
Supporting Statement for Puerto Rico Energy Resiliency Fund, Solar Ambassador Household Intake Form

Part A: Justification

OMB No. 1910-NEW

Solar Ambassador Household Intake Form

August 2023

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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.

Pursuant to the Office of Management and Budget (OMB) procedures established in 5 C.F.R. 1320, Controlling Paperwork Burdens on the Public, the U.S. Department of Energy (DOE), Grid Deployment Office (GDO), is requesting that the proposed information of collection, Solar Ambassador Household Intake Form, be processed as an Emergency Clearance Information Collection Request (ICR) as referenced in 5 C.F.R. 1320.13, Emergency Processing.

DOE has determined that the information must be collected prior to the time periods established under Part 1320 of the regulation, and that this information is essential to GDO's implementation of the Puerto Rico Energy Resiliency Fund (PR-ERF).

The PR-ERF will support the installation of rooftop solar and storage solutions for vulnerable Puerto Rican households. The purpose of this ICR is to authorize the 'Solar Ambassador Household Intake Form' as the means to collect homeowner information necessary to qualify households as eligible to participate in the deployment phase of the PR-ERF. Eligibility is limited to very low-income single-family households¹ residing in Puerto Rico that (1) include an individual with an energy-dependent disability or (2) are located in a Last Mile Community².

List of forms within this collection:

- 1) Solar Ambassador Household Intake Form

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.

The Consolidated Appropriations Act of 2023, Public Law 117-328,³ directs the Department of Energy to improve the resilience of the Puerto Rican electric grid, including grants for low-and-moderate-income households and households that include individuals with disabilities for the purchase and installation of renewable energy, energy storage, and other grid technologies. This narrow scope in purpose necessitates the need for a diligent verification process to demonstrate to Congress, Senior Leadership, and the public that these specific communities have been served.

According to information collected from LUMA, the grid operator of Puerto Rico, there have been 54 load shedding events (power outages caused by insufficient ability to generate

¹ A household in which at least one individual is enrolled in or receives benefits from one or more of the following government assistance programs: Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), or Temporary Assistance for Needy Families (TANF).

² A census block that (a) has a high percent of very low-income households and (b) experiences frequent and prolonged power outages.

³ [FY23 Summary of Appropriations Provisions.pdf \(house.gov\)](#), Title IV – Energy and Water Development, and Related Agencies --ENERGY AND WATER DEVELOPMENT, AND RELATED AGENCIES

electricity) in Puerto Rico during the last two and a half months. These power outages occur when customer demand for electricity exceeds the capacity of Puerto Rico's electric generation fleet. This is expected to continue as power plant maintenance schedules and associated high-priority repairs from Hurricane Fiona in September 2022 have been postponed due to the need to use all existing power capacity.

These daily outages in addition to recent record-breaking temperatures on the island (in the midst of hurricane season) are a combination of long-term damaging effects that affect the citizens of Puerto Rico, representing a public harm, specifically for individuals with an energy dependent disability or residents of areas that suffer frequent and prolonged power outages. By initiating installations of solar PV and battery storage systems before the 2024 hurricane season, DOE plans to address the harm and risk represented by the fragility of the islands' power system. Failure to collect the information immediately would cause delays in providing assistance that is necessary to reestablish the reliability of electric service to these vulnerable residents. GDO developed an in-person application process recognizing that the demographic served will lack access to broadband and have limited mobility but that it is essential to program operation to verify beneficiary eligibility for participation in the program. This process is currently envisioned to be facilitated by competitively selected Community Based Organizations (CBOs) but other entities such as electric cooperatives and solar installers may also contribute depending on program execution needs.

GDO plans to provide a mandatory training to Solar Ambassadors November 2023. The intake form is a critical part of that training and needs to be an approved method of collection prior to that date. DOE is not currently collecting information from the same population of respondents.

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.

On February 21, 2023, GDO released a request for information (RFI) to obtain feedback from Puerto Rican stakeholders to inform program design. Barriers to participation from very low-income single-family households that may lack resources such as computers and broadband was noted as one of the main challenges of certain demographics to have access to assistance programs. Also, residents with an energy dependent disability may have mobility issues that prevent them from applying to this type of program. Recommendations from stakeholders to overcome participation barriers included:

- 1) Create a well-defined but flexible application evaluation system to determine who is eligible so that very low-income populations will be confident they will qualify.
- 2) Offer a walk-in and in-person application process delivered in Spanish.

