants Voluntary Pledge Program and Better Buildings Alliance.

DOE currently seeks to revise the approved information collection by adjusting existing forms and incorporating new forms under the Better Buildings Challenge, Better Buildings Alliance, and Better Buildings, Better Plants Voluntary Pledge Program, to further support energy efficiency in the commercial building sector. This includes new application forms for two new recognition opportunities, and other adjustments, such as edits for clarification to the Better Buildings Challenge Showcase Form, Better Buildings Challenge Implementation Model Form, Better Buildings Challenge Website Profile Page Template Form, Better Buildings Challenge Financial Allies Reporting Form, and Better Plants In-Plant Training Application Form.

Together, these collections result in a reduction of 609 hours due to streamlining reporting forms and frequency, improved data collection methods, and an increase in number of participants with internal data collection systems. This request for information was first approved by OMB as a new collection on April 22, 2009. A subsequent revision to the approved collection was approved by OMB on August 13, 2012, again on May 27, 2014, and most recently on June 7, 2016.

Full descriptions of the new data collections are described below and a summary of the changes to existing collection activities previously approved are referenced in Appendix A – Summary of Amended Information Collection Review Activities.

## **Justification**

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

DOE intends to collect information for its Better Buildings Challenge, Better Buildings Alliance, and the Better Buildings, Better Plants Voluntary Pledge Program. Section 421 of the Energy Independence and Security Act of 2007 (EISA 2007) (42 U.S.C. § 17081) authorizes DOE to establish a national high-performance green building clearinghouse. Section 911 of the Energy Policy Act of 2005, as amended (42 U.S.C. § 16191), instructs DOE to conduct programs that include research, development, demonstration, and commercial application of cost-effective technologies to improve the energy efficiency and environmental performance of buildings.

The Better Buildings Challenge, Better Buildings Alliance, and Better Buildings, Better Plants Voluntary Pledge partners provide information on best practices that is distributed to facilitate reductions in energy intensity by other commercial, manufacturing, and community organizations. The information collected supports DOE in meeting the purpose of these statutory provisions.

Additionally, Section 106 of the Energy Policy Act of 2005 (EPAAct 2005, Pub. L. No. 190-58) permits the U.S. Secretary of Energy to enter into voluntary agreements with industry to reduce energy intensity by not less than 2.5 percent per year. The U.S. Secretary of Energy is also authorized by the legislation to provide these companies with technical assistance. Data collected through this ICR allows DOE to track progress made by its industry partners, validate their performance improvements, and adjust technical assistance offerings as needed.

- 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**

The information being collected will be used to report the progress of participants in the DOE Better Buildings Challenge, Better Buildings Alliance, and the Better Buildings, Better Plants Voluntary Pledge program. The programs are voluntary leadership initiatives intended to drive greater energy and water efficiency in the commercial and industrial marketplace to create cost savings and jobs.

This will be accomplished by highlighting the ways participants overcome market barriers and persistent obstacles with replicable, marketplace solutions. The program will showcase real solutions and partner with industry leaders to better understand policy and technical opportunities. DOE reports progress annually through a Better Buildings Progress Update and publishes case studies and other resources on a public web site.

**Existing Collection: Better Buildings Alliance**

The Better Buildings Alliance is a national initiative to improve commercial building energy efficiency by 20%. Section 422 of EISA 2007 supports this initiative by setting a goal to help pave the way for net-zero energy commercial buildings.<sup>1</sup> The Better Buildings Alliance accomplishes this by encouraging members to commit to an energy efficiency improvement goal of 2% or more per year while deploying energy-saving technologies and solutions. Better Building Alliance members cover key market sectors: retail, food service, commercial real estate, hospitality, health care, education, and state and local buildings owners and managers.

Several programmatic requirements were instituted to provide more transparency to the program, as well as track success of the program overall and accurately report EISA 2007 progress to Congress, as mandated in Section 421, Subtitle G of EISA 2007.<sup>2</sup> Better Buildings Alliance members also submit a basic application to DOE when they first join the program.

