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# Coordination of Federal Authorizations for Electric Transmission Facilities

## **Part A: Justification**

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**OMB No. 1910-5185**

May 2024

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## Introduction

This information collection is being used to meet the requirements of section 216(h) of the Federal Power Act. Information collected will be used by DOE to carry out its obligation to lead the coordination of permitting and environmental review for proposed interstate electric transmission facilities that require one or more Federal Authorizations and is consistent with the regulations that have been proposed to carry out section 216(h).

DOE published a 45-day notice in the Federal Register Vol. 88, No. 157 on August 16, 2023, seeking comment on the proposed rulemaking and revision of the three-year information collection. Since the closing of the comment period on Monday, October 2<sup>nd</sup>, 2023, the Department of Energy has analyzed the submitted comments and seeks to revise this collection request.

### 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.**

Section 216(h) of the Federal Power Act requires the Department of Energy (DOE) to adopt, and a 2023 Memorandum of Understanding<sup>1</sup> requires DOE to update, regulations, found at 10 CFR part 900, governing the coordination of Federal authorizations for proposed interstate electric transmission facilities. The proposed updated regulations create the Coordinated Interagency Transmission Authorization and Permits Program (CITAP) (section 900.1), which will serve as the primary vehicle through which DOE will act as the lead agency responsible for coordinating federal agency permitting and environmental review processes. The key mechanism that the CITAP Program will use to facilitate the development of a single environmental impact statement (EIS) for proposed interstate electric transmission projects is the Integrated Interagency Preapplication (IIP) Process, a pre-application process that is intended to prepare project proponents through the gathering and submission of materials and data that Federal agencies need in order to streamline the decision-rendering timeline for projects and to complete an environmental impact statement in two years (sections 900.4). The IIP Process is designed to allow a project developer to obtain multiple federal authorizations in an efficient manner while reducing administrative delays by establishing clear authority, process, and timelines, as required by section 216(h)(4)(C) and affirmed in the 2023 MOU.

DOE has concluded that a project proponent's participation in the IIP Process is necessary for the success of other elements of the CITAP Program and for the Secretary's satisfaction of the statutory obligations imposed by section 216(h). Specifically, section 216(h)(4)(B) requires that the Secretary determine that "an application has been submitted with such data as the Secretary considers necessary" and requires that the Secretary "ensure" that, once such data is submitted, "all permit decisions and related environmental reviews under all applicable Federal law . . . be completed" as soon as is practicable. DOE has determined that participation in the IIP Process is necessary for a project proponent to provide the "data . . . the Secretary considers necessary" such that the Secretary may

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<sup>1</sup> [www.energy.gov/sites/default/files/2023-05/5-04-2023%20216h%20Transmission%20MOU.pdf](http://www.energy.gov/sites/default/files/2023-05/5-04-2023%20216h%20Transmission%20MOU.pdf)

determine that the permit decisions and related environmental reviews relevant to that application may be completed within the time period DOE will establish by schedule.

During the IIP Process relevant Federal entities will identify issues of concern, information gaps, and potential issues or conflicts for the project through an initial meeting (section 900.5), the IIP Process Review Meeting (section 900.8), and the IIP Process Close-Out Meeting (section 900.9). After the initial meeting, applicants will be required to provide thirteen resource reports (section 900.6), which will provide information necessary for the development of a project-specific schedule and of use for agency decisions on relevant Federal authorizations and the preparation of a single EIS.

## **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.**

DOE and the permitting or potential permitting entities will use the information to develop a project-specific schedule, prepare an EIS, and inform agency actions and reviews. Information sought will support Section 900.5's IIP Initiation Process to begin DOE's coordination assistance and must include, based on best available information, (1) maps and information for the summary of qualifying project; (2) a project participation plan; and (3) a statement regarding whether the project is a FAST-41 covered project. Additional information collection required by Section 900.6 includes thirteen resource reports describing the project and its impacts, which may inform agency decision-making on relevant Federal authorizations and will allow DOE to complete a single EIS following the IIP Process. Those reports are: General project description; Water use and quality; Fish, wildlife, and vegetation; Cultural resources; Socioeconomics; Geological resources; Soil resources; Land use, recreation, and aesthetics; Communities of interest; Air and noise quality; Alternatives; Reliability and safety; and Tribal interests. Further, during the Review and Close-Out meetings, the project proponent will provide updates to project documents and the project schedule. DOE and the permitting or potential permitting entity will use that information to provide responses to the applicant regarding the status of their application.

