
Supporting Statement for Bonneville Power Administration Contracting

Part A: Justification

OMB No. 1910-5190

BPA F 4220.01ae, Request for Taxpayer Identification Number and Certificate

BPA F 4220.01n, Federal Tax Withholding Applied to Payments to Foreign Entities

BPA F 4220.03e, Realty Request for Taxpayer Identification Number and Certificate

BPA F 4220.04e, Subcontracting Report for Individual Contracts

BPA F 4220.05e, Beneficiary Request for Taxpayer Identification Number and Certificate

BPA F 4220.07e, Invitational Travel Request for Taxpayer Identification Number and Certificate

BPA F 4220.08e, Supplier Safety Program Variance Request

BPA F 4431.02e, Returned Materials Receipt

BPA F 5472.03e, Temporary Land-Use Assessment Questionnaire

BPA F 6410.11e, Daily Report to Inspector

BPA F 6410.41e, Contract Construction Material Request

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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.

Bonneville Power Administration (BPA) is submitting to the Office of Management and Budget (OMB) a proposal to revise currently approved information collection request 1910-5190. The proposed collection will allow BPA to gather information related to contracting activities.

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.

This collection adds ten new collection tools, called out below. In addition, the collection removes three collection tools that were determined to be primarily filled out by the government.

The relevant instruments for these collections are the following forms:

(New addition to Contracting package) BPA F 4220.01ae – Request for Taxpayer Identification Number and Certificate: **Form used to collect the required information to pay a vendor or payee.**

(New addition to Contracting package) BPA F 4220.01n – Federal Tax Withholding Applied to Payments to Foreign Entities: **Form used with foreign entities to collect information regarding taxable withholdings.**

(New addition to Contracting package) BPA F 4220.03e – Realty Request for Taxpayer Identification Number and Certificate: **Form used to collect required information to pay for land access, rights, or acquisition.**

BPA F 4220.04e – Subcontracting Report for Individual Contracts: **Form used to collect subcontract award data from prime contractors that: (a) hold one or more contracts over \$700,000 (over \$1,500,000 for construction); and (b) are required to report subcontracts awarded to Small Business (SB), Disadvantaged Small Businesses (DSB), Women-Owned Small Businesses (WOSB), Veteran-Owned Small Businesses (VOSB) and Service-Disabled Veteran-Owned Small Businesses under a subcontracting plan.**

BPA F 4220.05e – Beneficiary Request for Taxpayer Identification Number and Certificate: **Form used to collect required information in order to pay out decedent unpaid compensation benefits.**

BPA F 4220.07e – Invitational Travel Request for Taxpayer Identification Number and Certificate: **Form used to collect required information in order to pay for invitational travel.**

(New addition to Contracting package) BPA F 4220.08e – Supplier Safety Program Variance Request: **Form used to identify if contractors are using a variance from the performance metrics and ensures all contractual elements are aware of the variance request.**

(New addition to Contracting package) BPA F 4431.02e – Returned Materials Receipt: **Form used to document materials left over from a construction project, return those materials to inventory, and credit the project work order.**

(New addition to Contracting package) BPA F 5472.03e – Temporary Land-Use Assessment Questionnaire: **Form used with property that is being assessed for acquisition to identify if there are environmental liabilities or issues associated with the property.**

(New addition to Contracting package) BPA F 6410.11e – Daily Report to Inspector: **Form is used to confirm project activities by contractor for fiscal accountability.**

(New addition to Contracting package) BPA F 6410.41e – Contract Construction Material Request: **Form used to identify additional necessary materials that BPA provides for projects and order them in alignment with the project timeline. Additionally, if contractors damage or lose materials the form ensures that they are held accountable for that cost.**

Remove BPA F 4220.51e – Amendment of Solicitation/Modification of Contract/Order: Form is functionally identical to SF 1449, which in FR Doc. 02-5820 was exempted from PRA because, “this form is primarily completed by the Government”.

Remove BPA F 4220.52e – Solicitation, Offer, and Award for Construction: Form is functionally identical to SF 1449, which in FR Doc. 02-5820 was exempted from PRA because, “this form is primarily completed by the Government”.

Remove BPA F 4220.55e – Solicitation/Contract/Order for Commercial Items: Form is functionally identical to SF 1449, which in FR Doc. 02-5820 was exempted from PRA because, “this form is primarily completed by the Government”.

