

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST NUMBER 1772.08
“INFORMATION COLLECTION ACTIVITIES ASSOCIATED WITH EPA’S ENERGY
STAR® PROGRAM IN THE COMMERCIAL AND INDUSTRIAL SECTORS”**

October 5, 2020

**Office of Air and Radiation
U.S. Environmental Protection Agency**

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1. IDENTIFICATION OF THE INFORMATION COLLECTION

1(a) Title and Number of the Information Collection

This ICR is entitled “Information Collection Activities Associated with EPA’s ENERGY STAR® Program in the Commercial and Industrial Sectors,” ICR Number 1772.08, OMB Control No. 2060-0347.

1(b) Short Characterization or Abstract

The U.S. Environmental Protection Agency (EPA) created ENERGY STAR as a voluntary program to help businesses and individuals protect the environment through superior energy efficiency. The program focuses on reducing utility-generated emissions by reducing the demand for energy. In 1991, EPA launched the Green Lights program to encourage corporations, state and local governments, colleges and universities, and other organizations to adopt energy-efficient lighting as a profitable means of preventing pollution and improving lighting quality. Since then, EPA has rolled Green Lights into ENERGY STAR for the commercial and industrial sectors and expanded ENERGY STAR to encompass organization-wide energy performance improvement, such as building technology upgrades, product purchasing initiatives, and employee training. At the same time, EPA has streamlined the reporting requirements of ENERGY STAR and focused on providing recognition incentives for improvements (e.g., ENERGY STAR Awards program). EPA also makes tools and resources available over the web to help the public overcome the barriers to evaluating their energy performance and investing in profitable improvements.

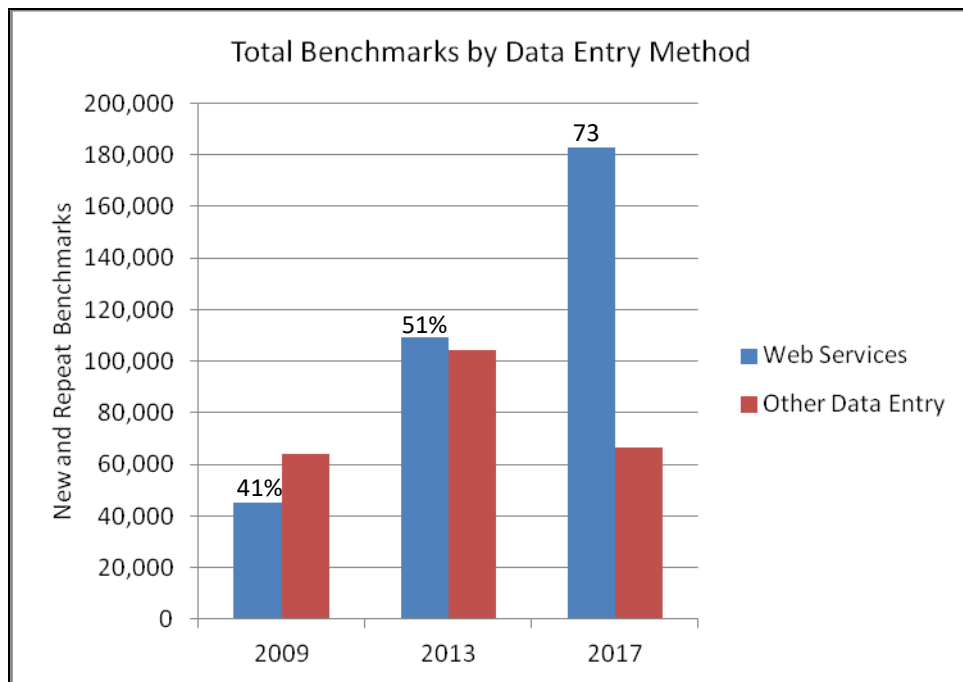
For several reasons, the public’s participation in the ENERGY STAR program for commercial and industrial sectors has continued to increase over the past several years, and EPA expects their participation to rise even more in the coming years. For example, a growing number of state and local governments are leveraging ENERGY STAR as a way for the public to respond to rising energy costs and greenhouse gas emissions, including mandatory energy benchmarking and disclosure laws that require buildings within their jurisdiction to use EPA’s ENERGY STAR Portfolio Manager. As of the end of 2018, 29 local governments and three states rely on Portfolio Manager as the foundation for their energy benchmarking and transparency policies.

Participation in ENERGY STAR has also risen dramatically because of the efforts of trade associations, utilities, and third-party providers in promoting the program to the public. These organizations voluntarily communicate ENERGY STAR messages and promote the use of ENERGY STAR tools and strategies in an effort to help companies reduce their energy consumption and find more environmentally friendly ways to conduct business.

As participation has increased, EPA has taken measures to reduce the burden on participants that take advantage of the benefits of ENERGY STAR. For example, EPA has expanded Portfolio Manager Web Services, which is one of several benchmarking data-entry

methods available to users.¹ Because Web Services integrates automated data collection and entry, it offers significant time-saving advantages over the other methods. For example, it takes almost five hours to perform a new benchmark using manual data entry, whereas about one hour using Web Services. A repeat benchmark takes 45 minutes using manual data entry, whereas about six minutes using Web Services.

Over many years, EPA has seen a growing trend of users opting for Web Services and thereby realizing these savings. This is illustrated in the bar graph below, which shows the total number of benchmarks performed annually using Web Services and the other methods. In 2009, 41% of all benchmarks were performed using Web Services. By 2017, this had grown to 73%.



In addition to expanding Web Services, the Agency has continued to enhance other features of Portfolio Manager, allowing participants to enter and retrieve information more quickly. Furthermore, EPA is always looking for ways to reduce burden and in recent years has introduced changes to the requirements for certification that reduce both labor and cost for applicants, without impacting the integrity of the ENERGY STAR certification.

In 2017, the ENERGY STAR program for commercial buildings helped businesses and organizations save 160 billion kilowatt-hours of electricity, avoid \$9 billion in energy costs, and protect the climate by achieving 110 million metric tons of greenhouse gas reductions. In 2018 alone, more than 270,000 commercial properties used Portfolio Manager to measure and track their energy use, water use, and waste and materials. On average, ENERGY STAR certified buildings use 35% less energy than typical buildings nationwide.

¹ See Portfolio Web Services at <https://portfoliomanager.energystar.gov/webservices/home>.

In 2017, the ENERGY STAR program for industrial plants helped businesses save 34 billion kilowatt-hours of electricity, avoid \$3 billion in energy costs, and protect the climate by achieving 40 million metric tons of greenhouse gas reductions. As of 2018, 31 diverse industrial sectors work with ENERGY STAR to strategically manage their energy use, from cookie and cracker bakeries and pharmaceutical plants to integrated steel mills and petroleum refineries. EPA provides ENERGY STAR certification for 19 types of manufacturing plants. In 2018, 100 industrial plants earned ENERGY STAR certification.

This ICR examines the information collections under the ENERGY STAR program in the commercial and industrial sectors. Sections 1 through 5 of this document describe the collections (e.g., from the standpoint of need and use/utility of the information collected). The sections also describe respondent and Agency activities. In Section 6, EPA estimates the total annual hour and cost burden to respondents and the Agency under the collections.

2. NEED FOR AND USE OF THE COLLECTION

2(a) Need and Authority for the Collection

ENERGY STAR is authorized under section 103(g) of the Clean Air Act. The Energy Policy Act of 2005 further provides authorization to EPA and the U.S. Department of Energy (DOE) to establish a voluntary program to identify and promote energy-efficient products and buildings in order to reduce energy consumption, improve energy security, and reduce pollution through voluntary certification of, or other forms of communication about, products and buildings that meet the highest energy conservation standards.

In 2015, Congress directed EPA to develop a recognition program for energy efficient tenant spaces under the ENERGY STAR program. See the Energy Efficiency Improvement Act of 2015 for more information (42 USC § 17085).

Under federal law, federal agencies may not lease space in any building that has not earned the ENERGY STAR in the most recent year. All federally owned buildings are also required to track and report their energy use through ENERGY STAR. See the Energy Independence and Security Act of 2007 (42 USC § 17091).

ENERGY STAR is a voluntary program aimed at preventing pollution rather than controlling it after its creation. Information is needed from organizations joining the program for identification purposes (e.g., contact information) and for establishing their partnership. ENERGY STAR online tools (e.g., Portfolio Manager) are needed for users to benchmark facility energy performance, assess energy management goals over time, and identify strategic opportunities for savings and recognition opportunities. Finally, information is needed from organizations seeking ENERGY STAR recognition so that EPA can evaluate and verify their accomplishments and share their lessons learned with the public.

2(b) Practical Utility and Users of the Data

EPA uses information from organizations joining the program to ascertain basic identification information about them and verify their commitment to the program. EPA may also use partnership information for program implementation purposes, such as maintaining up-to-date listings of products and services available to the public. Further, ENERGY STAR's tools (e.g., Portfolio Manager, Energy Performance Indicator) are available online for the public to benchmark facility energy performance and identify opportunities for improvements.² Finally, EPA uses information from organizations seeking recognition to evaluate and verify their energy performance and accomplishments. For example, EPA offers the public an opportunity to display the ENERGY STAR on their buildings if they meet certain energy performance criteria defined by EPA. To be approved to receive the ENERGY STAR, buildings must demonstrate that they

² See Portfolio Manager at <https://www.energystar.gov/portfoliomanager> and the Energy Performance Indicator at https://www.energystar.gov/industrial_plants/measure-track-and-benchmark/energy-star-energy. Additional tools and resources can be found at <https://www.energystar.gov/buildings/tools-and-resources>.

meet specific eligibility requirements as well as industry standards for comfort and indoor air quality. EPA recognition enhances the image of organizations as national leaders in energy performance.

3. NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

3(a) Nonduplication

The information collected under this ICR is not collected by any other EPA office or by any other federal agency. Therefore, there is not a potential for duplication with other federal collections.

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

In compliance with the Paperwork Reduction Act of 1995, EPA solicited public comments on this ICR through an announcement in the Federal Register on December 13, 2018 (83 FR 64125). No comments were received.

3(c) Consultations

In March 2019, EPA contacted several Partner organizations to request their input on the ICR's burden estimates. The purpose of the consultations was to determine if the burden estimates should be updated or revised in preparing ICR 1772.08. The table identifies the points of contact (POCs) and their organizations. EPA selected these organizations because of their substantial experience in carrying out collections under the ENERGY STAR program.

POC Name	Organization Name	Phone Number	Email
Russell Chambers	ENGIE Insight	(509) 329-7111	russell.chambers@engie.com
Stefanie Damm	ENGIE Insight	(509) 329-7188	stefanie.damm@engie.com
Jennifer McConkey	Principal Real Estate Investors	(515) 235-1605	mccconkey.jennifer@principal.com
James Wilkerson	Des Moines Public Schools	(515) 242-7911	james.wilkerson@dmschools.org

Following is a summary of EPA's questions, POCs' comments and EPA's responses (e.g., if and how the Agency incorporated the comments into ICR 1772.08):

- **Partnership Agreement:** The ICR estimates that an organization in the commercial and industrial sectors takes 30 minutes on average to read, complete and submit a Partnership Agreement. EPA asked if this is a reasonable estimate. The POCs discussed their experiences preparing the agreement and indicated that 30 minutes is reasonable. EPA did not revise its estimate.
- **Portfolio Manager:** The ICR estimates respondent burden for Portfolio Manager based on three alternative benchmarking methods: manual data entry, data entry

with Excel spreadsheet, and Web Services. EPA provided three POCs with the ICR's burden estimates and asked if they are reasonable.^{3, 4}

The POCs discussed their experiences and burdens using the tool. They agreed with the ICR's burden estimates for new and repeat benchmarks using manual data entry and data entry with Excel spreadsheet. In regard to new benchmarks using Web Services, two POCs agreed with the ICR's estimate of one hour, although one of them also suggested it might be too high. Another POC suggested 1.5 hours. Given this feedback, EPA believes the ICR's estimate of one hour is reasonable. First, two of the three POCs affirmed it, with a concern it might be too high; this feedback outweighs the suggestion to raise it. The estimate also has been affirmed in consultations performed during past ICR renewal cycles. In regard to repeat benchmarks using Web Services, two POCs agreed with the ICR's estimate of six minutes, whereas another suggested it should be two minutes. Given this, EPA believes the ICR's estimate of six minutes is reasonable. In summary, EPA did not revise its benchmarking estimates.

- **ENERGY STAR Certification:** The ICR estimates the burden for licensed professionals (LPs) to perform facility data reviews under the ENERGY STAR certification program. An applicant's in-house LP can perform the review or it can contract an external LP. EPA asked the POCs for input on the cost to contract an external LP. The POCs offered estimates ranging from \$500 to \$2,000 per building. Given their input and EPA's understanding of industry practices and costs, the Agency believes \$1,200 per building is a reasonable estimate and has included it in this ICR.⁵

3(d) Effects of Less Frequent Collection

EPA has carefully considered the information collection burden under the ENERGY STAR program. EPA is confident that those activities requested of respondents are necessary, and to the extent possible, the Agency has minimized the burden. A number of the requested activities, for example, will be performed once (e.g., one-time submittal of a Partnership Agreement). In addition, respondents can satisfy many of the collections in this ICR by submitting readily available information. For example, users of Portfolio Manager are asked to enter energy use data (e.g., data from their energy bills). EPA believes strongly that, if the information collections in this ICR are not performed at the requested frequency, EPA's ability to

³ EPA provided the POCs with the burden inputs used in the weighted-average calculations that determined respondent burden for each benchmarking method. For additional information on these inputs, see Section 6(d) of this document under the heading, "Benchmarking," and subheading, "Portfolio Manager."

