

Exhibit 1a. Year 2023: Total Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for States, Emission Guidelines for GHG Emissions for EGUs
(40 CFR part 60, subpart UUUUa)

Burden Item	(A) Hours/ Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)	(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
1. REPORTING REQUIREMENTS									
A. Read and Understand Rule Requirements	N/A								
B. Required Activities									
Review/disseminate assessment of progress ^{a,b}	4,160	1	4,160	43	178,880	141,315	16,099	21,466	\$14,581,453
C. Create Information	Incl. in 1B								
D. Gather Information	Incl. in 1B								
E. Report Preparation	N/A								
TOTAL ANNUAL LABOR BURDEN AND COST					178,880	141,315	16,099	21,466	\$14,581,453
AVERAGE ANNUALIZED COSTS (O&M)									
Recordkeeping/reporting supplies									\$31,605

^a Entails implementation of program, review and assessment of all building blocks utilized by the state that contribute to state reduction goal, possible development of contingency measures, state plan revisions, coordination with affected sources, oversight of consumer-based energy efficiency programs, and possible public meeting development on state plan revisions.

^b Burden hours based on 2 FTEs per state, expected to be performed by possibly 4 to 5 state staff part time, from the energy office and air office (2x8x5x52=4,160 hours). Respondents include all 49 states for which a state plan is being implemented.

Nationwide Respondent Assumptions

Respondents	No.	Notes
Total no. states	48	
No. expected to submit negative declaration	5	VT, ME, CA, ID, RI
No. expected to submit individual state plan	43	

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2017)		
	Unloaded	Overhead Multiplier (110%)	Loaded
States ^a			
Technical	\$40.84	2.1	\$85.76
Managerial	\$47.48	2.1	\$99.71
Clerical	\$19.00	2.1	\$39.90
Composite			\$109.70

^a Unloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2017 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 999200 - State Government, excluding schools and hospitals (OES Designation) <https://www.bls.gov/oes/current/naics3_999000.htm>

Recordkeeping/Reporting Supplies (Annual O&M Costs)

Supply Item	Price per Item	Number per Respondent	Number of Respondents	Total
File cabinet to store hard copy records ^{a,b}	\$235	1	43	\$10,105
Miscellaneous annual supplies ^b	\$500	1	43	\$21,500

^a One-time cost, incurred in 2023.

^b Respondents include all 43 states with state plans.

Exhibit 1b. Year 2025: Total Annual Respondent Burden and Cost of Reporting and Recordkeeping Requirements for States, Emission Guidelines for GHG Emissions for EGUs
(40 CFR part 60, subpart UUUUa)

Burden Item	(A) Hours/ Occurrence	(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)	(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
1. REPORTING REQUIREMENTS									
A. Read and Understand Rule Requirements	N/A								
B. Required Activities									
Review/disseminate assessment of progress ^{a,b}	4,160	1	4,160	43	178,880	141,315	16,099	21,466	\$14,581,453
C. Create Information	Incl. in 1B								
D. Gather Information	Incl. in 1B								
E. Report Preparation									
Prepare annual report for EPA ^{c,d}	320	1	320	43	13,760	10,870	1,238	1,651	\$1,121,650
TOTAL ANNUAL LABOR BURDEN AND COST					192,640	152,186	17,338	23,117	\$15,703,104
AVERAGE ANNUALIZED COSTS (O&M)									
Recordkeeping/reporting supplies									\$21,500

^a Entails implementation of program, review and assessment of all building blocks utilized by the state that contribute to state reduction goal, possible development of contingency measures, state plan revisions, coordination with affected sources, oversight of consumer-based energy efficiency programs, and possible public meeting development on state plan revisions.

^b Burden hours based on 2 FTEs per state, expected to be performed by possibly 4 to 5 state staff part time, from the energy office and air office (2x8x5x52=4,160 hours). Respondents include all 49 states for which a state plan is being implemented.

