
Supporting Statement for DOE's Superior Energy Performance 50001™ and 50001 Ready

Part A: Justification

OMB No. 1910-5177

DOE HQ F 413.37 SEP 50001 Application

DOE HQ F 413.2 SEP 50001 Energy Performance Improvement Report

DOE HQ F 413.40 SEP 50001 Scorecard Declaration

DOE F 413.39 50001 Ready Attestation Form

DOE HQ F 413.41 50001 Ready Energy Performance Improvement Report

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Washington, DC 20585

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 60-Day Federal Register Notice, and provide the list of forms within this collection.

This supporting statement provides information regarding the Department of Energy (DOE) request for information from participants in its voluntary ISO 50001 recognition programs: Superior Energy Performance 50001 (SEP 50001) program certification and 50001 Ready recognition. Note: the SEP program identified in previous collections was renamed as SEP 50001 after the previous collection.

This request for information consists of a voluntary data collection process for SEP 50001 and 50001 Ready participation: to engage commercial, industrial, and institutional facilities; manage and track certification and participation cycles; and maintain engagement with the stakeholders. Typical respondents are energy managers that have experience with compiling energy consumption data. SEP 50001 respondents are typically from facilities with mature energy programs and/or those interested in third-party certification of results. 50001 Ready respondents are typically from facilities that may be new to energy management, or facilities uninterested in pursuing third-party certification.

SEP 50001 is an energy efficiency certification and recognition program for commercial, institutional, and industrial facilities demonstrating excellence in energy management as well as continual improvement in energy efficiency through third-party verified energy performance. SEP 50001 program certification is an accredited certification scheme under the American National Standards Institute (ANSI) National Accreditation Board (ANAB). ANAB accreditation ensures that SEP 50001 program certifications are granted with the impartiality and competence, and in conformance to international auditing standards and best practices. ANAB accreditation fosters confidence and acceptance of the certifications by end users in the public and private sectors. ANAB-accredited SEP 50001 Verification Bodies are the non-governmental organizations (i.e., not DOE or the Federal government) that conduct the certification audits, and DOE provides the recognition of the certification outcomes.

DOE's 50001 Ready provides an alternative to certification. It is a self-guided approach for facilities to establish an energy management system and self-attest to the structure of ISO 50001. An organization submits information associated with their energy management system scope and basic information about how they analyzed their energy performance. No additional standards are required. DOE provides recognition for self-attested achievement, without the need for external audits.

The 60-Day FRN was published on July 7, 2021. This collection includes the following forms:

Summary of SEP 50001 and 50001 Ready Data Collection Uses		
	Who Submits the Form	How DOE Will Use the Information
SEP 50001 Application Form	End-User Facility (with mature energy program)	Track basic information on SEP 50001 participants to administer program
SEP 50001 Energy Performance Improvement Report	SEP 50001 Verification Body	Manage and track certification cycles; track results of SEP 50001 participation; recognize achievements

SEP 50001 Scorecard Declaration	End-User Facility (with mature energy program)	Provide elevated recognition to facilities beyond energy performance improvement
50001 Ready Attestation Form	End-User Facility (with less-experienced energy program) seeking 50001 Ready designation	Confirm program participants' requests for 50001 Ready recognition
50001 Ready Energy Performance Improvement Report	End-User Facility <i>renewing</i> 50001 Ready designation: Option 2 (if not submitting Option 1)	Track basic information on 50001 Ready participants to administer program and recognize energy performance improvement achievements

A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

DOE initially used the information from SEP 50001 to evaluate the costs and benefits of SEP 50001 certification, which is consistent with the [Executive Order \(EO\) 13624](#)—Accelerating Investment in Industrial Energy Efficiency (August 2012). EO 13624 asks Federal agencies to:

- “(i) [provide] general guidance, technical analysis and information, and financial analysis on the value of investment in industrial energy efficiency”
- “(ii) [improve] the usefulness of Federal data collection and analysis”

Executive Orders from subsequent administrations did not revoke this order. SEP 50001 and 50001 remain well aligned with the current Administration’s [priorities](#) to build a resilient, sustainable, clean energy economy, achieving net-zero emissions no later than 2050. In addition, SEP 50001 and 50001 Ready remain supportive of the Section 6005 of the [Energy Act of 2020](#) to authorize technical assistance programs to reduce industrial emissions.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection

This data collection is necessary in order to administer SEP and 50001 Ready and to assess its impact on saving energy in the commercial, institutional, and industrial sectors. SEP was developed in close consultation with industrial companies to support effective implementation of the ISO 50001 energy management system standard in the commercial, institutional, and industrial sectors. DOE supported U.S. leadership in developing the ISO 50001 standard with involvement from 59 countries, and continues to ensure that U.S. interests are reflected in the revision of the standard and in the creation of the family of standards that support ISO 50001. SEP and 50001 Ready are the U.S. governmental policy mechanisms for driving voluntary ISO 50001 implementation in the United States.