⁴ POCs were asked to provide input on benchmarking methods with which they had experience.

⁵ EPA is aware, for example, that some properties receive special rates from LPs, as low as \$500 per building, especially if they are certifying multiple buildings. In addition, it is becoming increasingly common for LPs to include the cost of building certification in their energy efficiency consulting services for the building, which helps to keep costs low.

implement the ENERGY STAR program and the public's ability to benefit from the program's tools and resources could be hampered significantly.

3(e) General Guidelines

Information collections performed under this clearance will follow all of OMB's General Guidelines regarding federal data collection.

3(f) Confidentiality

Participation in the ENERGY STAR program is voluntary and may be terminated by participants or EPA at any time. If a claim of confidential business information (CBI) is asserted, EPA will manage that information in accordance with EPA's provisions on confidentiality. 40 CFR Part 2, Subpart B establishes EPA's general policy on the public disclosure of information and procedures for handling CBI claims.

3(g) Sensitive Questions

No questions of a sensitive nature are asked of participants under the ENERGY STAR program.

4. THE RESPONDENTS AND THE INFORMATION REQUESTED

4(a) Respondents and NAICS Codes

Following are the North American Industry Classification System (NAICS) codes of respondents most likely to carry out the information collections under this ICR.

Industry Sectors	NAICS Code(s)
Agriculture, Forestry, Fishing and Hunting	11
Mining, Quarrying, and Oil and Gas Extraction	21
Utilities	22
Construction	23
Manufacturing	31-33
Wholesale Trade	42
Retail Trade	44-45
Transportation and Warehousing	48-49
Information	51
Finance and Insurance	52
Real Estate and Rental and Leasing	53
Professional, Scientific, and Technical Services	54
Management of Companies and Enterprises	55
Administrative and Support and Waste Management and Remediation Services	56
Educational Services	61
Health Care and Social Assistance	62
Arts, Entertainment, and Recreation	71
Accommodation and Food Services	72
Other Services (except Public Administration)	81
Public Administration	92

4(b) Information Requested

This section describes the information collections under this ICR, including data items and respondent activities. The section also identifies the sector (i.e., private and/or public sector) that is expected to carry out each collection (see the heading introducing each collection).

JOINING THE ENERGY STAR PROGRAM AND RELATED ACTIVITIES

Organizations interested in joining the ENERGY STAR program may be asked to submit a Partnership Agreement. They also may be asked to undertake related activities, as described below.

Commercial and Industrial Sector Partners (Private and Public Sector)

In order to join ENERGY STAR, organizations in the commercial and industrial sectors are asked to complete and submit a Partnership Agreement to EPA.⁶ These Partners agree to measure and track the energy performance of their organization's facilities where possible by using tools such as those offered through ENERGY STAR; develop and implement a plan consistent with the ENERGY STAR Energy Management Guidelines to achieve energy savings; help spread the word about the importance of energy efficiency to their staff and community; and highlight their achievements with recognition offered through ENERGY STAR.

(i) Data items

- A Partnership Agreement that includes the following information:
 - Organization's name;
 - Contact information on organization's Chief Executive;
 - Contact information on organization's Energy Manager;
 - Contact information on organization's Communications Contact (if applicable);
 - Description of organization's primary business or function (i.e., a checklist);
 - Total amount of building/facility square footage owned, leased, and/or managed; and
 - Brief explanation of how organization learned about ENERGY STAR.
- Energy Management Plan.

(ii) Respondent activities

- To join ENERGY STAR, organizations are asked to:
 - Complete and submit the Partnership Agreement online; and
 - Respond to EPA follow-up questions, if any.
- Partners may update their existing energy management plan.

⁶ This participant group includes businesses and other organizations in such fields as commercial and corporate real estate, education, entertainment, government, healthcare and senior care facilities, hospitality, manufacturing and industry, multifamily housing, retail, wastewater and drinking water treatment, and associations.

Service and Product Providers (Private Sector)

An organization must meet certain eligibility requirements before applying to become a Service and Product Provider (SPP) Partner.⁷ Applicants must demonstrate that they have actively used the ENERGY STAR approach to help clients achieve their energy management goals as specified.

- SPPs serving the existing commercial buildings market must benchmark at least 10 client commercial buildings in the last 12 months using Portfolio Manager and/or earn the ENERGY STAR certification for at least one client commercial building using Portfolio Manager and meet other program requirements. [Note that this ICR addresses benchmarking activities in the section, “Benchmarking,” under the heading, “Portfolio Manager.” This ICR addresses earning the ENERGY STAR in the section, “Recognition,” under the heading, “ENERGY STAR Certification.”]
- SPPs serving the commercial new construction market must submit commercial building design projects that achieve Designed to Earn the ENERGY STAR. Eligible design projects are determined by using Target Finder and require approval from EPA. [Note that this ICR addresses applying for the Designed to Earn the ENERGY STAR in the section, “Recognition,” under the heading, “Designed to Earn the ENERGY STAR.”]
- SPPs serving the industrial market must work with an ENERGY STAR industrial Partner on at least one energy efficiency project in the last two years and submit a Teaming Profile to EPA outlining the project scope and resulting savings for that project.

SPPs interested in joining ENERGY STAR complete and submit a Partnership Agreement to EPA using an online system. The Partnership Agreement requests SPP company information, contact information, and select pieces of information to enable automated verification that Partnership requirements have been met. The Partnership Agreement also lays out Partner commitments, disclaimers, procedures for dispute resolution, and other issues.

On an annual basis, SPPs may be asked to update contact information (i.e. contact name, phone, email) displayed on select Service and Product Provider listings on the web site and to maintain quality of contact mailing lists.

(i) Data items

- A Partnership Agreement to be completed and submitted online that includes the following information:
 - Applicant company name;

⁷This participant group includes companies that provide energy efficiency services and/or products in the commercial and industrial markets.

- Information about the company, such as web address and markets/sectors that the organization serves and services available;
 - Name, title, and contact information of the primary contact, communications contact, and signatory of the Partnership Agreement; and
 - For Existing Commercial Buildings SPPs only, information about SPP activities over the past 12 months (i.e., Portfolio Manager building ID numbers to complete automated verification of activity); or
 - For architecture firms only, information about Commercial New Construction SPP activities (i.e., Designed to Earn the ENERGY STAR of project achieving Designed to Earn the ENERGY STAR); or
 - For Industrial SPP only, information about SPP activities (i.e., Teaming Profile outlining the project scope and resulting savings for that project).
- Additional communications items that SPP Partner may elect to submit:
 - One-page success story for web site posting to demonstrate successful projects or relationships with commercial and institutional clients, or exemplary use of ENERGY STAR tools.
 - Communications about SPP efforts for feature in quarterly newsletters or other medium, at EPA discretion.

(ii) Respondent activities

- To join ENERGY STAR, organizations are asked to:
 - Complete and submit the Partnership Agreement online; and
 - Complete and submit requested materials for the appropriate partnership category (e.g., Statement of Energy Design Intent, Teaming Profile) online.
- SPP Partners are asked to:
 - Update contact information as needed by notifying program account manager of any changes and/or using the “My ENERGY STAR Account” tool; and
 - Communicate efforts and successes to ENERGY STAR and the broader market through success stories and other communications.

Energy Efficiency Program Sponsors (Private and Public Sector)

Energy Efficiency Program Sponsors (EEPS) interested in joining ENERGY STAR are asked to complete and submit a Partnership Agreement.^{8,9} They commit to promote and use

⁸ This participant group includes regulated utilities, publicly owned utilities, and energy delivery companies; national, regional, state, or local government entities; and other organizations involved in coordinating and/or administering energy-efficiency or environmental education programs that promote ENERGY STAR, including ENERGY STAR certified commercial and industrial buildings.

⁹ EEPS are given the opportunity to join one or more programs within ENERGY STAR when they complete and submit their Partnership Agreement (e.g., C&I, Products). EPA is currently renewing the ICR, “EPA’s ENERGY

ENERGY STAR in a manner consistent with the national ENERGY STAR efforts and specifically agree to follow all applicable terms and conditions governing the use of the ENERGY STAR logos, which are registered trade and service marks. Some Partners will be asked on an annual basis to update organization and contact information displayed on the ENERGY STAR web site and the Directory of Energy Efficiency Programs (DEEP). The Partners also agree to promote energy efficiency as an easy and desirable option for organizations and consumers to prevent pollution, protect the global environment, and save on energy bills.

(i) Data items

- Partnership Agreement.
- Updates to organization and contact information displayed on the ENERGY STAR web site and the Directory of Energy Efficiency Programs (DEEP).
- Information to promote energy efficiency as an easy and desirable option for organizations and consumers to prevent pollution, protect the global environment, and save on energy bills.

(ii) Respondent activities

- To join ENERGY STAR, organizations are asked to complete and submit a Partnership Agreement.
- EEPS also agree to:
 - Update organization and contact information displayed on the ENERGY STAR web site and the Directory of Energy Efficiency Programs (DEEP) annually; and
 - Provide information to promote energy efficiency as an easy and desirable option for organizations and consumers to prevent pollution, protect the global environment, and save on energy bills.

BENCHMARKING

Assessing energy use is a critical component of the ENERGY STAR program and guidance provided by EPA to Partners. EPA provides tools to track, measure and compare energy use for a range of building types and facilities. Portfolio Manager is the primary tool for undertaking these activities and is available online at <https://www.energystar.gov/portfoliomanager>.

STAR® Product Labeling,” (EPA ICR No. 2078, OMB Control Number 2060-0528). The Product Labeling ICR will consolidate the burden for EEPS Partnership Agreements across all ENERGY STAR programs. It also includes the EEPS Partnership Agreement (EPA Form 5900-33), which is used by all EEPS. As such, this ICR (EPA ICR 1772.08) no longer estimates burden for EEPS Partnership Agreements. See Section 6d of this document.

Portfolio Manager (Private and Public Sector)

Portfolio Manager is an interactive energy management tool that allows users to track and assess energy and water consumption across their entire portfolio of facilities in a secure online environment. Users enter energy consumption and cost data into their Portfolio Manager account to benchmark facility energy performance, assess energy management goals over time and identify strategic opportunities for savings and recognition opportunities. A “benchmark” is defined as a measurement of a facility’s energy performance resulting from entering facility information and at least 12 consecutive months of facility energy data into EPA’s Portfolio Manager. Portfolio Manager offers multiple types of benchmarks: the 1-100 ENERGY STAR energy performance score for select commercial facility types, site and source Energy Use Intensity (EUI) for all commercial facility types, weather normalized energy values, greenhouse gas emissions, water consumption, and annual energy and water costs.

The ENERGY STAR scale accounts for the impacts of year-to-year weather variations, as well as facility size, location, and several operating characteristics. Portfolio Manager helps the user update and track data over time to continuously monitor performance. The user can use both short and long term trends in energy performance to make budget and management decisions regarding investments in energy-related projects.

In addition, EPA intends to collect information from Portfolio Manager users on its usability as a web-based tool and on the effectiveness of Portfolio Manager guidance. Based on this information, EPA will identify and make needed improvements.

(i) Data items

- Information entered into Portfolio Manager:
 - Contact information;
 - Facility data (e.g., name, address, year constructed);
 - Facility operating characteristics (e.g., gross facility area, number of occupants, operating hours, number of PCs);
 - Energy use information (e.g., meter name, usage data);
 - Water use information - optional (e.g., meter name, usage data); and
 - Solid waste management/disposal information - optional (e.g., meter/waste type name, disposal quantity).
- Information provided to EPA on the usability of Portfolio Manager and effectiveness of guidance.

(ii) Respondent activities

- Organizations using the benchmarking feature of the Portfolio Manager system perform the following activities:
 - Review the instructions of Portfolio Manager and set up account;

- Gather facility and energy data; and
- Enter the data into Portfolio Manager.

[Note: Users have several options for entering facility and energy data into Portfolio Manager. These options and associated burden are described in Section 6(d) of this document.]

- Organizations may be asked to respond to EPA questions on the usability of Portfolio Manager.
- Organizations may be asked to respond to EPA questions about guidance or trainings on benchmarking.

Data Collection for Model Development and Beta Testing (Private and Public Sector)

Occasionally during the development, modification or testing of Portfolio Manager or other tool, EPA may collect information about annual energy use (one year's worth of energy data), along with basic information about facility operations, such as the operating hours or number of workers.

(i) Data items

- Information collected from participating organizations:
 - Contact information;
 - Facility data (e.g., name, address, year constructed);
 - Facility operating characteristics (e.g., gross facility area, number of occupants, operating hours, number of PCs);
 - Energy use information (e.g., meter name, usage data); and
 - Water use information (e.g. meter name, usage data).

(ii) Respondent activities

- Organizations may be asked to:
 - Review the instructions of Portfolio Manager or spreadsheet;
 - Gather facility and energy data; and
 - Enter the data into Portfolio Manager or spreadsheet.

