
Supporting Statement for Applications for DOE Loan Guarantees for Energy Projects

Part A: Justification
OMB No. 1910-5134

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Collection Instruments:

- Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005
- ~~Program Guidance for Title 17 Clean Energy Financing Program~~

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Table of Contents

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

Introduction

The U.S. Department of Energy (the “Department” or “DOE”) requests the revision of a previously approved information collection request under OMB Control Number 1910-5134 (the “ICR”) and utilized by DOE’s Loan Programs Office (“LPO”) to administer two DOE loan guarantee programs, known as the Title XVII Program and the Tribal Energy Loan Guarantee Program or “TELGP” (each, a Loan Guarantee Program and collectively, the “Loan Guarantee Programs”). This request is made in conjunction with the submission to OMB of the Interim Final Rule for “Loan Guarantees for Clean Energy Projects” for publication in the Federal Register and Code of Federal Regulations at 10. C.F.R. 609 (the “Title XVII IFR”). The request is to include an additional ICR collection instrument titled the “Program Guidance for Title 17 Clean Energy Financing Program” to be published on DOE’s Title XVII Loan Guarantee Program website (the “Title 17 Program Guidance”) immediately following the issuance of the Title XVII IFR.

The ICR collection instruments currently include the following four solicitations (“Solicitation” and collectively, the “Solicitations”), each of which describes the information that an applicant (“Applicant” or “Respondent”) must submit to LPO when requesting a loan guarantee from the Department for a project of the type to which that respective Solicitation applies.

Title 17 Solicitations

- Loan Guarantee Solicitation for Applications for Renewable Energy Projects and Efficient Energy Projects; Solicitation Number: DE-SOL-0007154;
- Loan Guarantee Solicitation for Applications for Advanced Nuclear Energy Projects; Solicitation Number: DE-SOL-0007791; and
- Loan Guarantee Solicitation for Applications for Advanced Fossil Energy Projects; Solicitation Number: DE-SOL-0006303.

TELGP Solicitation

- Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005.

While the Title 17 Solicitations will remain available for a period of time following the IFR and issuance of the Title 17 Program Guidance, LPO intends to transition to collecting information from applicants to the Title XVII Program exclusively under the Title 17 Program Guidance later in 2023. Specifically, applicants that submitted a Part I or Part II application based on the Title 17 Solicitations may continue to rely on the guidance provided in such Solicitations, unless otherwise notified by LPO.

Because the information requested of applicants under the Title 17 Program Guidance is materially the same as that collected under the current Solicitations, and burdens and costs are the same, the Title 17 Program Guidance will utilize the same ICR authority as currently utilized for Title XVII applications.

LPO uses the information an Applicant provides to determine whether the project proposed by the Applicant meets the eligibility and other legal requirements of the applicable Loan Guarantee Program.

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.

Title XVII of the Energy Policy Act of 2005 (42 U.S.C. 16511-16517; attached) (“Title XVII”) authorizes the Secretary of Energy to make loan guarantees for energy projects meeting the criteria specified in Title XVII and in regulations adopted the Department to implement Title XVII (10 U.S.C part 609) (the “Title XVII Rule”). This Secretary created LPO to administer this authority (the “Title XVII Program”).

The IFR incorporates two additional categories of projects that are eligible for loan guarantees from DOE under Title XVII of the Energy Policy Act of 2005 (“Title XVII”) as a result of amendments to Title XVII enacted by the Infrastructure Investment and Jobs Act (“IIJA”) in 2021 and the Inflation Reduction Act (“IRA”) in 2022. The new categories of eligible projects are Energy Infrastructure Reinvestment (Section 1706) projects and a new category of financing under section 1703 for projects supported by a State Energy Financing Institution (“SEFI”). The IRA also provided DOE with additional loan guarantee authority and appropriations for the cost of issuing loan guarantees under Title XVII. DOE intends to invite the submission of applications for loan guarantees for eligible projects under Title XVII, including the projects made eligible under Section 1706 and the SEFI authority, pursuant to the “Program Guidance for Title 17 Clean Energy Financing Program” to be published on DOE’s Title XVII Loan Guarantee Program website (the “Title 17 Program Guidance”) immediately following the issuance of the IFR.