Section 900.3 allows persons seeking DOE assistance in the Federal authorization process for projects other than qualifying projects, as defined in the regulations, to file a request for coordination with the Director. The requirements of such a request are set forth in that section including the legal name of the project sponsor, the proposed project details, and the list of Federal and non-federal entities involved in the project. DOE will use the information provided to determine whether it is appropriate to provide coordination assistance to the applicant and then proceed with the actions described above for section 900.5, 900.6, 900.8, and 900.9.

To date, there have been no collections made under any of these sections.

## **A.3. Use of Technology**

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

DOE encourages the electronic submission of information under sections 900.3, 900.5, 900.6, 900.8 and 900.9. DOE states that electronic submission is DOE's preferred method of submission, and that DOE will utilize electronic technologies to assist in the notification, submission, and sharing of information, as well as for participation in the initial, review, and close-out meetings required as provided for in the regulation. Further, DOE is in the process of developing an online web portal through which applicants can electronically submit information in a standardized manner.

To date, there have been no collections under these sections.

#### **A.4. Efforts to Identify Duplication**

**Describe efforts to identify duplication.**

This information is collected only in the regulations implementing section 216(h). Requests for coordination for other projects (section 900.3) and for the pre-application process (section 900.5) and its related steps (sections 900.6, 900.8, and 900.9) do not have overlapping requirements with other existing rules or programs. The information requested pursuant to 900.6 overlaps substantially with information necessary to seek Federal authorizations required for interstate transmission lines. The purpose of the IIP Process generally, and 900.6 specifically, is to provide a mechanism for the early and coordinated submission of that information, such that duplication may be avoided. Additionally, within the regulations there is guidance provided to applicants to prevent duplicative efforts.

#### **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.**

This collection of information does not impact small businesses or other small entities.

#### **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 under section 900.3 is not collected, applicants for projects other than qualifying projects will not be able to request coordination assistance from DOE, as authorized by section 216(h)(3). If the information under sections 900.5, 900.6, 900.8, and 900.9 is not collected, permitting entities or potential permitting entities will not be able to provide applicants with information on the completeness of their application(s) for authorizations and subsequent timelines and likelihood of permit approval, as required by section 216(h)(4)(C). Nor will applicants be able to provide DOE and the relevant permitting entities information necessary to prepare a single EIS and relevant to decision-making on the relevant Federal authorizations.

#### **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; (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 data are being collected in accordance with all OMB guidelines set forth in 5 C.F.R. 1320.5.

### **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 5 CFR 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.

DOE published a 45-day notice, DOE-HQ-2023-0050, in the Federal Register Vol. 88, No. 157, pages 55842 - 55855 on August 16, 2023 seeking comment on the proposed revision and extension of the three-year information collection. DOE hosted a publicly accessible webinar and public meeting on August 23, 2023. DOE also hosted five briefings on the proposed ruled between September 18<sup>th</sup>, 2023 and September 22<sup>nd</sup>, 2023 to gather additional input from stakeholders, including but not limited to industry representatives, State and Tribal Historic Preservation Officers, state governments, and environmental advocacy groups. The public comment period for the proposed ruled closed on October 2<sup>nd</sup>, 2023.

DOE received 50 comments from interested individuals and groups. Overall, the comments to the proposed rule were generally supportive of DOE's proposals; however, a few commenters sought further clarification or revisions to the NOPR. Several commenters stated that they believe that Sections 900.5, 900.6, 900.8, and 900.9 will reduce costs and efforts for respondents. One comment from Gallatin Power expressed concern that the cost burden estimates for Sections 900.5, 900.6, 900.8, and 900.9 are lower than current market rates and do not reflect the amount of work required to complete the Sections.

DOE makes no changes in this final rule in response to this comment. Although Gallatin Power expressed concern about the burden analysis, it did not challenge DOE's approach as unreasonable nor did it provide an alternative approach for DOE to consider. As Gallatin Power acknowledges, costs and time estimates can vary widely among projects. Given that estimates can vary widely by project, DOE believes it was reasonable to use the most recently available median hourly wage for management

analysts according to the Bureau of Labor Statistics, for the proposed rulemaking and in this final rule, consistent with DOE's previous burden analysis for this collection. Though this revised collection changes the volume and subject matter of the information collection, including requesting analysis from a range of experts, many of the median wages reported by BLS for environmental and scientific consultants are below the management analysis median wage proposed by DOE, further supporting DOE's use of this occupation as a basis for estimation. Regarding the size of transmission project, DOE estimated an average burden for a qualifying project under CITAP, which represents a wide range of length and size, based on the special expertise in environmental evaluation of transmission projects within DOE.