### Application Form

Better Buildings Alliance members must provide basic initial enrollment information to the program. The sign-up form (see attached) includes information on the member's building portfolio, current energy reduction goal and data tracking process, challenges, success stories, contact information, and Solutions Teams it may want to participate in through the Better Buildings Alliance. This information is collected in a web form and submitted electronically. "Building Envelope" was added as an option under the "Solutions Team" section.

### **Existing Collection: Better Buildings, Better Plants**

Better Buildings, Better Plants Voluntary Pledge Program is a national initiative to drive a 25% reduction in industrial energy intensity in ten years. This initiative is sponsored by the Advanced Manufacturing Office (AMO) within DOE's Office of Energy Efficiency & Renewable Energy (EERE) to reinforce energy efficiency as a profitable business model and expand markets for new energy technologies.

Any company in the U.S. industrial sector, or any water and wastewater treatment organization, can become a Better Buildings, Better Plants Partner, regardless of size and no matter its level of expertise in energy management. DOE offers two pathways for

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<sup>1</sup> Section 422 of EISA 2007 specifically calls for "the development and establishment of net-zero energy commercial buildings for:

- (1) any commercial building newly constructed in the United States by 2030;
- (2) 50 percent of the commercial building stock of the United States by 2040; and
- (3) all commercial buildings in the United States by 2050."

<sup>2</sup> Section 421, Subtitle G of EISA 2007 requires the submission of a biennial report detailing activities and accomplishments in support of the High-Performance Green Building Initiatives and other government initiatives that affect commercial buildings.

manufacturers to engage in Better Plants. The broader-based Program Level, and the higher-level Challenge Level. Challenge partners agree to additional transparency around their energy performance data and industry-leading best practices. Two forms, the Annual Challenge Reporting Form (for Challenge partners) and the Annual Reporting form (for Program partners), are used to collect annual energy intensity data to be reported to DOE. These forms collect largely the same information, however, the Challenge Reporting Form includes an additional field requesting the breakdown of energy intensity by plant or facility. Each respondent will only complete one of these two forms.

#### BBBP Challenge Annual Reporting Form

This form was previously OMB approved. No substantive changes were made.

#### BBBP Annual Reporting Form

This form was previously OMB approved. No substantive changes were made.

EPAct 2005 defines energy intensity as the “primary energy consumed for each unit of physical output in an industrial process.” Partners are encouraged to measure energy intensity in a way that adheres to this definition. However, DOE understands that each partner will need to adopt methods to measure and track energy intensity data that are appropriate for their operations. These energy intensity measurements will vary by industry and partner. The units of physical output (or units of production) can be the number, mass, volume, size, functionality, or economic value of a product. Many companies or organizations will need to track energy intensity across multiple product lines due to significant diversity in product groups. Segmenting energy use among specific product groups is challenging; however, efforts to do so will provide more accurate and valuable estimates of energy intensity for each product group.

The DOE has collected information for Better Plants through a web-based, password-protected system, and via e-mail. DOE has used this information to recognize partners for their accomplishments as well as to draft required progress reports to Congress. DOE is using the data to evaluate the impact of Better Plants, and to provide recognition to companies that are on track to meet the typical 25%, 10-year energy intensity target. To provide an additional layer of verification, DOE may conduct independent validation of a sample of participating partners’ data reports. The verification effort would be conducted by independent parties on a sampling of up to 25% of participating companies.

#### BBBP Showcase Project Website Profile Development Form

Partners will identify a showcase project and submit the showcase project basic information, expected annual energy or water savings, expected annual cost savings, background, solutions, and photos of the project. No substantive changes were made to this previously OMB approved-form.

#### In-Plant Training Forms

Section 106 of EAct 2005 states that manufacturers entering into voluntary agreements with DOE to reduce energy intensity are eligible to receive technical assistance from DOE. In-Plant Trainings are one way DOE delivers this technical assistance.

Through these trainings, companies participating in Better Buildings, Better Plants have an opportunity to receive hands-on training on conducting energy assessments, using DOE tools, developing energy management systems, and implementing and replicating energy projects. The training includes an assessment of common energy systems such as steam, process heating, or motor-driven systems. Personnel from other facilities within the company, as well as from other companies in the area and suppliers, may be invited to attend. Companies apply to host these on-site, three-day training sessions at their facilities.

