



*Independent Statistics & Analysis*

**U.S. Energy Information  
Administration**

---

# Supporting Statement for the Natural Gas Data Collection Program

## **Part A: Justification**

---

*Form EIA-176 Annual Report of Natural and Supplemental Gas Supply and Disposition*

*Form EIA-191 Monthly Underground Natural Gas Storage Report*

*Form EIA-191L Monthly Liquefied Natural Gas Storage Report*

*Form EIA-757 Natural Gas Processing Plant Survey*

*Form EIA-857 Monthly Report of Natural Gas Purchases and Deliveries to Consumers*

*Form EIA-910 Monthly Natural Gas Marketer Survey*

*Form EIA-912 Weekly Underground Natural Gas Storage Report*

**OMB No. 1905-0175**

---

---

January 2020



*Independent Statistics & Analysis*  
www.eia.gov

U.S. Department of Energy  
Washington, DC 20585

# Table of Contents

---

Part A: Justification.....	i
Introduction.....	1
A.1. Legal Justification.....	1
A.2. Needs and Uses of Data.....	2
A.3. Use of Technology.....	2
A.4. Efforts to Identify Duplication.....	2
A.5. Provisions for Reducing Burden on Small Businesses.....	2
A.6. Consequences of Less-Frequent Reporting.....	2
A.7. Compliance with 5 CFR 1320.5.....	3
A.8. Summary of Consultations Outside of the Agency.....	3
A.9. Payments or Gifts to Respondents.....	4
A.10. Provisions for Protection of Information.....	4
A.11. Justification for Sensitive Questions.....	4
A.12. Estimate of Respondent Burden Hours and Cost.....	4
A.13. Annual Cost to the Federal Government.....	5
A.14. Changes in Burden.....	6
A.15. Reasons for Changes in Burden.....	7
A.16. Collection, Tabulation, and Publication Plans.....	7
A.17. OMB Number and Expiration Date.....	7
A.18. Certification Statement.....	7

## Introduction

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy (DOE). It collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding regarding energy and its interaction with the economy and the environment.

The Natural Gas Data Collection Program includes the following surveys:

*EIA-176 Annual Report of Natural and Supplemental Gas Supply and Disposition;*

*EIA-191 Monthly Underground Natural Gas Storage Report;*

*EIA-191L Monthly Liquefied Natural Gas Storage Report;*

*EIA-757 Natural Gas Processing Plant Survey;*

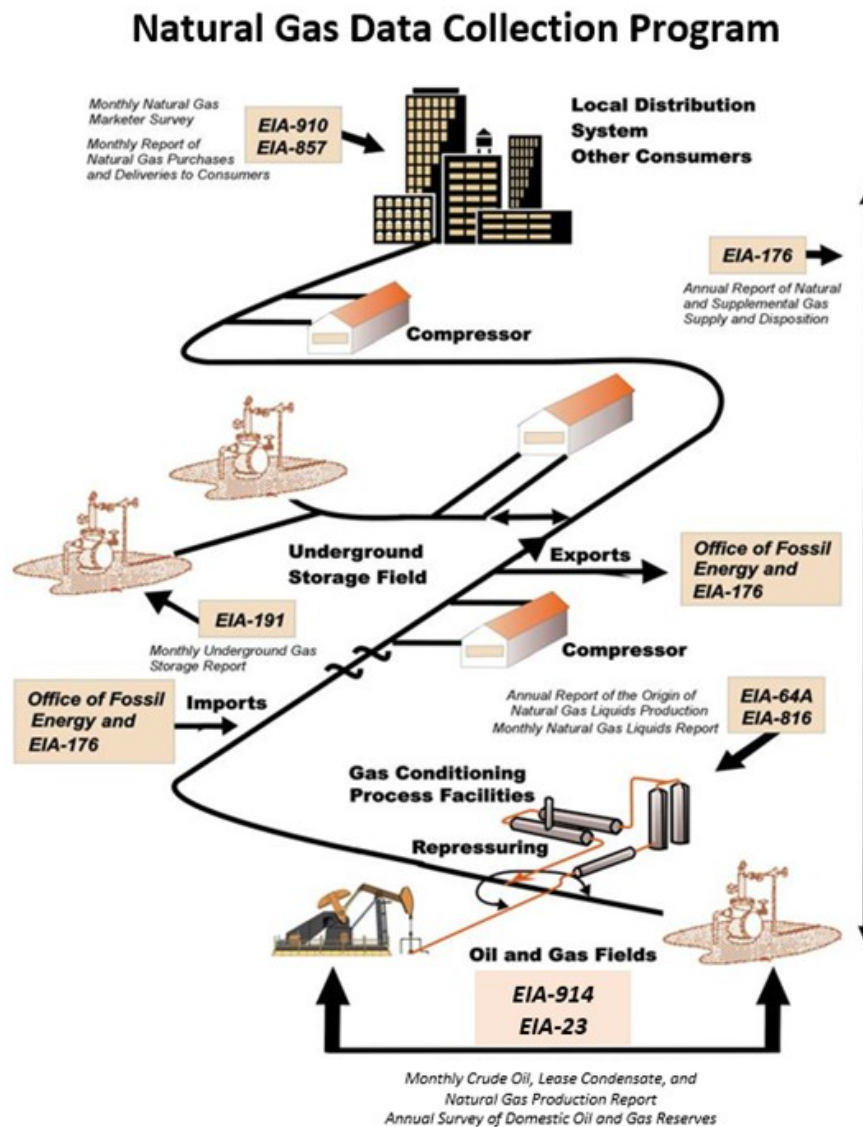
*EIA-857 Monthly Report of Natural Gas Purchases and Deliveries to Consumers;*

*EIA-910 Monthly Natural Gas Marketer Survey;* and

*EIA-912 Weekly Underground Natural Gas Storage Report.*

EIA requests a three-year extension of collection authority for each of the surveys referenced in the Natural Gas Data Collection Program with the addition of Form EIA-191L and changes to Forms EIA-176 and EIA-912. The addition of the EIA-191L and changes to Form EIA-912 are to more frequently capture natural gas storage stocks at liquefied natural gas (LNG) facilities, which are currently captured only annually. Form EIA-176 will be modified to include source and disposition of renewable natural gas.

Figure 1- Background of the Natural Gas Data Collection Package



Source: U.S. Energy Information Administration

The data collected under the Natural Gas Data Collection Program is used to estimate the amount of natural gas stored and consumed in the United States. EIA evaluates the lifecycle of natural gas from its reserves and production to consumption and prices throughout the upstream and downstream markets. The data collected by the Natural Gas Data Collection Program Package surveys are among those that are required to address the status and future role of natural gas in the energy mix and overall economy. Among the data series resulting from the information collected in these surveys is the rate, location and source of natural gas produced and entering the market, the quantities being stored and the location of the storage, and the quantities being delivered to various consuming sectors. Form EIA-176 *Annual Report of Natural and Supplemental Gas Supply and Disposition* is an annual survey that collects data on

the origin of natural gas supplies and the disposition of natural gas. Monthly natural gas surveys (Forms EIA-191, EIA-857, and EIA-910) collect data on underground storage, purchases and deliveries of natural gas to consumers, and sales from marketers. Form EIA-912 *Weekly Underground Natural Gas Storage Report* is a weekly survey that collects information on natural gas inventories held in underground storage facilities in the Lower 48 states. Form EIA-757 *Natural Gas Processing Plant Survey* is a triennial survey of natural gas processing plants. This survey collects information on midstream natural gas processing infrastructure such as capacity, status, and operations of natural gas processing plants. *Schedule B* of Form EIA-757 may be activated during an energy emergency to provide real-time data in the event of a supply disruption due, for example, to a natural disaster. Aggregated data are publicly released in the following publications:

## CHANGES TO NATURAL GAS DATA COLLECTION

The Natural Gas Data Collection Program contains the following changes:

### **Form EIA-176 Annual Report of Natural and Supplemental Gas Supply and Disposition**

EIA is modifying the survey instructions to include Renewable Natural Gas (RNG) producers who inject high-Btu RNG into an interstate pipeline, intra-state pipeline, or natural gas distribution company. This excludes on-site and local pipelines that deliver to a nearby CNG fueling station or power plant. EIA is adding this type of RNG producers because these facilities produce the equivalent of pipeline-quality natural gas that is not captured elsewhere in EIA's production statistics.

