

**SUPPORTING STATEMENT
ENVIRONMENTAL PROTECTION AGENCY**

Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating
Units

(40 CFR Part 60, Subpart UUUUa)

August 2018

Part A of the Supporting Statement

1. Identification of the Information Collection

1(a) Title and Number of the Information Collection

“State Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR Part 60, Subpart UUUUa).” The subpart proposes to determine that the best system of emission reduction (BSER) is a suite of heat rate improvement (HRI) measures and that states will use in setting standards of performance at units within the state. The HRIs will effectively reduce greenhouse gases, specifically carbon dioxide (CO₂), from existing electric utility generating units (EGUs) burning fossil fuels. A new information collection request (ICR) has been prepared in support of the guidelines being proposed. The EPA ICR tracking number is 2503.03. This ICR was developed for the three-year period following publication of the final rule.

1(b) Short Characterization/Abstract

Pursuant to Clean Air Act (CAA) section 111(d), the United States Environmental Protection Agency (EPA) is proposing a BSER and states will set standards of performance for CO₂ emissions from existing fossil fuel-fired EGUs and guidelines for states to use in developing plans. For purposes of these guidelines, fossil fuel-fired EGUs are coal-fired steam generating units that generate electricity for sale and are larger than 25 megawatts (MW). Existing sources include those EGUs that commenced construction on or before August 31, 2018.

The EPA is proposing these guidelines because CO₂ is a greenhouse gas (GHG), and fossil fuel-fired power plants are the country’s largest stationary source emitters of GHGs. The EPA in 2009 found that by causing or contributing to climate change, GHGs endanger both the public health and the public welfare of current and future generations.

This proposed action requires those states with one or more EGUs covered under this subpart to develop plans to implement the emission guidelines and submit the plans to EPA for approval. If an approvable state plan is not submitted by August 31, 2018, EPA will develop a federal plan according to 40 CFR 60.27a to implement the emission guidelines in those states. Owners and operators of EGUs not covered by an approved state plan must comply with the federal plan. The federal plan is an interim action and will be automatically withdrawn when the state plan is approved. Those states that have no EGUs for which construction commenced on or before August 31, 2018 would submit a negative declaration letter in place of the state plan.

The emission guidelines include required components of the state plan, the BSER determination, timing requirements for submitting the state plan, and criteria for affected sources (EGUs). Under the timing requirements provisions in the proposed implementing regulations,

states are given 3 years after promulgation of the emission guidelines to submit their plans.

This proposed action imposes no new information collection burden on affected sources (EGUs) during the first 3 years after final rule promulgation beyond what those sources would already be subject to under the authorities of 40 CFR parts 75 and 98. The Office of Management and Budget (OMB) has previously approved the information collection requirements contained in the existing 40 CFR parts 75 and 98 regulations under the provisions of the Paperwork Reduction Act, 44 U.S.C. 3501 et seq. and has assigned OMB control numbers 2060-0258, 2060-0667, 2060-0445 and 2060-0629, respectively. There are no new information collection costs for these affected sources during the first 3 years, as the information required for these sources by the proposed guidelines is already collected and reported by other regulatory programs during this period.

The only respondents expected to incur new information collection burden are those states with one or more EGUs covered under this subpart.

2. Need for and Use of the Collection

2(a) Need/Authority for the Collection

The EPA is charged under section 111(d) of the CAA to establish guidelines for existing stationary sources. Section 111(d)(1) states:

The Administrator shall prescribe regulations which shall establish a procedure similar to that provided by section 110 under which each State shall submit to the Administrator a plan which (A) establishes standards of performance for any existing source for any air pollutant (i) for which air quality criteria have not been issued...but (ii) to which a standard of performance under this section would apply if such existing source were a new source, and (B) provides for the implementation and enforcement of such standards of performance.

Subpart Ba of 40 CFR part 60 requires state plans to include monitoring, recordkeeping, and reporting provisions consistent with the emission guidelines. In addition, section 114(a) states that the Administrator may require any owner or operator subject to any requirement of this Act to:

(A) Establish and maintain such records; (B) make such reports; (C) install, use, and maintain such monitoring equipment, and use such audit procedures, or methods; (D) sample such emissions (in accordance with such procedures or methods, at such locations, at such intervals, during such periods, and in such manner as the Administrator shall prescribe); (E) keep records on control equipment parameters, production variables or other indirect data when direct monitoring of emissions is impractical; (F) submit compliance certifications in accordance with section 114(a)(3); and

(G) provide such other information as the Administrator may reasonably require.