However, DOE reviewed the estimated hourly burden associated with each element of the final rule and has updated its estimates accordingly.

### **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.**

There are no provisions for payments to 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.**

DOE will protect the confidentiality of any information submitted consistent with its Freedom of Information Act regulations at 10 CFR Part 1004.

### **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.**

There are no questions of a sensitive nature in these data collections.

### **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 proposed estimate of respondent burden hours below includes not only the time necessary to provide the requested information, but also the time needed to search data sources, gather information, and review the information for the Initiation Request and Initial Meeting, and supplementation of any new information necessary as a part of the Review and Close-out Meeting Requests and meetings. The burden was estimated based on DOE's understanding of how long it would

take to complete the tasks listed above, based on staff experience. The burden was reviewed and updated in response to comments received during the public comment period of the proposed rule. The current estimate of respondent burden hours below accounts for the time necessary to discuss, review, gather, and complete the information requested in the existing regulations. Under section 900.2, DOE’s assumption is that it takes 1 hour per respondent to complete the information requested and 5 hours per respondent to complete the information requested under section 900.4.

These values are reflected in the table below. The proposed revision increases the burden per respondent by 2,155 hours. DOE updated the analysis of the number of expected applicants and now estimates there will be 3 per year. DOE referred to the Federal Permitting Improvement Steering Council (FPISC) definitive transmission permitting data set and permitting dashboard and found that, tracked at the federal level, EISes were sought for an average of 2 transmission projects per year for the last 16 years. Taking this as a reasonable approximation of CITAP qualifying projects, DOE estimates that initiation of the CITAP program may increase the volume of transmission projects by making federal permitting faster and therefore federal lands more attractive to developers. Some of those projects may be subject to 216(b) permitting authority, so DOE conservatively estimates an additional 1 project per year.

**Table A1. Estimated Respondent Hour Burden**

Form Number/Title (and/or other Collection Instrument name)	Estimated Number of Respondents	Estimated Number of Total Responses*	Estimated Number of Burden Hours Per Response	Estimated Burden Hours (Total Responses x Number of Hours per response)
<b>Current Estimate of Respondent Burden Hours</b>				
Section 900.2	5	5	1	5
Section 900.4	5	10	5	50
<b>TOTAL</b>		<b>15</b>		<b>55</b>
<b>Proposed Estimate of Respondent Burden Hours</b>				
Section 900.5 – Initiation Request	3	3	30	90
Section 900.5 – Initial Meeting	3	3	8	24
Section 900.6 – Resource Report 1: General project description	3	3	110	330
Section 900.6 – Resource Report 2: Water use and quality	3	3	125	375
Section 900.6 – Resource Report 3: Fish, wildlife, and vegetation	3	3	200	600
Section 900.6 – Resource Report 4: Cultural resources	3	3	200	600
Section 900.6 – Resource Report 5: Socioeconomics	3	3	160	480
Section 900.6 – Resource Report 6: Tribal Interests	3	3	160	480
Section 900.6 – Resource Report 7:	3	3	96	288



Communities of Interest				
Section 900.6 – Resource Report 8: Geological resources and hazards	3	3	160	480
Section 900.6 – Resource Report 9: Soil resources	3	3	200	600
Section 900.6 – Resource Report 10: Land use, recreation and aesthetics	3	3	224	676
Section 900.6 – Resource Report 11: Air quality and noise effects	3	3	220	660
Section 900.6 – Resource Report 12: Alternatives	3	3	160	480
Section 900.6 – Resource Report 13: Reliability, resilience, and safety	3	3	100	300
Section 900.8 – Review Meeting Request	3	3	1	3
Section 900.8 – Review Meeting	3	3	4	12
Section 900.9 – Close Out Meeting Request	3	3	1	3
Section 900.9 – Close Out Meeting	3	3	2	6
<b>TOTAL</b>	<b>3</b>	<b>3</b>	<b>2,162</b>	<b>6,487</b>

\*One response per respondent

## 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’.**

Section 900.5 - Using DOE’s assumptions that it takes 114 hours to gather the information necessary to initiate the IIP Process under Section 900.5 and the time value is fully burdened at \$65.05/hour, assuming the median salary for a project manager (\$45.81<sup>2</sup> multiplied by 1.42<sup>3</sup> to include benefits) or filer with similar skills completing the request, the total cost for this activity is \$7,416.

