



# Supporting Statement A for the EIA-111 Quarterly Electricity Imports and Exports Report

May 2024

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## Introduction

The U.S. Energy Information Administration (EIA) is the statistical and analytical agency within the U.S. Department of Energy (DOE). It collects, analyzes, and disseminates independent and impartial energy information to promote sound policymaking, efficient markets, and public understanding regarding energy and its interaction with the economy and the environment. EIA is required to publish and otherwise make available independent, high-quality statistical data to federal government agencies, state and local governments, the energy industry, researchers, and interested parties through the EIA website.

Form EIA-111 collects U. S. electricity import and export data for the purpose of measuring the flow of electricity into and out of the United States from Canada and Mexico. U.S. purchasers, sellers, and transmitters of wholesale electricity are required to report their data to EIA. These include:

1. persons authorized by Order of DOE's Office of Electricity Delivery & Energy Reliability (DOE-OE) to export electric energy from the United States to foreign countries;
2. persons authorized by Presidential Permit to construct, operate, maintain, or connect electric power transmission lines that cross the U.S. international border; and,
3. U.S. Balancing Authorities that are interconnected with foreign Balancing Authorities.

Respondents report, each quarter, monthly flows of electric energy received or delivered across the border, the cost associated with the transactions, and actual (energy transfers that cross Balancing Authority boundaries) and implemented interchange (the state where the Balancing Authority enters the Confirmed Interchange into its Area Control Error equation). Responses to this form are mandatory.

EIA is requesting a three-year extension, with changes, to Form EIA-111 *Quarterly Electricity Imports and Exports Report*. The changes are a result of a reduction in the number of survey respondents required to file EIA-111 reports. This reduces the annual estimated responses and associated burden hours. There is no change to the content collected on the EIA-111.

### A.1. Legal Justification

The authority for this information collection is provided by the following general provisions:

1. Title 15 U.S. Code §772, which established the mandatory requirement of owners and operators of businesses in the U.S. to report energy supply and consumption data to the EIA Administrator.
2. Title 15 U.S. Code §764, which established the EIA Administrator's powers to plan, direct, and conduct mandatory and voluntary energy programs that are designed and implemented in a fair and efficient manner. These powers include duties to collect, evaluate, assemble, and analyze energy information on U.S. reserves, production, demand, and related economic data, while obtaining the cooperation of business, labor, consumer, and other interests.
3. Title 15 U.S. Code §790a, which established the National Energy Information System (NEIS) that is the enclave containing the energy data collected by EIA, which allows EIA to describe and analyze energy supply and consumption in the U.S. NEIS allows EIA to perform statistical and forecasting activities to meet the needs of the U.S. Department of Energy and Congress, as well as the needs of the States to the extent required by the Natural Gas Act [Title 15 U.S. Code §717 et seq.] and the Federal Power Act [Title 16 U.S. Code §791a et seq.].

The DOE's authority to regulate electricity exports from the United States to foreign countries is provided by Section 202(e) of the Federal Power Act (FPA) (codified as 16 U.S.C. §824e) and regulations thereunder (10 C.F.R. § 205.300 *et seq.*)

16 U.S.C. §824(e) states that DOE “shall issue such order upon application unless, after opportunity for hearing, it finds that the proposed transmission would impair the sufficiency of electric supply within the United States or would impede or tend to impede the coordination in the public interest of facilities subject to the jurisdiction of [DOE].” DOE has discretion to condition the order as necessary or appropriate, DOE “may by its order grant such application in whole or in part, with such modifications and upon such terms and conditions as the [DOE] may find necessary or appropriate.”

DOE has the responsibility for implementing Executive Order (EO) 10485, as amended by E.O. 12038, which delegates to DOE's Grid Deployment Office (GDO), the authority to issue Presidential permits for the Construction, operation, maintenance, or connection of electric transmission facilities at the United States international borders. DOE may issue such a permit if it determines that issuance of the permit is in the public interest and after obtaining favorable recommendations from the U.S. Departments of State and Defense.

## A.2. Needs and Uses of Data

Form EIA-111 collects U.S. electricity import and export data. The data are used to generate accurate estimates of the flow of electricity into and out of the United States.

### 2.1. Overview of Data Uses

Form EIA-111 data appear in several EIA publications that are available from EIA's website or a joint website. The most prominent are:

- Electric Power Annual <http://www.eia.gov/electricity/annual/>
- Monthly Energy Review <https://www.eia.gov/totalenergy/data/monthly/>
- Electric Power Monthly <https://www.eia.gov/electricity/monthly/>
- State Electricity Profiles <https://www.eia.gov/electricity/state/>
- North American Cooperation on Energy Information (NACEI) website <https://www.eia.gov/trilateral/#!/overview>

The data are used in other EIA products such as the State Energy Data System and as inputs to EIA projection models. The data collected support the following DOE-EIA functions:

- Assess the adequacy of the electricity supply from Canada and Mexico into the U.S.
- Used as historical electricity trade inputs for EIA's Annual Energy Outlook projection models.
- Analyze and report on the adequacy of short- and long-term electricity supply in the U.S.

The form is designed to collect data from all entities engaged in the sale, purchase, or transfer of cross-border electricity transmissions. The data are used by DOE-GDO for the following purposes:

- Monitor compliance with the terms of Presidential Permits and Export Authorizations.
- Evaluate open transmission access at the international border.
- Evaluate transmission constraints and system reliability.
- Evaluate the need for additional electric transmission capacity.