EIA is also adding the definition of RNG to the form's instructions. RNG is, a gaseous substance consisting mostly of methane, and chemically similar to conventional natural gas. RNG can be produced by purifying biogas produced at landfills, wastewater treatment facilities, and digesters.

### **Form EIA-191 Monthly Underground Natural Gas Storage Report**

Form EIA-191 collects data on the operations of all active underground storage facilities. The name of the survey is changing from *Monthly Underground Gas Storage Report* to *Monthly Underground Natural Gas Storage Report*.

### **Form EIA-191L Monthly Liquefied Natural Gas Storage Report**

EIA is adding a new survey, Form EIA-191L *Monthly Liquefied Natural Gas Storage Report* to collect natural gas inventory storage data from approximately 85 operators of Liquefied Natural Gas (LNG) facilities. These facilities include LNG peakshavers and satellite LNG facilities. EIA is specifically excluding marine terminals (due to their high variability in stock levels), on-site power plant LNG storage, and LNG vehicle fuel tanks. This is a change from the proposed changes in the 60 Day FRN based on comments received and a cognitive study conducted in spring of 2020. Form EIA-191L is a shorter version of Form EIA-191 and will collect the same natural gas data as Form EIA-191 except it will not collect information on base gas, working gas, field type, and facility type.

EIA is also adding definitions for peakshaving and satellite LNG facilities in the instructions to Form EIA-191L. *Peakshaving facilities* are an LNG storage facility which re-gasifies natural gas during periods of peak demand, such as during the wintertime. *Satellite LNG facilities* are LNG storage facilities that allow natural gas utilities that are not connected to the pipeline grid to supply natural gas to customers. The LNG is typically delivered by truck or train.

#### **Form EIA-757 Natural Gas Processing Plant Survey**

There are no changes to Form EIA-757.

#### **Form EIA-857 Monthly Report of Natural Gas Purchases and Deliveries to Consumers**

There are no changes to Form EIA-857.

#### **Form EIA-910 Monthly Natural Gas Marketer**

Form EIA-910 collects information on natural gas sales from marketers in selected states that have active consumer choice programs. EIA is adding 60 additional respondents to this survey due to the increased number of natural gas market participants.

#### **Form EIA-912 Weekly Underground Natural Gas Storage Report**

Form EIA-912 collects information on weekly inventories of natural gas in underground storage facilities. EIA is increasing the requested burden by 5 additional respondents to accommodate future changes in required reporting sample sizes.

## **A.1. Legal Justification**

The authority for these data collections is provided by the following provisions:

- a. 15 U.S.C. §772(b) states:
  - i. "All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the Administrator such information and periodic reports, records, documents, and other data, relating to the purposes of this Act, including full identification of all data and projections as to source, time and methodology of development; as the Administrator may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under this chapter."
- b. 15 U.S.C. §764(b) states that to the extent authorized by subsection (a), the Administrator shall:
  - i. advise the President and the Congress with respect to the establishment of a comprehensive national energy policy in relation to the energy matters for which the Administration has responsibility, and, in coordination with the Secretary of State, the integration of domestic and foreign policies relating to energy resource management;



- ii. assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public;
- iii. develop effective arrangements for the participation of State and local governments in the resolution of energy problems;
- iv. develop plans and programs for dealing with energy production shortages; ...
- v. promote stability in energy prices to the consumer, promote free and open competition in all aspects of the energy field, prevent unreasonable profits within the various segments of the energy industry, and promote free enterprise;
- vi. assure that energy programs are designed and implemented in a fair and efficient manner so as to minimize hardship and inequity while assuring that the priority needs of the Nation are met;
- vii. develop and oversee the implementation of equitable voluntary and mandatory energy conservation programs and promote efficiencies in the use of energy resources;
- viii. develop and recommend policies on the import and export of energy resources;
- ix. collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data;
- x. work with business, labor, consumer and other interests and obtain their cooperation;
- xi. in administering any pricing authority, provide by rule, for equitable allocation of all component costs of producing propane gas. Such rules may require that (a) only those costs directly related to the production of propane may be allocated by any producer to such gas for purposes of establishing any price for propane, and (b) prices for propane shall be based on the prices for propane in effect on May 15, 1973. The Administrator shall not allow costs attributable to changes in ownership and movement of propane gas where, in the opinion of the Administrator, changes in ownership and movement occur primarily for the purpose of establishing a higher price;
- xii. perform such other functions as may be prescribed by law."
- c. As the authority for invoking subsection (b), above, 15 U.S.C. §764(a) states:
  - i. "Subject to the provisions and procedures set forth in this Act, the [Secretary] shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the Nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions-
    - 1. specifically transferred to or vested in him by or pursuant to this chapter;
    - 2. delegated to him by the President pursuant to specific authority vested in the President by law; and
    - 3. otherwise specifically vested in the Administrator by the Congress."
- d. Additional authority for this information collection is provided by 15 U.S.C. §790(a) which states:
  - i. "It shall be the duty of the Director to establish a National Energy Information System... [which] shall contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption within and affecting the United

States on the basis of such geographic areas and economic sectors as may be appropriate... to meet adequately the needs of..."

1. the Department of Energy in carrying out its lawful functions;
  2. the Congress;
  3. other officers and employees of the United States in whom have been vested, or to whom have been delegated energy-related policy decision-making responsibilities;
  4. the States to the extent required by the Natural Gas Act [15 U.S.C. §717 et seq.] and the Federal Power Act [16 U.S.C. §791a et seq.].
- ii. "At a minimum, the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities, and shall include... such energy information as is required to define and permit analysis of;
1. the institutional structure of the energy supply system including patterns of ownership and control of mineral fuel and non-mineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;
  2. the consumption of mineral fuels, non-mineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this chapter;
  3. the sensitivity of energy resource reserves, exploration, development, production, transportation, and consumption to economic factors, environmental constraints, technological improvements, and suitability of alternate energy sources;
  4. the comparability of energy information and statistics that are supplied by different sources;
  5. industrial, labor, and regional impacts of changes in patterns of energy supply and consumption;
  6. international aspects, economic and otherwise, of the evolving energy situation; and
  7. long-term relationships between energy supply and consumption in the United States and world communities."

## A.2. Needs and Uses of Data

The purpose of the Natural Gas Data Collection Program Package is to collect basic and detailed data on natural gas production, distribution, and consumption to meet EIA's mandates and energy data users' needs. Adequate evaluation of the natural gas industry requires collection and processing of data related to natural gas production, processing, transmission, distribution, storage, marketing, and consumption.

1. The data EIA collects are used to address significant energy industry transparency concerns. In line with its mandated responsibility to collect data that adequately describe the natural gas marketplace, EIA evaluates the lifecycle of natural gas from its reserves and production to consumption and prices throughout the upstream and downstream market. Data collected by the Natural Gas Data Collection Program Package surveys are among those that are required to

address the status and future of the role of natural gas in the energy mix and overall economy. Among the data series resulting from the information collected in these surveys are the quantities stored and the location of the storage, locations and capabilities of natural gas processing, and quantities delivered to various consuming sectors by state. Prices are also reported at the end distribution stream by location and sector.

