
Supporting Statement for Customer Request Service

Part A: Justification

OMB No. 1910-NEW

BPA F 6500.15e, Transmission Operator Provider (TOP) Outage Request - Customers/USBR/COE

BPA F 6530.16e, Application for a Wireless Site Upgrade Co-Located on BPA Facilities

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U.S. Department of Energy
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.

Bonneville Power Administration (BPA) has submitted to the Office of Management and Budget (OMB) for clearance, a proposal for collection of information pursuant to the Paperwork Reduction Act of 1995. The proposed collection will allow BPA to gather information to assess the impacts of Customer Requests for transmission power outages and to BPA facilities for modification of wireless sites.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 27, 2022, volume 87, number 103, and page number 32151. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

These collections require OMB approval under the Paperwork Reduction Act because the various forms gather information from employees, contract employees, and members of the public. The relevant instruments for these collections are the following forms:

BPA F 6500.15e Transmission Operator Provider (TOP) Outage Request - Customers/USBR/COE: **form used to request a BPA transmission power outage.**

BPA F 6530.16e Application for a Wireless Site Upgrade Co-Located on BPA Facilities: **form used to request an upgrade or modification of a wireless facility on a BPA transmission facility.**

Gathering this information is necessary in order to allow BPA to manage the transmission of electricity and consider the space and structural capacity requirements to allow upgrades or modifications to existing wireless facilities located on BPA transmission facilities.

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.

BPA is a power marketing administration, a federal nonprofit agency based in the Pacific Northwest. Although BPA is part of the U.S. Department of Energy, it is self-funding and covers its costs by selling its products and services. BPA markets wholesale electrical power from 31 federal hydro-electric dams in the Columbia River Basin, one non-federal nuclear plant and several other small non-federal power plants. The U.S. Army Corps of Engineers and the Bureau of Reclamation own and operate the federal dams. BPA is responsible for marketing about one-third of the electric power used in the Northwest.

BPA also operates and maintains about three-fourths of the high-voltage transmission in its service territory. BPA's service territory includes Idaho, Oregon, Washington, western Montana and small parts of eastern Montana, California, Nevada, Utah, and Wyoming.

As part of its responsibilities, BPA promotes energy efficiency, renewable resources, and new technologies. The agency also funds regional efforts to protect and rebuild fish and wildlife populations affected by hydroelectric power development in the Columbia River Basin.

The authorities for this collection are:

- The Bonneville Project Act of 1937, 16 U.S.C. Ch. 12B; 16 U.S.C. 832a(b)
- The Federal Columbia River Transmission System Act of 1974, 16 U.S.C Ch. 12G; 16 U.S.C. §838

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

BPA F 6500.15e Transmission Operator Provider (TOP) Outage Request - Customers/USBR/COE: utility/customer/powerhouse contact representative name, contact business phone number, details relating to the equipment and facility electrical outage request. BPA's Transmission Operations office will use the information collection instrument to track and manage electrical outage requests in order to effectively balance the electrical transmission system.

BPA F 6530.16e Application for a Wireless Site Upgrade Co-Located on BPA Facilities: customer business name and representative contact name, Radio Frequency engineer contact name and contact information including business address, business phone numbers and emails, customer contact information including addresses for invoices and refunds, details relating to the modification to the wireless site including power and space requirements. BPA's Transmission Planning office will use the information collection instrument to review and assess requests from businesses contracting wireless locations regarding plans to update or modify existing wireless facilities located on BPA transmission facilities.

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.

The instruments are fillable electronic PDF forms and submitted entirely via email. The cost of additional automation significantly outweighs the potential reduction in burden on respondents.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The information is not collected by other means or in another form by BPA.

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 applies to businesses and government agencies; this collection will not have a significant impact on small entities. All questions asked on the two forms were reviewed and deemed necessary to ensure safe operations by BPA.

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.

These two forms are critical for operations, if the collections are not conducted then BPA would be unaware of outages, which could endanger lives as well as damage the electrical infrastructure; in the case of wireless upgrades or modifications, they could not occur since there would be no means of notifying BPA of the desire by the customer nor allow for BPA to assess the feasibility of these upgrades or modifications to structures located on BPA transmission facilities.

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.**

The information collection occurs more than quarterly due to the operational nature of the requests. Outage requests are submitted as needed by customers, which can occur more than quarterly, but the requests are necessary in order to ensure managed outages and safety for customers as well as employees. Wireless site upgrade requests are also submitted as needed by the customers, but generally also come in

more than quarterly. The requests have to be submitted in order to allow for the approval process. Both reporting requirements are customer driven in that as the customers determine they want to request an outage or upgrade a wireless facility they submit a request.

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 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on May 27, 2022, (volume 87, number 103, and page number 32151). No comments were received.

The Department published a 30-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on August 22, 2022, (volume 87, number 161, and page number 51404). No comments were received.

Due to the operational nature of the collection instruments in this package no other efforts were made 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 on the data elements to be recorded, disclosed or reported.

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 will not receive any payment or gift.

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.

There are no assurances of privacy, as the requests are made on behalf of business entities, not individuals. Neither of the collection instruments in this package require a Privacy Act Statement.

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.

None of the information requested is of a sensitive nature.

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.

The totals in the table below are based on averages calculated by Transmission staff. Burden hours were estimated based upon staff timing while reviewing instructions and filling out the collection instruments.

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
BPA F 6500.15e Transmission Operator Provider (TOP) Outage Request	public	125	6,250	.16	1,000	50
BPA F 6530.16e Application for a Wireless Site Upgrade Co-Located on BPA Facilities	public	6	75	1.5	113	12.5
TOTAL		131	6,325		1,113	

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’.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
public	1,113	40.35	\$44,910
TOTAL	1,113		\$44,910

Annual cost to the public is estimated to be \$44,910 based on an average of \$40.35/hour (fully burdened) using BLS data from: <http://www.bls.gov/news.release/ecec.nr0.htm> using civilian worker average compensation and 1,113 burden hours.

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.

Other than those described above, BPA does not anticipate any additional annual cost burden to respondents. There will be no ongoing operation or maintenance costs for respondents.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

The estimated budget for the System Operations office that processes this information collection is \$218,479 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, average full time equivalent (FTE) is approximately \$54.96/hour (based on the Bureau of Labor and Statistics Employer Costs for Employee Compensation Summary <http://www.bls.gov/news.release/ecec.nr0.htm>). BPA approximates .5 hour to review each form.

- 6250 reports/year x .5 hour/report x \$54.96/hour = \$171,750
- Those costs for the Systems Operation budget that are not personnel-related and for office and equipment are \$46,729.

The estimated budget for the Transmission Services office that processes this information collection is \$15,451 annually. This includes estimated federal burden for BPA personnel processing the completed forms, which is based on the total number of hours it would take to complete review and verification of information. The estimate for a fully burdened, average full time equivalent (FTE) is approximately \$54.96/hour (based on the Bureau of Labor and Statistics Employer Costs for Employee Compensation Summary <http://www.bls.gov/news.release/ecec.nr0.htm>). BPA approximates 3 hours to review each form.

- 75 reports/year x 3 hour/report x \$54.96/hour = \$12,366
- Those costs for the Transmission Services budget that are not personnel-related and for office and equipment are \$3,085.

The total cost for the Customer Request Services collection is \$233,930.

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.

This is a new collection, therefore there are no changes or adjustments reported.

A.16. Collection, Tabulation, and Publication Plans

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

This information collection will not be published.

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.

BPA will display the OMB Control Number and expiration date on all collection vehicles.

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.