As part of the trainings, DOE collects information from participants through the following existing mechanisms:

- **Application Form:** Partners must apply to host an In-Plant training. The application form (attached) includes information on the size and location of the facility, number of invited participants, the type of training desired and the intended cost-share ratio. DOE selects applications based on the information submitted, with the Department typically selecting applicants with high energy use, large numbers of invited attendees, and significant cost share commitments. The form has been visually updated, includes additional clarifying instructions, and has been amended to give partners the option of applying for new “Treasure Hunt Exchange,” “Wastewater/Water,” “Industrial Refrigeration,” and “50001 Ready” trainings while removing the option for “Strategic Energy Management.”
- **In-Plant Training Evaluation:** Training participants will be asked to complete a voluntary evaluation form (attached) upon completion of the in-plant training session. Respondents will provide feedback on the relevance, effectiveness and quality of teachings, training methods and objectives. DOE will use the information to assess and improve the program. A Better Plants Challenge logo was replaced with a Better Plants Program logo and a new question was added.
- **Follow-up with Host Plant:** Twelve months after completing the in-plant training, DOE will follow-up with the host plant in a phone survey to determine whether and to what extent the energy saving opportunities identified during the training session were implemented. No substantive changes have been made to the content of this form since the last submission to OMB.

DOE will use the information to improve and measure the impacts of the Better Buildings, Better Plants Voluntary Pledge Program.

Specifically, DOE will use the data collected to assess the effectiveness of its efforts to partner with industry to drive a 2.5% per year improvement in industrial energy intensity, as well as the effectiveness of its technical assistance offerings, as called for in EAct 2005.

### BBBP Water Data Collection Form

The Better Buildings, Better Plants Voluntary Pledge Program collects basic water usage data for each organization's portfolio of facilities on an annual basis through a standardized form. This includes contact information, water intake and water intensity performance metrics. Specifically, DOE uses the data collected to assess the effectiveness of its efforts to partner with industry to drive an improvement in industrial water intensity, as well as to recognize those partners making progress and/or meeting their water-saving goals. No substantive changes were made.

### **New Collection: Better Buildings, Better Plants**

To drive further energy savings, recognize innovation, and encourage replication, DOE has developed two new recognition opportunities for Better Buildings, Better Plants partners. One (Better Practice Awards) seeks to recognize innovative corporate-wide practices that institutionalize energy-saving approaches, and the other (Better Project Awards) recognizes impactful individual projects.

#### BBBP Better Practice Award Application Form

The Better Buildings, Better Plants Voluntary Pledge Program will recognize partners' outstanding accomplishments in implementing and promoting the practices, principles, and procedures of energy management in industry through annual "Better Practice Awards." DOE will use the data collected to compare applying-partners' eligible organizational practices and select a limited number for Better Practice Awards.

#### BBBP Better Project Award Application Form

The Better Buildings, Better Plants Voluntary Pledge Program will recognize partners' outstanding accomplishments in implementing industrial energy efficiency projects at individual facilities through annual "Better Project Awards." DOE will use the data collected to compare applying-partners' eligible projects and select a limited number for Better Project Awards.

### **Existing Collection: Better Buildings Challenge**

The Better Buildings Challenge (BBC) respondents are organized into two categories: Partners and Allies. Partners are organizations that make a public commitment to implement plans to achieve lasting, organization-wide energy savings, while Allies are organizations that make a public commitment to support the energy efficiency marketplace. Partners are further categorized as portfolio partners (e.g., Transwestern, Best Buy, Houston Independent School District, State of Minnesota), community partners (e.g., City of Seattle), and manufacturing partners (e.g., 3M, Alcoa). Allies are further categorized as financial allies (e.g., Citibank, Ygrene Energy Fund) and utility allies (e.g. Southern California Edison).