2. EIA must collect data at the state level. Congressional and state Agency users have historically emphasized their need for such data. EIA's collection of these data are consistent with its mandated responsibilities to collect specific product information for appropriate geographic areas and economic sectors, to act as a central clearinghouse, and to disseminate relevant information to the states. At the same time, EIA is committed to operate its data collections in a manner that will minimize the industry's reporting burden to the extent possible.
3. Timely data are essential to policy makers and industry planners who make decisions affecting all aspects of the natural gas industry. Consultants, investors, and financial actors rely on EIA data for accurate, current information on the energy sector, promoting sound decision-making, and efficient markets.
4. Alternative data sources do not adequately satisfy the needs of the EIA and its user communities. Accurate, meaningful, and independent price, supply and demand statistics are essential to describe and measure phenomena in the marketplace. It is necessary this information be collected by an unbiased, independent source, if the data are to be credible.
5. The data collected by EIA on these forms are unique. While similar data may be available from private and/or industry sources, as well as from other Federal agencies, such data are not reasonable alternatives for the comprehensive data provided by the Natural Gas Data Collection Program Package survey forms.

Data and estimates based on survey forms in the Natural Gas Data Collection Program Package are published in:

- [Annual Energy Outlook](#)
- [Natural Gas Annual](#)
- [Natural Gas Monthly](#)
- [Natural Gas Weekly Update](#),
- [Weekly Underground Natural Gas Storage Report](#),
- [Monthly Energy Review](#),
- [Short-Term Energy Outlook](#),
- [State Energy Portal](#),

Several new products have reported based on the Natural Gas Data Collection Program Package, including the [New England Dashboard](#), the [Southern California Daily Energy Report](#), and the [Natural Gas Storage Dashboard](#).

6. The following table identifies recurring EIA publications, which use data from each of the surveys in the Natural Gas Downstream Team (NGDT). The data are critical to the *Annual Energy Outlook*, the *Monthly Energy Review*, and the *Short-term Energy Outlook*. Critical means that the publication could not occur without this information or the publication can continue to be released in the short-term with the survey data missing, imputed, or modeled, but would be of reduced value to data customers.

<b>Survey No.</b>	Other recurring EIA Publications
<p><b>EIA-191</b></p> <p><i>Monthly Underground Natural Gas Storage Report</i></p>	<p><a href="#">Natural Gas Monthly</a>, <a href="#">Natural Gas Annual</a>,  <a href="#">Natural Gas Annual Respondent Query System</a>,  <a href="#">U.S. Energy Mapping System</a>, <a href="#">State Energy Portal</a>,  <a href="#">Short-Term Energy Outlook</a>, <a href="#">Annual Energy Outlook</a>,  <a href="#">Natural Gas Storage Dashboard</a>,  <a href="#">Southern California Daily Energy Report</a></p>
<p><b>EIA-912</b></p> <p><i>Weekly Underground Natural Gas Storage Report</i></p>	<p><a href="#">Weekly Natural Gas Storage Report</a>, <a href="#">Natural Gas Weekly Update</a>,  <a href="#">Natural Gas Storage Dashboard</a>,  <a href="#">Southern California Daily Energy Report</a></p>
<p><b>EIA-857</b></p> <p><i>Monthly Report of Natural Gas Purchases and Deliveries to Consumers</i></p>	<p><a href="#">Natural Gas Monthly</a>, <a href="#">Natural Gas Annual</a>,  <a href="#">Short-Term Energy Outlook</a>, <a href="#">Annual Energy Outlook</a></p>
<p><b>EIA-910</b></p> <p><i>Monthly Natural Gas Marketers Survey</i></p>	<p><a href="#">Natural Gas Monthly</a>, <a href="#">Natural Gas Annual</a></p>
<p><b>EIA-176</b></p> <p><i>Annual Report of Natural and Supplemental Gas Supply and Disposition</i></p>	<p><a href="#">Natural Gas Monthly</a>, <a href="#">Natural Gas Annual</a>,  <a href="#">Natural Gas Annual Respondent Query System</a>,  <a href="#">State Energy Portal</a>, <a href="#">Annual Energy Outlook</a></p>

EIA's natural gas data are published in papers, trade journals, and technical reports as well as cited and republished in reports by consulting firms, financial institutions, and numerous other entities. A number of state agencies republish EIA data in reports to the public. Major media publications use or republish EIA reports and data include but are not limited to: The New York Times, The Wall Street Journal, The Washington Post, NPR, The Economist, Financial Times, ABC News, CNBC, Fox Business, The Guardian, CNN Money, Forbes, USA Today, Bloomberg, Reuters, Associated Press, Platts, Marketwatch, The

Washington Examiner, New York Daily News, UPI, as well as energy trade press publications and hundreds of smaller-scale and local publications.

### **A.2.1 Form EIA-176 Annual Report of Natural and Supplemental Gas Supply and Disposition**

Natural gas supply and disposition data collection was initiated in 1910 and was conducted as a voluntary annual natural gas supply and disposition survey by the Department of Interior, Bureau of Mines (BOM) until 1977. With the establishment of the Department of Energy (DOE) in 1977, responsibility for the survey was transferred to EIA within DOE. The voluntary survey was continued through 1979 by EIA using the BOM Forms 6-1340-A, “*Supply and Disposition of Natural Gas*,” for non-producing distribution companies and 6-1341-A, *Supply and Disposition of Natural Gas*, for all other respondents. EIA received approval to continue the survey using a slightly modified mandatory survey Form EIA-176 *Supply and Disposition of Natural Gas*, for report years 1980 and 1981. Approvals of the use of a substantially-revised form were granted for report years 1982 through 1986, and for the use of the form with minor revisions for report years 1987 through 2001. In 2002, EIA requested and received approval to revise Form EIA-176 to collect data on natural gas deliveries to nonutility generators of electricity. In 2008, EIA requested and received approval to collect revenue data gathered from the deliveries of gas delivered on behalf of third-parties. In 2012, EIA requested and received approval for the collection of information on service territory changes and participation in customer choice programs. In 2015, EIA requested and received approval for collection of: information on the price of compressed natural gas sold to the public as vehicle fuel; costs associated with natural gas purchased and received at the city gate (which was discontinued in the 2018 clearance cycle); and liquefied natural gas storage capacity.

Form EIA-176 enables EIA to develop gas supply and disposition balances and relevant cost, price, and related information at the state level by combing and merging data collected on Form EIA-176 with other natural gas data gathered via other EIA surveys. The data collected are necessary to continue a long-term consistent, but evolving, data series of basic summary information on natural gas. These data are essential to provide analysts with the tools necessary to make informed assessments of the variations in natural gas supply, demand, and prices over time and geography.

The information collected on Form EIA-176 is needed and used by EIA for the following purposes:

1. To develop and make available to the Congress, the states, and the public an accurate quantified assessment of the disposition of natural gas, and the manner in which it was stored, shipped, and consumed or otherwise disposed of
2. To determine the quantity of natural and supplemental gas consumed within each of the various states by market sector, the average prices for such gas, and the changes in consumption and price patterns over time from the first purchase through the final price paid by consumers
3. To produce the [Natural Gas Annual](#) (NGA)
4. To provide natural gas data for the [State Energy Portal](#)

5. To provide natural gas input data to energy supply, demand, and price forecasting models especially EIA's National Energy Modeling System and Short-Term Integrated Forecasting System
6. To supply the Federal Energy Regulatory Commission (FERC) with background and baseline information on the total natural gas market by state and groups of states,
7. To provide natural gas input data to the following EIA publications: *Annual Energy Outlook*, *Short-Term Energy Outlook*, and *Monthly Energy Review*, which are distributed to all members of Congress
8. To respond to Congressional and internal departmental requests for analysis of policy and regulatory issues
9. To provide a frame for selecting respondents of Form EIA-857, *Monthly Report of Natural Gas Purchases and Deliveries to Consumers*, survey
10. To provide a portal of company-level utility information collected on Form EIA-176 for external analytic purposes at <http://www.eia.gov/cfapps/ngqs/ngqs.cfm>

### **A.2.2. Form EIA-191 Monthly Underground Natural Gas Storage Report and Form EIA-191L, Monthly Liquefied Natural Gas Storage Report**

Forms EIA-191 and EIA-191L collect monthly data on the location, ownership, capacity, and operations of all active natural gas storage facilities in the United States. Natural gas storage facilities are necessary because of fluctuating seasonal, daily, and even hourly market requirements. Natural gas is usually injected into storage when market requirements are below available gas flows in transmission lines, and then is withdrawn from storage when supplies from producing fields and/or the capacities of transmission systems are inadequate to meet peak requirements.