Section 900.6 - Using DOE’s assumptions that it takes 6,349 hours to gather and compile the Resource Reports requested under Section 900.6 and the time value is fully burdened at \$65.05/hour, assuming the median salary for a project manager (\$45.81 multiplied by 1.42 to include benefits) or filer with similar skills completing the request, the total cost for this activity is \$412,743.

Section 900.8 - Using DOE’s assumptions that it takes 15 hours to request, and prepare for, the IIP Review Meeting under Section 900.8 and the time value is fully burdened at \$65.05/hour, assuming the median salary for a project manager (\$45.81 multiplied by 1.42 to include benefits) or filer with similar skills completing the request, the total cost for this activity is \$976.

<sup>2</sup> <https://www.bls.gov/oes/current/oes131111.htm>

<sup>3</sup> [https://www.bls.gov/regions/southwest/news-release/employercostsforemployeecomensation\\_regions.htm](https://www.bls.gov/regions/southwest/news-release/employercostsforemployeecomensation_regions.htm)

Section 900.9 - Using DOE’s assumptions that it takes 9 hours to request, and prepare for, the IIP Close-Out Meeting under Section 900.9 and the time value is fully burdened at NP, assuming the median salary for a project manager (\$45.81 multiplied by 1.42 to include benefits) or filer with similar skills completing the request, the total cost for this activity is \$585.

**Table A2. Estimated Respondent Cost Burden**

Type of Respondents	Total Annual Burden Hours	Fully Burdened Wage Rate	Total Respondent Costs
Private Sector	6,487	\$65.05	\$421,720
<b>TOTAL</b>	<b>6,487</b>		<b>\$421,720</b>

### A.13. Other Estimated Annual Cost to Respondents

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

No other annual costs.

### A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

DOE will incur costs under section 900.5 in reviewing the information provided by applicants and determining whether to provide coordination assistance. DOE will incur costs under section 900.6 in reviewing the information provided by respondents and providing information (whether written or oral) on the likelihood of project approval based on the identification of potential siting constraints or opportunities, data gaps, or other considerations that could affect the likelihood of approval of the application. The Federal government will incur costs under section 900.8 and section 900.9 in reviewing the applicant’s proposal and making a final determination on the schedule for coordination assistance. These reviews, however, are expected to be conducted by existing Federal staff. Under all of the aforementioned sections, DOE assumes that its review of requested information would be performed by an employee at a GS-13 Step 1 pay scale fully burdened at \$81.89 (\$57.67/hour<sup>4</sup> multiplied by 1.42<sup>5</sup> to include benefits).

Section 900.5 - Using DOE’s assumptions that it takes 2 hours to review each of 3 separate responses and 8 hours to attend each meeting (for a total of 30 hours) under Section 900.5 and the time value is fully burdened at \$81.89/hour (GS-13, step 1 calculated at \$57.67<sup>6</sup> multiplied by 1.42 to include benefits), assuming the appropriate general scale salary for a management and program analyst or reviewer with similar skills completing the request, the total cost to the Federal Government for this activity is \$2,456.74.

<sup>4</sup> <https://www.bls.gov/oes/current/oes131111.htm>

<sup>5</sup> [https://www.bls.gov/regions/southwest/news-release/employercostsforemployeecomensation\\_regions.htm](https://www.bls.gov/regions/southwest/news-release/employercostsforemployeecomensation_regions.htm)

<sup>6</sup> <https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2023/DCB.pdf>

Section 900.6 - Using DOE’s assumptions that it takes 6 hours to review each of 3 separate responses for 13 different resource reports (for a total of 234 hours) under Section 900.6 and the time value is fully burdened at \$81.89/hour (GS-13, step 1 calculated at \$57.67 multiplied by 1.42 to include benefits), assuming the median salary for a management and program analyst or reviewer with similar skills completing the request, the total cost to the Federal Government for this activity is \$19,162.59.

Section 900.8 - Using DOE’s assumptions that it takes 6 hours to review and prepare for each of 3 separate review meetings and 4 hours to attend each meeting (for a total of 30 hours) under Section 900.8 and the time value is fully burdened at \$81.89/hour (GS-13, step 1 calculated at \$57.67 multiplied by 1.42 to include benefits), assuming the median salary for a management and program analyst or reviewer with similar skills completing the request, the total cost to the Federal Government for this activity is \$2,456.74.

Section 900.9 - Using DOE’s assumptions that it takes 6 hours to review and prepare for each of 3 separate close-out meetings and 2 hours to attend each meeting (for a total of 24 hours) under Section 900.9 and the time value is fully burdened at \$81.89/hour (GS-13, step 1 calculated at \$57.67 multiplied by 1.42 to include benefits), assuming the median salary for a management and program analyst or reviewer with similar skills completing the request, the total cost to the Federal Government for this activity is \$11,956.39.