^c Includes compilation of quarterly data downloaded to EPA's ECPMS system by the affected EGUs and summary of program progress performed above.

^d Burden hours based on 1 FTE for 1 month to prepare the report and another FTE (managers, attorneys, etc.) for another month to review and comment on the report.

Nationwide Respondent Assumptions

Respondents	No.	Notes
Total no. states	48	
No. expected to submit negative declaration	5	VT, ME, CA, ID, RI
No. expected to submit individual state plan	43	

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2017)		
	Unloaded	Overhead Multiplier (110%)	Loaded
States ^a			
Technical	\$40.84	2.1	\$85.76
Managerial	\$47.48	2.1	\$99.71
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Composite			\$109.70

^a Unloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics, Occupational Employment Statistics, May 2017 National Industry-Specific Occupational Employment and Wage Estimates, NAICS 999200 - State Government, excluding schools and hospitals (OES Designation) <https://www.bls.gov/oes/current/naics3_999000.htm>

Recordkeeping/Reporting Supplies (Annual O&M Costs)

Supply Item	Price per Item	Number per Respondent	Number of Respondents	Total
Miscellaneous annual supplies ^a	\$500	1	43	\$21,500

^a Respondents include all 43 states with state plans.

Exhibit 1c. Year 2030: Total Annual Respondent Burden and Cost of Reporting and Re (40 CFR part 60, subpart UUUUa)

Burden Item	(A) Hours/ Occurrence
1. REPORTING REQUIREMENTS	
A. Read and Understand Rule Requirements	N/A
B. Required Activities	
Review/disseminate assessment of progress ^{a,b}	4,160
C. Create Information	Incl. in 1B
D. Gather Information	Incl. in 1B
E. Report Preparation	
Prepare annual report for EPA ^{c,d}	320
TOTAL ANNUAL LABOR BURDEN AND COST	
AVERAGE ANNUALIZED COSTS (O&M)	
Recordkeeping/reporting supplies	

^a Entails implementation of program, review and assessment of all building blocks utilizing revisions, coordination with affected sources, oversight of consumer-based energy efficiency

^b Burden hours based on 2 FTEs per state, expected to be performed by possibly 4 to 5 a state plan is being implemented.

^c Includes compilation of quarterly data downloaded to EPA's ECPMS system by the affected

^d Burden hours based on 1 FTE for 1 month to prepare the report and another FTE (ma

Nationwide Respondent Assumptions

Respondents	No.
Total no. states	48
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Respondent Labor Rates

Labor Category	Re
	Unloaded
States ^a	
Technical	\$40.84
Managerial	\$47.48
Clerical	\$19.00
Composite	

^a Unloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics May 2017 National Industry-Specific Occupational Employment and Wage Estimation excluding schools and hospitals (OES Designation) <<https://www.bls.gov/oes/cu>

Recordkeeping/Reporting Supplies (Annual O&M Costs)

Supply Item	Price per Item
Miscellaneous annual supplies ^a	\$500

^a Respondents include all 43 states with state plans.

Recordkeeping Requirements for States, Emission Guidelines for GHG Emissions for EGUs

(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)
1	4,160	43	178,880	141,315
1	320	43	13,760	10,870
			192,640	152,186

zed by the state that contribute to state reduction goal, possible development of contingency mea
ciency programs, and possible public meeting development on state plan revisions.

state staff part time, from the energy office and air office (2x8x5x52=4,160 hours). Respondents in

ected EGUs and summary of program progress performed above.

nagers, attorneys, etc.) for another month to review and comment on the report.