DOE will collect several types of information from respondents. For Better Buildings Challenge Partners, DOE will collect the following information:

### BBC Partner Website Profile Form

An organization seeking to join the BBC as a Partner will be asked to submit background information on the organization/company that will be used to create a website profile for each BBC participant. This information includes name, energy efficiency goals, commitment in terms of square footage/number of buildings, and a company logo and facility photo for each participant. The wording for this form was updated and clarified, but no substantive changes were made to the information request.

### BBC Partner Showcase Project Form

Partners will identify a showcase building project and submit basic information on the showcase project, expected annual energy or water savings, expected annual cost savings, project background, solutions, and photos. The wording for this form was updated and clarified, but no substantive changes were made to the information request.

### BBC Partner Implementation Model Form

Partners will describe the approaches they are using to overcome market barriers to energy efficiency. DOE will use this information to highlight successful strategies that non-participating organizations/companies can adopt to overcome challenges, and will be publicly available to enable other entities to use and/or adapt for their specific needs. Several of the questions in this form were streamlined into one, but no substantive changes were made to the information request.

### BBC Facility-Level Energy Reporting Form

DOE will collect facility-level energy-related information for committed square footage or plants. This information will be used to quantify how deep energy retrofit measures impact energy usage. No substantive changes were made.

### BBC Financial Allies Reporting Form

On an annual basis, the financial allies will complete a template documenting the number of energy efficiency projects financed using these products. DOE will use this information to inform non-participating organizations/companies interested in replicating the energy reduction savings generated by the BBC Partners. This template has been simplified to make it easier for Allies by clarifying information requests and moving to once-a-year-reporting from twice-a-year-reporting.

### BBC Financial Allies Website Profile Form

For financial allies, DOE will also collect a description of the financial products offered by the ally. This is a one-time submission upon joining the BBC. Information collected includes general background, financial commitments, target market description, and photos. Questions

have been added to gather data on markets served, products and services, project size, the level of financial commitment, and the contact information of a point person.

DOE has used the information collected through the Better Buildings Challenge to recognize partners for their success, build web pages that educate the public on successful energy efficiency strategies, and draft publically available progress reports.

**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.**

The Better Buildings Challenge, Better Buildings Alliance and the Better Buildings, Better Plants voluntary pledge programs primarily rely on data provided in an electronic format via software tools, electronic files and a variety of template spreadsheets. There is a limited number of data collection responses received in writing, over the telephone, or in-person for verification purposes. Each data collection instrument is designed to support the respective voluntary pledge program that the respondent participates in with DOE. No other data collection systems will be employed to support these programs.

DOE has requested that Better Buildings Challenge Partners submit facility-level energy usage data through a publicly available and widely used electronic tool, ENERGY STAR Portfolio Manager (hereafter referred to as Portfolio Manager). The U.S. Environmental Protection Agency (EPA) freely provides this tool, and the submission of facility-level energy and water usage data using this tool will result in greater efficiency, timely reporting and a reduced paperwork burden for partners and DOE program staff. Portfolio Manager is an approved OMB data collection tool.<sup>3</sup> BBC Partners simply need to modify the settings on their Portfolio Manager profiles to share with DOE data they are already entering.

Portfolio and community partners that do not use Portfolio Manager (estimated at ~25% of all commercial partners) will be asked to use another method to collect the facility-level energy usage data. DOE will provide an Excel spreadsheet for Partners to use to extract their data from their in-house tracking tools for submission to DOE. DOE will use this spreadsheet to ensure consistency across all data reported. This instrument, the Better Buildings Challenge Data Template, is attached.

The energy usage data requested from the manufacturing partners in the Better Buildings Challenge is not housed in Portfolio Manager. DOE has created a one-page data collection form, the Annual Challenge Reporting Form (discussed on page 4), to standardize the data collected from these partners. This instrument is attached.

The Better Buildings, Better Plants Program and Better Buildings Alliance use a one page reporting form (also attached and discussed on page 4). The data collected for both of these programs is largely similar to the Better Buildings Challenge; however, the Better Buildings Challenge form contains an additional data entry field requesting a breakdown of energy

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<sup>3</sup> See EPA ICR 1772.05, OMB Control Number 2060-0347, "Information Collection Activities Associated with EPA's ENERGY STAR Program in the Commercial and Industrial Sectors."



intensity performance at the facility level. The additional reporting requirements for the Better Buildings Challenge Partners are consistent with that program's goals for greater transparency of energy savings data. In efforts to reduce burden, the reporting document can be submitted electronically. The collection requests do not require a specific collection technique be used; automated, electronic, mechanical, or any other technological collection techniques may be utilized for the collection effort.