Gathering this information is necessary to ensure that BPA is complying with IRS requirements, ensuring appropriate financial stewardship, and reducing fiscal risks to the organization.

The Department published a 60-day Federal Register Notice and Request for Comments concerning this collection in the Federal Register on June 16, 2023, volume 88, number 116, and page number 39413. The notice described the collection and invited interested parties to submit comments or recommendations regarding the collection. No comments were received.

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.

BPA derives its contracting authority from several acts. The Bonneville Project Act, particularly Sections 2(f) and 8 (16 U.S.C. § 832a.), grants authority to the Bonneville Administrator to contract for supplies and services. The Federal Columbia River Transmission System Act of 1974, particularly Section 11(b) (16 U.S.C. § 838 et seq.), grants authority to the Bonneville Administrator to make expenditures without appropriations from Congress or limitation to fiscal year. The Pacific Northwest Electric Power Planning and Conservation Act, particularly Section 9(a) (16 U.S.C. § 839 et seq.), reaffirms the need for the special contracting authorities in Section 2(f) of the Bonneville Project Act. Establishment of the Department of Energy Act (42 U.S.C. 7101 et seq.). Additionally, 26 U.S.C. 6109 allows for the collection of "identifying numbers" in order to secure the identification of recipients of payments.

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.

Vendors complete and submit these forms to fulfill BPA contracting requirements. The contracting office is responsible for collecting and maintaining records of purchasing data for acquisition activities. The data shall provide, at a minimum: (a) A basis for responding and reporting to the Federal government and the public; (b) A means of measuring and assessing the impact of Bonneville supplier diversity program activities; and (c) Data for HCA oversight, management decisions, and operational purchasing management and internal control purposes. The forms gather information from contract employees, vendors, and other utilities.

BPA F 4220.01ae – Request for Taxpayer Identification Number and Certificate: collects the name of the individual and business, Taxpayer Identification Number, Social Security Number, business phone number, business address, financial institution information (required for payment) including – (bank name, bank phone number, nine digit transit number, depositor account number, payee contact person name, payee contact phone number), vendor name, vendor contact person name, vendor contact address if different from tax address, remit address if different than vendor contact address, service classification, award category classification.

BPA F 4220.01n – Federal Tax Withholding Applied to Payments to Foreign Entities: collects the vendor activity, IRS withholding certificate, name, company name, and work phone number.

BPA F 4220.03e – Realty Request for Taxpayer Identification Number and Certificate: collects the name of the individual and business, Taxpayer Identification Number or Social Security Number, business address, federal tax classification, financial institution information (required for payment) including – (bank name, bank phone number, nine-digit transit number, depositor account number, payee contact person name, payee contact phone number).

BPA F 4220.04e – Subcontracting Report for Individual Contracts: collects the Prime contractor’s name, Prime contractor’s address, Contractor Identification Number, Subcontract number, Subcontract awards, Name of Contractor individual administering Subcontracting plan, work phone number and work email address. Used to identify subcontractor award data, report is not required of small businesses.

BPA F 4220.05e – Beneficiary Request for Taxpayer Identification Number and Certificate: collects the name of the beneficiary, name of the decedent, federal tax classification, Taxpayer Identification Number or Social Security Number, beneficiary’s address, financial institution information (required for payment) including – (bank name, bank phone number, nine-digit transit number, depositor account number, payee contact person name, payee contact phone number).

BPA F 4220.07e – Invitational Travel Request for Taxpayer Identification Number and Certificate: collects the name, federal tax exemptions, address, Taxpayer Identification Number or Social Security Number, financial institution information (required for payment) including – (bank name, bank phone number, nine-digit transit number, depositor account number, payee contact person name, payee contact phone number).

BPA F 4220.08e – Supplier Safety Program Variance Request: collects the name of the requestor, facility/site, project title, project manager name, Contracting Officer Representative name, the BPA RFO or Contract Number, Company name, Primary Contact person, Primary Contact’s work email, Primary Contact Person’s work physical address, identification of whether a small business or not, office phone number, office fax number, work cell phone number, deficiency for which requesting a variance, and Contractor Safety Committee Approving Official name.

BPA F 4431.02e – Returned Materials Receipt: collects the contractor’s name. Used to document materials left over from a construction project, return those materials to inventory, and credit the project work order.