DOE envisions that information collection will be performed by a network of CBOs selected through a competitive 'Solar Ambassador Prize.'⁴ The Solar Ambassador Prize will incentivize up to twenty Puerto Rican CBOs to perform program outreach, education, and assist Puerto

⁴ [Puerto Rico Energy Resilience Fund | Department of Energy](#)

Rican homeowners interested in receiving rooftop solar PV and battery storage installation complete the ‘Solar Ambassador Household Intake Form.’ Information collected on the Form will be used to ensure households are eligible to participate in the deployment phase of the PR-ERF. Solar Ambassadors, working on behalf of the selected CBOs, will be the individuals performing outreach and assisting homeowners with the intake process.

Although the in-person intake recommendation would increase burden, GDO designed the Solar Ambassador Prize based on these recommendations from the public whereby education, outreach, and household verification would be performed by trusted community members (Solar Ambassadors) through an in-person application process.

Sections of Form to be completed by the homeowner/s:

Yes/No check a box format:

- 1) Is the home a single-family house (i.e., fully detached house, semidetached (side-by-side) house, row house, or townhouse)?
- 1) Is at least one of the residents of the household enrolled in or receive benefits from one or more.
 - 2) of the following government assistance programs: Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), or Temporary Assistance for Needy Families (TANF).
- 3) Is this the primary residence of the homeowner?
- 4) Does at least one of the residents of the household qualify as an Individual with an Energy Dependent Disability?
- 5) Is the household located in a [Last Mile Community](#) (a qualifying census block that has a high percent of very low-income households, and experiences frequent and prolonged power outages)?

Data Fields:

- 1) Installation Physical Address
- 2) Name of Individual with energy dependent disability (if applicable)
- 3) Name of Homeowner
- 4) Homeowner’s Phone number
- 5) Alternate phone number (if identified by the homeowner, someone who lives at or outside the household)
- 6) Homeowner’s Email
- 7) Name of Individual enrolled in TANF, PAN, or LIHEAP
- 8) Section 4: Homeowner’s Verification of Information

Supporting Documentation to be provided:

- 9) Proof of enrollment in Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), or Temporary Assistance for Needy Families (TANF)
- 10) Proof of Individual with Energy Dependent Disability living in household
- 11) Proof of homeownership
- 12) Proof of most recent electric bill

Sections of Form to be completed by the Solar Ambassador:

Yes/No check a box format:

- 1) Does the house have an intact roof?
- 2) Does the house appear to be a single-family dwelling?
- 3) Does the house have any tall surrounding vegetation and/or trees that may shade the roof?
- 4) Does the household have reliable internet connection?

Data fields:

- 13) Section 5: Ambassador Statement

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.

Solar Ambassadors will provide a digital means for homeowners to complete the Intake Form. Homeowners will also have the option to submit the completed form and required documents by mail. We estimate that 90% of homeowners will be able to complete intake by digital means and 10% will submit intake forms via mail. There will be no change in burden hours between digital and mail-in submissions as there will be no change in required information.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

This is a unique collection with a very narrow scope of purpose. Consultations with program offices serving low-income populations such as the Housing and Urban Development (HUD) and the State Weatherization Program (WAP) were had to determine if there was an approved ICR seeking the same information. It was determined that there are no existing ICRs that can be used or modified for our purpose.

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.

Neither small businesses nor other small entities are impacted.

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.

This request is to cover a one-time collection of information with a performance period of 6-months. This is a new collection request.

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 will be conducted in a manner consistent 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.

Due to the expedited timeframe for collecting this information, DOE is requesting an Emergency Clearance as referenced in 5 CFR 1320.13, Emergency processing. GDO is submitting a 30-day FRN for publication to run concurrently with the Emergency approval, if granted.

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 is being provided to the respondents.

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.

Information collected on the Form was developed in consultation with the DOE Privacy Program under the Office of the Chief Information (OCIO) that manages the Department's compliance with and implementation of the Privacy Act of 1974, Section 208 of the e-Government Act of 2002. The Form contains a 'Solar Ambassador Program Privacy Act Statement'.

The complete listing of possible recipients of this Acknowledgment may be found under the heading "Routine Uses" in the Federal Register notice of the system of records in which it will be kept by DOE under DOE-82, Grant and Contract Records for Research Projects, Science Education, and Related Activities, published at 74 Fed. Reg. 994 (January 9, 2009).

DOE will provide privacy training to Solar Ambassadors and solar installers that addresses the key elements necessary for ensuring the safeguarding of personally identifiable information as prescribed by Federal Acquisition Regulation (FAR) 52.224-3 Privacy Training.⁵

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.

Not applicable.

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

⁵ [52.224-3 Privacy Training. | Acquisition.GOV](#)

conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

Homeowner Burden Hours:

Our goal is to receive responses from up to 40,000 eligible households. While the number of households Solar Ambassadors are able to reach may be less, we are using the 40,000 goal as our benchmark.

Total number of Respondents: Up to 40,000 homeowners.

Annual Number of Responses: Up to 40,000 homeowners.