RECOGNITION

ENERGY STAR Certification (Private and Public Sector)

Buildings (Private and Public Sector)

EPA offers the public an opportunity to display the ENERGY STAR on their buildings if they meet certain energy performance criteria defined by EPA. The online application for the ENERGY STAR is submitted through EPA's benchmarking tool, Portfolio Manager. To be approved to receive the ENERGY STAR, buildings must meet specific eligibility requirements as well as industry standards for comfort and indoor air quality. A Professional Engineer or Registered Architect must verify that these requirements have been met and the Application for ENERGY STAR Certification (stamped/embossed and signed) is submitted. [Note that this ICR addresses applicant benchmarking activities in the section, "Benchmarking," under the heading, "Portfolio Manager."]

In addition, EPA conducts audits on a small percentage of applications for quality control purposes. EPA confirms, for example, the accuracy of the information provided in the application for the ENERGY STAR and may request facility documentation.

EPA also expects to periodically contact representatives of buildings that have earned the ENERGY STAR to collect information about the characteristics of buildings that lead to top energy performance and their reasons for benchmarking. This includes information on the buildings' construction, equipment used in the buildings, building management, and involvement in ENERGY STAR. EPA will use this information to better understand the specific design, construction, and operating characteristics of ENERGY STAR certified buildings and how these characteristics contributed to the buildings' top energy performance. In addition, EPA intends to collect information about the qualification process to measure how easy it is for organizations to use. EPA needs this information to identify and make improvements to the process that buildings use to qualify for the ENERGY STAR.

(i) Data items

- Application for ENERGY STAR Certification.
- Audit information requested by EPA as part of its application review or quality control audit:
 - ENERGY STAR Certification Audit Form; and
 - Indoor Environmental Quality Measurement Form for ENERGY STAR Building Verification Site Visit.
- Information provided to EPA for analysis of ENERGY STAR certified buildings.

(ii) Respondent activities

- Organizations applying for the ENERGY STAR perform the following:
 - Engage a Professional Engineer or Registered Architect to conduct a facility data review, complete and stamp the application;¹⁰ and
 - Complete and submit the online application to EPA and respond to EPA questions if any.
- Some organizations may be asked to complete forms as part of a quality control audit performed by EPA on a percentage of applications.
- ENERGY STAR certified buildings may be asked to respond to EPA questions for analysis of ENERGY STAR certified buildings.

Plants (Private Sector)

Industrial companies have an opportunity to earn the ENERGY STAR certification for specific types of plants that meet EPA’s energy efficiency criteria. To measure efficiency and improve energy use in the company, a company enters basic information about its plant (e.g., energy consumption data) into a spreadsheet tool called the Energy Performance Indicator (EPI), which can be downloaded from EPA’s ENERGY STAR web site. The EPI produces a plant percentile score between 1 and 100 and compares that score to the most energy-efficient plants in the industry and to the previous performance for the plant.

If the plant’s EPI score is in the top quartile of the industry’s energy performance scale, the company can apply for the ENERGY STAR certification by printing out a Statement of Energy Performance (SEP). A Professional Engineer (PE) verifies, signs and stamps the SEP, and completes the PE Verification Checklist. The EPI, certified SEP, PE Verification Checklist, Plant Award Specification Sheet, and Plant Award Application Letter are sent to EPA. If the submittal contains confidential business information (CBI), the company sends the information to EPA’s contractor to verify energy performance results. If approved by EPA, the plant receives the ENERGY STAR certification.

Some companies may submit a profile of their certified plant that describes how the plant improved its energy performance and obtained recognition. This submission is optional.

(i) Data items

- Information entered into the EPI or alternative tracking system:
 - Plant characteristics; and
 - Energy consumption.

¹⁰ The on-site portion of the facility review can be conducted every other year if applying in consecutive years.

- Statement of Energy Performance.
- PE Verification Checklist.
- Plant Award Specification Sheet.
- Plant Award Application Letter.
- Profile of certified plant. This is optional.

(ii) Respondent activities

- Organizations seeking plant certification perform the following:
 - Enter information into the EPI or alternative system; and
 - Complete and submit the application materials to EPA.
- Some organizations may also prepare and submit a profile of a certified plant. This is optional.

ENERGY STAR Challenge for Industry (Private Sector)

EPA has established a tool, the ENERGY STAR Challenge for Industry (Challenge), which encourages companies to pledge to reduce the energy intensity of their sites by 10% within five years and track their progress towards this goal using a tracking system (e.g., company in-house tracking systems, Portfolio Manager, EPA’s Energy Tracking Tool). Sites that achieve a 10% reduction in energy intensity within five years of their baseline have the opportunity to apply for recognition from EPA.

Companies are asked to register their sites’ baseline energy intensity to participate in the Challenge. Sites that have not achieved recognition in the past (e.g., first-time participants) are asked to complete the online Challenge for Industry Registration Form. Sites that have achieved recognition can re-register by checking a box on the online Challenge for Industry Recognition Application. They do not need to complete the registration form again.

Each site completes the online Challenge for Industry Recognition Application and fills out a Statement of Energy Improvement (SEI). A Professional Engineer (PE) verifies, prints, signs, and stamps the SEI and completes a PE Verification Checklist, which are both then sent via email to EPA. If approved by EPA, the site receives recognition (e.g., a certificate, congratulatory letter to the CEO).

EPA may ask follow-up questions of companies whose sites achieved recognition (e.g., for program evaluation).

(i) Data items

- Challenge for Industry Registration Form.
- Challenge for Industry Recognition Application.
- Statement of Energy Improvement (SEI).
- PE Verification Checklist.
- Responses to EPA follow-up questions, if any.

(ii) Respondent activities

- Organizations seeking recognition under the ENERGY STAR Challenge for Industry perform the following:
 - Prepare and submit the online Challenge for Industry Registration Form if necessary;
 - Track energy use;
 - Prepare and submit the online Challenge for Industry Recognition Application, SEI and PE Verification Checklist; and
 - Respond to EPA follow-up questions, if any.

Designed to Earn the ENERGY STAR (Private Sector)

To seek Designed to Earn the ENERGY STAR (DEES) recognition, an organization is asked to become an ENERGY STAR Partner as an initial step. [Note that this ICR addresses organizations’ becoming a Partner in the section, “Joining the ENERGY STAR Program and Related Activities,” under the heading, “Commercial and Industrial Sector Partners.”] Then, an organization can enter information into EPA’s online tool, Portfolio Manager, and follow simple user prompts to save and generate information needed for the application. The tool can be used to obtain an ENERGY STAR score of 1 – 100 to determine if the design project’s estimated annual energy use meets criteria for DEES recognition.

The organization then generates a Statement of Energy Design Intent (SEDI). The SEDI is printed, stamped and signed by a Registered Architect or Professional Engineer and Architect of Record (AOR) and building owner/developer representatives. It is then submitted to EPA for recognition. Once the application is approved, EPA will email instructions to organizations meeting the DEES recognition criteria so they can download the DEES graphic.

(i) Data items

- Data entered into Portfolio Manager (e.g., property use data).
- Statement of Energy Design Intent.

[Note: Organizations seeking recognition for commercial new construction design projects are asked to submit the data items above. Organizations seeking recognition for multifamily high rise new construction design projects are asked to submit the data items above as well; they also are asked to submit additional documents.¹¹ These additional documents are addressed in EPA ICR 2193, “EPA’s ENERGY STAR Program in the Residential Sector” (OMB Control No. 2060-0586).]

(ii) Respondent activities

- Organizations submitting a DEES application perform the following activities:
 - Review application instructions and create account in Portfolio Manager, if needed;
 - Gather design data and estimated annual energy use data;
 - Enter the data into Portfolio Manager; and
 - Complete and submit DEES application consisting of SEDI and, for commercial design projects, Letters of Intent from the Architect of Record (AOR) and building owner to EPA.

ENERGY STAR Awards (Private and Public Sector)

Organizations interested in receiving recognition for their efforts in improving their energy performance may apply for an ENERGY STAR Award. EPA currently issues awards to Commercial and Industrial (C&I) Sector Partners, Service and Product Providers (SPPs), and Energy Efficiency Program Sponsors (EEPS).

(i) Data items

- Information provided by C&I Partners:
 - General information (e.g., contact information, address, signed/dated); and
 - Description of the following:
 - Management practices (e.g., best practices for managing energy).
 - Organization-wide improvements in energy performance.
 - Efforts in promoting and communicating success.
- Information provided by SPPs:
 - General information (e.g., contact information, address, and signed/dated certification); and
 - Description of the following:
 - Organization and Business Practices.

¹¹ These documents include the following: Multifamily High Rise Developer Participation Agreement (5900-267), Multifamily High Rise Project Application (5900-266), Multifamily High Rise Testing & Verification Worksheet (5900-269), Multifamily High Rise Submittal Validation Form (5900-270), and Multifamily High Rise Performance Path Calculator (5900-268).

- Benchmarking and Certification (Existing Buildings).
 - Benchmarking and Certification (Design Projects).
 - Marketing and Recognition.
- Information provided by EEPS:
 - General information (e.g., contact information, address, and signed/dated certification); and
 - Description of the following:
 - Category(-ies) that the EEPS program is designed to address (e.g., energy improvements in the C&I sector).
 - Program design (e.g., in terms of goals).
 - How ENERGY STAR has been incorporated into the Partner's initiative.
 - Market effects resulting from Partner's efforts.
 - Data sources used to support market claims.

(ii) Respondent activities

- Organizations that apply for an award are asked to:
 - Review the instructions; and
 - Complete and submit the information online.

Treasure Hunt, Improvement-Based Recognition (Private and Public Sector)

EPA provides guidance at its web site to assist owners and managers of commercial buildings and industrial facilities in conducting walk-throughs to find ways to reduce energy. Periodically, EPA may encourage these organizations to seek recognition of their voluntary energy reduction efforts.

An organization seeking recognition first establishes an energy (and optionally, water and waste) baseline of its facility using Portfolio Manager or Energy Performance Indicator (EPI). It then plans and conducts a walk-through looking for and estimating energy and cost savings opportunities. Finally, it submits a summary of this information to EPA, which provides recognition if warranted.

An organization may decide to implement energy-savings measures and seek additional recognition post-upgrade by verifying that it implemented the identified measures and/or improved energy efficiency of its facility by 10, 20, 30 percent or more. This involves measuring the energy savings using Portfolio Manager or EPI or an equivalent tool if an EPI is not available, obtaining Professional Engineer verification, and submitting this information to EPA. The Agency will provide additional recognition if available and warranted.

EPA may ask some organizations to submit a case study or best practices, e.g., for posting at the EPA web site.

(i) Data items

- Data entered into Portfolio Manager or EPI.
- Results of walk-through:
 - Basic building or plant information;
 - Energy data (e.g., fuel usage);
 - Water and waste data (optional); and
 - Summary of potential energy and cost savings opportunities.
- Case study or best practices (optional).

(ii) Respondent activities

- Organizations seeking recognition perform the following:
 - Establish a baseline using Portfolio Manager or EPI;
 - Summarize estimates of potential energy and cost savings opportunities identified during walk-through;
 - Submit information to EPA; and
 - If seeking additional recognition post-upgrade, measure the energy savings (e.g., using Portfolio Manager), obtain PE verification and submit this information to EPA.
- Some organizations may submit a case study or best practices.

Tenant Recognition Program (Private and Public Sector)

In April 2015, Congress passed the Energy Efficiency Improvement Act of 2015. This legislation mandates EPA to develop a voluntary recognition program for commercial tenants in buildings. Tenants will be encouraged to design, build and operate their spaces to be energy efficient. EPA will recognize tenants who meet EPA’s energy efficiency criteria for the design, build-out and operation of energy efficient tenant spaces.

To apply for recognition, a tenant establishes an account in Portfolio Manager. [Note that this ICR addresses setting up Portfolio Manager accounts in the section, “Benchmarking,” under the heading, “Portfolio Manager.”] The tenant then gathers and enters data (e.g., office space characteristics, lighting inventory) into the tool. If the energy efficiency criteria are met, an application is generated by the tool. A Professional Engineer or Registered Architect reviews, verifies and stamps the application. It then can be signed and uploaded to EPA. The Agency reviews it and provides recognition if warranted. Some participants may be contacted by EPA to answer questions about their submission, if needed.

(i) Data items

- Information entered in Portfolio Manager:
 - Office space characteristics (e.g., operating hours, number of workers);
 - Equipment inventory (e.g., types of equipment);
 - Copy of organization’s procurement policy;
 - Lighting inventory (e.g., type, number and wattage of lighting fixtures);
and
 - Information on energy meters.

- Responses to EPA follow-up questions, if any.

(ii) Respondent activities

- Tenants seeking recognition perform the following:
 - Gather and enter data into Portfolio Manager;
 - Complete and submit an application for recognition if applicable criteria are met; and
 - Respond to EPA follow-up questions, if any.

5. THE INFORMATION COLLECTED, AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5(a) Agency Activities

This section describes EPA's activities under ENERGY STAR.

JOINING THE ENERGY STAR PROGRAM AND RELATED ACTIVITIES

Partnership Agreements and Related Activities

- EPA performs the following activities in regard to Partnership Agreements and related materials for all Partners:
 - Review the completed Partnership Agreements and related materials;
 - Follow up with Partners, if needed;
 - Send emails, passwords, and welcome aboard kits; and
 - Update and maintain the ENERGY STAR web site.