LPO will use the Title 17 Program Guidance to collect from Applicants the information that Title XVII and the Title XVII IFR require Applicants to provide and LPO to evaluate when deciding whether the Secretary should issue a loan guarantee to the Applicant.

In addition, the information collected through the ICR assists the Department to meet its public transparency and accountability obligations, such as requirements and requests to deliver timely information on Title XVII Program activities to OMB, Congress, and the public.

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.

LPO will use the information it collects pursuant to the Title 17 Program Guidance ICR to administer the Loan Guarantee Programs in the same manner that it uses the information collected pursuant to the Solicitations, including as follows:

LPO uses the ICR to obtain business, financial, and technical information from an Applicant about the ability of the proposed borrower to comply with Title XVII, the Title XVII IFR, the Title 17 Program Guidance, and other federal law, as applicable, before DOE can provide financing. For instance, among

many other requirements: Title XVII requires that projects receiving a loan guarantee (i) be innovative, (ii) meet the energy infrastructure reinvestment criteria contained in Section 1706; or (iii) receive meaningful financial support or credit enhancements from a state energy financing institution; projects must avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases, and provide a reasonable prospect of repaying the loan; the National Environmental Policy Act of 1969 (“NEPA”) prohibits the Secretary from making a loan guarantee unless the borrower complies with that statute; and Title XVII requires that the borrower pay prevailing local wages to mechanics and laborers constructing the project in accordance with the Davis Bacon Act. LPO also requires Applicants to submit information regarding the Community Benefits Plan applicable to the project.

The financial and technical information that the Applicant must provide through the ICR comprises the same information as the Applicant would provide in the private sector when seeking financing for a project of similar complexity, size, and risk. For instance, among many other things, LPO requires Applicants to submit: a description of the nature and scope of the project, including key milestones and location; a detailed estimate of the total project costs; a detailed overall financial plan for the project, including all sources and uses of funding, equity, and debt, and the liabilities of parties associated with the project; the Applicant’s business on which the project is based and Applicant’s financial model presenting project *pro forma* statements for the proposed term of the loan including income statements, balance sheets, and cash flows; an analysis of the projected market use for any product; etc.

Following the issuance of the IFR, LPO will direct all potential applicants to utilize the Title 17 Program Guidance ICR to apply for Title 17 loan guarantee instead of the Title 17 Solicitations. The Title 17 Solicitations will remain available for reference on LPO’s website and applicants that submitted a Part I or Part II application based on such Solicitations may continue to rely on the guidance provided in such Solicitations, unless otherwise notified by LPO.

The TELGP Solicitation will remain the ICR for the TELGP Program.

LPO has continuously used, and will continue to use, the information it collects pursuant to the ICR as follows:

- LPO’s teams of credit analysts, engineers, lawyers, risk managers, and other professionals rely on the ICR information provided by Applicants to determine whether and on what terms to issue a loan guarantee for the project the Applicant proposes, including evaluating the eligibility of proposed borrowers and projects under the requirements of the Loan Guarantee Programs, evaluating the financial, policy, and engineering merits of applications and projects, and structuring the terms of the loan guarantees so that they protect the federal government’s financial interests and achieve its policy objectives. Each project and loan guarantee is unique, but historically projects receiving loan guarantees under Title XVII cost hundreds of millions of dollars, deployed innovative technology, and entered uncertain markets. In such complex situations and with such large sums of money at stake, LPO’s process for evaluating loan guarantee applications is necessarily deep and exacting. Because of their scale and complexity, these projects typically take years to develop. LPO simply could not successfully carry out the Loan Guarantee Programs without the information it obtains through the ICR.
- LPO uses the ICR information for planning, management, and evaluation of the Loan Guarantee Programs;

- LPO uses the ICR information to manage its funds and make projections of risks;
- LPO uses the ICR information to answer congressional, OMB and public inquiries regarding the Loan Guarantee Programs; and
- LPO has over 100 active applications pursuant to the Solicitations requesting loan guarantees in excess of \$90 billion and expects many more.

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.

LPO requires Applicants to submit their applications to LPO in electronic form through LPO’s application portal, which they can access via an internet address LPO provides them upon request (at present: <https://dart-uat.loanprograms.energy.gov/Content/Login.html>). As a result, 100% of the ICR is collected in electronic form.