The data collected for SEP provides information required to certify a facility to SEP (SEP Application and SEP Energy Performance Improvement Report). The SEP 50001 Scorecard enables DOE to provide elevated levels of recognition to certified facilities at the Silver, Gold, and Platinum levels for energy management practices beyond their energy performance improvements. Further, the SEP Energy Performance Improvement Report and SEP 50001 Scorecard allows DOE to assess its impact on saving energy in the commercial, institutional, and industrial sectors.

50001 Ready is intended to introduce ISO 50001 to organizations that are not ready to seek external audits, such as those new to energy management. For first-time recognition of 50001 Ready, reporting requirements are simple: facility-level energy consumption for operations included in their 50001 Ready energy management system. Users fill out the 50001 Ready Attestation Form to confirm that they completed the 50001 Ready implementation process. Users also submit the 50001 Ready Energy Performance Improvement Form as a format for demonstrating energy performance improvement. This form is a simplified and shorter version of the information collected under SEP. 50001 Ready designation is good for one year. For initial recognition, the facility completes the first two sections of the report. To renew designation after the first year, facilities demonstrate positive energy performance improvement, measured on a year over year basis. Both the Attestation form and 50001 Ready Energy Performance Improvement Report are submitted through the 50001 Ready Navigator tool (see A.3. Use of Technology for tool description).

This collection will enable DOE to conduct the technical and financial analysis needed to substantiate the investment in SEP certification and 50001 Ready recognition and demonstrate the programs' impact on national energy savings. Data collection from SEP-certified and 50001 Ready recognized facilities will also provide insight into best practices that will be distributed to facilitate improvements in energy performance by other organizations.

SEP Application Form

After a facility has implemented SEP and is ready to pursue a verification audit, the facility fills out the SEP Application Form. The SEP Application gathers data pertaining to the facility's preliminary estimation of its energy performance improvement and how it was achieved. The respondent will have already developed the requested information as part of their use of the SEP Measurement and Verification Protocol to meet SEP program requirements. No new energy models or calculations are required to fill out the Application form, and the burden to the respondent will be minimal.

This application is required by the ANSI/MSE 50028 standard so that a SEP Verification Body will have enough documentation to initiate an audit and determine if the facility meets SEP certification requirements. (50001 Ready participants do not fill out this form.)

SEP Energy Performance Improvement Report

After a facility achieves SEP certification, the SEP Verification Body submits a SEP Energy Performance Improvement Report to the SEP Administrator. The form collects basic information about the energy performance improvement, how it was achieved, how models were applied from the SEP Measurement and Verification Protocol, and verifies the accuracy of the claims made by the facility on the SEP

Application form. The SEP Administrator and DOE use the information collected to manage and track certification cycles, maintain records of expired certifications, and determine and make public aggregated program impacts. This report will be used by DOE to confirm if a facility should be certified. Without this form, the program would not be able to recognize SEP certification. This is a spreadsheet-based form. (50001 Ready participants do not fill out this form.)

SEP 50001 Scorecard Declaration

Certified facilities often seek additional DOE recognition for innovative energy management practices, and the SEP 50001 Scorecard Declaration Form is offered as a way for them to receive elevated recognition from the SEP Administrator. The form is a simple Excel-based attestation that allows users to select from a list of energy actions, processes, procedures, or advanced technologies that they implemented beyond the requirements for ISO 50001 and SEP 50001. The spreadsheet calculates “points” based on the number and type of project implemented. The number of points achieved determine the level of recognition (Silver, Gold, or Platinum). Most, but not all certified facilities seek elevated recognition from DOE. (50001 Ready participants do not fill out this form.)