As previously stated, the EPA in 2009 found that by causing or contributing to climate change, GHGs endanger both the public health and the public welfare of current and future generations. Fossil fuel-fired power plants are the country's largest stationary source emitters of GHGs. Therefore, emission guidelines for emissions of CO₂ are being proposed for existing sources in this category at 40 CFR part 60, subpart UUUUa. The emission guidelines are being proposed for states to use in developing state plans.

2(b) Use/Users of the Data

The data collected from respondents (states) include state plans for those states covered under the emission guidelines. These data provide the foundation for identifying standards of performance and compliance requirements for each affected entity; and specifying program implementation milestones. These standards of performance, compliance requirements, and milestones will be developed during the course of this ICR period.

3. Nonduplication, Consultations, and Other Collection Criteria

3(a) Nonduplication

As previously stated, this proposed action would impose no new information collection burden on affected sources (EGUs) during the first 3 years after final rule promulgation, beyond what those sources would already be subject to under the authorities of 40 CFR parts 75 and 98. There are no new information collection costs; the information required by these proposed guidelines is already collected and reported by other regulatory programs. Therefore, no duplication exists for the affected industry.

If a state plan is disapproved, the state can respond to EPA's concerns and submit a revised plan. If an approvable state plan is not submitted, EPA will adopt and implement a federal plan that applies to existing sources in the state. Consequently, the information would be submitted to the appropriate EPA Regional office, until such time as the state is delegated this authority. Therefore, no duplication exists for states.

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

Public notice is provided in the preamble to the proposed rule.

3(c) Consultations

This outreach process has produced a wealth of information. The EPA has ongoing consultations and will take information from these meetings and used it to inform this proposal. The EPA recognizes the importance of working with all stakeholders, and in particular with the states, to ensure a clear and common understanding of the role the states will play in addressing carbon pollution from power plants.

3(d) Effects of Less Frequent Collection

This section is not applicable because respondents for this 3-year ICR period do not include EGU facilities, and annual reports from states will be submitted after the 3-year ICR period.

3(e) *General Guidelines*

None of the guidelines in 5 CFR 1320.5 are being exceeded.

3(f) *Confidentiality*

All information submitted to the Agency for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, Chapter 1, part 2, subpart B—Confidentiality of Business Information (see 40 CFR 2; 41 FR 36902, September 1, 1976; amended by 43 FR 39999, September 28, 1978; 43 FR 42251, September 28, 1978; 44 FR 17674, March 23, 1979).

3(g) *Sensitive Questions*

This section is not applicable because this ICR does not involve matters of a sensitive nature.

4. The Respondents and the Information Requested

4(a) *Respondents/NAICS Codes*

The respondents expected to incur new information collection burden under subpart UUUUa are those states with one or more EGUs covered under this subpart. An estimated 49 state plans are expected to be submitted by within three years of this rule’s promulgation. Negative declarations are expected from 1 state (Vermont) and the District of Columbia. The applicable North American Industry Classification System (NAICS) code for state governments is 999200, “State Government, excluding schools and hospitals.”

4(b) *Information Requested*

(i) *Data Items, Including Recordkeeping Requirements*

There are no new information collection costs for the affected industry, as the information required by this proposed rule is already collected and reported by other regulatory programs (40 CFR parts 75 and 98). The only new information collection costs are for those states with one or more EGUs covered under this subpart.

State respondents must make the following reports:

Requirement	Guidelines Citation by Section
State plan to implement and enforce emission guidelines	60.5740a and 60.23a(a)
Negative declaration letter documenting there are no affected EGUs in the state that are covered under the emission guidelines	60.5710a
Notification of public hearing on state plan	60.23a(c)
Certification that public hearing on state plan conducted according to subpart Ba state procedures	60.23a(f)

State respondents must also keep the following records:

Requirement	Guidelines Citation by Section
Records of hourly values for each affected source to support the calculation of the annual emission performance goal	60.5790a
Records of public hearing conducted on state plan	60.23a(e)

(ii) Respondent Activities

The respondent activities that would be required by the proposed emission guidelines are described in the tables and footnotes in Exhibits 1a and 1b at the end of this document. Exhibits 1a and 1b include the respondent activities associated with developing and implementing individual state plans.

(iii) Summary of Requirements

The proposal would require states covered under the emission guidelines to prepare and submit state plans to implement the guidelines and conduct public hearings on the state plans as necessary, according to the procedures in 40 CFR part 60, subpart Ba.