This electronic manner of collection reduces the hour and cost burdens on Applicants by allowing them to easily and speedily deliver, store, review, and amend their applications using contemporary methods and technologies with which Applicants and LPO are familiar and regularly conduct their business.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

The eligibility requirements of the Loan Guarantee Programs are unique within DOE and the federal government, therefore the information collected through the ICR is also unique. Neither DOE nor other federal agencies collect the same information from Applicants. However, because Applicants will have already developed the same or similar information in the course of seeking private sector-capital for their projects, they are able to respond to this ICR using much of this existing information, thus reducing potential burdens of the collection.

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.

Most eligible projects under the Loan Guarantee Programs will be larger than those that small businesses usually undertake. Nevertheless, LPO has taken steps that may increase the attractiveness of the Programs to smaller businesses.

There are no application fees associated with applications under the Title XVII Program, and the application encourages prospective Applicants to consult with program staff before applying. This allows prospective Applicants to better understand eligibility and related program requirements before incurring the hour burden and cost associated with submission of an application. Similarly, the two-part process for applying under the Title XVII Program (see A.6 below) helps LPO to help Applicants avoid unnecessary burdens.

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.

If the information is not collected, DOE will become unable to continue with the implementation and administration of the Loan Guarantee Programs. Failure to do so would be contrary to Title XVII, the Title XVII IFR, and related appropriations laws. An Applicant submits only one application per project, therefore short of not collecting the information at all, it is not a possibility to collect the information less frequently than this single application.

That said, LPO has exercised the discretion provided in the Title XVII Rule to use a two-part application process. LPO uses Part I of the application to screen for project eligibility and readiness to proceed, before inviting an Applicant to submit Part II of the application. The initial review conducted with Part I may save Applicants the marginal costs of submitting Part II for projects LPO does not expect to successfully proceed through the program.

Additionally, if the information is not collected, DOE will be unable to effectively respond to congressional, budget, and general public inquiries about activity of the Loan Guarantee Programs.

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 produce 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 ICR is consistent with OMB guidelines. No special circumstances require the ICR to be conducted in a manner inconsistent with OMB guidelines.

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 Title XVII IFR specifies that DOE must publish the Title 17 Program Guidance on its website containing the method and instructions for the submission of a Title XVII Program application.

As required in 5 CFR 1320.11(d), DOE is providing the initial 60-day review and comment process through the preamble of the proposed rulemaking. DOE will address in the preamble to the final rulemaking any comments received and make necessary adjustments where applicable. No individual respondents were contacted due to the proposed rulemaking nature of the collection.

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.

No payment or gift to Applicants is being proposed under this ICR. However, providing the information requested by this ICR is one condition under the Title XVII Rule and the Solicitations to receiving a loan guarantee under the Loan Guarantee Programs.

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 ICR seeks information that Applicants are likely to deem includes proprietary trade secret and other confidential business information. LPO must have this information to evaluate the financial and technical merits of the project an Applicant proposes to finance under the applicable Loan Guarantee Program. The ICR does not seek other common types of confidential information, such as personally identifiable information.

LPO protects an Applicant’s trade secret and confidential business information in LPO’s possession from public disclosure to the maximum extent permitted by law, including under the Trade Secrets Act, 18 U.S.C. 1905, which prohibits federal employees from unauthorized disclosure of such information, and under the Freedom of Information Act’s exemption from disclosure for trade secret and confidential business information (5 U.S.C. § 552a, exemption 4). In addition, an Applicant’s trade secret and confidential business information is deemed “Confidential Unclassified Information” information under DOE policy (DOE O 471.7) and is to be labeled as such by DOE personnel so as to guard against inadvertent public disclosure and to limit distribution to only those within the U.S. Government who have a need to know it in order to perform their jobs. Lastly, the Title 17 Program Guidance (cross-referencing

10 C.F.R. 600.15) provides detailed instructions to Applicants about how they may mark their trade secret and business confidential information so that DOE can readily recognize it as subject to a claim of confidentiality and accord it appropriate protections. LPO stores Applicant information on DOE's computer systems, which are protected by government IT security measures and allow access only to authorized personnel.

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.

No questions of a personally sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private are included in this ICR.

The ICR seeks financial and business information that Applicants typically consider sensitive and often constitutes trade secret and confidential business information. However, Applicants to the Loan Guarantee Programs understand well that it is necessary and customary to provide such information when seeking financing, whether in the private or public sectors, for projects of such size, complexity, and risk.