Notes
VT, ME, CA, ID, RI

Respondent Labor Rates (May 2017)	
Overhead Multiplier (110%)	Loaded
2.1	\$85.76
2.1	\$99.71
2.1	\$39.90
	\$109.70

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ates, NAICS 999200 - State Government,
rrent/naics3_999000.htm>

Number per Respondent	Number of Respondents	Total
1	43	\$21,500

(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
16,099	21,466	\$14,581,453
1,238	1,651	\$1,121,650
17,338	23,117	\$15,703,104
		\$21,500

asures, state plan

include all 49 states for which

Exhibit 1d. Year 2035: Total Annual Respondent Burden and Cost of Reporting and Re (40 CFR part 60, subpart UUUUa)

Burden Item	(A) Hours/ Occurrence
1. REPORTING REQUIREMENTS	
A. Read and Understand Rule Requirements	N/A
B. Required Activities	
Review/disseminate assessment of progress ^{a,b}	4,160
C. Create Information	Incl. in 1B
D. Gather Information	Incl. in 1B
E. Report Preparation	
Prepare annual report for EPA ^{c,d}	320
TOTAL ANNUAL LABOR BURDEN AND COST	
AVERAGE ANNUALIZED COSTS (O&M)	
Recordkeeping/reporting supplies	

^a Entails implementation of program, review and assessment of all building blocks utilizing revisions, coordination with affected sources, oversight of consumer-based energy efficiency

^b Burden hours based on 2 FTEs per state, expected to be performed by possibly 4 to 5 a state plan is being implemented.

^c Includes compilation of quarterly data downloaded to EPA's ECPMS system by the affected

^d Burden hours based on 1 FTE for 1 month to prepare the report and another FTE (ma

Nationwide Respondent Assumptions

Respondents	No.
Total no. states	48
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Respondent Labor Rates

Labor Category	Re
	Unloaded
States ^a	
Technical	\$40.84
Managerial	\$47.48
Clerical	\$19.00
Composite	

^a Unloaded labor rates from U.S. Department of Labor, Bureau of Labor Statistics May 2013 National Industry-Specific Occupational Employment and Wage Estimation excluding schools and hospitals (OES Designation) <<https://www.bls.gov/oes/cu>

Recordkeeping/Reporting Supplies (Annual O&M Costs)

Supply Item	Price per Item
Miscellaneous annual supplies ^a	\$500

^a Respondents include all 43 states with state plans.

Recordkeeping Requirements for States, Emission Guidelines for GHG Emissions for EGUs

(B) Occurrences/ Respondent/Year	(C) Hours/ Respondent/Year (A x B)	(D) Respondents/ Year	(E) Total Hours/Year (C x D)	(F) Technical Hours/Year (E x 0.79)
1	4,160	43	178,880	141,315
1	320	43	13,760	10,870
			192,640	152,186

zed by the state that contribute to state reduction goal, possible development of contingency mea
ciency programs, and possible public meeting development on state plan revisions.

state staff part time, from the energy office and air office (2x8x5x52=4,160 hours). Respondents in

ected EGUs and summary of program progress performed above.

nagers, attorneys, etc.) for another month to review and comment on the report

Notes
VT, ME, CA, ID, RI

Respondent Labor Rates (May 2017)	
Overhead Multiplier (110%)	Loaded
2.1	\$85.76
2.1	\$99.71
2.1	\$39.90
	\$109.70

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ates, NAICS 999200 - State Government,
rrent/naics3_999000.htm>

Number per Respondent	Number of Respondents	Total
1	43	\$21,500

(G) Managerial Hours/Year (E x 0.09)	(H) Clerical Hours/Year (E x 0.12)	(I) Cost/Year
16,099	21,466	\$14,581,453
1,238	1,651	\$1,121,650
17,338	23,117	\$15,703,104
		\$21,500

asures, state plan

include all 49 states for which

Exhibit 1e. Years 2023, 2025, 2030 and 2035: Summary of Respondent Burden and Cost of Reporting and Record Requirements for States, Emission Guidelines for GHG Emissions for EGUs (40 CFR part 60, subpart UUUUa)