5. The Information Collected: Agency Activities, Collection Methodology, and Information Management (covering the first 3 years following final rule promulgation)

5(a) Agency Activities

The Agency, specifically EPA Headquarters and EPA Regions, will incur burden associated with the reporting requirements for states, including: (1) providing support and outreach to states regarding the implementation of the emission guidelines and preparation of state plans, (2) reviewing and approving state plans, (3) reviewing negative declarations from states with no EGUs covered under the emission guidelines, (4) reviewing notifications from states regarding public hearings on state plans, and (5) reviewing certifications from states that the public hearings were conducted according to 40 CFR part 60, subpart Ba state procedures.

5(b) Collection Methodology and Management

The state plans prepared by states will set forth the specifics regarding the actual collection methodology and management. The plans must include the following elements:

- Identification of affected entities, including an inventory of CO₂ emissions from affected EGUs during the most recent calendar year prior to the submission of the plan for which data is available.
- Identification of standards of performance for each affected EGU and compliance periods for each standard of performance.
- A summary of how states evaluated each of the heat rate improvements for all affected EGUs.
- A summary of each affected EGU’s anticipated future operation characteristics.
- A demonstration that each emission standard is quantifiable, permanent, verifiable, and enforceable with respect to an affected EGU.
- Identification of applicable monitoring, reporting, and recordkeeping requirements for each affected EGU.

- Description of the process, contents, and schedule for annual state reporting to the EPA about plan implementation and progress.
- Certification that the hearing on the state plan was held, a list of witnesses and their organizational affiliations, if any, appearing at the hearing, and a brief written summary of each presentation or written submission.
- Supporting material, including (1) materials demonstrating the state’s legal authority to carry out each component of its plan, including standards of performance; (2) Materials supporting calculations for affected EGU’s standards of performance; and (3) materials necessary to support evaluation of the plan by EPA.

5(c) Small Entity Flexibility

The EPA is aware that there is substantial interest in the proposed rule among small entities (municipal and rural electric cooperatives). The EPA has invited comments on the potential impacts of this emission guideline, but does not anticipate that there are any.

5(d) Collection Schedule

The specific frequency for each information collection activity within this request is shown in Exhibits 1a and 1b for the first 3 years following promulgation of the emission guidelines.

6. Estimating the Burden and Cost of the Collection

Exhibits 1a and 1b document the lower and upper bounds, respectively, of individual burdens for the reporting requirements applicable to the states for the first 3 years. The lower bounds account for 23 states already having active energy efficiency programs in place for achieving their emission performance goals, while the upper bounds do not account for existing energy efficiency programs. By accounting for states’ existing programs, the burden estimates in Exhibit 1a are lower than those in Exhibit 1b. Table 1 below presents the range of the respondent burden hours and costs (detailed in Exhibit 1c).

**Table 1. Range of Respondent Burden and Costs
(3-year period following final rule publication)**

Year	Total Annual Labor Burden (hours)	Total Annual Labor Costs (\$)
3-Year Total	536,000 – 578,00	\$43.7 – \$47.1 million
Average Annual	178,880 – 192,640	\$14.6 – \$15.7 million
Average Annual per Respondent	4,160 – 4,480	\$339 – \$365 thousand

The individual burdens are expressed under standardized headings believed to be consistent with the concept of burden under the Paperwork Reduction Act. Where appropriate, specific tasks and major assumptions have been identified; responses to this information collection are mandatory.

6(a) Estimating Respondent Burden

The average annual burden to states over the 3-year period of this ICR from these reporting requirements is estimated to range from approximately 178,880 to 192,640 hours per

year (detailed in Exhibit 1c). These hours are based on Agency studies and background documents from the development of the regulation, Agency knowledge and experience with part 60 and other regulations, and the previously approved ICR for the subpart TTTT proposal.

6(b) Estimating Respondent Costs

Respondent costs are typically divided into three categories. These categories include labor costs, operation and maintenance (O&M) costs, and annualized capital costs. Labor costs and O&M costs are the only respondent costs associated with this ICR.

(i) Estimating Labor Costs

The average annual labor costs to states over the 3-year period of this ICR from these reporting requirements are estimated to range from approximately \$14.6 to \$15.7 million per year (detailed in Exhibit 1c). Labor rates and associated costs are based on Bureau of Labor Statistics (BLS) data. Technical, managerial, and clerical average hourly rates for state government workers were based on the Bureau of Labor Statistics, Occupational Employment Statistics, May 2017 National Industry-Specific Occupational Employment and Wage Estimates for state government (NAICS code 999200). The state government labor rates from BLS were multiplied by an overhead multiplier of 110 percent to estimate loaded labor rates of \$85.76 per hour for technical, \$99.71 per hour for managerial, and \$39.90 per hour for clerical.