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 ICR seeks complex business, financial, and technical information, including information regarding innovative technologies and financial models. Accordingly, the estimate of hour burden of the information collection is as follows:

Total number of unduplicated respondents: 92

Reports filed per respondent: 1

Total annual responses: 92

Total annual burden hours: 13,478 hours

Average Burden

Per Collection: 146.5 hours

Per Applicant: 146.5 hours

The forgoing estimates are based on LPO's 10-plus years of experience administering the Title XVII Program and other similar LPO programs, including feedback and other experience working with Applicants to collect the information for applications. The estimates are based on the assumption

described in response to Question 13 below regarding the functional/occupational categories of personnel working for the Applicant who would typically be involved in furnishing the required information and the time required of each category.

Furthermore, and also based on LPO’s experience administering the Loan Guarantee Programs, LPO understands from Applicants that the information LPO seeks through the ICR is information that Applicants already possess in the ordinary course of business. For instance, Applicants will have previously generated and used the same information in some form for the purposes developing the project, including raising equity and exploring other financing sources. Thus, the LPO’s hour burden estimate comes from LPO’s estimate of the time it takes Applicants to assemble, organize and upload into the LPO application portal this information they already have.

The burden hours per response (146.5 hours) is 14 hours more than the burden hours per response that was used to calculate the approved burden hours inventory for the 2022 extension due to the inclusion of a collection of information regarding the Applicant’s Community Benefits Plan within the ICR.

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
Loan Guarantee Solicitation for Applications for Renewable Energy Projects and Efficient Energy Projects; Solicitation Number: DE-SOL-0007154	Applicant for Title XVII Program loan guarantee (business or other for-profit)	0	0	132.5	0	1
Loan Guarantee Solicitation for Applications for Advanced Nuclear Energy Projects; Solicitation Number: DE-SOL-0007791	Applicant for Title XVII Program loan guarantee (business or other for-profit)	0	0	132.5	0	1
Loan Guarantee Solicitation for Applications for Advanced Fossil Energy Projects; Solicitation Number: DE-SOL-0006303	Applicant for Title XVII Program loan guarantee (business or other for-profit)	0	0	132.5	0	1
Loan Guarantee Solicitation for Applications for Federal Loan Guarantees for Tribal Energy Development Projects; Solicitation Number: 89303018RLP000005	Applicant (lender) for a TELGP loan guarantee (business or other for-profit)	3	3	146.5	439.5	1
Program Guidance for Title 17 Clean Energy Financing Program	Applicant for Title XVII Program loan	89	89	146.5	13,038.5	1

	guarantee (business or other for- profit)					
TOTAL		92	92		13,478	

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’.

LPO estimates the cost for the hour burden of the information collection is \$28,589 per Title 17 Applicant, totaling \$2,544,421. The total for TELGP Applicants is \$28,589 per TELGP Applicant totaling \$85,767. This estimate is based on the estimate of the amount of time to complete an application (146.5 hours) distributed in the same amounts across the same functional/occupational categories of personnel as in the estimate contained in LPO’s most recent (2022) request to OMB to extend the ICR authorization.

In the following table, LPO breaks out the various functional/occupational categories involved in preparing and submitting an application, the estimated amount of time for the activities in each functional/occupational category, and an estimate of the hourly wage rate of the personnel in each functional/occupational working for a hypothetical and typical Applicant. These figures are multiplied and added to produce the estimated total cost per Applicant. Then, multiplying the estimated cost of \$28,589 per Applicant times the estimated 92 annual Applicants LPO expects produces an annual combined cost estimate for 92 Applicants equal to \$2,630,188.

ESTIMATED COST BURDEN TO APPLICANT

FUNCTION	RATE	HOURS	TOTAL COST
Collecting information	\$ 81	46.0	\$ 3,726
Compiling information	\$ 81	46.0	\$ 3,726
Management review	\$ 271	22.0	\$ 5,962
Legal review	\$ 677	20.0	\$ 13,540
Submitting information	\$ 55	10.0	\$ 550
Other labor/services	\$ 22	2.5	\$ 55
General expense*	n/a	n/a	\$ 1,030
TOTAL			\$ 28,589

* General expenses include supplies, delivery charges, mailing, copying, telecommunications, etc.