- EPA performs the following additional activities in regard to SPPs:
 - Request updated contact information annually;
 - Receive and enter updated contact information into database;
 - Receive and process efforts and successes; and
 - Receive and process other requested materials for appropriate Partnership category.

- EPA receives annual updates from EEPS and updates the Directory of Energy Efficiency Programs.

BENCHMARKING

Portfolio Manager

- EPA performs the following activities related to the benchmarking process:
 - Upgrade Portfolio Manager to enhance functionality (easier data entry, more sharing options, more reporting metrics, etc);
 - Maintain secure database infrastructure, including maintaining a firewall and monitoring system activity;
 - Perform system maintenance activities, such as deploying software patches, correcting defects, etc.; and
 - Collect data submitted through Excel spreadsheets and enter data into Portfolio Manager.

- EPA performs the following activities in evaluating the usability of Portfolio Manager and the effectiveness of guidance and trainings on benchmarking in the tool:
 - Solicit feedback from respondents;
 - Review answers to questions; and
 - Design and develop Portfolio Manager software changes, as applicable, to make the tool more effective.

Data Collection for Model Development and Beta Testing

- EPA conducts the data collections.

RECOGNITION

ENERGY STAR Certification

Buildings

- EPA performs the following activities for buildings applying for the ENERGY STAR:
 - Review applications and follow up with organization if questions; and
 - Send a letter of denial or acceptance.
- EPA collects information from ENERGY STAR certified buildings in performing periodic quality control audits.
- EPA performs the following activities in evaluating ENERGY STAR certified buildings:
 - Solicit feedback from respondents;
 - Review answers to questions; and
 - Take follow-up action.

Plants

- EPA performs the following activities for companies seeking the ENERGY STAR certification for their plants:
 - Enhance the functionality of and maintains the EPI and other tools and information on the web site;
 - Review and evaluate the submissions;
 - Give permission to display the ENERGY STAR certification logo; and
 - Review and post profiles of certified plants on the web site.

ENERGY STAR Challenge for Industry

- EPA performs the following activities under the ENERGY STAR Challenge for Industry:
 - Review online Challenge for Industry Registration Form;
 - Review online Challenge for Industry Recognition Application, SEI and PE Verification Checklist and provide recognition; and
 - Ask follow-up questions if any.

Designed to Earn the ENERGY STAR

- EPA performs the following activities for the graphic:
 - Evaluate the DEES applications; and
 - Update the ENERGY STAR web site to reflect the information collected.

ENERGY STAR Awards

- EPA performs the following activities to administer the awards process:
 - Develop the awards criteria;
 - Receive and review the information submitted; and
 - Take follow-up action (e.g., send letters of award or loss).

Treasure Hunt, Improvement-Based Recognition

- EPA performs the following activities for this program:
 - Receive and review submissions and provide recognition if warranted;
 - For organizations seeking additional recognition, receive and review submissions and provide recognition if warranted; and
 - Receive and review case study or best practices.

Tenant Recognition Program

- EPA performs the following activities under the Tenant Recognition program:
 - Review applications and provide recognition if warranted; and
 - Contact participants and ask questions, if needed.

5(b) Collection Methodology and Management

EPA gives respondents the ability to fill out forms (e.g., Partnership Agreements) and tools electronically. In addition, respondents can submit the information electronically (e.g., via web forms, email), without the use of postal mail. EPA reviews the submittals to ensure their accuracy and completeness.

5(c) Small Entity Flexibility

Under ENERGY STAR, EPA has made enhancements to its information collections where possible to streamline the efforts of small businesses in reporting information and deriving energy savings. For example, EPA recently added a feature to Portfolio Manager, its interactive energy management tool, to better promote opportunities for automated data transfer through Web Services, which is offered as a free service increasingly by many utilities. Web Services is particularly beneficial for small businesses, which are less likely to have resources to manage Portfolio Manager data entry themselves.

Through Web Services, users set up buildings in Portfolio Manager and create a connection with the utility, and then the energy bills are automatically uploaded to Portfolio Manager on a monthly basis. EPA modified Portfolio Manager to notify small business users if they are located in a utility service territory that offers free Web Services. The notification includes a link to the provider's web site to help them connect with the provider and learn about its services.

5(d) Collection Schedule

No information collection in this ICR requires collection more frequently than quarterly. Many collections are implemented on a one-time or annual basis. Respondents may voluntarily submit information more frequently.

6. ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6(a) Estimating Respondent Burden

Exhibits 1 through 3 estimate the annual respondent burden hours for information collection activities associated with the ENERGY STAR program in the commercial and industrial sectors. Table 1 presents the total annual hours to respondents under all activities.

6(b) Estimating Respondent Costs

Exhibits 1 through 3 present the annual respondent costs for information collection activities associated with the ENERGY STAR program in the commercial and industrial sectors. Table 1 presents the total annual respondent costs under all activities. Specific cost assumptions are discussed below.

(i) Estimating Labor Costs

EPA estimates an average hourly respondent labor cost (\$2019) of \$115.16/hr for legal staff, \$100.18/hr for managerial staff, \$47.21/hr for technical staff, and \$29.96/hr for clerical staff. To derive these hourly estimates, EPA referred to the *May 2017 National Occupational Employment and Wage Estimates* published by the U.S. Bureau of Labor Statistics.¹² This publication summarizes the unloaded (base) hourly rate for major occupational groups.¹³ EPA then applied the standard government overhead factor of 1.6 to the unloaded rate to derive loaded hourly rates. Finally, EPA updated the loaded hourly rates to December 2018 levels using Employment Cost Indexes developed by the U.S. Bureau of Labor Statistics.¹⁴

(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

Operation and maintenance (O&M) costs are those costs associated with a paperwork requirement incurred continually over the life of the ICR. They are defined by the Paperwork Reduction Act of 1995 as “the recurring dollar amount of costs associated with O&M or purchasing services.” This ICR includes lump-sum costs that respondents pay for contractor support in the completion of various collections, as listed below (\$2019):

¹² U.S. Bureau of Labor Statistics (BLS), Occupational Employment Statistics (OES), *May 2017 National Occupational Employment and Wage Estimates*. Available online at: https://www.bls.gov/oes/2017/may/oes_nat.htm#23-0000.

¹³ For purposes of this analysis, the following occupational groups of the U.S. Bureau of Labor Statistics (BLS) were used: Legal staff, SOC 23-1011, Lawyers; managerial staff, BLS SOC Code 11-1021, General and Operations Managers; technical staff, BLS SOC Code 17-3027, Mechanical Engineering Technicians; and clerical staff, BLS SOC Code 43-6014, Secretaries and Administrative Assistants, Except Legal, Medical, and Executive.

¹⁴ Bureau of Labor Statistics, *Economic News Release*, “Table 2. Seasonally adjusted: Employment Cost Index for wages and salaries, by ownership, occupational group, and industry.” Available online at: <https://www.bls.gov/news.release/eci.t02.htm>.

- \$1,200 for a respondent to obtain support from an external Professional Engineer or Registered Architect to conduct a facility data review in applying for ENERGY STAR certification for a building.
- \$3,480 for a petroleum company to obtain support from a consulting service to generate energy-efficiency results of its plant for ENERGY STAR certification for a plant.
- \$130 for a respondent to obtain support from an external Registered Architect or Professional Engineer in completing (e.g., reviewing, signing) the Statement of Energy Design Intent (SEDI) for DEES recognition.
- \$1,060 for a respondent to obtain third-party verification of the submittal for recognition under the Tenant Recognition program.

There are no capital costs associated with any activities related to the ENERGY STAR program in the commercial and industrial sectors.

6(c) Estimating Agency Burden and Costs

(i) Estimating Labor Costs

The hourly Agency labor rates used in this ICR were obtained from the 2019 Salary Tables for federal civilian employees, which are published by the Office of Personnel Management.¹⁵ EPA estimates an average hourly labor cost of \$80.59/hr for legal staff, \$75.36/hr for managerial staff, \$55.26/hr for technical staff, and \$22.19/hr for clerical staff. The labor costs are based on the following GS levels and steps: legal labor rates were based on GS Level 15, Step 1, managerial labor rates were based on GS Level 14, Step 4, technical labor rates were based on GS Level 12, Step 5, and clerical labor rates were based on GS Level 5, Step 1. To derive hourly estimates, EPA multiplied hourly rates by the standard government overhead factor of 1.6. Agency burden and costs are estimated in Exhibits 4 through 6 and Table 2.

(ii) Estimating Capital and Operations and Maintenance (O&M) Costs

For certain information collections, EPA sends items to respondents using the U.S. postal service and incurs \$0.55 for postage. This includes decals and other items that cannot be sent electronically.

6(d) Estimating the Respondent Universe

¹⁵ See 2019 General Schedule (Base), "SALARY TABLE 2019-GS RATES FROZEN AT 2018 LEVELS EFFECTIVE JANUARY 2019," available at: https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2019/GS_h.pdf.

In this section, EPA describes its estimates of the number of respondents carrying out the information collections under the ENERGY STAR program in the commercial and industrial (C&I) sectors. In developing its estimates, EPA referred to its databases and other documentation in order to understand historical trends in the number of new and existing respondents. Based on this understanding, EPA has estimated the average annual number of respondents associated with each of the information collections under the program.

In total, EPA estimates 37,021 organizations participate under the ENERGY STAR program in the commercial and industrial sectors annually. In deriving this estimate, EPA ascertained the annual number of users of its online tool, Portfolio Manager (36,500 organizations). EPA notes that most respondents in this ICR use the tool during the year and are therefore captured in this estimate. For example, organizations seeking recognition (e.g., under ENERGY STAR certification for buildings) benchmark their buildings in Portfolio Manager and are therefore reflected in the estimate. Therefore, to avoid double-counting, EPA next identified organizations not captured in the 36,500-organization estimate. EPA estimates that 521 organizations carry out collections that do not involve the tool ($36,500 + 521 = 37,021$ respondents). Most of the 521 organizations are industrial plants that use the EPI or other tool instead of Portfolio Manager to track their energy performance.

These organizations are discussed further below.

JOINING THE ENERGY STAR PROGRAM AND RELATED ACTIVITIES (EXHIBIT 1)

Commercial and Industrial Sector Partners

EPA estimates that, on average, 150 organizations in the commercial and industrial sectors will submit a Partnership Agreement to EPA each year. EPA may ask Partners follow-up questions. In addition, EPA believes that organizations joining the program already have some form of existing plans for energy management, which they have prepared as a usual and customary industry practice. EPA estimates that, each year, five organizations will update their existing plans to meet ENERGY STAR best practice criteria.

Service and Product Providers

EPA estimates that, on average, 70 SPPs will submit a Partnership Agreement to EPA each year through an online system. These SPPs will also submit requested materials for their appropriate category (e.g., Teaming Profiles from Industrial SPPs). In addition, EPA estimates that, on average, 200 existing SPPs will update their contact information and 125 existing SPPs will communicate their efforts and successes to EPA annually.

Energy Efficiency Program Sponsors

EEPS are given the opportunity to join one or more programs within ENERGY STAR (e.g., C&I, Products) when they complete and submit their Partnership Agreement. The ICR,

“EPA’s ENERGY STAR® Product Labeling” (EPA ICR No. 2078, OMB Control Number 2060-0528), will consolidate the burden for the EEPS Partnership Agreement across all ENERGY STAR programs.¹⁶ As such, this ICR (EPA ICR 1772.08) does not estimate the burden for EEPS Partnership Agreements.

EPA estimates that, on average, 60 existing EEPS will actively participate in the program, update contact information on the ENERGY STAR web site and DEEP, and provide information to promote energy efficiency as an easy and desirable option for organizations and consumers to prevent pollution, protect the global environment, and save on energy bills.

BENCHMARKING (EXHIBIT 2)

Portfolio Manager

To estimate Portfolio Manager’s burden, EPA collected and analyzed historical data about the tool, including the annual number of new and active accounts and buildings benchmarked.¹⁷ EPA collected data on the three benchmarking methods offered by the tool: manual data entry, data entry with Excel spreadsheet, and data entry using Electronic Web Services. EPA entered the data into an Excel-based model to estimate total annual burden. The table below presents the annual number of new and active accounts and benchmarked buildings estimated over the next three years.

Annual Number of New Accounts, Benchmarked Buildings and Active Accounts in Portfolio Manager¹			
Benchmarking Method	Annual No. of New Accounts	Annual No. of Buildings Benchmarked – Total	Annual Number of Active Accounts
1. Manual Data Entry	21,800	66,000	29,600
2. Data Entry with Excel Spreadsheet	700	14,000	300
3. Data Entry using Electronic Web Services			
Provider Accounts	26	219,000	6,600
Customer Accounts	1,200		
Total	23,726	299,000	36,500

¹ These estimates are based on an analysis of historical data from standard reports (e.g., benchmarking reports, quarterly data import reports) and extrapolation over the next three years.

¹⁶ EPA is currently renewing ICR 2078 and consolidating the burden of EEPS Partnership Agreements across all ENERGY STAR programs. ICR 2078 includes the EEPS Partnership Agreement (EPA Form 5900-33), which is used by all EEPS.

¹⁷ As used in this ICR, the number of “buildings benchmarked annually” equals the number of “annual benchmarks” (i.e., the terms represent the same quantity).