The In-Plant Training forms can be submitted via e-mail, fax or postal mail. The application form is provided in Excel, which allows some calculations to be automated, though applicants and participants are free to print the forms out and fill them out by hand. Hard copies of the course evaluation forms will be distributed at the training events, filled out by hand, and manually collected by DOE representatives.

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

Other voluntary reporting programs were investigated for duplication, including the Environmental Protection Agency's Climate Leaders Program, the Energy Information Agency's Manufacturing Energy Consumption Survey, and its voluntary reporting of greenhouse gasses. The EPA has since discontinued the Climate Leaders program. While the EIA requires reports on total energy use, the Better Buildings, Better Plants Program requests information about a base energy intensity number and the annual change in intensity. This metric, defined in EPA 2005 as "the primary energy consumed for each unit of physical output in the industrial process," is not collected by any other existing program.

To ease the reporting burden on the Better Buildings Challenge recipients, DOE has opted to gather facility-level energy usage data using a pre-existing electronic tool widely available and used within the industry for such purposes. The majority of Better Buildings Challenge partners have already submitted the facility-level energy data using this EPA tool.

Better Buildings Alliance and Better Buildings, Better Plants members who also participate in the Better Buildings Challenge will be exempt from Better Buildings Alliance or Better Buildings, Better Plants reporting requirements. DOE will use the information collected from the Better Buildings Challenge in lieu of the Better Buildings Alliance or Better Buildings, Better Plants reporting form.

In addition, DOE conducts periodic reviews of energy efficiency programs to align national initiatives and reduce the annual reporting burden for respondents.

DOE will continue to evaluate the Better Buildings Challenge, Better Buildings Alliance and Better Buildings, Better Plants Programs for opportunities to minimize duplication of effort.

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

The collection of information does not impact small businesses or other small entities.

**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.**

To be successfully implemented, the programs require the collection of some unique and specific participant information.

The re-occurring reporting burden of the collections targets facility-level, annual energy usage data from the portfolio and community partners and corporate-wide annual data from the manufacturing partners.

DOE is requesting the minimum level of information required to fully support and implement the programs, and a less frequent collection of information would hinder DOE's ability to share best practices of energy and water efficiency with other partners and the public, or to support the partners in achieving their energy and water reduction goals.

The In-Plant Training forms are necessary to carry out Congress' directive for DOE to provide technical assistance to manufacturers entering into voluntary agreements with DOE to reduce their energy intensity. Without the application form, DOE would not have a systematic way of selecting technical assistance recipients, and without the evaluation form and process to collect implementation data, DOE would lack a mechanism to track the effectiveness of the training.

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

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

**8. If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize**

**public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.**

The Department published a 60-day Federal Register Notice on July 26, 2018, Vol.83, No. 144, requesting public comment on an amendment to this approved agency information collection. Received comments were not germane to the Better Buildings Challenge; Better Buildings Alliance; and Better Buildings, Better Plants Voluntary Pledge Program. DOE frequently consults with partners regarding its data collection efforts. Changes made to the data collection forms over the years reflect input gained from these conversations.

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

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

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

Energy consumption and savings data reported to DOE through the Better Buildings, Better Plants Voluntary Pledge Program and the Better Buildings Alliance is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. DOE will aggregate the energy savings data to ensure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

Better Building Challenge Program Partners and Allies agree to provide the information identified in this supporting statement as a means of informing the broader marketplace of commercial and industrial building owners and operators about successful implementation models that generate significant energy savings and quantifying the results of those models.

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

This project collects data on energy consumption, water consumption, and related conservation efforts of partner organizations and contains no personal data.