50001 Ready Attestation Form

This short, fillable PDF provides a simple confirmation from an energy management representative and a top manager to confirm the facility’s completion of the 50001 Ready implementation process. No energy information or data is collected. Upon completion of the 50001 Ready process, this attestation is uploaded through the 50001 Ready Navigator. (SEP participants do not fill out this form.)

50001 Ready Energy Performance Improvement Report

Many facilities seeking initial or re-designation for 50001 Ready will submit the 50001 Ready Energy Performance Improvement Report to demonstrate completion of the 50001 Ready implementation process through the 50001 Ready Navigator tool. The Excel-based report has sections to collect simple information on project and energy consumption information (for initial and re-attesting facilities), and a section for energy performance improvement for re-attesting facilities. This is a simplified version of the approved information collected in the SEP 50001 Energy Performance Improvement Report. Users upload the form through the 50001 Ready Navigator. (SEP participants do not fill out this form.)

This form enables organizations to report facility-level energy consumption for operations included in their 50001 Ready energy management system. DOE formerly collected this information from 50001 Ready participants with separate forms for initial recognition (50001 Ready Baseline Report) and those renewing (EnPI Lite Output File). DOE combined the submission process into one report that all participants can use. Participants seeking initial recognition only fill out the first two sections of the report; while participants who are renewing their 50001 Ready designation fill out the report’s three sections.

Facilities seeking re-designation for 50001 Ready demonstrate energy performance improvement, measured on a year over year basis. It is recommended that energy performance metrics be normalized through regression modeling that controls for key independent variables such as weather, production

volume, building size, etc. Many tools and calculators are available to help users conveniently generate this information, but **DOE does not collect the inputs to optional tools and calculators; DOE only collects the summary of the tools' analyses.** The information collected in this form is a simplified version of the information collected in the SEP Energy Performance Improvement Report. (SEP participants do not fill out this form.)

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

DOE is currently the administrator for SEP and 50001 Ready and uses electronic methods to receive the collection instruments. Report collection for SEP is conducted electronically via email. During the previous ICR, DOE was piloting a database to collect and store program information on a web-based, password-protected system housed in a DOE data system and compliant with the Federal Information Security Management Act (FISMA). However, SEP 50001 Verification Bodies expressed concerns to DOE about using the database. Due to ANAB accreditation procedures for the Verification Bodies the proposed database would have compromised their accreditation status. ANAB accreditation of the SEP 50001 program is vital for maintaining the credibility of its outcomes. In response to these concerns, SEP 50001 data collection to DOE has remained as an email submission process to accommodate the SEP 50001 Verification Bodies. However, DOE continues to engage the SEP 50001 Verification Bodies in case the use of other electronic submission methods become feasible in the future.

The 50001 Ready program's report collection is conducted on the 50001 Ready Navigator (<https://navigator.lbl.gov/>), which provides users with a single tool to access ISO 50001 implementation guidance and to submit documentation to request 50001 Ready recognition from DOE. 50001 Ready does not use ANAB-accredited verification and does not have the same stakeholder constraints as SEP 50001.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

SEP 50001 is the only national certification program offering third-party verification of ISO 50001 and energy performance improvements. 50001 Ready complements SEP 50001 by providing technical tools and guidance to users that do not pursue external audits. No other certification or recognition programs in the United States focus on ISO 50001 and its impacts.

Other voluntary reporting programs were reviewed for potential duplication, including the Environmental Protection Agency's Climate Leaders Program and ENERGY STAR building and plant certification, the Energy Information Agency's Manufacturing Energy Consumption Survey and its voluntary reporting of greenhouse gasses, and DOE Better Buildings, Better Plants. The EPA has since discontinued the Climate Leaders program. ENERGY STAR building and plant (synonymous with "facility") certification compares a facility to similar facilities in its sector, whereas SEP 50001 and 50001 Ready compare a facility's energy performance to a baseline of its own past performance. EIA requires

reports on total energy use for entire industry sectors. The Better Buildings, Better Plants Program requests information about a baseline energy intensity number and the annual change in energy intensity relative to the baseline at the corporate level. SEP 50001 collects information pertaining to energy performance—a measurement of energy intensity normalized over production—typically over a 3-year period at a facility level.

50001 Ready collects energy consumption data for the first year and energy performance data for subsequent years, but on a self-reported basis. For facilities participating in SEP, Better Plants, or Energy Star, 50001 Ready allows re-submission of forms used for those programs without any additional data collected.

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.