The model used the data in the table to estimate the burden of each benchmarking method, as discussed below:

- Manual Data Entry.** EPA estimates that, each year, 21,800 users will read the instructions and set up an account in Portfolio Manager to benchmark their buildings manually. In addition, EPA estimates that 66,000 buildings will be manually benchmarked annually, on average. Of these, EPA estimates that users will benchmark 65% (42,900) by gathering facility and energy data for their buildings not using standard industry practices. EPA estimates that users will benchmark 35% (23,100) by gathering facility and energy data for their buildings using standard industry practices (i.e., usual and customary business practices that would be conducted even in the absence of ENERGY STAR). These practices could include, for example, compiling and keeping readily available, centralized paper and/or electronic records (e.g., invoices, facility data) for their portfolio of buildings. Users who employ such standard industry practices would generally incur a lower incremental burden than others to gather data for Portfolio Manager. All users will enter the data into Portfolio Manager to benchmark their buildings. Finally, of the 66,000 buildings benchmarked, EPA estimates that 27.27% (17,998) are new benchmarks (i.e., buildings benchmarked for the first time) and 72.73% (48,002) are repeats.

Exhibit 2 includes weighted-average burden estimates for gathering and entering data into Portfolio Manager to account for standard business practices as well as new and repeat benchmarks. See the table below for the inputs used in these weighted-average calculations.

Manual Data Entry			
Activity	No. of Buildings¹	Burden per New Benchmark	Burden per Repeat Benchmark
Gathering data for benchmarks not using standard business practices	42,900	4 hrs	0.5 hr
Gathering data for benchmarks using standard business practices	23,100	2 hrs	0.25 hr
Entering data into Portfolio Manager	66,000	0.75 hr	0.25 hr

¹EPA estimates that 27.27% of the buildings in this column are new benchmarks (i.e., buildings benchmarked for the first time) and 72.73% are repeats.

- Data Entry with Excel Spreadsheet.** EPA estimates that, each year, 700 organizations will set up an account to provide their data via Excel spreadsheet to EPA. The data will be uploaded into Portfolio Manager. In addition, EPA estimates that 14,000 buildings will be benchmarked annually using this method. Of these, EPA estimates that 50% (7,000) are new benchmarks (i.e., buildings benchmarked for the first time) and 50% are repeats.

Exhibit 2 includes weighted-average burden estimates for gathering and entering data into Portfolio Manager to account for new and repeat benchmarks. See the table below for the inputs used in these weighted-average calculations.

Data Entry with Excel Spreadsheet			
Activity	No. of Buildings¹	Burden per New Benchmark	Burden per Repeat Benchmark
Gathering data for benchmarks	14,000	2 hrs	0.25 hr
Entering data into Portfolio Manager	14,000	0.25 hr	0.10 hr

¹EPA estimates that 50% of the buildings in this column are new benchmarks (i.e., buildings benchmarked for the first time) and 50% are repeats.

- Data Entry using Electronic Web Services. EPA expects that 26 new providers will use this benchmarking method each year. EPA estimates that new accounts also will be established for 1,200 customers each year. In addition, EPA estimates that information will be gathered and entered into Portfolio Manager for 219,000 buildings annually. Of these, EPA estimates that 11.41% (24,988) are new benchmarks (i.e., buildings benchmarked for the first time) and 88.59% (194,012) are repeats.

Exhibit 2 includes weighted-average burden estimates for gathering and entering data into Portfolio Manager to account for new and repeat benchmarks. See the table below for the inputs used in these weighted-average calculations.

Data Entry using Electronic Web Services			
Activity	No. of Buildings¹	Burden per New Benchmark	Burden per Repeat Benchmark
Gathering data for benchmarks	219,000	1 hr	0 hr
Entering data into Portfolio Manager	219,000	0.1 hr	0.1 hr

¹EPA estimates that 11.41% of the buildings in this column are new benchmarks (i.e., buildings benchmarked for the first time) and 88.59% are repeats.

Further, EPA estimates that, each year, it will ask 50 users of Portfolio Manager about the usability of the tool. It will also ask 50 users for feedback about the guidance or training on the tool each year.

Data Collection for Model Development and Beta Testing

EPA expects to expand Portfolio Manager or the Energy Performance Indicator (EPI) downloadable spreadsheet tools by adding new facility types and revising existing types. In doing so, the Agency may need to gather information for model development and/or beta testing to

make sure the tool produces relevant results. EPA expects that organizations will submit information on 950 properties annually.

RECOGNITION (EXHIBIT 3)

ENERGY STAR Certification

Buildings

EPA estimates that organizations will submit 7,000 applications for the ENERGY STAR each year. These organizations must benchmark the building, engage a Professional Engineer or Registered Architect to conduct a facility data review, and submit an online Application for ENERGY STAR Certification to EPA. [Note that this ICR burdens participants for benchmarking in the section, “Benchmarking,” under the heading, “Portfolio Manager.” See Exhibit 2.] EPA estimates that 85% will contract a Professional Engineer or Registered Architect and 15% will use an in-house Professional Engineer or Registered Architect to perform the facility review.¹⁸ Further, in the spring of 2018, EPA clarified that on-site facility reviews can be performed every other year (instead of annually) for buildings that apply for certification in consecutive years. Because of this, EPA expects the number of on-site facility reviews to decrease by one-third annually. Hence, EPA estimates that 3,987 facility reviews will be performed by a contracted Professional Engineer or Registered Architect (7,000 applications x 85% x 67%) and 704 facility reviews by an in-house Professional Engineer or Registered Architect (7,000 applications x 15% x 67%) annually.

In addition, EPA estimates that, each year, it will ask for additional information from up to 240 applications for ENERGY STAR certification as part of its quality control audits.

EPA also expects to contact representatives of buildings that have earned the ENERGY STAR to collect information about the characteristics of buildings that lead to top energy performance. EPA will also collect information about the qualification process to measure how easy it is for organizations to use. EPA intends to contact no more than 66 representatives annually.

Plants

EPA estimates that industrial companies will seek ENERGY STAR certification for 115 plants annually, on average, during the 3-year life of this ICR. EPA expects all companies, except petroleum companies, to use the Energy Performance Indicator (EPI) to track plant energy performance and generate the Statement of Energy Performance (SEP). EPA estimates this will be done for 105 non-petroleum plants annually.

¹⁸ EPA conducted limited industry consultations in preparing this ICR and improved its estimate of the cost to hire an external LP. EPA adjusted the cost from \$1,665 to \$1,200 per property based on industry input. Refer to Section 3(c) for a summary of the consultations.

EPA expects petroleum companies to use a third-party consulting service to measure the energy efficiency of their plants. To request a plant score from the consulting service, a petroleum company is estimated to spend 10 minutes and \$3,480 as a flat fee per plant. EPA estimates this will be done for 10 petroleum plants annually.

EPA expects these non-petroleum and petroleum companies to complete the application materials (e.g., Plant Award Specification Sheet, Plant Award Application Letter, PE Checklist, Statement of Energy Performance) and submit them to EPA (115 plants/yr).

EPA estimates that four profiles of certified plants will be submitted annually. Profiles are optional.

ENERGY STAR Challenge for Industry

Companies are asked to register their sites to participate in the Challenge for Industry. EPA estimates that 60 sites will complete the online Challenge for Industry Registration Form annually. A site is asked to complete this form if it has not achieved recognition in the past (e.g., first-time participants). A site that has achieved recognition in the past and is applying again can re-register by checking a box on the online Challenge for Industry Recognition Application. They do not need to complete the registration form again. EPA estimates that 40 sites will re-register using the recognition application annually.

EPA estimates that 40 sites will seek recognition each year by preparing and submitting the application materials. There are two options for completing the Statement of Energy Improvement (SEI). One option is to track energy using an in-house system and then complete the SEI. EPA estimates that these sites use their existing in-house system to track their energy performance as a standard industry practice (i.e., usual and customary business practices that would be conducted even in the absence of ENERGY STAR). EPA does not expect them to incur any incremental burden in tracking their energy performance under the ENERGY STAR Challenge for Industry. EPA estimates that 39 sites will use this option annually.

Another option is to use EPA's Energy Tracking Tool (ETT) to generate the SEI. Unlike sites that use their existing in-house systems as a standard industry practice, sites using the ETT will incur incremental burden to set up and use the system. EPA estimates that one site will use this option annually.

In addition, all 40 sites are asked to complete the online Challenge for Industry Recognition Application and PE Verification Checklist.

Finally, EPA estimates that, each year, it will contact 33 companies with sites that have achieved the Challenge for Industry, e.g., for program evaluation purposes.

Designed to Earn the ENERGY STAR

EPA estimates that 25 Designed to Earn the ENERGY STAR (DEES) applications will be submitted to EPA each year by organizations seeking recognition for commercial or multifamily high rise (MFHR) new construction design projects. The application process involves reviewing the DEES application instructions and setting up a new account in Portfolio Manager if needed. EPA estimates six first-time applicants will need to perform these activities. In addition, it involves gathering and entering design data into the tool and preparing a DEES application package consisting of a Statement of Energy Design Intent (SEDI). The application is emailed to EPA. [Note: In addition to these documents, organizations with MFHR projects are asked to submit additional documents which are not addressed in this ICR. Rather, they are addressed in EPA ICR 2193, “EPA’s ENERGY STAR Program in the Residential Sector” (OMB Control No. 2060-0586).]

ENERGY STAR Awards

EPA estimates that 75 C&I Partners, 15 SPPs, and 15 EEPS will apply for an ENERGY STAR Award each year. Of the 75 C&I Partners, EPA estimates that 39 will apply for a Sustained Excellence Award, which recognizes sustained excellence in energy management in partnership with ENERGY STAR. They submit streamlined application materials.

Treasure Hunt, Improvement-Based Recognition

EPA estimates that 50 commercial building and 100 industrial organizations will seek recognition annually. They will first establish a baseline for the building or industrial facility using Portfolio Manager or EPI. [Note: This ICR burdens the use of Portfolio Manager in the section, “Benchmarking,” under the heading, “Portfolio Manager.” See Exhibit 2.] They then plan and conduct a walk-through, estimate the energy and cost savings opportunities, and submit a summary of this information to EPA. [Note: EPA believes the walk-through and estimation of savings are, for the most part, a usual and customary business practice that would be conducted even in the absence of ENERGY STAR. The recognition program adds minor incremental burden.]

In addition, EPA estimates that 50 commercial buildings and 25 industrial facilities will decide to implement their energy savings measures and seek additional recognition post-upgrade annually. These applicants will measure the energy savings, obtain PE verification and submit this information to EPA. EPA assumes that applicants will use an internal PE for verification.

Finally, EPA estimates that 10 organizations will submit a case study or best practices annually.

Tenant Recognition Program

EPA estimates that 300 organizations will establish an account in Portfolio Manager to participate in the program annually. [Note that this ICR addresses setting up Portfolio Manager

accounts in the section, “Benchmarking,” under the heading, “Portfolio Manager.”] These organizations will gather and enter data (e.g., equipment and lighting inventory data) into the tool. If the energy efficiency criteria are met, an application is generated by the tool, which is completed by the organization (e.g., reviewed/stamped by a Professional Engineer or Registered Architect) and uploaded to EPA. EPA estimates that 200 applications will be completed and submitted annually. In addition, some participants may be contacted by EPA to answer questions about their submission, if needed.

Exhibit 1*

**Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Joining the ENERGY STAR Program and Related Activities**

Information Collection Activity	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours/Activity	Labor Costs/Activity	Capital Start-up Costs/Activity	O&M Costs/Activity	Number of Activities/Year	Total Hours/Year	Total Cost/Year
	\$115.16	\$100.18	\$47.21	\$29.96							
Commercial and Industrial Sector Partners											
Partnership Agreement											
Complete and submit the Partnership Agreement online	0.00	0.25	0.25	0.00	0.50	\$36.85	\$0.00	\$0.00	150	75.00	\$5,527.50
Respond to EPA follow-up questions, if any	0.00	0.00	0.25	0.00	0.25	\$11.80	\$0.00	\$0.00	25	6.25	\$295.00
Subtotal	0.00	varies	0.25	0.00	varies	varies	\$0.00	\$0.00	varies	81.25	\$5,822.50
Related Activities											
Update existing energy management plan	0.00	0.00	5.00	0.00	5.00	\$236.05	\$0.00	\$0.00	5	25.00	\$1,180.25
Subtotal	0.00	0.00	5.00	0.00	5.00	\$236.05	\$0.00	\$0.00	5	25.00	\$1,180.25
Subtotal (for Commercial and Industrial Sector Partners)	0.00	varies	varies	0.00	varies	varies	\$0.00	\$0.00	varies	106.25	\$7,002.75
Service and Product Providers											
Partnership Agreement											
Complete and submit the Partnership Agreement online	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	70	70.00	\$5,159.00
Complete and submit requested materials for appropriate partnership category	0.00	0.00	0.07	0.00	0.07	\$3.30	\$0.00	\$0.00	70	4.90	\$231.00
Subtotal	0.00	0.50	0.57	0.00	1.07	\$77.00	\$0.00	\$0.00	70	74.90	\$5,390.00
Related Activities											
Update contact information as needed	0.00	0.00	0.16	0.00	0.16	\$7.55	\$0.00	\$0.00	200	32.00	\$1,510.00
Communicate efforts and successes	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	125	125.00	\$9,212.50
Subtotal	0.00	varies	varies	0.00	varies	varies	\$0.00	\$0.00	varies	157.00	\$10,722.50
Subtotal (for Service and Product Providers)	varies	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	231.90	\$16,112.50

Exhibit 1 (continued)*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Joining the ENERGY STAR Program and Related Activities

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours/Activity	Labor Costs/Activity	Capital Start-up Costs/Activity	O&M Costs/Activity	Number of Activities/Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
Energy Efficiency Program Sponsors											
Partnership Agreement											
Organizations Submitting Entire Partnership Agreement											
Complete and submit the Partnership Agreement	0.50	0.25	0.75	0.00	1.50	\$118.03	\$0.00	\$0.00	0	0.00	\$0.00
Organizations Submitting Updated Participation Form Only											
Update and submit Participation Form online	0.00	0.00	0.00	0.08	0.08	\$2.40	\$0.00	\$0.00	0	0.00	\$0.00
Subtotal	varies	varies	varies	varies	varies	varies	\$0.00	\$0.00	0	0.00	\$0.00
Related Activities											
Update organization and contact information displayed on the Web site and DEEP	0.00	0.00	0.00	0.08	0.08	\$2.40	\$0.00	\$0.00	60	4.80	\$144.00
Provide information to promote ENERGY STAR in the commercial and/or industrial markets	0.00	0.10	2.00	0.15	2.25	\$108.93	\$0.00	\$0.00	60	135.00	\$6,535.80
Subtotal	0.00	0.10	2.00	0.23	2.33	\$111.33	\$0.00	\$0.00	60	139.80	\$6,679.80
Subtotal (for Energy Efficiency Program Sponsors)	varies	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	139.80	\$6,679.80
TOTAL	varies	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	477.95	\$29,795.05

* Exhibit contains rounding.