BPA F 5472.03e – Temporary Land-Use Assessment Questionnaire: collects the requestor name, company, work phone number, work email, site address, property owner’s name, representative’s name, and phone number of owner or representative. Used to assess environmental liabilities or issues associated with the property that are being considered for acquisition.

BPA F 6410.11e – Daily Report to Inspector: collects the contractor, name of the superintendent or foreman. Used to report on specific jobsites work performance for fiscal accountability. Submitted electronically.

BPA F 6410.41e – Contract Construction Material Request: collects contractor name. Used to identify additional necessary materials that BPA provides for projects and order them in alignment with the project timeline. Additionally, if contractors damage or lose materials the form ensures that they are held accountable for that cost.

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 submitted via email, internal mail, or fax. 99% of all forms are returned via electronic means, occasionally a hard copy Taxpayer Identification and Certificate will be received via mail or fax. 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.

While the collection applies to every type of party (private individuals, small businesses, government agencies, etc), this collection will not have a significant impact on small entities such as small businesses, organizations. The collection instruments were reviewed to minimize the number of questions to reduce the impact to the respondents. Additionally, certain forms are not required from small businesses, specifically BPA F 4220.04e. Efforts were made to alleviate the burden of BPA F 4220.01ae by only requiring a new substitute W9 if there is a significant change to the business, not required annually.

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.

Contracting officers are responsible for safeguarding the interests of Bonneville in its contractual relationships. Information collected related to payment is for the purpose of tax reporting and correct payment. In order to perform these responsibilities, most forms in this collection are single-use forms. However, safety related forms (variance request) are submitted more frequently and the material request and return forms are used as frequently as the contractor needs to either request or return

materials. Generally, the vendors retain the filled in copy of the forms that are submitted regularly and update as necessary. Requiring less frequent submittal would mean that vendors weren't compensated in a timely manner, which would unnecessarily penalize the vendor. Not submitting the daily report would reduce oversight of project management and could lead to fraud or waste. Variance report submitted at a less frequent interval would mean that there is less opportunity to resolve minor issues with contractors allowing them to continue working.

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.**

(a) Two of the eleven information collections occur more frequently than quarterly due to the operational nature of the requests. BPA F 6410.11 is a daily job report regarding performance of work to meet contract obligations. BPA F 6410.41 occurs more frequently because throughout the span of a contract the contractor may discover they need additional materials for the contract beyond what was initially provided.

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 June 16, 2023, (volume 88, number 116, and page number 39413). 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 November 15, 2023, (volume 88, number 219, and page number 78,349). 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.

Other than payment generated via the contracts or obligations, 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.

BPA provides notice that the proposed collection of information in this program will be part of a system of records covered by the Privacy Act and may not be available under the Freedom of Information Act. Collection instruments requiring a Privacy Act statement contain that statement, not all forms in this collection require a Privacy Act statement.

System of Record Notices referenced in this collection are:

- [DOE-18, Financial Accounting System](#) (4220.01ae, 4220.03e, 4220.05e, & 4220.07e),
- [DOE-24, Land Records System](#) (5472.03e).

Forms containing a Privacy Act Statement:

- BPA F 4220.01ae – Request for Taxpayer Identification Number and Certificate,
- BPA F 4220.03e – Realty Request for Taxpayer Identification Number and Certificate,
- BPA F 4220.05e – Beneficiary Request for Taxpayer Identification Number and Certificate,
- BPA F 4220.07e – Invitational Travel Request for Taxpayer Identification Number and Certificate,

- BPA F 5472.03e – Temporary Land-Use Assessment Questionnaire.

Forms not requiring a Privacy Act Statement:

- BPA F 4220.01n – Federal Tax Withholding Applied to Payments to Foreign Entities,
- BPA F 4220.04e – Subcontracting Report for Individual Contracts,
- BPA F 4220.08e – Supplier Safety Program Variance Request,
- BPA F 4431.02e – Returned Materials Receipt,
- BPA F 6410.11e – Daily Report to Inspector,
- BPA F 6410.41e – Contract Construction Material Request.

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 sensitive nature are asked of respondents.

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 three-year averages provided by BPA’s supply chain, fish and wildlife, and transmission staff. Burden hours were estimated based upon staff timing while reviewing instructions and filling out the collection instrument. Rounding may cause small discrepancies in the table below.