(ii) Estimating Annualized Capital Costs

There are no annualized capital costs associated with this ICR.

(iii) Estimating Operations and Maintenance (O&M) Costs

The annual O&M costs associated with this ICR are the costs associated with the paperwork requirements incurred continuously over the life of the ICR (e.g., storing hard copy records, electronic data storage, and miscellaneous annual supplies) (see Exhibits 1a and 1b). The average annual O&M costs associated with this ICR are approximately \$21,500 (detailed in Exhibit 1c).

6(c) Estimating Agency Burden and Cost

Because the information collection requirements were developed as an incidental part of standards development, no costs can be attributed to the development of the information collection requirements. Because reporting and recordkeeping requirements on the part of the respondents are required under section 111 of the CAA, no operational costs will be incurred by the federal government. Publication and distribution of the information are part of the Compliance Data System, with the result that no federal costs can be directly attributed to the ICR. Examination of records to be maintained by the respondents will occur incidentally as part of EPA's overall compliance and enforcement program, and, therefore, is not attributable to the ICR. The only costs to the federal government, specifically EPA Headquarters and EPA Regions, under this ICR are those costs associated with the support and outreach to states; the review of state plans, negative declarations, extension requests for state plan submittals, and public hearing notifications/certifications; and miscellaneous administrative charges. Exhibit 2a presents the average annual Agency burden and cost estimates for the first 3 years after promulgation of the emission guidelines. Table 2 below contains a summary of the 3-year total and average annual Agency burden hours and costs (detailed in Exhibit 2b).

**Table 2. Summary of Agency Burden and Costs
(3-year period following final rule publication)**

Year	Total Annual Labor Burden (hours)	Total Annual Labor Costs (\$)
3-Year Total	74,880	\$4.28million
Average Annual	24,960	\$1.43 million

Technical, managerial, and clerical average hourly rates for EPA Headquarters staff and EPA Regional staff were selected from the U.S. Office of Personnel Management Salary Table 2018-GS (accessed at https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2018/GS_h.pdf). These rates were increased by 60 percent to include fringe benefits and overhead. For EPA Headquarters staff, the loaded labor rates are \$65.71 per hour for technical (GS-13, Step 5), \$91.34 per hour for managerial (GS-15, Step 5), and \$38.11 per hour for clerical (GS-9, Step 5). For EPA Regional staff, the loaded labor rates are \$55.26 per hour for technical (GS-12, Step 5), \$91.34 per hour for managerial (GS-15, Step 5), and \$31.15 per hour for clerical (GS-7, Step 5).

The Agency cost estimates also include annual costs of \$1,000 for miscellaneous administrative charges (e.g., telephone, photocopies, and postage) incurred during the first 3 years after promulgation.

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

Forty-eight states will be subject to the requirements of the proposed emission guidelines. Five (Vermont, Maine, Idaho, California, and Rhode Island) have no EGUs covered under this subpart, thus are expected to submit negative declarations. There are 43 states which have EGUs covered under this subpart. These states are expected to submit state plans. The total number of responses for the monitoring, recordkeeping, and reporting guidelines in proposed subpart UUUUa over the 3-year ICR period is estimated to be 43. The average number of annual responses over the 3-year ICR period is 15 per year. The total labor burden over the 3-year ICR period is estimated to range from approximately 536,000 to 578,000 person hours. The total labor costs over the 3-year ICR period are estimated to range from approximately \$43.7 to \$47.1 million.

6(e) Bottom Line Burden Hours and Cost Tables

The bottom line labor hours and costs are shown in Exhibits 1a and 1b for respondents and Exhibit 2a for EPA. The labor hours and costs are summarized in Exhibit 1c for respondents and Exhibit 2b for EPA.

6(f) Reasons for Change in Burden

This ICR is for a new collection, accounting for the burden related to the reporting and recordkeeping requirements being introduced in the proposed rule.

6(g) Burden Statement

The annual public reporting and recordkeeping burden (as listed in Section 5(b) above) for this collection of information is estimated to range from approximately 4,160 – 4,480 hours per response. Burden means the total time, effort, or financial resources expended by persons to

generate, maintain, retain, or disclose or provide information to or for a federal agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information, processing and maintaining information, and disclosing and providing information; adjust the existing ways to comply with any previously applicable instructions and requirements; train personnel to be able to respond to a collection of information; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information.

An agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations in 40 CFR part 60 are listed in 40 CFR part 9.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, the EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2017-0355, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket and Information Center in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket and Information Center is (202) 566-1742. An electronic version of the public docket is available at www.regulations.gov. This site can be used to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. When in the system, select "search," then key in the Docket ID Number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, D.C. 20503, Attention: Desk Officer for EPA. Please include the EPA Docket ID Number EPA-HQ-OAR-2013-0602 in any correspondence.

PART B

This section is not applicable because statistical methods are not used in data collection associated with these guidelines.

ATTACHMENTS

Exhibit 1a. Lower Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Exhibit 1b. Upper Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Exhibit 1c. Summary of Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Exhibit 2a. Burden and Cost to the Agency, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Exhibit 2b. Summary of Agency Burden and Cost, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Exhibit 1a. Lower Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Burden Item	(A) Hours/ Occurrence	(B) Occurrences/ Respondent/ Year	(C) Hours/ Respondent / Year (A x B)	(D) Respond- ents/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 ^a	N/A								
B. Required Activities									
Review/disseminate assessment of progress ^{ab}	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								
AVERAGE 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 State Assumptions

Breakdown of States	No.	Notes
Total no. respondents	48	
No. expected to submit negative declaration	5	VT, ME, CA, ID, RI
No. expected to submit individual state plan	43	

Recordkeeping/Reporting Supplies (Annual O&M Costs) ^a

Supply Item	Price/Item	No./Resp.	No. Resp.	Total
Miscellaneous annual supplies	\$500	1	43	\$21,500
Average Annual Cost				\$21,500

^a Costs based on estimates initially prepared for 40 CFR part 60, subpart TTTT.

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2013)		
	Unloaded ^a	Overhead Multiplier (110%)	Loaded
Technical	\$40.84	2.1	\$85.76
Managerial	\$47.48	2.1	\$99.71
Clerical	\$19.00	2.1	\$39.90

^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 >

Exhibit 1b. Upper Bound Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (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^a	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									
D. Gather Information									
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
AVERAGE ANNUAL LABOR BURDEN AND COST					192,640	152,186	17,338	23,117	\$15,703,104
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.

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 State Assumptions

Nationwide State Assumptions

Breakdown of States	No.	Notes
Total no. respondents	48	
No. expected to submit negative declaration	5	VT, ME, CA, ID, RI
No. expected to submit individual state plan	43	

Recordkeeping/Reporting Supplies (Annual O&M Costs) ^a

Supply Item	Price/Item	No./Resp.	No. Resp.	Total
Miscellaneous annual supplies	\$500	1	43	\$21,500
Average Annual Cost				\$21,500

^a Costs based on estimates initially prepared for 40 CFR part 60, subpart TTTT.

Respondent Labor Rates

Labor Category	Respondent Labor Rates (May 2013)		
	Unloaded^a	Overhead Multiplier (110%)	Loaded
Technical	\$40.84	2.1	\$85.76
Managerial	\$47.48	2.1	\$99.71
Clerical	\$19.00	2.1	\$39.90

^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 >

Exhibit 1c. Summary of Respondent Burden and Cost of Reporting and Recordkeeping Requirements, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (40 CFR part 60, subpart UUUUa)

Summary of Respondent Burden and Cost

Year	Total Annual Labor Burden (hours)	Total Annual Labor Costs (\$)
3-Year Total	536,000 – 578,00	\$43.7 – \$47.1 million
Average Annual	178,880 – 192,640	\$14.6 – \$15.7 million
Average Annual per Respondent	4,160 – 4,480	\$339 – \$365 thousand

Summary of 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
			Year 2030	4,480
			Year 2035	4,480

Exhibit 2a. Burden and Cost to the Agency, Emission Guidelines for Greenhouse Gas Emissions from Existing Electric Utility Generating Units (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 ^a
Miscellaneous cost (e.g., telephone, photocopies, postage)	\$1,000

^a Cost based on estimate initially prepared for 40 CFR part 60, subpart TTTT.

Exhibit 2b. Summary of Agency Burden and Cost,
 Emission Guidelines for Greenhouse Gas Emissions from
 Existing Electric Utility Generating Units (40 CFR part 60,
 subpart UUUUa)

Year	Total Annual Labor Burden (hours)	Total Annual Labor Costs (\$)
3-Year Total	74,880	\$4.28million
Average Annual	24,960	\$1.43 million

Average Annual Agency Hour Burden per Response = 3,632
 Average Annual Agency Cost Burden per Response = \$201,682