Exhibit 2*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Benchmarking

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs/ Activity	Capital Startup Cos Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
Portfolio Manager											
Set Up of New Accounts											
New Accounts using Manual Entry - Review instructions in Portfolio Manager and set up account	0.00	0.00	0.50	0.00	0.50	\$23.61	\$0.00	\$0.00	21,800	10,900.00	\$514,698.00
New Accounts using Spreadsheet Upload - Review instructions in Portfolio Manager and set up account	0.00	0.00	1.00	0.00	1.00	\$47.21	\$0.00	\$0.00	700	700.00	\$33,047.00
New Providers using Data Exchange - Review instructions and set up account and automated process	0.00	0.00	250.00	0.00	250.00	\$11,802.50	\$0.00	\$0.00	26	6,500.00	\$306,865.00
New Accounts using Data Exchange - Conduct initial customer set-up	0.00	0.00	1.40	0.00	1.40	\$66.09	\$0.00	\$0.00	1,200	1,680.00	\$79,308.00
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	19,780.00	\$933,918.00
Manual Data Entry (per building)											
Gather facility and energy data	0.00	0.00	1.20	0.00	1.20	\$56.65	\$0.00	\$0.00	66,000	79,200.00	\$3,738,900.00
Enter data into Portfolio Manager	0.00	0.00	0.40	0.00	0.40	\$18.88	\$0.00	\$0.00	66,000	26,400.00	\$1,246,080.00
Subtotal	0.00	0.00	1.60	0.00	1.60	\$75.53	\$0.00	\$0.00	66,000	105,600.00	\$4,984,980.00
Data Entry using Excel Spreadsheet (per building)											
Gather facility and energy data	0.00	0.00	1.10	0.00	1.10	\$51.93	\$0.00	\$0.00	14,000	15,400.00	\$727,020.00
Enter data into Portfolio Manager/spreadsheet	0.00	0.00	0.20	0.00	0.20	\$9.44	\$0.00	\$0.00	14,000	2,800.00	\$132,160.00
Subtotal	0.00	0.00	1.30	0.00	1.30	\$61.37	\$0.00	\$0.00	14,000	18,200.00	\$859,180.00
Data Entry using Electronic Web Services (per building)											
Gather facility and energy data	0.00	0.00	0.10	0.00	0.10	\$4.72	\$0.00	\$0.00	219,000	21,900.00	\$1,033,680.00
Submit information to EPA monthly and retrieve/relay scores to customers	0.00	0.00	0.10	0.00	0.10	\$4.72	\$0.00	\$0.00	219,000	21,900.00	\$1,033,680.00
Subtotal	0.00	0.00	0.20	0.00	0.20	\$9.44	\$0.00	\$0.00	219,000	43,800.00	\$2,067,360.00
Evaluation of Portfolio Manager											
Respond to questions about usability of tool	0.00	0.00	0.25	0.00	0.25	\$11.80	\$0.00	\$0.00	50	12.50	\$590.00
Respond to questions about guidance or training on tool	0.00	0.00	0.17	0.00	0.17	\$8.03	\$0.00	\$0.00	50	8.50	\$401.50
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	21.00	\$991.50
Subtotal (for Portfolio Manager)	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	187,401.00	\$8,846,429.50

Exhibit 2 (continued)*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Benchmarking

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs/ Activity	Capital Startup Cos Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
Data Collection for Model Development and Beta Testing											
Review instructions of Portfolio Manager or spreadsheet	0.00	0.00	0.14	0.00	0.14	\$6.61	\$0.00	\$0.00	950	133.00	\$6,279.50
Gather facility and energy data	0.00	0.00	1.79	0.00	1.79	\$84.51	\$0.00	\$0.00	950	1,700.50	\$80,284.50
Enter data into Portfolio Manager or spreadsheet	0.00	0.00	0.32	0.00	0.32	\$15.11	\$0.00	\$0.00	950	304.00	\$4,354.50
Subtotal (for Information for Model Development and Beta Testing)	0.00	0.00	2.25	0.00	2.25	\$106.23	\$0.00	\$0.00	950	2,137.50	\$100,918.50
TOTAL	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	189,538.50	\$8,947,348.00

*Exhibit contains rounding.

Exhibit 3*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
ENERGY STAR Certification											
Buildings											
Contract a Professional Engineer or Registered Architect to conduct a facility data review	0.00	0.00	2.00	0.00	2.00	\$94.42	\$0.00	\$1,200.00	3,987	7,974.00	\$5,160,852.54
Engage an internal Professional Engineer or Registered Architect to conduct a facility data review	0.00	0.00	3.00	0.00	3.00	\$141.63	\$0.00	\$0.00	704	2,112.00	\$99,707.52
Complete and submit the online application to EPA and respond to EPA questions if any	0.00	0.00	0.00	1.00	1.00	\$29.96	\$0.00	\$0.00	7,000	7,000.00	\$209,720.00
Provide additional information to EPA as part of quality control audit, if requested	0.00	0.00	2.00	0.00	2.00	\$94.42	\$0.00	\$0.00	240	480.00	\$22,660.80
Respond to EPA questions for the analysis of ENERGY STAR certified buildings, if requested	0.00	0.00	0.40	0.00	0.40	\$18.88	\$0.00	\$0.00	66	26.40	\$1,246.08
Subtotal (for Buildings)	0.00	0.00	varies	varies	varies	varies	\$0.00	varies	varies	17,592.40	\$5,494,186.94

Exhibit 3* (continued)

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition

Information Collection Activity	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
	\$115.16	\$100.18	\$47.21	\$29.96							
ENERGY STAR Certification											
Plants											
Non-Petroleum Plants											
Enter information into the EPI	0.00	0.00	0.30	0.00	0.30	\$14.16	\$0.00	\$0.00	105	31.50	\$1,486.80
Complete and submit materials to EPA	0.00	0.08	0.50	0.17	0.75	\$36.71	\$0.00	\$0.00	105	78.75	\$3,854.55
Petroleum Plants											
Generate energy-efficiency results	0.00	0.00	0.17	0.00	0.17	\$8.03	\$0.00	\$3,480.00	10	1.70	\$34,880.30
Complete and submit materials to EPA	0.00	0.08	0.50	0.17	0.75	\$36.71	\$0.00	\$0.00	10	7.50	\$367.10
All Plants (optional profiles)											
Prepare and submit profile of certified plant	0.08	0.08	0.34	0.00	0.50	\$33.28	\$0.00	\$0.00	4	2.00	\$133.12
Subtotal (for Plants)	varies	varies	varies	varies	varies	varies	\$0.00	varies	varies	121.45	\$40,721.87
Subtotal (for ENERGY STAR Certification)	varies	varies	varies	varies	varies	varies	\$0.00	varies	varies	17,713.85	\$5,534,908.81

Exhibit 3 (continued)*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
ENERGY STAR Challenge for Industry											
Prepare and submit online Challenge for Industry Registration Form if necessary	0.00	0.00	0.17	0.00	0.17	\$8.03	\$0.00	\$0.00	60	10.20	\$481.80
Track energy use - in-house systems	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	39	0.00	\$0.00
Track energy use - ETT	0.00	2.00	0.00	0.50	2.50	\$215.34	\$0.00	\$0.00	1	2.50	\$215.34
Prepare and submit online Challenge for Industry Recognition Application, SEI and PE Verification Checklist	0.00	0.08	0.42	0.17	0.67	\$32.94	\$0.00	\$0.00	40	26.80	\$1,317.60
Respond to EPA follow-up questions if any	0.00	0.00	0.17	0.00	0.17	\$8.03	\$0.00	\$0.00	33	5.61	\$264.99
Subtotal (for ENERGY STAR Challenge for Industry)	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	45.11	\$2,279.73
Designed to Earn the ENERGY STAR											
Review instructions and create an account in Portfolio Manager	0.00	0.00	0.75	0.00	0.75	\$35.41	\$0.00	\$0.00	6	4.50	\$212.46
Gather building data and estimated energy use data	0.00	0.00	1.50	0.00	1.50	\$70.82	\$0.00	\$130.00	25	37.50	\$5,020.50
Enter data into Portfolio Manager	0.00	0.00	0.25	0.00	0.25	\$11.80	\$0.00	\$0.00	25	6.25	\$295.00
Complete and submit DEES application to EPA	0.00	0.00	0.25	0.25	0.50	\$19.29	\$0.00	\$0.00	25	12.50	\$482.25
Subtotal (for Designed to Earn the ENERGY STAR)	0.00	0.00	varies	varies	varies	varies	\$0.00	varies	varies	60.75	\$6,010.21

Exhibit 3 (continued)*

Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition

	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$115.16	\$100.18	\$47.21	\$29.96							
ENERGY STAR Awards											
Commercial and Industrial Sector Partners											
Review the instructions	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	36	36.00	\$2,653.20
Complete and submit the information online	0.00	3.00	7.00	3.00	13.00	\$720.89	\$0.00	\$0.00	36	468.00	\$25,952.04
Sustained Excellence											
Review the instructions	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	39	39.00	\$2,874.30
Complete and submit the information online	0.00	2.00	3.00	2.00	7.00	\$401.91	\$0.00	\$0.00	39	273.00	\$15,674.49
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	75	816.00	\$47,154.03
Service and Product Providers											
Review the instructions	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	15	15.00	\$1,105.50
Complete and submit the information online	0.00	3.00	7.00	3.00	13.00	\$720.89	\$0.00	\$0.00	15	195.00	\$10,813.35
Subtotal	0.00	3.50	7.50	3.00	14.00	\$794.59	\$0.00	\$0.00	15	210.00	\$11,918.85
Energy Efficiency Program Sponsors											
Review the instructions	0.00	0.50	0.50	0.00	1.00	\$73.70	\$0.00	\$0.00	15	15.00	\$1,105.50
Complete and submit the information online	0.00	1.00	2.00	1.00	4.00	\$224.56	\$0.00	\$0.00	15	60.00	\$3,368.40
Subtotal	0.00	1.50	2.50	1.00	5.00	\$298.26	\$0.00	\$0.00	15	75.00	\$4,473.90
Subtotal (for ENERGY STAR Awards)	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	105	1,101.00	\$63,546.78

Exhibit 3 (continued)*

**Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition**

Information Collection Activity	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Start-up Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Treasure Hunt, Improvement-Based Recognition											
Establish a baseline - Commercial Buildings	0.00	0.00	0.00	0.00	0.00	\$0.00	\$0.00	\$0.00	50	0.00	\$0.00
Establish a baseline - Industrial Facilities	0.00	0.00	0.30	0.00	0.30	\$14.16	\$0.00	\$0.00	100	30.00	\$1,416.00
Summarize estimates of potential energy and cost savings opportunities identified during walk-through	0.00	0.00	1.00	0.00	1.00	\$47.21	\$0.00	\$0.00	150	150.00	\$7,081.50
Submit information to EPA	0.00	0.00	0.00	0.08	0.08	\$2.40	\$0.00	\$0.00	150	12.00	\$360.00
Seek additional recognition - Commercial Buildings	0.00	0.00	2.00	0.00	2.00	\$94.42	\$0.00	\$0.00	50	100.00	\$4,721.00
Seek additional recognition - Industrial Facilities	0.00	0.00	2.30	0.00	2.30	\$108.58	\$0.00	\$0.00	25	57.50	\$2,714.50
Submit case study or best practices	0.00	0.00	1.00	0.00	1.00	\$47.21	\$0.00	\$0.00	10	10.00	\$472.10
Subtotal (for Treasure Hunt, Improvement-Based Recognition)	0.00	0.00	varies	0.00	varies	varies	\$0.00	varies	varies	359.50	\$16,765.10

Exhibit 3 (continued)*

**Estimated Annual Respondent Burden and Cost
ENERGY STAR Program: Recognition**

Information Collection Activity	Hours and Costs Per Respondent per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs/ Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
	\$115.16	\$100.18	\$47.21	\$29.96							
Tenant Recognition Program											
Gather and enter data into Portfolio Manager	0.00	0.00	3.00	0.00	3.00	\$141.63	\$0.00	\$0.00	300	900.00	\$42,489.00
Prepare and submit documentation for recognition	0.00	0.00	0.40	0.10	0.50	\$21.88	\$0.00	\$1,060.00	200	100.00	\$216,376.00
Respond to EPA questions, if needed	0.00	0.00	0.50	0.00	0.50	\$23.61	\$0.00	\$0.00	20	10.00	\$472.20
Subtotal (for Tenant Recognition)	0.00	0.00	varies	0.00	varies	varies	\$0.00	varies	varies	1,010.00	\$259,337.20
TOTAL	varies	varies	varies	varies	varies	varies	\$0.00	varies	varies	20,290.21	\$5,882,847.83

*Exhibit contains rounding.