The information collected on Form EIA-191 and EIA-191L is used by EIA for the following purposes:

- To provide state-level data on natural gas storage with respect to injections, withdrawal capabilities, inventories, type of storage facility, location of facilities, and capacity for EIA's *Natural Gas Monthly*. State-level storage data are comparable with state-level production and consumption data published in the *Natural Gas Monthly*. This monthly data collection also provides reliable baseline data on storage operations necessary for analyses, modeling, and comparison with normal industry operations in case of severe weather, natural disaster, or other extreme circumstances
- To serve as the universe from which the sample for the weekly survey Form EIA-912 is drawn
- To provide data on natural gas storage injections, withdrawals, and inventories for EIA's *Natural Gas Weekly Update*, and *Monthly Energy Review*, as well several of our new dashboard products: [New England Dashboard](#), the [Southern California Daily Energy Report](#), and the [Natural Gas Storage Dashboard](#).
- To provide data on natural gas storage inventories for the forecasts contained in the EIA *Short-Term Energy Outlook*
- To provide data on all aspects of natural gas storage to enable EIA, FERC, and other elements of the DOE to identify and assess the supplies of gas in storage by geographic location on a timely basis

- To provide data for system deliverability studies undertaken by EIA as a part of its analysis tasks. Capacity information is collected at the reservoir level to allow comparisons of the utilization of the individual reservoirs. Storage data are a critical link in understanding the peak day deliverability of the natural gas system and overall system operations
- To produce the Natural Gas Annual (NGA)
- To provide a portal of storage field-level capacity and deliverability information collected on Form EIA-191 for external analytic purposes at <http://www.eia.gov/cfapps/ngqs/ngqs.cfm>
- To provide baseline data for Form EIA-912 data, allowing EIA to check the reliability of the *Weekly Natural Gas Storage Report (WNGSR)*, and do to analysis on the data therein, such is in the Triennial WNGSR Review, which is submitted to the Office of Management and Budget.

### A.2.3. Form EIA-757 Natural Gas Processing Plant Survey

The purpose of Form EIA-757 is to collect data on the operational status and capacity of natural gas processing plants to understand their production levels and characteristics, as well as to monitor constraints resulting from natural gas supply emergencies. The information is used to develop periodic reports presenting aggregate information on processing plant capacity and operations. In an emergency situation that disrupts natural gas supplies, the information collected from Schedule B of this form is used to assess the severity of the disruption to market conditions. The location of natural gas processing plants in the supply chain, between production and consumption, allows quick collection of relatively low-cost information about the impact of a natural gas supply disruption. This information is crucial during a natural gas supply disruption for informed decision and policymaking. The information collected through this survey is used widely by Federal and state agencies, Congress, industry analysts and the general public to understand the operational capabilities and characteristics of natural gas processing plants. In the event of a natural gas supply emergency, it is used to understand the plant constraints and expected recovery from an emergency.

Using information reported on Form EIA-757, EIA can publish periodic reports on the operational characteristics, status, and constraints of natural gas processing plants, providing aggregate statistics. EIA will report aggregate information from *Schedule A* each time *Schedule A* is fielded, at most every three years. Data collected on Part 5 of Form EIA-757 *Schedule A* are publicly available on EIA's Query System. EIA will determine the frequency of reporting aggregate information from *Schedule B* at the time the schedule is activated. Aggregate statistics, based on Form EIA-757, would be published every three years or less frequently depending on resources. In the case of a natural gas supply disruption, aggregate statistics may be published either daily or weekly, in emergency status reports prepared by EIA and DOE, and used in the production of several other EIA information products.

EIA-757 is used:

1. To develop and make available to the Congress, the states, other Government agencies and the public a timely and accurate quantified assessment of current natural gas processing plant operations, outages, operational capacity, and constraints
2. As an input to other EIA and DOE information products, such as DOE Situation Reports
3. To provide an input to supply, demand, and price forecasting models, such as the Short-Term Integrated Forecasting System
4. To respond to Congressional, internal Departmental and inter-Agency requests for analysis of natural gas supply constraints and operating levels in the United States, as well as policy and regulatory issues

#### **A.2.4. Form EIA-857 Monthly Report of Natural Gas Purchases and Deliveries to Consumers**

Form EIA-857 was designed to collect monthly natural gas data at the state level consisting of average natural gas purchase prices, consumption of natural gas by sector, and average price by sector from a sample of the respondents reporting on Form EIA-176. These data are necessary to provide timely information needed to measure the combined impact of government, industry, and consumer actions; geographic location; fuel competition; climatic or seasonal conditions; and a host of other factors upon the natural gas industry and natural gas consumers.

The purchased gas data collected on Form EIA-857 are needed to develop average delivered, or city gate, prices to provide analysts and decision-makers with information on the levels and rates of change in “wholesale” prices to distribution systems and the differences in such prices across the nation. This information provides direct measures of the combined effect of producer prices, transportation costs, and pipeline-provided services upon distributors’ purchased gas costs and the variations geographically, seasonally, and under changing market conditions. The information collected also enables analysts to monitor the effects of Public Utility Commission actions at the state level.

Consumer price information collected enables EIA to provide information on the prices by consumer class on a monthly basis. Consumer prices provide analysts and decision-makers, with direct measures of average consumer prices and price changes, geographically, seasonally, among consumer classes, and under changing market conditions.

Collection of revenue data associated with gas distributed to end users for the account of others is used by EIA to analyze changes in distribution tariffs and for projections of future natural gas prices in EIA’s *Short-Term Energy Outlook* and *Annual Energy Outlook*. EIA calculates the average cost of distribution services charged by local natural gas utilities to end-use consumers. EIA exempts pipeline companies in Form EIA-857 survey sample from reporting transportation revenues that are outside the scope of the reporting requirement.

EIA currently collects information about the number of customers for each of the end-use sectors for gas sold and transported to residential, commercial, industrial, electric power, and other customers. Having this data enables EIA to better monitor fluctuations in monthly volume reporting which are commonly the result of changes to the number of customers being served.



Current data on consumption by the major consumer classes by state are necessary to enable EIA to provide timely information on any changes in the levels of consumption at the state level by sector, analyze the patterns of change over time and the underlying drivers, and develop projections of future usage patterns for inclusion in the *Short-Term Energy Outlook* and *Annual Energy Outlook*.

State-level data are necessary to enable EIA to provide information on the frequently substantial differences in prices and consumption patterns among the various states. State-level data allow analysts to view and assess regional disparities in prices and consumption with respect to local climate, regulatory structure, and proximity to supply, transmission capabilities, and demand requirements. Information on consumption profiles is necessary to enable analysts and decision-makers to assess ultimate impacts of various legislative or industry actions upon particular areas or regions.

The information collected on Form EIA-857 is used to estimate:

1. Monthly average price by state of natural gas delivered by local distribution companies
2. Monthly average price of natural gas billed to residential, commercial, and industrial consumers in each of the various states
3. Total quantity of natural gas for which residential, commercial, industrial, electric power, and vehicle fuel consumers used each month in each of the various states.

State and national level aggregate data are published in EIA's *Natural Gas Monthly*, *Monthly Energy Review*, and *Winter Fuels Report*, and are made available to the Executive Branch, Congress, state governments, industry, and the public.

If the collection of information on Form EIA-857 is not conducted, EIA would be unable to provide current information on natural gas market sectors. This information facilitates legislation and regulation in the detail and time frame necessary for policy makers to make informed decisions. Seasonality of the market is an important driver of the price and supply. Monthly data are the minimum level of reporting that will allow for assessment of the impacts of weather and other seasonal factors on the consumption and price patterns.

