



Independent Statistics & Analysis

U.S. Energy Information
Administration

Supporting Statement for Quarterly Electricity Imports and Exports Report

Part A: Justification

Form EIA-111 *Quarterly Electricity Imports and Exports Report*

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Introduction

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the 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. EIA is required to publish and otherwise make available independent, high-quality statistical data to federal government agencies, state and local governments, the energy industry, researchers, and interested parties through the EIA website.

EIA is requesting a three-year extension with no changes to Form EIA-111 *Quarterly Electricity Imports and Exports Report*. Form EIA-111 collects U. S. electricity import and export data for the purpose of measuring the flow of electricity into and out of the United States from Canada and Mexico. U.S. purchasers, sellers, and transmitters of wholesale electricity are required to report their data to EIA. These include:

1. persons authorized by Order of DOE's Office of Electricity Delivery & Energy Reliability (DOE-OE) to export electric energy from the United States to foreign countries;
2. persons authorized by Presidential Permit to construct, operate, maintain, or connect electric power transmission lines that cross the U.S. international border; and,
3. U.S. Balancing Authorities that are interconnected with foreign Balancing Authorities.

Respondents report, each quarter, monthly flows of electric energy received or delivered across the border, the cost associated with the transactions, and actual (energy transfers that cross Balancing Authority boundaries) and implemented interchange (the state where the Balancing Authority enters the Confirmed Interchange into its Area Control Error equation). Responses to this form are mandatory.

A.1. Legal Justification

The authority for this information collection is provided by the following general provisions:

1. Title 15 U.S. Code §772, which established the mandatory requirement of owners and operators of businesses in the U.S. to report energy supply and consumption data to the EIA Administrator.
2. Title 15 U.S. Code §764, which established the EIA Administrator's powers to plan, direct, and conduct mandatory and voluntary energy programs that are designed and implemented in a fair and efficient manner. These powers include duties to collect, evaluate, assemble, and analyze energy information on U.S. reserves, production, demand, and related economic data, while obtaining the cooperation of business, labor, consumer, and other interests.

3. Title 15 U.S. Code §790a, which established the National Energy Information System (NEIS) that is the enclave containing the energy data collected by EIA, which allows EIA to describe and analyze energy supply and consumption in the U.S. NEIS allows EIA to perform statistical and forecasting activities to meet the needs of the U.S. Department of Energy and Congress, as well as the needs of the States to the extent required by the Natural Gas Act [Title 15 U.S. Code §717 et seq.] and the Federal Power Act [Title 16 U.S. Code §791a et seq.].

The DOE's authority to regulate electricity exports from the United States to foreign countries is provided by Section 202(e) of the Federal Power Act (FPA) (codified as 16 U.S.C. §824e) and regulations thereunder (10 C.F.R. § 205.300 *et seq.*)

16 U.S.C. §824(e) states that DOE "shall issue such order upon application unless, after opportunity for hearing, it finds that the proposed transmission would impair the sufficiency of electric supply within the United States or would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of [DOE]." DOE has discretion to condition the order as necessary or appropriate, DOE "may by its order grant such application in whole or in part, with such modifications and upon such terms and conditions as the [DOE] may find necessary or appropriate."

DOE has the responsibility for implementing Executive Order (EO) 10485, as amended by E.O. 12038, which delegates to DOE's Office of Electricity Deliverability & Energy Reliability, the authority to issue Presidential permits for the Construction, operation, maintenance, or connection of electric transmission facilities at the United States international borders. DOE may issue such a permit if it determines that issuance of the permit is in the public interest and after obtaining favorable recommendations from the U.S. Departments of State and Defense.

A.2. Needs and Uses of Data

Form EIA-111 collects U.S. electricity import and export data. The data are used to generate accurate estimates of the flow of electricity into and out of the United States.

2.1. Overview of Data Uses

Form EIA-111 data appear in several EIA publications that are available from EIA's website or a joint website. The most prominent are:

- Electric Power Annual <http://www.eia.gov/electricity/annual/>
- Monthly Energy Review <https://www.eia.gov/totalenergy/data/monthly/>
- Electric Power Monthly <https://www.eia.gov/electricity/monthly/>
- State Electricity Profiles <https://www.eia.gov/electricity/state/>
- North American Cooperation on Energy Information (NACEI) web page <http://www.nacei.org/#!/overview>

The data are used in other EIA products such as the State Energy Data System and as inputs to EIA projection models. The data collected support the following DOE-EIA functions:

- Assess the adequacy of the electricity supply from Canada and Mexico into the U.S.
- Used as historical electricity trade inputs for EIA's Annual Energy Outlook projection models
- Analyze and report on the adequacy of short- and long-term electricity supply in the U.S.
- Electricity imports and exports information was included in the Secretary of Energy's 2019 CERAWEEK presentation
- An article in EIA's Electricity Monthly Update July 2019 publication, [International U.S. electricity trade varies by regional transmission capacity](#)
- Fulfill DOE's obligations for sharing import/export of energy data under the trilateral Memorandum of Understanding (MOU) (December 2014) on energy information cooperation between the United States, Canada, and Mexico. The MOU created a framework for consultation and cooperation on sharing publicly available energy information among the participants, with the purpose of setting the stage for dialogue, comparisons and deliverables on each of the participant's energy outlooks and information. Section 3 of the MOU states:

“Participants understand that cooperative activities under this MOU, in subject areas within each Participant's respective purview, are intended to include:

(a) systematically comparing respective import and export information on energy flows to validate publicly available data and improve data quality.”

The form is designed to collect data from all entities engaged in the sale, purchase, or transfer of cross-border electricity transmissions. The data are used by DOE-OE for the following purposes:

- Monitor compliance with the terms of Presidential Permits and Export Authorizations.
- Evaluate open transmission access at the international border.
- Evaluate transmission constraints and system reliability.
- Evaluate the need for additional electric transmission capacity.

2.2. Overview of Data Collections

The data collected on Form EIA-111 is used to obtain an accurate measure of the flow of electricity into and out of the United States.

Form EIA-111 collects U. S. electricity import and export data from:

1. U.S. entities that purchase, sell, or exchange electricity at wholesale, including persons authorized by Order of DOE-OE to export electric energy from the United States to foreign countries, report monthly flows of electric energy received, or delivered across the border and the cost associated with the transactions.
2. U.S. Balancing Authorities that are directly interconnected with foreign Balancing Authorities report actual and implemented interchange.
3. Persons authorized by Presidential Permit to construct, operate, maintain, or connect electric power transmission lines that cross the U.S. international border and export authorization holders report events where their DOE Order terms were exceeded.

A.3. Use of Technology

Form EIA-111 uses Internet-based data collection systems as the primary means of data collection. The majority of contact with respondents (e.g., notification that a survey has opened for a collection cycle) is done by email.

Internet data collection is the primary collection mode for the electricity surveys. The Internet-based systems allow respondents to enter their data directly into the EIA survey databases, which reduces the time needed for data collection and processing. The systems identify reported data that fail edit specifications prior to submission, which allow respondents to make necessary corrections or explain unusual situations affecting the reported data. This process aids in detecting and minimizing response errors, data validation procedures are used to check current data. It also improves the timeliness of reporting the information to the public. The only equipment and software respondents require are a connection to the Internet and a standard industry web browser.

A.4. Efforts to Identify Duplication

EIA has verified that Form EIA-111 data are not collected by more than one federal government agency. The Canadian National Energy Board (NEB) publishes imports and exports of electricity from Canada. The NEB reports do not include information on Presidential permits and export authorizations issued by DOE which makes it ineffective in determining compliance with the DOE orders. There is no known alternative source of data for electricity trade with Mexico. In the absence of the centralized and public data collection by EIA, each state on an international border would have to undertake its own collection of the volumes and prices of imported purchases and exported sales of electricity at wholesale for use by public utility commissions when reviewing rate cases. This may lead duplicative information requests from multiple firms within the electric power industry that engage in the import or export of electricity at the international border.

A.5. Provisions for Reducing Burden on Small Businesses

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

EIA determined that businesses that engage in electricity transmission are not small businesses. There are no small businesses reporting on this survey.

A.6. Consequences of Less-Frequent Reporting

Form EIA-111 collects monthly electric power import and export data information on a quarterly basis. Less frequent reporting would result in less timely data on the flow of electricity between the U.S., Canada, and Mexico.

A.7. Compliance with 5 CFR 1320.5

Form EIA-111 is operated in accordance with the guidelines in 5 CFR 1320.5.

A.8. Summary of Consultations Outside of the Agency

On 12/15/2021, EIA published a 60-day Federal Register Notice (FRN) in volume 85, page number 81192, regarding the renewal of the Form EIA-111. EIA received one written comment in response to the 60-Day FRN. The comment was from a single respondent. The respondent found the “Category of Service” element burdensome to provide per transaction because the information must be manually reviewed in order to determine whether a transaction is firm, non-firm, exchange, or other. The program office’s reply was to let the respondent know that this reporting requirement did not extend to each of their individual transactions but to their contractual obligations. Furthermore, the “Category of Service” question cannot be removed because it has significant relevance to the type of commercial transactions that cross U.S. borders and its impact on the international electricity trade industry is still being researched.