Exhibit 4*

**Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Joining the ENERGY STAR Program and Related Activities**

	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs/ Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$80.59	\$75.36	\$55.26	\$22.19							
Partnership Agreements and Related Activities											
Partnership Agreements											
Review the completed Partnership Agreements and related materials from C&I, SPP and EEPS Partners	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	220	110.00	\$6,078.60
Follow up with Partners, if needed	0.00	0.00	0.25	0.00	0.25	\$13.82	\$0.00	\$0.00	25	6.25	\$345.50
Send emails, passwords, and welcome aboard kits	0.00	0.00	0.08	0.00	0.08	\$4.42	\$0.00	\$0.55	220	17.60	\$1,093.40
Update and maintain the ENERGY STAR Web site	0.00	0.00	30.00	0.00	30.00	\$1,657.80	\$0.00	\$0.00	1	30.00	\$1,657.80
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	varies	varies	163.85	\$9,175.30
Additional SPP Related Activities											
Request updated contact information annually	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	1	0.50	\$27.63
Receive and enter updated contact information into database	0.00	0.00	0.00	0.08	0.08	\$1.78	\$0.00	\$0.00	200	16.00	\$356.00
Receive and process efforts and successes	0.00	0.00	0.17	0.00	0.17	\$9.39	\$0.00	\$0.00	125	21.25	\$1,173.75
Receive and process other requested materials	0.00	0.00	0.00	0.20	0.20	\$4.44	\$0.00	\$0.00	70	14.00	\$310.80
Subtotal	0.00	0.00	varies	varies	varies	varies	\$0.00	\$0.00	varies	51.75	\$1,868.18
Additional EEPS Related Activities											
Receive annual updates from EEPS and update the Directory of Energy Efficiency Programs	0.00	0.00	0.00	0.08	0.08	\$1.78	\$0.00	\$0.00	60	4.80	\$106.80
Subtotal	0.00	0.00	0.00	0.08	0.08	\$1.78	\$0.00	\$0.00	60	4.80	\$106.80
Subtotal (for Partnership Letter or Agreement/Related Activities)	0.00	0.00	varies	varies	varies	varies	\$0.00	varies	varies	220.40	\$11,150.28

*Exhibit contains rounding.

Exhibit 5*

Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Benchmarking

	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs/ Activity	Capital Startup Costs/ Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$80.59	\$75.36	\$55.26	\$22.19							
Portfolio Manager											
Maintenance and Use of Portfolio Manager											
Upgrade Portfolio Manager to enhance functionality	0.00	200.00	850.00	200.00	1,250.00	\$66,481.00	\$0.00	\$0.00	1	1,250.00	\$66,481.00
Maintain secure database infrastructure	0.00	0.00	500.00	0.00	500.00	\$27,630.00	\$0.00	\$0.00	1	500.00	\$27,630.00
Perform system maintenance	0.00	0.00	600.00	0.00	600.00	\$33,156.00	\$0.00	\$0.00	1	600.00	\$33,156.00
Collect data submitted through Excel spreadsheet and enter data into Portfolio Manager	0.00	0.00	0.08	0.00	0.08	\$4.42	\$0.00	\$0.00	14,000	1,120.00	\$61,880.00
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	3,470.00	\$189,147.00
Evaluation of Portfolio Manager											
Solicit feedback from respondents	0.00	0.00	150.00	0.00	150.00	\$8,289.00	\$0.00	\$0.00	1	150.00	\$8,289.00
Review answers to questions	0.00	0.00	3.00	0.00	3.00	\$165.78	\$0.00	\$0.00	100	300.00	\$16,578.00
Design and develop software changes	0.00	0.00	1,250.00	0.00	1,250.00	\$69,075.00	\$0.00	\$0.00	1	1,250.00	\$69,075.00
Subtotal	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	1,700.00	\$93,942.00
Subtotal (for Portfolio Manager)	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	5,170.00	\$283,089.00
Data Collection for Model Development and Beta Testing											
Conduct the data collections	0.00	0.00	0.17	0.00	0.17	\$9.39	\$0.00	\$0.00	950	161.50	\$8,920.50
Subtotal (for Data Collection for Model Development and Beta Testing)	0.00	0.00	0.17	0.00	0.17	\$9.39	\$0.00	\$0.00	950	161.50	\$8,920.50
TOTAL	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	5,331.50	\$292,009.50

*Exhibit contains rounding.

Exhibit 6*

**Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Recognition**

	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Cos Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$80.59	\$75.36	\$55.26	\$22.19							
ENERGY STAR Certification											
Buildings											
Review of Applications											
Review applications and follow up with organizations if questions	0.00	0.10	0.25	0.25	0.60	\$26.90	\$0.00	\$0.00	7,000	4,200.00	\$188,300.00
Send a letter of denial/acceptance (and certificate and decal if accepted)	0.00	0.00	0.00	0.08	0.08	\$1.78	\$0.00	\$0.55	7,000	560.00	\$16,310.00
Quality Control Audits of Applications											
Collect information from applicants in performing quality control audits	0.00	0.00	4.00	0.00	4.00	\$221.04	\$0.00	\$0.00	240	960.00	\$53,049.60
Evaluation of ENERGY STAR Certified Buildings											
Solicit feedback from respondents	0.00	0.00	0.40	0.00	0.40	\$22.10	\$0.00	\$0.00	66	26.40	\$1,458.60
Review answers to questions	0.00	0.00	0.25	0.00	0.25	\$13.82	\$0.00	\$0.00	66	16.50	\$912.12
Take follow-up action	0.00	0.00	0.25	0.00	0.25	\$13.82	\$0.00	\$0.00	66	16.50	\$912.12
Subtotal (for Buildings)	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	5,779.40	\$260,942.44
Plants											
Enhance functionality of and maintain the EPI and other tools and information on the Web site	0.00	0.00	24.00	0.00	24.00	\$1,326.24	\$0.00	\$0.00	1	24.00	\$1,326.24
Review and evaluate the submissions	0.00	0.00	0.67	0.00	0.67	\$37.02	\$0.00	\$0.00	115	77.05	\$4,257.30
Give permission to display the ENERGY STAR certification logo	0.00	0.00	0.06	0.00	0.06	\$3.32	\$0.00	\$0.55	115	6.90	\$445.05
Review and post profiles of certified plants on the Web site	0.00	0.00	0.17	0.00	0.17	\$9.39	\$0.00	\$0.00	4	0.68	\$37.56
Subtotal (for Plants)	0.00	0.00	varies	0.00	varies	varies	\$0.00	varies	varies	108.63	\$6,066.15
Subtotal (for ENERGY STAR Certification)	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	5,888.03	\$267,008.59
ENERGY STAR Challenge for Industry											
Review online Challenge for Industry Registration Form	0.00	0.00	0.25	0.00	0.25	\$13.82	\$0.00	\$0.00	60	15.00	\$829.20
Review online Challenge for Industry Recognition Application, SEI and PE Verification Checklist and provide recognition	0.00	0.25	0.75	0.00	1.00	\$60.29	\$0.00	\$0.00	40	40.00	\$2,411.60
Ask follow-up questions if any	0.00	0.00	0.17	0.00	0.17	\$9.39	\$0.00	\$0.00	33	5.61	\$309.87
Subtotal (for ENERGY STAR Challenge for Industry)	0.00	varies	varies	0.00	varies	varies	\$0.00	\$0.00	varies	60.61	\$3,550.67
Designed to Earn the ENERGY STAR											
Evaluate the DEES applications	0.00	0.00	1.00	0.00	1.00	\$55.26	\$0.00	\$0.00	25	25.00	\$1,381.50
Update the ENERGY STAR Web site to reflect the information collected	0.00	0.00	6.00	0.00	6.00	\$331.56	\$0.00	\$0.00	1	6.00	\$331.56
Subtotal (for Designed to Earn the ENERGY STAR)	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	31.00	\$1,713.06

Exhibit 6 (continued)*

Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Recognition

Information Collection Activity	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Cos Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
ENERGY STAR Awards	\$80.59	\$75.36	\$55.26	\$22.19							
Commercial and Industrial Sector Partners											
Develop the awards criteria	0.00	1.00	4.00	1.00	6.00	\$318.59	\$0.00	\$0.00	1	6.00	\$318.59
Receive and review the information submitted	0.00	2.00	3.00	1.00	6.00	\$338.69	\$0.00	\$0.00	36	216.00	\$12,192.84
Take follow-up action (e.g., send letter of award or loss)	0.00	0.08	0.00	0.08	0.16	\$7.80	\$0.00	\$0.55	36	5.76	\$300.60
Sustained Excellence											
Develop the awards criteria	0.00	1.00	4.00	1.00	6.00	\$318.59	\$0.00	\$0.00	1	6.00	\$318.59
Receive and review the information submitted	0.00	1.00	2.00	0.50	3.50	\$196.98	\$0.00	\$0.00	39	136.50	\$7,682.22
Take follow-up action (e.g., send letter of award or loss)	0.00	0.08	0.00	0.08	0.16	\$7.80	\$0.00	\$0.55	39	6.24	\$325.65
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	376.50	\$21,138.49
Service and Product Providers											
Develop the awards criteria	0.00	1.00	4.00	1.00	6.00	\$318.59	\$0.00	\$0.00	1	6.00	\$318.59
Receive and review the information submitted	0.00	2.00	3.00	1.00	6.00	\$338.69	\$0.00	\$0.00	15	90.00	\$5,080.35
Take follow-up action (e.g., send letter of award or loss)	0.00	0.08	0.00	0.08	0.16	\$7.80	\$0.00	\$0.55	15	2.40	\$125.25
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	98.40	\$5,524.19
Energy Efficiency Program Sponsors											
Develop the awards criteria	0.00	0.50	1.00	0.50	2.00	\$104.04	\$0.00	\$0.00	1	2.00	\$104.04
Receive and review the information submitted	0.00	0.50	1.00	0.50	2.00	\$104.04	\$0.00	\$0.00	15	30.00	\$1,560.60
Take follow-up action (e.g., send letter of award or loss)	0.00	0.08	0.00	0.08	0.16	\$7.80	\$0.00	\$0.55	15	2.40	\$125.25
Subtotal	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	34.40	\$1,789.89
Subtotal (for ENERGY STAR Awards)	0.00	varies	varies	varies	varies	varies	\$0.00	varies	varies	509.30	\$28,452.57

Exhibit 6 (continued)*

Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Recognition

	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$80.59	\$75.36	\$55.26	\$22.19							
Treasure Hunt, Improvement-Based Recognition											
Receive and review submissions and provide recognition if warranted	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	150	75.00	\$4,144.50
For organizations seeking additional recognition, receive and review submissions and provide recognition if warranted	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	75	37.50	\$2,072.25
Receive and review case study or best practices	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	10	5.00	\$276.30
Subtotal (for Treasure Hunt, Improvement-Based Recognition)	0.00	varies	0.50	0.00	0.50	varies	\$0.00	\$0.00	varies	117.50	\$6,493.05

Exhibit 6 (continued)*

Estimated Annual Agency Burden and Cost
ENERGY STAR Program: Recognition

	Agency Hours and Costs Per Activity								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Total Hours Activity	Labor Costs Activity	Capital Startup Costs Activity	O&M Costs Activity	Number of Activities/ Year	Total Hours/Year	Total Cost/Year
Information Collection Activity	\$80.59	\$75.36	\$55.26	\$22.19							
Tenant Recognition Program											
Review applications and provide recognition if warranted	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	200	100.00	\$5,526.00
Contact participants and ask questions, if needed	0.00	0.00	0.50	0.00	0.50	\$27.63	\$0.00	\$0.00	20	10.00	\$552.60
Subtotal (for Tenant Recognition)	0.00	0.00	varies	0.00	varies	varies	\$0.00	\$0.00	varies	110.00	\$6,078.60
TOTAL	0.00	varies	varies	varies	varies	varies	\$0.00	\$0.00	varies	6,716.44	\$313,296.54

* Exhibit contains rounding.