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 4220.01ae - Request for Taxpayer Identification Number and Certificate	contractors	276	276	.25	69	1
BPA F 4220.01n - Federal Tax Withholding Applied to Payments to Foreign Entities	contractors	35	35	.12	4.2	1
BPA F 4220.03e Realty Request for Taxpayer Identification	contractors	300	300	.25	75	1

Number and Certificate						
BPA F 4220.04e - Subcontracting Report for Individual Contracts	contractors	33	100	.5	50	3
BPA F 4220.05e Beneficiary Request for Taxpayer Identification Number and Certificate	public	12	12	.25	3	1
BPA F 4220.07e Invitational Travel Request for Taxpayer Identification Number and Certificate	contractors	12	12	.25	3	1
BPA F 4220.08e - Supplier Safety Program Variance Request	contractors	10	10	.5	5	1
BPA F 4431.02e - Returned Materials Receipt	contractors	40	40	.08	3.2	1
BPA F 5472.03 - Temporary Land-Use Assessment Questionnaire	public	30	30	.16	4.8	1
BPA F 6410.11e - Daily Report to Inspector	contractors	50	4000	.25	1000	80
BPA F 6410.41e - Contract Construction Material Request	contractors	60	300	.08	24	5
			0		0	
TOTAL		858	5,115		1,241.2	

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'.

Annual cost to the public is estimated to be \$54,525.92 based on an average of \$43.93/hour using BLS fully burdened data from <http://www.bls.gov/news.release/ecec.nr0.htm> using civilian worker average compensation and 1,241.2 burden hours for the responses. Capital and startup costs do not apply to these questionnaires.

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Contractors/public	1,241.2	43.93	\$54,525.92
			0

TOTAL	1,241.2		\$54,525.92
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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 total annualized cost to BPA to process these forms is: **\$258,420.08**.

The estimated budget for the Supply Chain offices that process this information collection is **\$220,472 annually**. This includes estimated federal burden for BPA full-time government 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 General Schedule (GS) 12 full time equivalent (FTE) with locality pay is approximately \$50.80/hour multiplied by 1.6 to establish a fully burdened rate of \$81.28 (based on the OPM salary tables for 2024 [Pay & Leave : Salaries & Wages - OPM.gov](#)). BPA approximates 2.5 hours to review each form and anticipates 1,085 forms submitted annually.

The estimated budget for the Environment, Fish & Wildlife office that processed this information collection is **\$5,793.60 annually**. This includes estimated federal burden for BPA full-time government 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 General Schedule (GS) 13 full time equivalent (FTE) with locality pay is approximately \$60.41/hour multiplied by 1.6 to establish a fully burdened rate of \$96.56 (based on the OPM salary tables for 2024 [Pay & Leave : Salaries & Wages - OPM.gov](#)). BPA approximates 2 hours to review each form and anticipates 30 forms submitted annually.

The estimated budget for the Transmission - Field offices that process this information collection is **\$32,154.48 annually**. This includes estimated federal burden for BPA full-time government 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 General Schedule (GS) 13 full time equivalent (FTE) with locality pay is approximately \$60.41/hour multiplied by 1.6 to establish a fully burdened rate of \$96.56 (based on the OPM salary tables for 2024 [Pay & Leave : Salaries & Wages - OPM.gov](#)). BPA approximates 5 minutes to review each form and anticipates receiving 4,000 forms annually.

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 collection had ten forms added to it, which were determined to fit under the Contracting nexus of this package. Additionally, during review with form owners three forms were removed from the

package, due to the forms primarily being completed by the government. This is consistent with practices around Standard Form 1449 and Standard Form 33. Additionally, during the review by form owners the number of forms submitted was increased for those forms which had been included in the previous submittal due to increased contracting that is currently occurring related to capital improvements. Finally, in reviewing the previous application the hourly burden rate was calculated at a much higher amount, the current application uses the hourly rate calculated by the Bureau of Labor and Statistics, which led to a less significant change in the cost burden despite increasing the size of the collection.

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	5,115	+5,015	-3,270	3,370
Total Time Burden (Hr)	1,241.2	+1,191.2	-493	543
Total Cost Burden	\$54,525.2	+\$52,402	-\$60,321	\$62,445

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.