Summary of Annual Respondent Burden and Cost

Totals	Total Annual Labor Burden (Hours)	Total Annual Labor Costs	Total Annualized Capital Costs	Total Annual O&M Costs
Nationwide Total				
Year 2023	178,880	\$14,581,453	\$0	\$31,605
Year 2025	192,640	\$15,703,104	\$0	\$21,500
Year 2030	192,640	\$15,703,104	\$0	\$21,500
Year 2035	192,640	\$15,703,104	\$0	\$21,500
Average per Respondent				
Year 2020 ^a	4,160	\$339,104	\$0	\$735
Year 2025 ^b	4,480	\$365,188	\$0	\$500
Year 2030 ^c	4,480	\$365,188	\$0	\$500
Year 2035 ^d	4,480	\$365,188	\$0	\$500

^a Equal to estimate for each burden item in Exhibit 1a divided by the number of respondents in Exhibit 1a for that burden item, summed for all burden items.

^b Equal to estimate for each burden item in Exhibit 1b divided by the number of respondents in Exhibit 1b for that burden item, summed for all burden items.

Summary of Total Annual Responses

Information Collection Activity	Occurrence per Respondent per Year	Respondents per Year	Total Responses	Average
REPORT REQUIREMENTS				
Annual report preparation	1	43	43	
Total Annual Responses			43	
Total Number of Responses =				43
Average Responses per Respondent =				1.0
Average Hours per Response =				
Year 2023				4,160
Year 2025				4,480

Exhibit 2a. Year 2023: Total Annual Burden and Cost to the Agency, Emission Guidelines for GHG Emissions for EGUs (40 CFR part 60, subpart UUUUa)

Activity	(A) Hours/ Occurrence	(B) Occurrences/ Facility/Year	(C) Hours/ Facility/Year (A x B)	(D) Facilities/ Year	(E) EPA Total Hours/Year (C x D)	(F) EPA Technical Hours/Year (E x 0.79)	(G) EPA Managerial Hours/Year (E x 0.09)	(H) EPA Clerical Hours/Year (E x 0.12)	(I) Cost, \$
1. REPORTING SYSTEMS	N/A								
2. MODELING, ADMIN.									
EPA Headquarters ^a	4,160	1	4,160	1	4,160	3,286	374	499	\$269,181
EPA Regions ^b	20,800	1	20,800	1	20,800	16,432	1,872	2,496	\$1,156,849
TOTAL ANNUAL LABOR BURDEN AND COST					24,960	19,718	2,246	2,995	\$1,426,030
TOTAL ANNUAL OTHER DIRECT COSTS									
Miscellaneous cost (e.g., telephone, photocopies, postage)									\$1,000
TOTAL AVERAGE ANNUAL COST (Average Annual Labor Cost + Average Annual Other Direct Costs)									\$1,427,030

^a Includes 2 FTEs per year for EPA Headquarters to oversee the entire program and help with outreach/state/enforceability questions and regional assistance.

^b Includes 1 FTE per year for each EPA Region covering modeling, energy efficiency, and administrative issues.

EPA Staff Labor Rates

Labor Category	Labor Rates (2018)		
	Unloaded ^a	Overhead Multiplier (60%)	Loaded
EPA Headquarters			
Technical (Grade 13, Step 5)	\$41.07	1.6	\$65.71
Managerial (Grade 15, Step 5)	\$57.09	1.6	\$91.34
Clerical (Grade 9, Step 5)	\$23.82	1.6	\$38.11
EPA Regions			
Technical (Grade 12, Step 5)	\$34.54	1.6	\$55.26
Managerial (Grade 15, Step 5)	\$57.09	1.6	\$91.34
Clerical (Grade 7, Step 5)	\$19.47	1.6	\$31.15

^a Unloaded labor rates from U.S. Office of Personnel Management < https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf>

Other Direct Costs

Expense Item	Cost
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

Exhibit 2b. Year 2025: Total Annual Burden and Cost to the Agency, Emission Guidelines for GHG Emissions for EGUs (40 CFR part 60, subpart UUUUa)