The collection of information is not mandatory, so it does not impact small businesses or other small entities unless they choose to participate voluntarily. SEP and 50001 Ready are voluntary, and small businesses may choose not to participate. The program's technical guidance documents and downloadable tools are freely available. Facilities may read the documents and use the tools to gain the benefit of energy management systems without participating in the DOE programs and seeking recognition. However, participants are typically motivated to participate because they want to publicize their achievements and their participation in these DOE programs.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

DOE is requesting the minimum level of information required to fully support and implement SEP 50001 and 50001 Ready. To be successfully administered, the SEP and 50001 Ready require the collection of some unique and specific participant information. DOE cannot administer the program or track participation and outcomes without the information gathered by the collection instruments described in this collection request. DOE is the only possible administrator at this point because of its unique engagement with past and present participants in the program.

DOE conducted demonstrations to test SEP at 40 industrial facilities throughout the United States. Results demonstrate that SEP is a cost-effective mechanism for manufacturing facilities to achieve energy savings. Continued collection of this data is essential to make a stronger case to benefits of ISO 50001 and SEP as to sustaining energy savings of previous energy efficiency investments, improve the effectiveness of the SEP program through refinements to program elements, and to create enduring value of ISO 50001 in the commercial, institutional, and industrial sectors. ISO does not collect this information on ISO 50001 certified facilities, furthering the need for DOE to collect the information in this request.

The SEP Application Form is necessary for DOE to gather basic information about the building or facility wishing to implement SEP program requirements and eventually pursue certification. Without the SEP

Application Form, the SEP Verification Body would be unable to conduct the audit to determine certification. Without the Energy Performance Improvement Report, DOE would not have a systematic way to collect implementation data or attribute energy performance improvements to ISO 50001. For SEP 50001, the collection of information only occurs once during a participant's three-year certification cycle. Repeated collection is not conducted unless the participant voluntarily chooses to recertify and return to the program to update its achievements. Collection at less frequent intervals may result in missing participant information needed to engage and remain responsive to them through their certification cycle. Missing information would also impact DOE's assessment of program impacts on energy performance improvements.

The SEP 50001 Scorecard was previously audited by SEP 50001 Verification Bodies to determine Silver, Gold, or Platinum-level achievements. The Verification Bodies previously confirmed the level as part of completing the SEP Energy Performance Improvement Report. However, in the most recent SEP 50001 program revision, the Scorecard portion was removed from the audit to simplify the audits, reduce audit costs and duration, and reduce burden on auditors. However, the SEP 50001 companies often cite the Silver, Gold, and Platinum recognition levels as motivation for participating in the program and pursuing more ambitious energy-saving actions. In response to stakeholder feedback, DOE retained and now offers a simplified Scorecard Declaration Form so that organizations can simply select the activities, processes, and procedures to attain Silver, Gold, or Platinum recognition. Achievement information from the SEP 50001 Energy Performance Improvement Report was considered for defining the Silver, Gold, and Platinum-level requirements (in lieu of the Scorecard) but was deemed insufficient for this purpose. The SEP Energy Performance Improvement Report summarizes achievements as a percentage of energy performance improvement over number of years. Using this percentage as the basis for the levels would create disadvantages for energy-intensive industries and/or those with mature energy programs—the target audiences for the program. These users would have greater difficulty achieving high percentages of improvement. However, the Scorecard helps DOE recognize energy management best practices more equitably across all sectors and sizes of its stakeholders, while providing the elevated recognition that they find valuable.

The 50001 Ready Attestation Form and 50001 Ready Energy Performance Improvement Report are necessary for DOE to provide recognition to facilities that self-attest implementation of an ISO 50001 system. For 50001 Ready re-designations (sought annually), facilities demonstrate improvement in energy performance. Additionally, the 50001 Ready Energy Performance Improvement Report provides a simple means to show energy performance improvement if they do not already have methods to compile this information and/or if they have not reported their energy performance already through an existing OMB-approved pathway (e.g., Better Buildings, Better Plants). A standard form ensures that they do not submit information that DOE does not need. Similarly for 50001 Ready, less frequent reporting may result in missing participant information needed to engage and remain responsive through them throughout their participation in the program. Missing information would also impact DOE's assessment of program impacts on energy performance improvements.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:

- (a) requiring respondents to report information to the agency more often than quarterly;
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;
- (c) requiring respondents to submit more than an original and two copies of any document;
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;
- (e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;
- (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or
- (h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

Neither SEP 50001 nor 50001 Ready require these special circumstances.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

The Department published a Notice and Request for Comment concerning this collection in the Federal Register on July 7, 2021 at FR Doc # 2021-14333. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received as a result of that notice.