### **A.2.5. Form EIA-910 Monthly Natural Gas Marketers Survey**

To ensure the coverage of all natural gas sales to residential and commercial consumers in its natural gas price data, EIA is requesting continued use of Form EIA-910, *Monthly Natural Gas Marketers Survey*. This survey was first approved for use in May 2001, under ICR 1905-0202. Form EIA-910 collects state-level monthly data on sales to residential and commercial customers by companies that market natural gas but are not involved in the physical final deliveries of gas to customers. Form EIA-857, *Monthly Report of Natural Gas Purchases and Deliveries to Consumers*, collects information on direct sales and gas transported for others from companies making deliveries of natural gas. Combining information from Forms EIA-910 and EIA-857 helps ensure complete price coverage of natural gas deliveries in the states surveyed, as marketers account for a significant share of natural gas sales to end-users in certain states.

In 2012, the OMB granted permission for EIA to continue data collection activities of natural gas marketers in Georgia, Ohio and New York, with the option to collect in an additional six states based on market coverage and EIA resources to expand the survey.

EIA incorporates Form EIA-910 data collected from marketers who sell natural gas to residential and commercial customers into EIA's monthly and annual natural gas databases to improve the accuracy of EIA's price estimates. Data from Form EIA-910 supplements information already tabulated and published in other EIA publications. The data are used in EIA's modeling and analytical efforts, and to answer questions from federal policymakers, Congress, and the general public. These data are needed for policy making; for assessing supply, demand and price developments within the industry, and for assessing the competitiveness of the industry.

### **A.2.6. Form EIA-912 Weekly Underground Natural Gas Storage Report**

Form EIA-912, *Weekly Underground Natural Gas Storage Report* (WNGSR), provides a data series for natural gas in underground storage similarly to the formerly published by the American Gas Association (AGA). The AGA began data collection in 1994 and discontinued its data collection on May 1, 2002. EIA initiated data collection on March 15, 2002 under an emergency clearance (ICR 1905-0202). The emergency clearance allowed EIA to survey a sample of underground storage operators on a weekly basis to continue the data series.

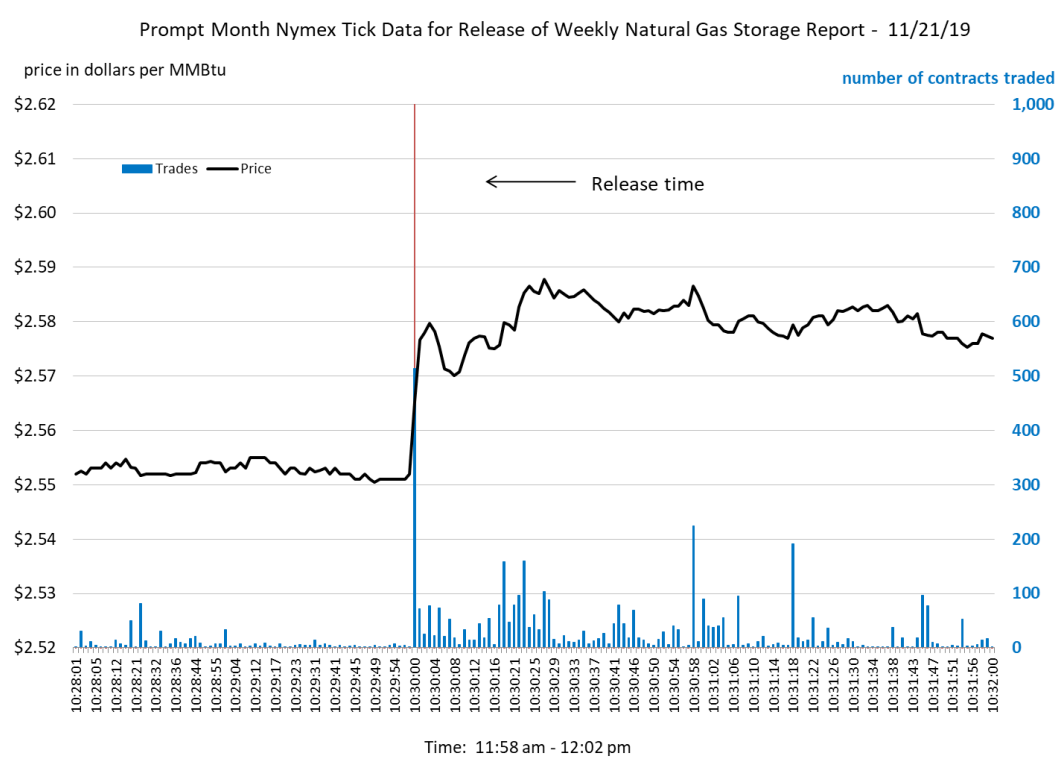
The Office of Enforcement and Office of Analytics and Surveillance at the Federal Energy Regulatory Commission, (FERC) uses the weekly underground natural gas storage report to assess the tightness of supply of natural gas and to understand U.S. gas market fundamentals. FERC references this weekly report in their winter and summer seasonal assessments and state of the market reports available at <https://www.ferc.gov/market-oversight/reports-analyses/reports-analyses.asp>. FERC staff use the WNGSR to track volumes of natural gas in storage, weekly injections and withdrawals, and their impact on spot and futures gas prices. They also use the EIA-912 data as price screens to understand changes in gas spot prices in response to the release of the weekly storage report each Thursday. FERC sets a threshold for spot price changes, both in domestic and foreign trading markets, due to the weekly storage report. When the spot price change exceeds the threshold, FERC analyzes other causation factors that explain the spot price movements.

The WNGSR is EIA's only report designated as a Principal Federal Economic Indicator (PFEI). The WNGSR was designated as a PFEI in January 2008, because it is a key source of weekly natural gas volumetric data, a market signal of readily available natural gas supply. Natural gas is a key part of energy markets and a key influence on the prices set on spot and futures contract markets is the amount of natural gas in underground storage. For this reason, the U.S. natural gas market relies heavily on the WNGSR, typically released on Thursday at 10:30 a.m. EST.

Figures 1 and 2 illustrate the significant impact on the natural gas market of EIA's WNGSR at one point in time and over time. Figure 1 shows the data trend for September 21, 2017, on the New York Mercantile Exchange (NYMEX). After the EIA data were released at 10:30 a.m., there was a significant decline in the near-month futures prices. Figure 2 illustrates the impact on the NYMEX from December 19, 2005,

through February 1, 2006, immediately following the release each Thursday morning of EIA’s natural gas storage numbers.

**Figure 2: Natural Gas Markets Respond to WNGSR Releases**



Source: U.S. Energy Information Administration based on data from Bloomberg

Each week, EIA collects data on the amount of working natural gas in underground storage facilities as of 9 a.m. Central Standard Time Friday. EIA compiles and processes these data for release on its website the following Thursday at 10:30 a.m. Eastern Standard Time (EST). The total volume of natural gas in underground storage reservoirs is classified as either base gas or working gas. Underground storage facilities may be reservoirs in depleted oil and gas fields, aquifers, or salt caverns.

Summary totals of working gas stocks are presented for the United States. They are broken into five regions: the East, Midwest, Mountain, South Central, and Pacific regions. This represents an expansion of the original survey, which only covered three regions: the East, West, and Producing regions. In the 2014 OMB Clearance Package, EIA requested and obtained approval for the collection of two additional regions, giving the published data more granularity and utility for data users.

Respondents are also instructed to submit revisions to data for previous weeks if those revisions were greater than 500 million cubic feet and to include notes explaining any unusual activity. Examples of unusual activity include inventory adjustments, such as reclassification of working and base gas, or changes in ownership, or operation of storage fields. In practice, respondents do not often have need to

provide notes on unusual activity. In Form EIA-912, inventory adjustments will be reported in Part 4, broken out by geographic region.

Form EIA-912 data are used to respond to requests from industry to provide weekly measures of natural gas underground storage operations. EIA uses the data to prepare analytical products assessing storage operations in the five geographical regions and the impact of those operations on supplies available for the winter heating season.