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

The estimated combined number of respondents for the Better Buildings Challenge, Better Buildings Alliance and Better Buildings, Better Plants Voluntary Pledge Program is 857, and the associated burden hour for the three programs is 2,292.25 hours.

The attachment to this supporting statement provides a detailed synopsis of annual burden hours for this information collection. The following outline provides estimates of the reporting burden for the Better Buildings Challenge, Better Buildings Alliance and the Better Buildings, Better Plants Voluntary Pledge Program.

**Burden hour summary for BBC**

Total number of unduplicated respondents: 400  
Reports filed per person: 0.63  
Total annual responses: 220  
Total annual burden hours: 287.5

Average Burden Per Collection: 1.3 hours  
Per Applicant: 0.72 hours

**Burden hour summary for BBBP**

Total number of unduplicated respondents: 245  
Reports filed per person: 3  
Total annual responses: 622  
Total annual burden hours: 2,001

Average Burden Per Collection: 3.2 hours  
Per Applicant: 8.2 hours (see discussion)

**Burden hour summary for BBA**

Total number of unduplicated respondents: 185  
Reports filed per person: 0.075  
Total annual responses: 15  
Total annual burden hours: 3.75

Average Burden Per Collection: 0.25 hours  
Per Applicants: 0.02 hours

**Combined totals**

Total number of unduplicated respondents: 830  
Total annual responses: 857

Total annual burden hours: 2,292.25

Each organization participating in BBC and BBBP will respond to an annual data request. Although each organization may represent multiple buildings which may track their own progress, organizations submit one aggregate report for all of their buildings and/or plants.

#### Better Buildings Challenge Data Collection

Currently there are 310 Better Buildings Challenge partners. Based on current activities, DOE estimates that 30 new partners will join per year, resulting in a total of 400 partners at the end of the three-year period covered by this ICR.

Based on prior year experience, DOE anticipates that (annually) 30 partners will submit initial website profiles (0.5 hour per response), 40 partners will submit showcase projects (2 hours per response), and 30 partners will submit implementation models (2 hours per response). 30 partners are anticipated to initiate data sharing via Portfolio Manager (0.25 hours per response), and 40 partners are expected to submit via the spreadsheet facility reporting tool (2 hours per response). These activities total 242.5 hours.

DOE anticipates that 40 financial allies will submit data (1 hour per response once a year), and 10 will submit website profiles (0.5 hour per response), totaling another 45 hours.

In total BBC collection activities will total 287.5 hours, a reduction of 171.5 hours from the prior submission, for reasons documented in question 15.

#### Better Buildings Better Plants Data Collection

There are currently 200 industrial companies participating in the Better Buildings, Better Plants program. The number of participants is expected to grow by about 15 new partners per year to about 245 at the end of the three-year period covered by this ICR.

For most Better Buildings, Better Plants partners, plant-level data are already collected and stored at the corporate level, so the process of reporting this data to DOE is relatively simple. DOE estimates that it will take companies with data collection systems about 4 hours annually to review and report their data.

A small number of participating Better Buildings, Better Plants partners do not have an existing collection system, therefore, it will require more time for these companies to collect, review, and report their data. DOE estimates that it takes these companies approximately 48 hours per company to complete these activities. This 48 hour estimate for the companies that lack an existing corporate-level tracking system is derived from two observations: 1) it takes these companies approximately six hours *per plant* to collect, review and report the data; and 2) these companies tend to be relatively smaller and have about 8 plants enrolled in the program.

As a result, DOE estimates each company will spend on average, 6.94 hours compiling and submitting the energy consumption data per year. This burden estimate is based on a weighted average from companies that use an existing data collection system versus those

companies that do not have a data collection system to capture energy consumption information.

As part of its recognition efforts, DOE also creates individual web profiles hosted on the DOE website. It will continue building these for ten new companies each year. DOE develops the web profiles in-house based on data which companies provide through a standardized template. As detailed in question 2, DOE will also be soliciting application forms from partners for Better Practice and Better Project awards, respectively. The annual data and web profile template reporting result in a total time burden of 1,825 hours for Better Buildings, Better Plants Partners.