No formal efforts were made to ask specific stakeholders to ask about the cost or time burden associated with filling out the forms. The time estimate described in the DOE and contractor resources for processing the forms was provided during the development of this Supporting Statement.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

Respondents do not receive any payment or gift for participating in the DOE voluntary programs for SEP 50001 program certification and 50001 Ready recognition.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

The SEP 50001 and 50001 Ready program collection instruments and relevant program guidance documents (documents, not collection instruments) contain a notice of confidentiality.

For example, the notice of confidentiality contained in the SEP 50001 Application is as follows:

The U.S. Department of Energy (US DOE), as the SEP 50001 Program Administrator within the United States, maintains the confidentiality of proprietary energy and production related data as proprietary that is submitted to the SEP 50001 program by SEP 50001-certified facilities, to the fullest extent of U.S. federal law. Data included within the *SEP 50001 Application*, *SEP 50001 Energy Performance Improvement Report*, and any other forms or data shared with the US DOE will not be released publicly. The US DOE will publicly report the following information about each SEP 50001-certified facility:

1. Facility name
2. Facility location (city, state)
3. Verified achievement period energy performance improvement
 - a. The SEP 50001-certified facility can elect if energy performance improvement is reported, or not. If the energy performance improvement is reported, the facility has the option to report as an absolute value of energy savings (British thermal units (BTU)), a percentage value as compared to the energy baseline (SEnPI), or both.
4. Verified achievement period length
5. Certification date (month/year)

US DOE will, from time-to-time, publicly share aggregate, program-wide metrics, such as the number of SEP 50001-certified facilities, and annual and cumulative SEP 50001 program energy savings without revealing data or analysis that could lead to the identification of specific facilities.

US DOE may use data to study the effectiveness and impact of the SEP 50001 program. Results from such analysis will be made public only if participating organization anonymity can be ensured. The participating organization may be asked if they wish to voluntarily participate in the formation of case studies and other activities regarding the SEP 50001 program.

All data provided to US DOE is subject to the Freedom of Information Act (FOIA); however, US DOE will notify the SEP 50001-certified facility if a FOIA request has been submitted for which their data might be responsive. US DOE will consult with the SEP 50001-certified facility and ensure the facility has an opportunity to inform US DOE what data they view is proprietary. US DOE will review the SEP

50001-certified facility's suggestions and will not release to the public any data US DOE deems proprietary.

Individual SEP 50001 Verification Bodies have established and implemented procedures for ensuring confidentiality. These procedures address both the SEP 50001 Verification Body as well as the individual auditor/verifier. Subcontracted or outsourced activities are subject to the same requirements.

Data that SEP and 50001 Ready participants submit will not be able to be seen by other facilities. Users can only see their own data.

Participants agree to provide the information identified in this supporting statement in order to apply for and receive recognition for SEP 50001 or 50001 Ready. Additionally for SEP, participants provide the information to help DOE inform the broader marketplace of commercial and industrial facilities and companies about successful implementation models that generate significant energy savings and quantify the results of those models. SEP participants are informed that DOE will publicly report the items listed in the notice of confidentiality. 50001 Ready does not require any public reporting of policies or outcomes. Only the company names and the location (city) of 50001 Ready facilities are listed on the web page for recognized facilities.

Energy consumption and savings data reported to DOE through SEP and 50001 Ready is confidential and treated as proprietary information. Data may be reported to the public at the discretion of the company. DOE will aggregate the energy data for pledging entities to ensure that no individual company can be identified. DOE will obtain company permission before using any data or information in case studies and other publications.

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

Neither SEP 50001 nor 50001 Ready request private information. The information collected for this project is energy consumption and conservation efforts of partner organizations and contains no personal data beyond the name, affiliation, title, and contact information for the person submitting the forms.