### **A.3. Use of Technology**

In an effort to reduce respondent burden and to provide for more timely processing of filings, automated reporting of natural gas data are accepted, provided such reports are prepared and transmitted to EIA in the same format as in the data collection form. Data are submitted predominantly using Secure File Transfer, but also by email, facsimile, and mail. Due to time constraints on the weekly survey, Form EIA-912 respondents electronically file their reports by e-mail. More than 98% of natural gas survey forms are submitted electronically.

### **A.4. Efforts to Identify Duplication**

#### **A.4.1. Form EIA-176 Annual Report of Natural and Supplemental Gas Supply and Disposition**

Certain data elements similar to those reported on Form EIA-176 are collected and compiled or estimated from other EIA surveys. Data on electric power sector consumption and price from Form EIA-923, "*Power Plant Operations Report*," is used for electric power sector consumption and price summaries to maintain consistency in published consumption information. Electric power data collected on Form EIA-176 are for internal balancing of individual reports and for cross-checking data collected on Form EIA-923. This cross-checking enables EIA to identify misreporting by electric power consumers, a benefit that outweighs the negligible burden involved. The inclusion of lines for reporting deliveries to electric power generators and volumes transported to electric power generators for the account of others allows the respondent to account for all volumes of natural gas delivered to end users. The respondent then can perform reasonableness checks on the supply/disposition balance and for unaccounted volumes. This internal check is designed to eliminate some follow-up calls and reduce reporting burden for the respondent.

Certain data collected on Form EIA-176 survey are similar to data reported by interstate natural gas pipeline companies on FERC Form 2, *Annual Report of Major Natural Gas Companies*. However, the content and format of FERC Form 2 are not directly comparable to the data collected on Form EIA-176, particularly in terms of state specific, physical custody data. State-by-state data necessary to develop individual state gas balances, comparable with data collected from respondents other than interstate pipeline companies on Form EIA-176, cannot be extracted from the FERC Form 2 report. Tracking

movements of natural gas across state lines and tracking of flows of natural gas from production areas to end users are two essential purposes of Form EIA-176. Transport of natural gas across state lines is performed almost entirely by interstate pipeline companies and the volumes transported state-to-state are not reported on FERC Form 2.

The U.S. Department of Transportation (DOT) has an annual survey of aboveground LNG facilities, and makes their data collected available to the public: <https://www.phmsa.dot.gov/data-and-statistics/pipeline/distribution-transmission-gathering-lng-and-liquid-annual-data>. This dataset contains a wide range of information about each of the aboveground LNG storage facilities, including location, function, liquefaction and regasification rates, and capacity. However, the dataset does not provide information on the connection between LDCs and aboveground LNG storage facilities. In other words, the dataset is not sufficient to determine which LNG storage facilities are providing service to which LDCs. This information could be important in an emergency response situation, as decision makers need to know all available pipeline connections and sources of supply that could reasonably be accessed during periods of supply disruption. Further, DOT data do not report stock levels of facilities, which make an estimate of end-of-year natural gas stocks impossible.

Each of the above mentioned systems collect data that are similar to data collected on Form EIA-176. However, with the exceptions noted, data collected cannot be reasonably substituted, in whole or in part, for data collected on Form EIA-176.

#### **A.4.2. Form EIA-191 Monthly Natural Gas Storage Report, and EIA-191L, Monthly Liquefied Natural Gas Storage Report**

Data similar to the underground storage information on Form EIA-191 and the new proposed survey EIA-191L are collected on the weekly survey Form EIA-912, *Weekly Underground Natural Gas Storage Report*. However, the weekly survey is collected from a sample of the monthly survey respondents in order to provide a more timely measure of market information. Form EIA-191 and EIA-191L are and will be collected from the census of storage operators and is used as the benchmark for adjustments to Form EIA-912 data.

#### **A.4.3. Form EIA-757 Natural Gas Processing Plant Survey**

EIA investigated alternative ways to obtain timely and precise natural gas processing plant information for use in assessing processing plant operations, damage and expected restoration during a supply emergency. The alternatives considered were using monthly data from natural gas processors, Form EIA-816, *Monthly Natural Gas Liquids Report*, and a potential new EIA survey of natural gas processing plants. Data similar to the capacity and design of gas processing plants collected on Form EIA-757 are not currently any other organization, though there is limited overlap with the current EIA-64A survey, which asks for annual processing plant throughput. To remove duplicability, as well as to eliminate the need to survey processing plants twice during activation years, EIA may combine these two survey forms in the future.

#### **A.4.4. Form EIA-857 Monthly Report of Natural Gas Purchases and Deliveries to Consumers**

Certain elements of data similar to these collected on Form EIA-857 are available to EIA from other surveys or sources, but none that could be used or modified for the purposes described above.

Monthly information on the average price of natural gas to residential consumers is available from the Bureau of Labor Statistics (BLS), but the price is only for given quantities of gas in major metropolitan areas. Volume information is not available. The data cannot be presented by state and do not represent average prices of quantities actually consumed.

Annual information is available by state on purchased gas prices, consumer prices by market sector, and consumption by market sector from Form EIA-176, *Annual Report of Natural and Supplemental Gas Supply and Disposition*. Form EIA-857 complements Form EIA-176 by providing current information reflecting monthly and seasonal variations associated with the supply and disposition of natural gas. Data collected Form EIA-176 information is used to develop the sample frame for Form EIA-857 survey and provides an annual control for testing and adjusting Form EIA-857 survey estimation procedures.

#### **A.4.5. Form EIA-910 Monthly Natural Gas Marketer Survey**

The data elements collected on Form EIA-910 are not duplicated in other surveys or sources known to EIA.

#### **A.4.6. Form EIA-912 Weekly Underground Natural Gas Storage Report**

The EIA's Weekly Underground Natural Gas Storage Report (WNGSR) is the only source of national volumetric information available on a timely basis. No alternative private sources for comparable national and regional weekly storage data are known.

Pipeline Flows of natural gas into underground storage can be observed on interstate pipelines due to regulations that require public posting of nominations on electronic bulletin boards. Third-party analysts use this data to derive estimates of total changes to natural gas storage inventories. However, due to limited coverage and the variable nature of nominations data, Form EIA-912 is a much more accurate vehicle to provide weekly estimates of natural gas storage stocks.

### **A.5. Provisions for Reducing Burden on Small Businesses**

Data requested provide the minimum information necessary to fulfill EIA's responsibility to provide meaningful, timely, objective, and accurate energy data. Respondents to the survey complete only those data elements applicable to their operations. For small firms, fewer data elements are generally applicable and are easily obtained from generally existing records. EIA staff members are also available during normal business hours to provide assistance by telephone.

EIA encourages electronic reporting on all natural gas surveys.

Companies responding to Form EIA-191 and Form EIA-912 are typically not small businesses. Form EIA-912 uses a sample in order to minimize reporting burden on small facilities, which are more likely to be operated by a small business.

Form EIA-176 is required of all companies with natural gas deliveries to end-use customers regardless of size. However, the majority of the small-sized respondents only have to fill out a small percentage of the data elements on the form as the majority of the questions asked are not applicable to small-sized respondents. Therefore, the burden to small businesses on Form EIA-176 is the minimum necessary to gather the information required.

Form EIA-910 survey burden is the minimum amount of time necessary to gather the information required. Similarly, the natural gas processing plant operators that complete Form EIA-757 are not small businesses or other small entities.

Respondents to the survey complete only those data elements applicable to their operations. Sampling practices are utilized for the weekly surveys in order to minimize burden on respondents while still ensuring that quality summary-level data can be estimated for publication. The use of the Internet by respondents reduces reporting burden by eliminating paperwork and reducing the need for follow-up calls and resubmissions of the forms. Also, EIA staff members are available during normal business hours to provide assistance by telephone.