Additionally, completing the In-Plant Training forms results in another 71 hours per year for a total time burden of 2,001 hours associated with the Better Buildings, Better Plants Voluntary Pledge Program.

While the Better Buildings, Better Plants program continues to grow, there is an overall burden reduction of 235 hours. This is largely due to the fact that those companies that entered into the program without internal data collection systems have, over time and with DOE's help, developed data systems. For these companies, the hourly burden associated with the annual data reporting process has reduced.

#### Better Buildings Alliance Data Collection

There are currently 140 Better Buildings Alliance members that are not also BBC partners, with 46 members enrolled in both the Alliance and the Challenge. 38 additional participants are Better Buildings Alliance affiliate members, and do not complete the data collection forms. DOE estimates that 15 new members will join annually, leading to approximately 185 total members at the end of the three-year period covered by this ICR that are only in the Alliance.

BBA members respond to one information request – 15 new members will complete an initial enrollment form (0.25 hours per response). In total, a burden of 3.75 hours is associated with the Better Buildings Alliance.

### **13. Provide an estimate for the total annual cost burden to respondents or record-keepers resulting from the collection of information.**

The estimated total annual cost burden to respondents from the Better Buildings, Better Plants Voluntary Pledge Report collection of information is about \$86,903.43 while the estimated annual cost for the Better Buildings Alliance is \$162.86, and the estimated annual cost for the Better Buildings Challenge is \$12,486.13, for a total cost of approximately \$99,552. The per respondent cost for the Better Buildings, Better Plants Voluntary Pledge Reports is about \$354.71, the Better Buildings Alliance per respondent cost is approximately \$0.88, and the approximate per respondent cost for the Better Buildings Challenge is \$31.21. The average per response burden cost is approximately \$119.94.

These numbers are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$43.43) for industrial engineers, compiled by the U.S. Department of Labor's Bureau of Labor Statistics. (See <http://www.bls.gov/oes/current/oes172112.htm>) There are no capital and start-up cost components or operations and maintenance associated with either of these data collections.

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

DOE will require contractor support to process and analyze the data being reported by recipients and prepare an annual summary of energy savings achieved. The following estimate reflects the DOE and contractor resources needed to process and analyze the data being reported by participants.

Better Buildings, Better Plants Voluntary Pledge Report Collection Costs

100 hours per year to collect and review annual reports (approximately ½ hour per report)

100 hours @ \$150 per hour = \$15,000

Better Buildings, Better Plants In-Plant Training Collection Costs

20 hours per year to collect and review In-Plant Training applications

20 hours @ \$150 per hour = \$3,000

6 hours per year to collect implementation data from host plant

6 hours @ \$150 per hour = \$900

Better Buildings Challenge Collection Costs

40 hours per year to collect and review annual reports (approximately ½ hour per report)

40 hours @ \$90.00 per hour = \$3,600

Data Management for both Better Buildings, Better Plants and Better Buildings Challenge

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

(approximately 12 hours per month)

144 hours @ \$100 per hour = \$14,400

Therefore, total costs to the Federal government for these collection efforts will be \$36,900.

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

The Better Buildings Challenge Report is an existing, approved collection effort that is being renewed; it is the result of the Congressional directive from Section 106 of EAct 2005. Changes have been made to the estimated burden time that decrease the total projected hourly burden from the 459 hours per year cited in the most recent ICR to the 287.5 cited in this request.

The Better Buildings, Better Plants Voluntary Pledge Report is an existing, approved collection effort that is being renewed; it is the result of the Congressional directive from Section 106 of EAct 2005. Changes have been made to the estimated burden time that

decrease the total projected hourly burden from the 2,236 hours per year cited in the most recent ICR to the 2001 hours cited in this request.

The Better Buildings Alliance Report is an existing, approved collection effort that is being renewed; it is the result of the Congressional directive from Section 106 of EPA Act 2005. Changes have been made to the estimated burden time that decrease the total projected hourly burden from the 206.25 hours per year cited in the most recent ICR to the 3.75 hours cited in this request. DOE has dropped the requirement that BBA members submit an annual data report, resulting in the reduction in burden hours. DOE eliminated this requirement because most BBA members were not ready to compile, analyze, and report this data, and those that were, could join BBC.