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

As of 2021, there are ~70 facilities certified to the SEP 50001 program. DOE estimates that 100 facilities will apply for certification annually by 2024. The accompanying reporting steps are:

- In order to certify to SEP:
 - The facility submits the SEP Application Form, and
 - The SEP Verification Body submits the Energy Performance Improvement Report to the SEP Administrator (DOE) after the certification audit.
- To receive elevated SEP 50001 recognition at the Silver, Gold, or Platinum levels,
 - The facility submits the SEP 50001 Scorecard Declaration

As of 2021, there are ~80 recognized 50001 Ready facilities. To receive 50001 Ready recognition from DOE, the reporting steps include submission of the 50001 Ready Attestation form and 50001 Ready Energy Performance Improvement Report to affirm completion of the 50001 Ready participation process. The attestation entails no other burden other than to identify the respondent and confirm the respondent's request for 50001 Ready recognition.

DOE estimates that the burden to complete the forms will be:

- SEP Application form- 1.5 hours per 3-year certification cycle
- SEP Energy Performance Improvement Report - 1.0 hours per 3-year certification cycle
- SEP 50001 Scorecard – 1.0 hour per 3-year recognition cycle
- 50001 Ready Attestation form – 0.5 hour
- 50001 Ready Energy Performance Improvement Report - 1 hour

When estimating the burden hours for each form, the following was taken into consideration:

- Each facility receiving SEP certification has implemented a robust and well documented energy management system supported by facility energy use and consumption data. As such, a SEP certified facility is much more advanced than a “typical” manufacturing facility in terms of its ability to quantify and track its historic and current energy performance.
- The data required for the SEP Application Form is within the scope of the facility's data collection abilities and the data will already exist within the documentation for their energy management system.
- Similarly, the data requested on the SEP Energy Performance Improvement Report is already being collected by the Verification Body for certification purposes. The SEP Energy Performance Improvement Report has been developed to mirror the statistics collected by the Verification Body to determine the facility's certification status.

- Similarly, for 50001 Ready users, the data asked on the 50001 Ready Energy Performance Improvement Report will have already been compiled as part of implementing a 50001 Ready EnMS.
- The 50001 Ready Navigator facilitate submission of the forms by providing a secure web-based platform for accessing, completing, and submitting forms in an automated manner.
- Responses from previous forms submitted by the facility for the current certification will be pre-filled in other forms wherever and whenever applicable (i.e., facility location, contact information, etc.)

It is estimated that there will be 450 forms submitted annually to DOE for the Superior Energy Performance and 50001 Ready programs by 2024. The corresponding burden is estimated to be 450 hours annually. Respondents from the industrial, commercial, and institutional sectors will include the facilities seeking or achieving SEP certification or 50001 Ready recognition and SEP Verification Bodies conducting the SEP audits.

It is estimated that 100 facilities will seek 50001 Ready first-time recognition or re-designation annually by 2024. The number of users has grown since the previous collection, in which 6 facilities had achieved 50001 Ready recognition. Respondents include the facilities seeking recognition for 50001 Ready implementation. The following outline provides estimates of the reporting burden for all respondents to the Superior Energy Performance Program and 50001 Ready.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
SEP 50001 - respondents submit forms once per 3-year certification cycle, not annually						
SEP 50001 Application	Company/facility	100	100	1.5	150	1
SEP 50001 Energy Performance Improvement Report	SEP 50001 Verification Body	100	100	1.0	100	1
SEP 50001 Scorecard	Company/facility	50	50	1.0	50	1
50001 Ready - annual recognition						
50001 Ready Attestation Form	Company/facility	100	100	0.5	50	1
50001 Ready Energy Performance Improvement Report	Company/facility	100	100	1	100	1
TOTAL		450	450		450	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be

included here. Instead, this cost should be included under ‘Annual Cost to Federal Government’.

Labor cost summary for SEP Facilities

Total annual cost associated with total annual burden hours: \$11,973¹

Labor cost summary for SEP Verification Body

Total annual cost associated with total annual burden hours: \$10,500²

Labor cost summary for 50001 Ready Facilities

Total annual cost associated with total annual burden hours: \$8,980³

Combined totals

Total annual cost associated with total annual burden hours: \$31,452

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Industrial engineers at companies/facilities (combined SEP 50001 and 50001 Ready respondents)	350	\$59.86 (full burdened rate)	\$20,952
SEP 50001 Verification Bodies	100	\$105.00 (full burdened rate)	\$10,500
TOTAL	450		\$31,452