6(e) Bottom Line Burden Hours and Cost Tables

(i) Respondent Tally

As shown in Table 1, EPA estimates the total annual hour and cost burden to respondents to be 210,306 hours and \$14,859,991. The burden to respondents over the three years of this ICR is estimated to be 630,918 hours and \$44,579,973.

**TABLE 1
TOTAL ESTIMATED ANNUAL RESPONDENT BURDEN AND COST SUMMARY¹**

Information Collections	Total Hours Per Year	Total Labor Cost Per Year	Total Annual Capital Costs	Total Annual O&M Costs	Total Cost Per Year
Joining the ENERGY STAR Program and Related Activities	478	\$29,795	\$0	\$0	\$29,795
Benchmarking	189,538	\$8,947,348	\$0	\$0	\$8,947,348
Recognition	20,290	\$848,398	\$0	\$5,034,450	\$5,882,848
TOTAL	210,306	\$9,825,541	\$0	\$5,034,450	\$14,859,991

¹ Table contains rounding.

(ii) Agency Tally

As shown in Table 2, EPA estimates the total annual hour and cost burden to the Agency to be 12,269 hours and \$616,456. The bottom-line burden to the Agency over the three years of this ICR is estimated to be 36,807 hours and \$1,849,368.

**TABLE 2
TOTAL ESTIMATED ANNUAL AGENCY BURDEN AND COST SUMMARY¹**

Information Collections	Total Hours Per Year	Total Labor Cost Per Year	Total Annual Capital Costs	Total Annual O&M Costs	Total Cost Per Year
Joining the ENERGY STAR Program and Related Activities	220	\$11,029	\$0	\$121	\$11,150
Benchmarking	5,332	\$292,010	\$0	\$0	\$292,010
Recognition	6,716	\$309,326	\$0	\$3,971	\$313,297
TOTAL	12,269	\$612,365	\$0	\$4,092	\$616,456

¹Table includes rounding.

6(f) Reasons for Change in Burden

EPA estimates a total annual respondent burden in this ICR, 1772.08, of 210,306 hours. This is a decrease of 43,778 hours from the currently approved burden of 254,084 hours in ICR 1772.07.

Table 3 explains this decrease. Specifically, the table presents the total annual hours estimated in ICR 1772.07 and ICR 1772.08 for each information collection (see columns 1-3). The table then compares their respective hours for each collection to derive the change in hours, and indicates whether this hour-change resulted from a program change and/or adjustment (see column 4). The table also briefly describes the program change and/or adjustment (see column 5). Finally, the table sums up all hour-changes to derive the total annual change in hours for all collections (see the bottom row of the table).

The table shows that there was a 7,656-hour decrease due to program changes and a 36,122-hour decrease due to adjustments. This resulted in a total decrease of 43,778 hours in ICR 1772.08.

Program Changes

The decrease due to program changes resulted primarily from clarifications and enhancements to EPA's recognition programs. For example, in 2018, EPA issued clarification under the ENERGY STAR certification program concerning facility data reviews performed by licensed professionals (LPs). EPA clarified that on-site facility visits for data reviews and Indoor Air Quality Measurements can be performed every other year instead of annually for buildings that apply for certification in consecutive years, although the data review itself is still conducted every year. This has reduced the estimated number of LP on-site visits conducted annually. This flexibility regarding the on-site requirement substantially reduces costs as well.

Under the Challenge for Industry, EPA introduced a streamlined registration process for organizations that achieved recognition in the past and want to re-register. They no longer need to complete the online Challenge for Industry Registration Form. Under the ENERGY STAR Awards program, EPA introduced a new Sustained Excellence Award, which requests less information from eligible C&I Partners. EPA also phased out the National Building Competition and Small Business Network.

Adjustments

The decrease due to adjustments resulted primarily from updates and improvements to EPA's analysis of Portfolio Manager and the ENERGY STAR certification program. Portfolio Manager is EPA's voluntary online tool for energy management. Based on its data analysis, EPA estimates that 299,000 buildings will be benchmarked annually in this ICR, whereas it estimated 246,000 in ICR 1772.07.

In addition, EPA updated its analysis to account for changes in user benchmarking practices and methods. Portfolio Manager data indicate an increasing percentage of users are opting for Web Services over other benchmarking methods. Whereas EPA estimated 59% of buildings would be benchmarked using Web Services in ICR 1772.07, it estimates 73% in this ICR.¹⁹ Web Services offers greater economies of scale and time-savings efficiencies than the other methods. For example, it takes almost five hours to perform a new benchmark using manual data entry, whereas about one hour using Web Services.

Portfolio Manager data also indicate that the percentage of repeat benchmarks performed in the tool has increased over new benchmarks. Whereas EPA estimated that 70% of buildings benchmarked are repeats in ICR 1772.07, it estimates 83% in this ICR. Repeat benchmarks take significantly less time than new ones, regardless of the method used. Under Web Services, for example, it takes about one hour to perform a new benchmark, whereas about six minutes for a repeat benchmark.

In summary, Portfolio Manager data indicate that users are spending less time per building benchmarked, on average, than in the past. EPA reflected these data in ICR 1772.08, which resulted in a decrease in total burden.²⁰

Under the ENERGY STAR certification program, EPA adjusted the annual number of applications because of recent changes to Portfolio Manager. In 2018, EPA updated the tool's performance metrics for buildings based on the most recent market data available.²¹ These changes have decreased the number of properties eligible for certification. In addition, EPA conducted limited industry consultations in preparing this ICR and improved its estimates of the burden and cost for LPs to perform facility reviews. The estimates in ICR 1772.08 reflect current industry burdens and practices. Refer to Section 6(d) for additional information on LP costs for ENERGY STAR certifications.

¹⁹ As discussed in Section 1b of this document, this trend has been continuing for many years.

²⁰ EPA performed limited industry consultations in preparing this ICR and verified the accuracy of its burden estimates for the tool.

²¹ The update was part of EPA's standard process to keep ENERGY STAR metrics as current as possible, and reflective of current market performance.

**TABLE 3
COMPARISON OF TOTAL ANNUAL HOURS UNDER ICR 1772.07 AND ICR 1772.08¹**

(1) Information Collections ²	(2) Annual Hour Burden in ICR 1772.07	(3) Annual Hour Burden in ICR 1772.08	(4) Difference in Hour Burden Between ICR 1772.07 and 1772.08			(5) Description of Adjustment and/or Program Change
			Program Change	Adjustment	Total	
Joining the ENERGY STAR Program and Related Activities						
Commercial and Industrial Sector Partners	106.25	106.25	0.00	0.00	0.00	Based on current data, EPA estimates the annual number of respondents and burden per activity to remain steady over the next 3 years.
Service and Product Providers	231.90	231.90	0.00	0.00	0.00	Based on current data, EPA estimates the annual number of respondents and burden per activity to remain steady over the next 3 years.
Energy Efficiency Program Sponsors	155.04	139.80	0.00	(15.24)	(15.24)	Based on current data, EPA estimates the annual number of respondents and burden per activity to remain steady over the next 3 years. In addition, EPA transferred EEPS Partnership Agreement burden from this ICR to the ICR, "EPA's ENERGY STAR® Product Labeling," (EPA ICR No. 2078, OMB Control Number 2060-0528), which is currently being renewed. The Product Labeling ICR will consolidate the burden for EEPS Partnership Agreements across all ENERGY STAR programs. As revised, ICR 1772.08 estimates EEPS burden only for activities performed after joining the program (e.g., supplying updated contact information to EPA).
Small Business Network ³	36.00	0.00	(36.00)	0.00	(36.00)	The Small Business Network has been phased out and removed from this ICR.
Benchmarking						
Portfolio Manager	219,741.00	187,401.00	0.00	(32,340.00)	(32,340.00)	Based on its analysis of historical data and trends, EPA increased the total annual number of buildings benchmarked in Portfolio Manager from 246,000 buildings in ICR 1772.07 to 299,000 buildings in ICR 1772.08. In addition, EPA updated its analysis to account for changes in user benchmarking practices and methods. Portfolio Manager data indicate an increasing percentage of users are opting for Web Services over other benchmarking methods. Whereas EPA estimated 59% of buildings would be benchmarked using Web Services in ICR 1772.07, it estimates 73% in this ICR. Web Services offers greater economies of scale and time-savings efficiencies than the other methods. Portfolio Manager data also indicate that the percentage of repeat benchmarks performed in the tool has increased over new benchmarks. Whereas EPA estimated that 70% of buildings benchmarked are repeats in ICR 1772.07, it estimates 83% in this ICR. Repeat benchmarks take significantly less time than new ones, regardless of the method used. In summary, Portfolio Manager data indicate that users are spending less time per building benchmarked, on average, than in the past. EPA reflected these data in ICR 1772.08, which resulted in a decrease in total burden.
ENERGY STAR Energy Performance Indicator and Related Systems ⁴	64.30	0.00	0.00	(64.30)	(64.30)	In preparing ICR 1772.08, EPA reorganized its analysis of the Energy Performance Indicator and related systems by moving it from the "Benchmarking" section to the "Recognition" section under "ENERGY STAR Certification" and "ENERGY STAR Challenge for Industry."
Data Collection for Model Development and Beta Testing	2,137.50	2,137.50	0.00	0.00	0.00	Based on current data, EPA estimates the annual number of respondents and burden per activity to remain steady over the next 3 years.

TABLE 3 (continued)
COMPARISON OF TOTAL ANNUAL HOURS UNDER ICR 1772.07 AND ICR 1772.08¹

(1) Information Collections ²	(2) Annual Hour Burden in ICR 1772.07	(3) Annual Hour Burden in ICR 1772.08	(4) Difference in Hour Burden Between ICR 1772.07 and 1772.08			(5) Description of Adjustment and/or Program Change
			Program Change	Adjustment	Total	
Recognition						
ENERGY STAR Certification	29,409.15	17,713.85	(7,264.00)	(4,431.00)	(11,695.00)	EPA adjusted the annual number of ENERGY STAR applications in ICR 1772.08 because of recent changes to Portfolio Manager (i.e., recalibrated metrics), which have decreased the number of properties eligible for certification. EPA also conducted limited industry consultations and improved its estimates of the burden for LPs to perform facility reviews. The estimates in ICR 1772.08 reflect current industry burdens and practices. In addition, EPA revised this analysis by moving portions of the Energy Performance Indicator burden related to plant certifications from the "Benchmarking" section to this analysis. Finally, ICR 1772.08 reflects recent program clarifications and improvements, which have simplified the application process.
ENERGY STAR Challenge for Industry and Related Activities ⁵	60.25	45.11	(14.39)	(0.75)	(15.14)	EPA adjusted the number of respondents based on updated data. The burden estimates in ICR 1772.08 reflect EPA's program experience gained over the past three years. In addition, EPA revised this analysis by moving portions of the Energy Performance Indicator burden related to the Challenge for Industry from the "Benchmarking" section to this analysis. Finally, EPA introduced a streamlined registration process for organizations that have achieved recognition in the past and want to re-register. They no longer need to complete the online Challenge for Industry Registration Form.
Designed to Earn the Energy Star	280.00	60.75	(43.75)	(175.50)	(219.25)	EPA adjusted the number of respondents per activity based on updated data. The burden estimates in ICR 1772.08 reflect EPA's program experience gained over the past three years. In addition, EPA simplified some application components (e.g., merged some forms) and no longer collects Design Profiles.
ENERGY STAR Awards	1,335.00	1,101.00	(234.00)	0.00	(234.00)	Based on current data, EPA estimates the annual number of respondents to remain steady over the next 3 years. In addition, EPA has introduced a new Sustained Excellence Award, which requests less information from eligible C&I Partners.
National Building Competition ⁶	422.78	0.00	(422.78)	0.00	(422.78)	The National Building Competition has been phased out and removed from this ICR.
Treasure Hunt, Improvement-Based Recognition ⁷	0.00	359.50	359.50	0.00	359.50	The Treasure Hunt, Improvement-Based Recognition is a new program.
Tenant Recognition Program	105.00	1,010.00	0.00	905.00	905.00	EPA adjusted the number of respondents and hours per activity based on the pilot phase, which enhanced the Agency's understanding of market-wide participation and burdens.
Total (rounded)	254,084.00	210,306.00	(7,656.00)	(36,122.00)	(43,778.00)	

¹ Table includes minor rounding. Decreases in burden are shown in parentheses.

² This column reflects the collections in ICR 1772.07, except as otherwise noted.

³ This collection has been phased out and is not included in ICR 1772.08.

⁴ In preparing ICR 1772.08, EPA reorganized its analysis of the Energy Performance Indicator and related systems by moving it from the "Benchmarking" section to the "Recognition" section under "ENERGY STAR Certification" and "ENERGY STAR Challenge for Industry."

⁵ This collection is called "ENERGY STAR Challenge for Industry" in ICR 1772.08.

⁶ This collection has been phased out and is not included in ICR 1772.08.

⁷ This is a new collection in ICR 1772.08.

6(g) Burden Statement

The public reporting and recordkeeping burden for this collection of information is estimated to average 38 minutes 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 are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

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, EPA has established a public docket for this ICR under Docket ID Number EPA-HQ-OAR-2006-0407, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), WJC West Building, Room 3334, 1301 Constitution Avenue, NW, Washington, D.C. The EPA Docket Center Public Reading Room is open from 8:00 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 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-2006-0407 in any correspondence.