A.9. Payments or Gifts to Respondents

There will not be any payments made or gifts given to respondents as an incentive to complete Form EIA-111.

A.10. Provisions for Protection of Information

The information reported on Form EIA-111 will be considered public information and may be publicly released in identifiable form.

A.11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

A.12. Estimate of Respondent Burden Hours and Cost

The total annual burden is estimated to be 1,080 hours (see Table 1 below). Based on the estimated rate of \$81.65 per hour for employees who would complete these forms, the total annual respondent cost for all forms is estimated to be:

$$\$81.65/\text{hour} \times 1,080 \text{ hours/year} = \$88,182$$

The \$81.65 hourly wage is based on the average hourly loaded cost (including benefits and cost-of-living adjustments for the Washington, DC area) among all EIA administrative, professional, and executive employees for the current fiscal year. EIA assumes that the survey respondent workforce completing surveys is comparable to the EIA workforce. The Table 2 shows how EIA arrives at the wage estimate which includes administrative and executive level employees. Cognitive studies conducted by EIA show that people who actually fill out and submit EIA surveys are industry professionals who perform a variety of tasks and hold a variety of positions.

Table 1: 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-111, Quarterly Electricity Imports and Exports Report	4	180	720	1.50	1,080
TOTAL		180	720		1,080

Table 2: Average Hourly Loaded Cost of an EIA Employee, Fiscal year 2021

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)	287	\$129,612	26.58%	\$34,451	\$164,063	\$78.88
Executive (EJ,ES,EX,SL)	23	\$190,939	26.58%	\$50,752	\$241,691	\$116.20
All EIA Employees	310	\$134,162	26.58%	\$35,660	\$169,822	\$81.65

A.13. Annual Cost to the Federal Government

The annual cost of operating these surveys is estimated at \$171,465 and includes contractor costs and federal staff time for survey related activities. Table 3 shows the approximate costs of survey related activities including frame maintenance, collection, processing, dissemination, and data systems maintenance. EIA anticipates no additional respondent costs for generating, maintaining, and providing the information required in this Information Collection Request.

The estimated annual cost of Form EIA-111 is \$171,465. Approximately 2,100 hours per year are spent administering Form EIA-111.

Table 3: Annual Cost to the Federal Government

Activity	Labor hours	x Rate	= Cost
Survey frame and maintenance	372	\$81.65	\$30,374
Data collection and processing	1,228	\$81.65	\$100,266
Data dissemination	274	\$81.65	\$22,372
Data systems maintenance and enhancements	226	\$81.65	\$18,453
Total Annual Cost			\$171,465

A.14. Changes in Burden

There is an estimated increase of 24 annual burden hours as shown in Table 4 below. This increase in annual burden hours was due to an additional four respondents to the EIA-111 frame which increased the annual number of responses by 16. These changes to burden were recorded as *Changes Due to Agency Estimate*.

Table 4: Changes in 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			Annual Burden Hours		
										Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment	Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Adjustment
Form EIA-111, Quaterly Electricity Imports and Exports Report	4	176	180	704	720	1.5	1.5	1,056	1,080	0	16	16	0	24	24
TOTAL		176	180	704	720			1,056	1,080	0	16	16	0	24	24

A.15. Reasons for Changes in Burden

The minor increase in estimated annual burden is due to an increase in the respondent frame. The EIA-111 respondents who were issued export authorizations and/or presidential permits must report until those permits expire or are rescinded. Export authorizations can expire after five years, ten years, or when the affiliated transmission facility is decommissioned. Presidential permits are valid until the affiliated transmission facility is decommissioned. The net change in new permits being issued, expiring permits, and the renewal of existing permits has resulted in an increase in respondents and the estimated annual burden.

Table 5: ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	720	0	0 16	704
Total Time Burden (Hr)	1080	0	24	1056

A.16. Collection, Tabulation, and Publication Plans

The data collected on this form will be released in EIA reports and will be made available on the EIA website.

A.17. OMB Number and Expiration Date

The OMB number (OMB Number 1905-0208) and expiration date will be displayed on the data collection form and the instructions.

A.18. Certification Statement

There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I. This information collection request complies with 5 CFR 1320.9.