The cost numbers for facilities are calculated by multiplying the total and per respondent hourly burden estimates by the mean hourly wage rate (\$42.76) for industrial engineers, compiled by the U.S. Department of Labor’s Bureau of Labor Statistics and a multiplier of 1.4 to achieve a full-burdened rate of \$59.86. (See <https://www.bls.gov/ooh/architecture-and-engineering/industrial-engineers.htm>) The

¹ Total annual cost associated with total annual burden hours to facilities calculated by multiplying the total burden hours to facilities (1 hours) by the average hourly labor rate for an [Industrial Engineer](#) per the US Department of Labor Bureau of Labor Statistics (\$42.76) and a multiplier of 1.4 to achieve a full burdened rate of \$59.86/hr, or 200 hours x \$59.86 /hour = \$11,973

² Total annual cost associated with total annual burden hours to Verification Bodies calculated by multiplying the total burden hours to Verification Bodies (100 hours) by the average hourly labor rate for an auditor based on Verification Body audit costs (\$75/hr) and a multiplier of 1.4 to achieve a full burdened rate of \$105/hr, or 150 hours x \$150 /hour = \$10,500

³ Total annual cost associated with total annual burden hours to facilities calculated by multiplying the total burden hours to facilities (150 hours) by the average hourly labor rate for an [Industrial Engineer](#) per the US Department of Labor Bureau of Labor Statistics (\$42.76) and a multiplier of 1.4 to achieve a full burdened rate of \$59.86/hr, or 150 hours x \$59.86 /hour = \$8,980

cost numbers for the Verification Body are calculated similarly, but use \$75/hr for the hourly wage rate and a multiplier of 1.4 to achieve a full-burdened rate of \$105.00 (based on audit costs from the SEP Verification Bodies).

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

There are no capital and start-up cost components associated with any of these data collections. All costs associated with these data collections are personnel costs. It is assumed that the level of effort and cost by a SEP or 50001 Ready facility and/or SEP Verification Body is a sunk cost to them. The incremental level of effort for the facility and the SEP Verification Body to report to DOE for two forms (1-2 for the facility and 1 for the SEP Verification Body) benefits from data already gathered for SEP certification. Similarly, the incremental effort for 50001 Ready participants to assemble either the 50001 Ready Baseline Reporting Form or the EnPI Lite output form is minimal due to the data gathering and analysis conducted during ISO 50001 implementation.

There is no operation and maintenance and purchase of services component with any of these data collections. All costs associated with these data collections are personnel costs.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

DOE will require contractor support to process and analyze the data being reported by recipients and prepare an annual summary of energy savings achieved. The following estimate reflects the DOE and contractor resources needed to process and analyze the data being reported by participants. All hourly wages used below are taken from the Bureau of Labor Statistics: https://www.bls.gov/oes/current/oes_nat.htm#11-0000. The mean hourly wage for an Architecture and Engineering Manager are used (\$76.01/hr) with a multiplier of 1.4 to achieve a full-burdened rate of \$106.41.

SEP Application Form Collection Costs

Approximately 1 hours per form to review completeness, correspond with applicant to clarify submission, conduct technical review to determine readiness for SEP certification audit, and facilitate interaction with SEP Verification Body.

100 forms submitted per year

100 hours per year to review and process SEP Application Form

100 hours @ \$106.41 per hour = \$10,641

SEP Energy Performance Improvement Report Costs

Approximately ½ hour per report to conduct recordkeeping and track certification cycle

100 forms submitted per year

50 hours per year to collect implementation data from Verification Body

50 hours @ \$106.41 per hour = \$5,321

SEP 50001 Scorecard

Approximately 1 hour per report to conduct recordkeeping and track recognition

50 forms submitted per year

50 hours per year to collect implementation data from host plant

50 hours @ \$106.41 per hour = \$5,321

50001 Ready Energy Consumption Attestation and 50001 Ready Energy Performance Improvement Report (submitted together)

Approximately 1 hours per submission to review for completeness

100 submissions per year

100 submissions per year to collect energy data from facility

100 submissions @ \$106.41 per hour = \$10,641

Therefore, total costs to the Federal government for these collection efforts will be \$31,924.

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

In the previous collection request, DOE had streamlined the SEP collection instruments to reduce burden to industrial facilities by reducing the number of forms from four in 2015 to two in 2018 and reduced the annual hour burden by nearly half. This was accomplished by discontinuing two forms and combining relevant content into the existing SEP Application Form. 50001 Ready forms collect only a subset of information that was already approved for SEP collection.