## A.6. Consequences of Less-Frequent Reporting

Data are required at the requested frequency in order to satisfy EIA's programmatic needs as described in A2 above. The requested frequency of reporting is: Form EIA-176, and Form EIA-757 Schedule A annually; and Forms EIA-191, EIA-857, and EIA-910 monthly. Form EIA-912 is filed weekly. Form EIA-912 provides timely data on underground storage and is routinely relied upon by financial traders to assess current supply conditions in natural gas markets. It is a leading economic indicator and its timed release every work affects daily futures trading for New York Mercantile Exchange Henry Hub Natural Gas Near-Month Futures Contract prices. Form EIA-757 baseline survey, Schedule A, is filed no more than once every three years, but once combined with form EIA-64A, will be filed annually as part of the EIA-64A data collection, which will allow data users to see the annual changes to processing capacity. Without these data, natural gas market participants, including local distribution companies, producers, traders, importers, gas purchasers, Federal and state agencies providing income assistance for energy, and the gas trading community, would not have accurate, comprehensive, and timely information about natural gas supply and demand. The importance of timely information and the fact that there are no other sources are the basis for the requested report frequency.

If Form EIA-757 collection is not conducted, EIA could not provide essential natural gas processing plant information prior to and during a supply emergency. Less frequent reporting would prohibit EIA from meeting its mandate of providing timely and reliable energy information. The frequency of reporting on Schedule B will be determined at the time the survey is activated in response to a supply emergency.

## A.7. Compliance with 5 CFR 1320.5

There are not any special circumstances for these collections.

## A.8. Summary of Consultations Outside of the Agency

A request for comments from interested persons was solicited in a Federal Register notice describing the proposed extension of the forms and proposed modifications to each form. The notice was published in the Federal Register, 82 Fed. Reg. 82, 20333 (May 1, 2017). An announcement of the Federal Register notice was sent to current respondents to Forms EIA-176, EIA-857, EIA-191, EIA-912, and EIA-910. The notice and proposed versions of the survey forms were posted on EIA's website.

EIA conducted a cognitive research project during October through December 2019 involving eight participants to collect feedback on the proposed changes to Form EIA-191, *Monthly Underground Gas Storage Survey*. The participants of this cognitive research project included several LNG peakshaving facilities and marine terminals, and included several phone interviews and two in-person interviews. This research project confirmed the viability of monthly data collection of storage stocks from LNG facilities, as all facilities confirmed ability to reasonably report requested storage data, and with a burden estimate close to that of the current EIA-191.

EIA briefed the DOE Fossil Energy's webinar with federal agencies representatives dealing with oil and gas industries. Also, EIA held a webinar on May 28, 2020 with the leadership of the American Biogas Council (ABC) and a second webinar on June 18, 2020 for their member companies at different segments of the natural gas industry. In their presentation to EIA, ABC showed a slide illustrating the different sources of the renewable natural gas and how biogas system work get stored in aboveground natural gas tanks used to feed electricity generators, to fuel trucks, create heat, and to link the gas to the gas pipeline system, among other uses.

In return, EIA explained the major changes that were part of the OMB Clearance Package. ABC subsequently posted the PowerPoint presentation and a recording of the WebEx presentation on their website for reference to any interested parties who were unavailable to attend. A full recording of the webinar is at this link: <https://www.youtube.com/watch?v=ov6e7SlrUhA>. Access to the slides is in this link: <https://americanbiogascouncil.org/wp-content/uploads/2020/06/ABC-Webinar-National-Biogas-RNG-Data-Collection-by-EIA.pdf>.

These items were also made available on the special notice page for the 60-Day Federal Register Notice, and accessed at: <https://www.eia.gov/survey/notice/ngdownstreamforms2018.mp4>



## A.9. Payments or Gifts to Respondents

No payments or gifts are made to the survey respondents.

## A.10. Provisions for Protection of Information

EIA considers information collected on Forms EIA-176, EIA-757, and certain data elements collected on Form EIA-191 to be public information.

The following statement is included in the instructions to Forms EIA-176:

*“Information reported on this survey form is considered public information and may be publicly released in company or individually identifiable form.”*

The following statement is included in the instructions to Form EIA-757:

*“Information reported on Form EIA-757 is considered public information, except for Part 3 of Schedule A, and may be publicly released in company or individually identifiable form.”*

The following statement regarding protected data elements is included in the instructions of the version of Form EIA-191:

Information collected in Parts 1, 2, and 3, as well as Base Gas data, on Form EIA-191 will be considered public information, and may be publicly released in company or individually identifiable form. Information collected in Part 4 (including Working Gas and Total Gas in Storage data but excluding Base Gas), however, *will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.*

Forms EIA-910 and EIA-912 protect these data under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA). These data are considered confidential and will be used exclusively for statistical purposes. The instructions to Forms EIA-910 and EIA-912 contain the following data confidentiality notice:

*The information you provide on Form EIA-XXX will be used for statistical purposes only and is confidential by law. In accordance with the Confidential Information Protection and Statistical Efficiency Act of 2002 and other applicable Federal laws, your responses will not be disclosed in identifiable form without your consent. Per the Federal Cybersecurity Enhancement Act of 2015, Federal information systems are protected from malicious activities through cybersecurity screening of transmitted data. Every EIA employee, as well as every agent, is subject to a jail term, a fine, or both if he or she makes public ANY identifiable information you reported.*

*Disclosure limitation procedures are applied to the statistical data published from EIA-XXX survey information to ensure that the risk of disclosing identifiable information is very small EIA will protect information reported on Form EIA-857. The instructions to Form EIA-857 contain the following provision:*

The following statement regarding protected data elements is included in the instructions of the version of Form EIA-857:

*Information reported on Form EIA-857 will be protected and not disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. §552, the DOE regulations, 10 C.F.R. §1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. §1905.*

*The Federal Energy Administration Act requires EIA to provide company-specific data to other Federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of the Department of Energy (DOE); or to any Committee of Congress, the U.S. Government Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any nonstatistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.*

*Disclosure limitation procedures are not applied to the statistical data published from Form EIA-857 survey information. Thus, there may be some statistics that are based on data from fewer than three respondents, or that are dominated by data from one or two large respondents. In these cases, it may be possible for a knowledgeable person to estimate the information reported by a specific respondent.*

### **A.11. Justification for Sensitive Questions**

The forms contain no questions of a sensitive nature.

## A.12. Estimate of Respondent Burden Hours and Cost

**Table A1. Estimated Respondent Burden**

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
EIA-176	1	2,070	2,070	12.00	24,840
EIA-191	12	145	1,740	2.60	4,524
EIA-191L	12	85	1,020	2.60	2,652
EIA-757 Sch. A	0.33	600	200	0.50	100
EIA-757 Sch. B*	14	20	187	1.50	280
EIA-857	12	330	3,960	3.50	13,860
EIA-910	12	160	1,920	2.00	3,840
EIA-912	52	100	5,200	1.00	5,200
<b>TOTAL</b>		<b>3,510</b>	<b>16,297</b>		<b>55,296</b>

Notes: EIA-757 Schedule B is presumed to be activated approximately two out of every three years, with about 20 respondents each activation cycle, and twice daily reporting for one week upon activation.

\* Form EIA-757 Schedule B will be collected only in response to a significant disruption in natural gas supply. 20 respondents will be accounted for over a three-year period for Schedule B based on the most recent activation of the survey in 2012, which was in response to Hurricane Isaac. These 20 respondents completed the survey twice daily over the course of 7 days, (14\*20) yielding an annual total of 280 responses and 420 burden hours. The 420 burden hours is multiplied by (2/3) to equal 280 burden hours shown in Table A1 above for Form EIA-757 Sch. B. based on the assumption that two significant supply disruption incidences may occur every three years.

Table A1 shows the estimates of respondent burden for the individual forms contained in this package. The overall annual respondent burden is estimated to be 55,296 hours. The estimated costs to respondents for the burden hours are estimated to be \$4,431,421 (55,296 hours times \$80.14 per hour). Table 4, in the next page, shows how EIA calculates the fully burdened wage rate for 2020. The fully burdened hourly wage rate is calculated based on a weighted average of EIA management and staff full benefit salary.