To produce this estimate of the cost to each Applicant, LPO consulted the U.S. Bureau of Labor Statistics’ most recently published (2020) data regarding hourly wage rates for various occupational categories and functions similar to those involved in submitting an Application. LPO also drew from its

10+ years of institutional knowledge and experience administering the Title XVII Program and other similar loan programs, including its experience working with hundreds of prospective Applicants and actual Applicants as they prepared and/or submitted their applications to LPO. LPO then adjusted these estimated rates so that they would reflect a fully-burdened wage (*i.e.*, wage plus benefits).

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.

To apply under the Loan Guarantee Programs, an Applicant need not incur costs for capital, start-up, total operation, maintenance, or purchase of services beyond what the Applicant already incurs in the ordinary course of business of developing its project.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

LPO estimates that in utilizing the information it collects through applications under the Loan Guarantee Programs, LPO incurs annual costs of \$66,700,000.

LPO derives this estimate from its Cost Estimation Model and from its 10-plus years of experience originating loans under the Title XVII Program. LPO most recently updated its Cost Estimation Model in early calendar year 2021. That version of the Model estimates the cost to LPO to originate a single loan as \$1,450,000 over an assumed 24-month period from receipt of the Application through loan closing. Annualized, this is \$725,000 per Application. And because the circumstances regarding each Application vary greatly, LPO ascribes a +/- 45% confidence level to this estimate, resulting in a range of \$400,000 to \$1,050,000 annually per Application. Multiplying the middle of that range (\$725,000) by LPO's estimate of 92 Applications per year yields \$66,700,000 as its estimate of annual cost (with a confidence range from \$36,800,000 and \$96,600,000) to LPO to utilize the information contained in all of those Applications.

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.

The upward estimate from 2022 results from the inclusion of information regarding an applicant's Community Benefits Plan in the ICR. All Title 17 project applicants are required to submit a Community Benefits Plan with Part II of their application. To support the goal of building a clean and equitable energy economy, LPO projects are expected to (1) support meaningful community and labor engagement; (2) invest in America's workforce; (3) advance diversity, equity, inclusion, and accessibility; and (4) contribute to the President's goal that 40% of the overall project benefits flow to Disadvantaged Communities (DACs) (the Justice40 Initiative). TELGP Projects will also be asked to provide information regarding a Community Benefits Plan.

A Community Benefits Plan for an LPO application does not need to entail extraordinary additional requirements beyond the normal course of project development activities. The Community Benefits Plan should be approximately 3-8 pages in length and written in an executive summary format to identify project benefits described elsewhere in the application. Applicants should specifically communicate ways in which the Community Benefits Plan de-risks the project and mitigates community harm. The Community Benefits Plan organizes information on specific activities (such as Operation and

Maintenance Plan, obtaining skilled labor, training, site selection, community and environmental engagement, GHG analysis) that are included elsewhere in the application and provides guidance on already prepared suggested items to include and attach that are already prepared.

The estimate for the number of hours for each section is based on the guidance and relationship to other requirements of the application:

- Estimated Hours Community and Labor Engagement – 3 hours
- Estimated Hours Quality Jobs and Workforce Continuity – 4 hours
- Estimated Hours Diversity, Equity, Inclusion, and Accessibility – 3 hours
- Estimated Hours Justice40 – 4 hours

Total Estimated Hours for preparing the Community Benefits Plan is 14 hours. These hours are expected to be allocated among collecting information, compiling information, and management review. LPO developed this estimate based on experience the DOE has gained in assessing Community Benefit Plans since the passage of the IIJA.

LPO continues to estimate that it will receive 92 applications annually from 92 Applicants.

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	92	0	0	92
Total Time Burden (Hr)	13,478	0	1,288	12,190
Total Cost Burden	\$2,630,188	0	\$139,288	\$2,490,900

A.16. Collection, Tabulation, and Publication Plans

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

The information collected is not intended to be published. There will be no collections of information for which results will be published for statistical use. No complex analytical techniques will be employed. There will not be a report on the information LPO collects, other than quarterly and annual reporting on the progress of the Title XVII Program as a whole.

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.

The OMB control number, OMB expiration date, and burden disclosure statement will be included on all forms and instructions, including LPO’s web-based application portal.

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 in Item 19 of the OMB Form 83-I to which this Supplemental Statement pertains.