It was determined that shortening the forms further would not be possible in 2021 without omitting key participant information, including data to back up their energy savings claims. The forms are already collecting the minimum information to engage participants and also compile program impacts, demonstrate efficacy, and demonstrate energy savings achieved. Any less than this minimum information would create difficulty in differentiating energy savings and benefits attributable to the DOE programs vs. attributable from other energy efficiency efforts.

The estimate on the number of respondents for SEP 50001 remained the same (100 unique participants). The actual number of participants has not reached 100 annually, but the estimate remains

the same to account for future growth. For 50001 Ready, the 2018 collection request estimated the number of forms at 33 participants annually. For the current collection renewal request, the number of estimated respondents has increased to 100 unique participants for 50001 Ready by 2024.

Furthermore for SEP 50001, the addition of the SEP 50001 Scorecard form in response to stakeholder requests for DOE recognition has impacted the estimated burden. The information in the Scorecard had previously been audited by the SEP 50001 Verification Body and collected in the SEP 50001 Energy Performance Improvement Report. The burden to the SEP 50001 Verification Body decreased due to the removal of the Scorecard portion from the audit and from the relevant section of the SEP 50001 Energy Performance Improvement form. However, many SEP 50001 facilities wanted DOE to continue recognizing their Scorecard accomplishments, rather than discontinuing the Scorecard. They now attest to their Scorecard and submit it to DOE. DOE uses this information to provide elevated DOE recognition outside of the certification process. In summary, the Scorecard reduces the burden for Verification Bodies. The burden for industrial facilities has increased to accommodate their desire for recognition through the Scorecard. In addition, the burden to the Federal government has increased to process these forms and validate the elevated recognition.

The cost burden for facilities and to the Federal government for reviewing SEP 50001 and 50001 Ready forms rose from the previous collection due to increases in the mean salaries for the job positions, and more importantly, the use of a multiplier of 1.4 to reflect a full burdened rate on the 2021 cost burden. This multiplier was not applied in previous collections. Therefore, the magnitude of the change in burden appears more substantial than if the calculations had been conducted without the multiplier.

The cost burden also increased due to the growth of the 50001 Ready program. In 2018, there were 6 50001 Ready participants. Future increases in burden may be expected as program participation grows due to the increased number of voluntary respondents, rather than increases in the information collected.

The cost to the Federal government increased from an estimated \$25,120 in the 2018 collection to \$31,924 in this collection due to the multiplier of 1.4 to the mean salaries to realize a full burdened rate. This multiplier was not applied in previous collections. If the multiplier had **not** been applied in 2021, then the cost to the Federal government would have shown a modest decrease due to the discontinuation of the database for SEP 50001 data collection and the removal of costs to maintain the online database. As noted in [A.3. Use of Technology](#), the database was discontinued in response to stakeholders at the non-governmental SEP 50001 Verification Bodies that conduct the audits.

Table A3. ICR Summary of Burden

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	450		217	233

Total Time Burden (Hr)	450		117	333
Total Cost Burden	\$31,452		\$12,785	\$18,667

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

The information collected in these forms may be used internally by DOE to produce high-level summaries and analyses of aggregated data of program impacts, including program-wide energy savings, and developing strategies to improve program participation. For example, the development of 50001 Ready was an outcome of SEP 50001 data analysis that identified the need to introduce ISO 50001 concepts in a more basic manner to serve a wider swath of the intended stakeholders.

Results of the analyses and summaries of program results may be published at industry conferences, publications, and on the DOE website. Raw data is not published. Aside from the items listed above, no information that could potentially relate the data to a specific facility is published. Some facilities choose to publicize additional details about their energy performance improvements in their own promotions. DOE may sometimes share this information after the facility makes this information public.

DOE will take all necessary precautions to ensure that the sharing of respondent information does not contain National Security information or other information/data that is protected by other statute, practice, or legal precedent. DOE will maintain compliance with current privacy requirements including OMB guidance and will ensure that data made available has any required Privacy Impact Assessments or System of Records Notices available on DOE's websites. DOE will also maintain currency with public disclosure requirements as well as ensure the required confidentiality, integrity, and availability controls are corroborated prior to release.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

No exemption is requested to avoid displaying the expiration date.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement identified in Item 19 of the OMB Form 83-I.