EIA estimates that there are no additional costs to respondents associated with the surveys in the Natural Gas Data Collection Program Package other than the costs associated with the burden hours as set forth in Table A1 above.

**Table 4: Average Hourly Loaded Cost of an EIA Employee, Fiscal year 2020**

As of 1/21/2020	Number of Employees	Average Annual Salary	Average Benefit Percentage	Average Benefit Costs	Total Average Salary and Benefits	Average Hourly Loaded Cost
Administrative/ Professional (GS)	305	\$128,221	26.33%	\$33,761	\$161,982	\$77.88
Executive (EJ,ES,EX,SL)	22	\$183,610	26.33%	\$48,344	\$231,954	\$111,52
All EIA Employees	327	\$131,947	26.33%	\$34,742	\$166,689	<b>\$80.14</b>

### A.13. Annual Cost to the Federal Government

The annual cost estimate which includes personnel, development/maintenance, collection, processing, analysis, and publication for the six surveys in the Natural Gas Downstream package is \$2,490,000. This cost is calculated for 7 FTE federal staff and 8 FTE contractor staff. This cost includes time dedicated to tasks such as frame maintenance, data collection, dissemination, and systems maintenance. Below, Table A6 shows the breakdown of the costs per task.

**Table A6. Annual Cost to the Federal Government**

Activity	Labor hours	x Rate	= Cost
Survey frame and maintenance	5,502	\$ 80.14	\$ 440,938
Data collection and processing	18,168	\$ 80.14	\$ 1,455,958
Data dissemination	4,056	\$ 80.14	\$ 325,083
Data systems maintenance and enhancements	3,344	\$ 80.14	\$ 268,021
<b>Total Annual Cost</b>			<b>\$ 2,490,000</b>

#### **A.14. Changes in Burden**

The overall burden for the Natural Gas Data Collection Program Package is estimated to be 55,296 hours annually for all the forms included in this clearance package. The information collections in this request are currently approved under OMB control number ICR 1905-0175. This request will result in a net increase of 6,288 hours for all the forms in this clearance package.

Table A1. Estimated Respondent Burden

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents (Previously Approved)	Number of Respondents (Requested)	Annual Number of Responses (Previously Approved)	Annual Number of Responses (Requested)	Burden Hours Per Response (Previously Approved)	Burden Hours Per Response (Requested)	Annual Burden Hours (Previously Approved)	Annual Burden Hours (Requested)	Annual Number of Responses		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
EIA-176	1	2,050	2,070	2,050	2,070	12	12	24,600	24,840	20	-	20
EIA-191	12	145	145	1,740	1,740	2.6	2.6	4,524	4,524	-	-	-
EIA-191L	12	-	85	-	1,020	2.6	2.6	-	2,652	1,020	-	1,020
EIA-757 Sch. A*	0.33	600	600	200	200	0.6	0.5	120	100	0	-	0
EIA-757 Sch. B**	14	20	20	187	187	2	2	280	280	-	-	-
EIA-857	12	330	330	3,960	3,960	3.5	3.5	13,860	13,860	-	-	-
EIA-910	12	100	160	1,200	1,920	2	2	2,400	3,840	720	-	720
EIA-912	52	95	100	4,940	5,200	1	1	4,940	5,200	260	-	260
<b>TOTAL</b>		<b>3,340</b>	<b>3,510</b>	<b>14,277</b>	<b>16,297</b>			<b>50,724</b>	<b>55,296</b>	<b>2,020</b>	<b>0</b>	<b>2,020</b>

### A.15. Reasons for Changes in Burden

The increase in total burden hours are due to increases in respondents for four surveys in this ICR package. EIA-176 is adding 20 additional respondents. These respondents include Renewable Natural Gas (RNG) producers who inject high-Btu RNG into an interstate pipeline, intra-state pipeline, or natural gas distribution company system. The original intent was to add all suppliers of biogas and RNG. However, comments received for the 60 Day FRN pointed out that biogas still requires additional processing to meet pipeline quality standards and so the decision was made to only add RNG producers who inject RNG into the natural gas pipelines. The largest addition of burden comes from the creation of Form EIA-191L *Monthly Liquefied Natural Gas Storage Report*. This new survey will add 85 respondents. These respondents include peak shaving facilities and satellite LNG storage facilities. Form EIA-910 *Monthly Natural Gas Marketer* is adding 60 additional respondents to accommodate the increase in market participants in this particular section of the industry. EIA-912 *Weekly Underground Natural Gas Storage Report* is adding 5 additional respondents to address possible increases to survey sampling sizes. The original intent was to add Marine Terminals to this survey. However, the decision to not add them was based on cognitive research that detailed the operations of these terminals and their consistently wide stock variability. In the previous OMB clearance package, Form EIA-757 *Natural Gas Processing Plant Survey Schedule A* was incorrectly listed as a 0.6 hour burden survey, instead of a 0.5 hour burden survey, which previously inflated its burden estimate by a small increment.

Table A3. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Annual Number of Responses	16,297	2,020	0	14,277
Annual Time Burden (Hr)	55,296	4,572	0	50,724

## A.16. Collection, Tabulation, and Publication Plans

The data collected, reviewed, and tabulated by EIA from Form EIA-176 will be merged with data collected on Forms EIA-857 and EIA-910 to develop quantitative overviews of gas available to each of the various states and the sources of such gas; gas used or otherwise disposed of in each of the various states; the number of consumers; total and average quantities consumed; and total and average prices paid by consumers by market sector in each of the various states. The data will be used as input to the State Energy Data System, the Short-Term Integrated Forecasting System, the National Energy Modeling System, and other supply, demand, and price forecast models. They are published in the *Natural Gas Annual* and provide input to the *Natural Gas Monthly*, *Annual Energy Outlook*, *Monthly Energy Review*, *Short-Term Energy Outlook* and State Energy Profiles.

### A.16.1 Annual Survey

The time schedule for the *Natural Gas Annual* data collection, tabulation, and publication is shown in Table A4 below.

Table A4 Time Schedule for the *Natural Gas Annual*

EIA Form	Due date	Extension Date	Processing completion	Posted on website
EIA-176	March 1	April 1	September 30	November 20

The *Natural Gas Annual* publication is typically released by December 31 of each year.

### A.16.2. Monthly Surveys

Data gathered monthly on Forms EIA-191, EIA-857, and EIA-910 will be reviewed, verified, and aggregated to be used as input for the *Natural Gas Monthly* and the *Monthly Energy Review* publications. In addition, data collected from Form EIA-191 will be used in studies of peak day supplies to major market areas, utilization of storage capacity, and the load leveling function of storage in the market.

Individual company reports will be checked for reasonableness by comparing current reports with prior responses. Respondents will be required to resubmit reports containing any inconsistencies or errors.

A typical time schedule for the monthly Forms EIA-191, EIA-857, and EIA-910 data collection tabulation and publication is shown below using August data release for the example:

Table A5: *Natural Gas Monthly* – August 20XX Issue

EIA Form	Data report month	Due Date	Processing complete	Posted on website
EIA-191	June	July 20	August 20	August 31
EIA-857	June	July 30	August 20	August 31

EIA-910	June	July 30	August 20	August 31

A typical time schedule for the weekly Form EIA-912 data collection, tabulation, and publication is shown below using the first several weeks of August as example. The *Weekly Natural Gas Storage Report* is released every Thursday at 10:30 AM EST.

Table A6: Weekly Natural Gas Storage Report – August 20xx Issues

EIA Form	Data report for week ending	Due Date	Processing complete	Posted on website
EIA-912	August 1	August 4	August 6	August 7
EIA-912	August 8	August 11	August 13	August 14
EIA-912	August 15	August 18	August 20	August 21

### A.17. OMB Number and Expiration Date

The OMB Number 1905-0175 and expiration date will be displayed on all the data collection forms and instructions.

### A.18. Certification Statement

There are no exceptions to the certification statement of OMB Form 83-I.