Activity	(A) Hours/ Occurrence	(B) Occurrences/ Facility/Year	(C) Hours/ Facility/Year (A x B)	(D) Facilities/ Year	(E) EPA Total Hours/Year (C x D)	(F) EPA Technical Hours/Year (E x 0.79)	(G) EPA Managerial Hours/Year (E x 0.09)	(H) EPA Clerical Hours/Year (E x 0.12)	(I) Cost, \$
1. REPORTING SYSTEMS	N/A								
2. REPORT REVIEW, MODELING, ADMIN.									
EPA Headquarters ^a	4,160	1	4,160	1	4,160	3,286	374	499	\$269,181
EPA Regions ^b	20,800	1	20,800	1	20,800	16,432	1,872	2,496	\$1,156,849
TOTAL ANNUAL LABOR BURDEN AND COST					24,960	19,718	2,246	2,995	\$1,426,030
TOTAL ANNUAL OTHER DIRECT COSTS									
Miscellaneous cost (e.g., telephone, photocopies, postage)									\$1,000
TOTAL AVERAGE ANNUAL COST (Average Annual Labor Cost + Average Annual Other Direct Costs)									\$1,427,030

^a Includes 2 FTEs per year for EPA Headquarters to oversee the entire program and help with outreach/state/enforceability questions and regional assistance.

^b Includes 1 FTE per year for each EPA Region covering report review, modeling, energy efficiency, and administrative issues.

EPA Staff Labor Rates

Labor Category	Labor Rates (2018)		
	Unloaded ^a	Overhead Multiplier (60%)	Loaded
EPA Headquarters			
Technical (Grade 13, Step 5)	\$41.07	1.6	\$65.71
Managerial (Grade 15, Step 5)	\$57.09	1.6	\$91.34
Clerical (Grade 9, Step 5)	\$23.82	1.6	\$38.11
EPA Regions			
Technical (Grade 12, Step 5)	\$34.54	1.6	\$55.26
Managerial (Grade 15, Step 5)	\$57.09	1.6	\$91.34
Clerical (Grade 7, Step 5)	\$19.47	1.6	\$31.15

^a Unloaded labor rates from U.S. Office of Personnel Management <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf>

Other Direct Costs

Expense Item	Cost
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

**EXHIBIT 2C. Year 2030: Total Annual Burden and Cost to the Agency, EMISSION GUIDELINES FOR GHG E
FGUs (40 CFR part 60, subpart UUUUa)**

Activity	(A) Hours/ Occurrence	(B) Occurrences/ Facility/Year
1. REPORTING SYSTEMS	N/A	
2. REPORT REVIEW, MODELING, ADMIN.		
EPA Headquarters ^a	4,160	1
EPA Regions ^b	20,800	1
TOTAL ANNUAL LABOR BURDEN AND COST		
TOTAL ANNUAL OTHER DIRECT COSTS		
Miscellaneous cost (e.g., telephone, photocopies, postage)		
TOTAL		

^a Includes 2 FTEs per year for EPA Headquarters to oversee the entire program and help with outrea

^b Includes 1 FTE per year for each EPA Region covering report review, modeling, energy efficiency, an

EPA Staff Labor Rates

Labor Category	Labor Rates (2018)	
	Unloaded ^a	Overhead Multiplier (60%)
EPA Headquarters		
Technical (Grade 13, Step 5)	\$41.07	1.6
Managerial (Grade 15, Step 5)	\$57.09	1.6
Clerical (Grade 9, Step 5)	\$23.82	1.6
EPA Regions		
Technical (Grade 12, Step 5)	\$34.54	1.6
Managerial (Grade 15, Step 5)	\$57.09	1.6
Clerical (Grade 7, Step 5)	\$19.47	1.6

^a Unloaded labor rates from U.S. Office of Personnel Management < <https://www.opm.gov/policy-d>