Burden Hours Per Response:

We estimate it can take five minutes for the homeowner or for the Solar Ambassador to review instructions (one pager and/or frequently ask questions documents). We estimate that it will take a homeowner (respondent) ten minutes to complete contact information and basic inputs such as home address. We estimate that it will take forty minutes for a homeowner to access information that may not be readily available such as proof of homeownership, income, and/or copies of electric bills. GDO has built-in methods to reduce burden to homeowners by providing Solar Ambassadors with links to sites where information, if not readily available, can be located by the homeowner. **In total, we do not expect a homeowner to have a time burden of over 55 minutes.**

Using a homeowner time burden of fifty-five minutes multiplied by 40,000 homeowner respondents, this would equate to 36,800 hours of burden over the 6-month life of the program.

Solar Ambassador Burden Hours:

Total number of Respondents: Up to 200 Solar Ambassadors

Annual Number of Responses: Up to 40,000 Solar Ambassadors

We estimate that it will take five minutes for the Solar Ambassador to engage with the homeowner and provide all relevant information regarding the program. Solar Ambassadors will be responsible for completing ‘Section 6: Rooftop Solar Readiness’ of the Solar Ambassador Household Intake Form. The assessment is visual in nature and process for collection is provided in a check-a-box format. **We estimate that time burden associated with the assessment and information collection will not exceed 30 minutes.** We estimate that each of the twenty CBOs will enlist approximately no more than ten Ambassadors leading to an average total network of two-hundred Ambassador respondents.

Reporting Frequency

One time.

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
Household Intake Form: Homeowner Data	Homeowner	40,000	40,000	0.92	36,800	1
Household Intake Form: Introduction/Program Overview and Solar Readiness	Solar Ambassador	200	40,000	0.5	20,000	1
TOTAL		40,200	80,000		56,800	

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’.

Cost to Homeowners

The hourly minimum wage rate for Puerto Rico from the Department of Labor’s (DOL) ‘Consolidated Minimum Wage Table,’ is \$8.50.⁶ As the populations we are working to serve are very low income, this rate has been applied as our benchmark. To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 was applied.⁷

Fully burdened rate for Homeowners: $8.5 \times 1.4 = \$11.90$

Total costs: $36,800 \text{ hours} \times 11.9 = \$437,920$

Cost to Solar Ambassadors

Using wage rate data specific to Puerto Rico from the DOL BLS, Occupation Code 21-0000, Community and Social Services Occupations with the hourly wage rate of \$14.56 seems most in-line with duties to be performed by Solar Ambassadors.⁸ To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 for private employees was applied.

⁶ [Consolidated Minimum Wage Table | U.S. Department of Labor \(dol.gov\)](https://www.dol.gov/eis/whd/consolidated-minimum-wage-table)

⁷ <http://www.bls.gov/news.release/ecec.nr0.htm>

⁸ 21-0000, Community and Social Services Occupations, [Puerto Rico - May 2022 OEWS State Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/archives/oeu220501.pdf)

Fully burdened rate for Solar Ambassadors: $14.56 \times 1.4 = \$20.38$
 Total costs: $20,000 \text{ hours} \times 20.38 = \$407,600$

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Homeowners	36,800	\$11.90	\$437,920
Solar Ambassadors	20,000	\$20.38	\$407,600
TOTAL	56,800		\$845,520

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.

GDO estimates that respondents will have no additional costs associated with the collection other than the burden hours and costs related to completing the Intake Form.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

Third-party Verification

DOE plans to contract with an independent third-party verifier to ensure Forms submitted by Ambassadors are complete. On July 31, 2023, DOE received bids from three interested parties. On average, the three bids received estimated that verification activities would take four employees 7,500 hours to complete. Using national data from the DOL BLS, ‘Occupation Code 3-1000, Business Operations Specialist’ with an hourly wage rate of \$40.04 seems most in-line with verification duties we are requesting to be performed.⁹

To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 for private employees was applied.

Fully burdened rate: $40.04 \times 1.4 = \$56.20$
 Total costs: $7500 \text{ hours} \times 56.20 = \$421,500$

TOTAL SUM OF ANNUAL COSTS TO THE FEDERAL GOVERNMENT = \$421,500

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.

Not applicable as this is a new collection.

⁹ 3-1000, Business Operations Specialist, [May 2021 National Occupational Employment and Wage Estimates \(bls.gov\)](https://www.bls.gov/news.release/ocwage/20210501.pdf)

A.16. Collection, Tabulation, and Publication Plans

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

There are no plans for publication.

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 Department is not seeking approval to not display the expiration date for OMB approval of the information collections contained in this package.

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, “Certification for Paperwork Reduction Act submissions” of OMB form 83-I.