The current estimates include program changes in Items 13 and 14 associated with changes in number of respondents, total annual responses, and total hours requested. The total annualized cost requested from the current OMB inventory is adjusted from \$106,934 to \$99,552 resulting in a decrease of \$7,382 for the total collection.

The decrease in cost is largely due to

- Reductions in the anticipated annual number of respondents for the Better Buildings Challenge Website Profile Page Template, Showcase Project, and Facility-level Energy Reporting forms, respectively, which resulted in a burden reduction of 134 hours;
- Halving the anticipated annual number of respondents for the Better Plants Program Pledge form (companies without collection system), which resulted in a burden reduction of 720 hours.

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

This package contains no collections whose results will be published for statistical use. Information collected through this effort will be used to publicize the efforts and strategies of Better Buildings, Better Plants, Better Buildings Alliance, and Better Buildings Challenge partners via the program's websites as a means to encourage other organizations to learn from their successes and adapt their implementation models to achieve similar reductions in energy intensity. The results of the programs will only be published in program evaluation and metrics documentation. No complex calculations are required to track the progress of program participants towards the goal of reducing annual energy intensity.

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



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

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

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

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

Appendix A – Summary of Amended Information Collection Review Activities

Program	Information Collection Description	Status	Average Burden Hours per Responder	Notes
BBC	Website Profile Page Template	Approved	0.5	As compared to the last ICR submission, total burden hours were reduced. The majority of partners have completed their one-time submissions.
	Financial Allies Website Profile Form			
BBC	Showcase Project Form	Approved	2	As compared to the last ICR submission, total burden hours were reduced. The majority of partners have completed their one-time submissions.
BBC	Implementation Model Form	Approved	2	No change in burden hours.
BBC	Facility-Level Energy Performance Data	Approved	0.25	No DOE information collection form required; Companies share access to EPA Portfolio Manager tool reports.
BBC	Better Buildings Facility-Level Energy Reporting Form	Approved	2	As compared to the last ICR submission, total burden hours were reduced. The majority of partners have completed their one-time submissions.
BBC	Financial Allies Data Collection Form	Approved	1	This form was simplified and collection frequency was decreased. As compared to the last ICR submission, total burden hours were reduced.
BBBP	Better Buildings Better Plants Challenge Annual Reporting Form	Approved	4	Increased total burden hours due to growth in the program and an increase in the anticipated hours per response per participant, per feedback from participants.
BBBP	Better Buildings Better Plants Annual Reporting Form	Approved	6.5 <sup>4</sup>	Form updated after previous OMB approval. Reduced the total burden hours due to an increase in the number of partners with internal data collection systems. This burden estimate is based on a weighted average from companies that use an existing data collection system and those that do not.
BBBP	Better Practice Award Application Form	New	2	New Form.
BBBP	Better Project Award Application Form	New	2	New Form.
BBBP	Water Data Collection Form	Approved	4	Increased total burden hours due to an increase in the anticipated hours per response per participant, per feedback from participants.

<sup>4</sup>The following method was used to calculate burden hours of annual data reporting for Better Plant partners based on a weighted average:  $[245 \text{ (partners with collection systems)} \times 4 \text{ burden hours}] + [15 \text{ (partners without collection systems)} \times 48 \text{ burden hours}] / 245 \text{ (total partners)} = 6.94 \text{ burden hours per partner.}$

BBBP	Report Data Verification	Approved	2	No form necessary; data verification will occur via email and conference calls.
BBBP	In-Plant Trainings Application Form	Approved	0.5	No change in burden hours.
BBBP	In-Plant Trainings Course Evaluation Form	Approved	0.25	No change in burden hours.
BBBP	In-Plant Trainings Post Follow-up with Host Plant	Approved	0.5	No change in burden hours.
BBA	Application Form	Approved	0.25	Adjusted the number of respondents and total burden hours to reflect the projected growth in the program.

BBC, Better Buildings Challenge  
 BBBP, Better Buildings, Better Plants Program  
 BBA, Better Buildings Alliance