Other Direct Costs

Expense Item	Cost
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

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(C) Hours/ Facility/Year (A x B)	(D) Facilities/ Year	(E) EPA Total Hours/Year (C x D)	(F) EPA Technical Hours/Year (E x 0.79)	(G) EPA Managerial Hours/Year (E x 0.09)	(H) EPA Clerical Hours/Year (E x 0.12)	(I) Cost, \$
4,160	1	4,160	3,286	374	499	\$269,181
20,800	1	20,800	16,432	1,872	2,496	\$1,156,849
		24,960	19,718	2,246	2,995	\$1,426,030
						\$1,000
AVERAGE ANNUAL COST (Average Annual Labor Cost + Average Annual Other Direct Costs)						\$1,427,030

ch/state/enforceability questions and regional assistance.

nd administrative issues.

3)
Loaded
\$65.71
\$91.34
\$38.11
\$55.26
\$91.34
\$31.15

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**EXHIBIT 2d. Year 2035: Total Annual Burden and Cost to the Agency, EMISSION GUIDELINES FOR GHG E
FGUs (40 CFR part 60, subpart UUUUa)**

Activity	(A) Hours/ Occurrence	(B) Occurrences/ Facility/Year
1. REPORTING SYSTEMS	N/A	
2. REPORT REVIEW, MODELING, ADMIN.		
EPA Headquarters ^a	4,160	1
EPA Regions ^b	20,800	1
TOTAL ANNUAL LABOR BURDEN AND COST		
TOTAL ANNUAL OTHER DIRECT COSTS		
Miscellaneous cost (e.g., telephone, photocopies, postage)		
TOTAL		

^a Includes 2 FTEs per year for EPA Headquarters to oversee the entire program and help with outrea

^b Includes 1 FTE per year for each EPA Region covering report review, modeling, energy efficiency, an

EPA Staff Labor Rates

Labor Category	Labor Rates (2018)	
	Unloaded ^a	Overhead Multiplier (60%)
EPA Headquarters		
Technical (Grade 13, Step 5)	\$41.07	1.6
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Clerical (Grade 9, Step 5)	\$23.82	1.6
EPA Regions		
Technical (Grade 12, Step 5)	\$34.54	1.6
Managerial (Grade 15, Step 5)	\$57.09	1.6
Clerical (Grade 7, Step 5)	\$19.47	1.6

^a Unloaded labor rates from U.S. Office of Personnel Management < <https://www.opm.gov/policy-d>

Other Direct Costs

Expense Item	Cost
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

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(C) Hours/ Facility/Year (A x B)	(D) Facilities/ Year	(E) EPA Total Hours/Year (C x D)	(F) EPA Technical Hours/Year (E x 0.79)	(G) EPA Managerial Hours/Year (E x 0.09)	(H) EPA Clerical Hours/Year (E x 0.12)	(I) Cost, \$
4,160	1	4,160	3,286	374	499	\$269,181
20,800	1	20,800	16,432	1,872	2,496	\$1,156,849
		24,960	19,718	2,246	2,995	\$1,426,030
						\$1,000
AVG AVERAGE ANNUAL COST (Average Annual Labor Cost + Average Annual Other Direct Costs)						\$1,427,030

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\$65.71
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\$91.34
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Exhibit 2e. Years 2023, 2025, 2030 and 2035: Summary of Agency Burden and Cost, Emission Guidelines for GHG Emissions for EGUs (40 CFR part 60, subpart UUUUa)

Totals	Total Annual Labor Burden (Hours)	Total Annual Costs
Total		
Year 2023	24,960	\$1,427,030
Year 2025	24,960	\$1,427,030
Year 2030	24,960	\$1,427,030
Year 2035	24,960	\$1,427,030
Average per Response		
Year 2023	580	\$33,187
Year 2025	580	\$33,187
Year 2030	580	\$33,187
Year 2035	580	\$33,187