Therefore, the proposed estimated annualized cost to review the total maximum anticipated responses under sections 900.5, 900.6, 900.8, and 900.9 of the rule is estimated to be **\$26,041.47**.

The current estimated annual cost burden to the Federal Government under previous Sections 900.2 and Section 900.4 totals **\$17,561.85**, signifying a difference in cost burden of **\$8,479.62**.

**Table A3. Estimated Federal Government Hour and Cost Burden**

Form Number/Title (and/or other Collection Instrument name)	Annual estimated Number of Respondents	Annual estimated Number of Total Responses	Estimated Number of Federal Burden Hours Per Response	Annual Estimated Federal Burden Hours	Annual Estimated Federal Reporting and Recordkeeping Cost Burden
<b>Current Estimate of Federal Government Hours and Cost Burden</b>					
Section 900.2	5	5	3	15	\$ 1,033.05
Section 900.4	5	10	24	240	\$ 16,528.80
<b>TOTAL</b>					<b>\$ 17,561.85</b>
<b>Proposed Estimate of Federal Government Hours and Cost Burden</b>					
Section 900.5 – Initial Meeting	3	3	10	30	\$ 2,456.74
Section 900.6 – Resource Report 1: General project description	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 2: Water use and quality	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 3: Fish, wildlife, and vegetation	3	3	6	18	\$ 1,474.05

Section 900.6 – Resource Report 4: Cultural resources	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 5: Socioeconomics	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 6: Tribal Interests	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 7: Communities of Interest	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 8: Geological resources and hazards	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 9: Soil resources	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 10: Land use, recreation and aesthetics	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 11: Air quality and noise effects	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 12: Alternatives	3	3	6	18	\$ 1,474.05
Section 900.6 – Resource Report 13: Reliability, resilience, and safety	3	3	6	18	\$ 1,474.05
Section 900.8 – Review Meeting	3	3	10	30	\$ 2,456.74
Section 900.9 – Close Out Meeting	3	3	8	24	\$ 1,965.39
<b>TOTAL</b>	<b>3</b>	<b>3</b>	<b>92</b>	<b>276</b>	<b>\$ 26,041.47</b>

## A.15. Reasons for Changes in Burden

**Explain the reasons for any program changes or adjustments reported in Items 12, 13 (or 14) of OMB Form 83-I.**

Pursuant to the 2023 Memorandum of Understanding<sup>7</sup>, DOE will serve as the lead agency responsible for coordinating one or more Federal authorizations for proposed interstate electric transmission facilities. The mandatory pre-application IIP Process is comprehensive and designed to reduce duplicative efforts and administrative burdens across multiple Federal permitting and environmental review authorities and necessitates more information from applicants at the outset of the process. Compared to the previous version of the OMB Form 83-I, the burden is higher, but DOE believes that identifying and addressing issues throughout the IIP Process will expedite DOE’s preparation of an EIS and ensure that a project proponent’s applications for federal authorizations are complete. Additionally, with DOE serving as the lead agency coordinating other Federal agencies, the burden on the Federal Government as a whole will be reduced through the IIP Process.

<sup>7</sup> [www.energy.gov/sites/default/files/2023-05/5-04-2023%2016h%20Transmission%20MOU.pdf](https://www.energy.gov/sites/default/files/2023-05/5-04-2023%2016h%20Transmission%20MOU.pdf)

The burden has been updated to increase the expected time for Resource Report 8 by 4 hours per applicant to meet the requirements of the updated definition for specially designated areas. The Initial Meeting burden has been updated from 2 to 8 hours to reflect the request made of applicants to provide alternative development processes and clarification on analysis areas for the 13 resource reports; the discussion of these processes and clarifications may require the increase of 6 hours so that relevant federal agencies may perform their due diligence. The Review Meeting burden has been updated from 2 to 4 hours and the Close-Out Meeting burden has been increased from 1 to 2 hours: both of these burden increases are tied to the alternative development processes and clarification changes for the 13 resource reports.

**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	3	n/a	-12	15
Total Time Burden (Hr.)	6,487	n/a	+6,432	55
Total Respondent Cost Burden	\$421,720	n/a	+418,607	\$3,113
Cost to the Federal Government	\$26,041.47	n/a	+\$8,479.62	\$17,561.85

**A.16. Collection, Tabulation, and Publication Plans**

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

Results of 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.

The expiration date will be included on the forms.

**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.