## 2.2. Overview of Data Collections

The data collected on Form EIA-111 is used to obtain an accurate measure of the flow of electricity into and out of the United States.

Form EIA-111 collects U. S. electricity import and export data from:

1. U.S. entities that purchase, sell, or exchange electricity at wholesale, including persons authorized by Order of DOE-OE to export electric energy from the United States to foreign countries, report monthly flows of electric energy received, or delivered across the border and the cost associated with the transactions.
2. U.S. Balancing Authorities that are directly interconnected with foreign Balancing Authorities report actual and implemented interchange.
3. Persons authorized by Presidential Permit to construct, operate, maintain, or connect electric power transmission lines that cross the U.S. international border and export authorization holders report events where their DOE Order terms were exceeded.

## A.3. Use of Technology

Form EIA-111 uses Internet-based data collection systems as the primary means of data collection. The majority of contact with respondents (e.g., notification that a survey has opened for a collection cycle) is done by email.

Internet data collection is the primary collection mode for the electricity surveys. The Internet-based systems allow respondents to enter their data directly into the EIA survey databases, which reduces the time needed for data collection and processing. The systems identify reported data that fail edit specifications prior to submission, which allow respondents to make necessary corrections or explain unusual situations affecting the reported data. This process aids in detecting and minimizing response errors, data validation procedures are used to check current data. It also improves the timeliness of reporting the information to the public. The only equipment and software respondents require are a connection to the Internet and a standard industry web browser.

## A.4. Efforts to Identify Duplication

EIA has verified that Form EIA-111 data are not collected by more than one federal government agency. The Canadian National Energy Board (NEB) publishes imports and exports of electricity from Canada. The NEB reports do not include information on Presidential permits and export authorizations issued by DOE which makes it ineffective in determining compliance with the DOE orders. There is no known alternative source of data for electricity trade with Mexico. In the absence of the centralized and public data collection by EIA, each state on an international border would have to undertake its own collection of the volumes and prices of imported purchases and exported sales of electricity at wholesale for use by public utility commissions when reviewing rate cases. This may lead duplicative information requests from multiple firms within the electric power industry that engage in the import or export of electricity at the international border.

## A.5. Provisions for Reducing Burden on Small Businesses

EIA determined that businesses that engage in electricity transmission are not small businesses. There are no small businesses reporting on this survey.

## A.6. Consequences of Less-Frequent Reporting

Form EIA-111 collects monthly electric power import and export data information on a quarterly basis. Less frequent reporting would result in less timely data on the flow of electricity between the U.S., Canada, and Mexico.

## A.7. Compliance with 5 CFR 1320.5

Form EIA-111 is operated in accordance with the guidelines in 5 CFR 1320.5.

## A.8. Summary of Consultations Outside of the Agency

On 12/21/2023, EIA published a 60-day Federal Register Notice (FRN) in volume 88, page number 88383, regarding the renewal of the Form EIA-111. EIA received two written comments in response to the 60-Day FRN. One comment from the U.S. Department of Energy Grid Deployment Office and was supportive of EIA's continued efforts to manage the EIA-111 so that the terms set forth in the Presidential Permits and Export Authorizations can be verified. The second comment was from a respondent requesting additional balancing authorities and transmission system owners/transfer facilities to be added to drop-down menus, and to prepopulate data from previously submitted reports. EIA will respond to specific requests for adding options to the drop-down menus. In addition, EIA is assessing our ability to add the pre-population function to the data collection system for Form EIA-111.

## A.9. Payments or Gifts to Respondents

There will not be any payments made or gifts given to respondents as an incentive to complete Form EIA-111.

## A.10. Provisions for Protection of Information

The information reported on Form EIA-111 will be considered public information and may be publicly released in identifiable form.

## A.11. Justification for Sensitive Questions

There are no questions of a sensitive nature.

## A.12. Estimate of Respondent Burden Hours and Cost

The total annual burden is estimated to be 918 hours (see *Table 1* below). Based on the estimated rate of \$91.16 per hour for employees who would complete these forms, the total annual respondent cost for all forms is estimated to be:  $\$91.16/\text{hour} \times 918 \text{ hours/year} = \$83,684.88$

The \$91.16 hourly wage is based on the average hourly loaded cost (including benefits and cost-of-living adjustments for the Washington, DC area) among all EIA administrative, professional, and executive employees for the current fiscal year. EIA assumes that the survey respondent workforce completing surveys is comparable to the EIA workforce.

**Table 1: Estimated Respondent Burden**

EIA Form Number/Title	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
EIA 111, Quarterly Electricity Imports and Exports Report	4	153	612	1.5	918
<b>Total</b>		153	612		918

### A.13. Annual Cost to the Federal Government

The annual cost of operating these surveys is estimated at \$191,436 and includes contractor costs and federal staff time for survey related activities. Table 2 shows the approximate costs of survey related activities including frame maintenance, collection, processing, dissemination, and data systems maintenance. EIA anticipates no additional respondent costs for generating, maintaining, and providing the information required in this Information Collection Request.

**Table 2: Annual Cost for the Federal Government**

Activity	Labor hours	x Rate	Cost
Survey frame and maintenance	372	\$91.16	\$33,911.52
Data collection and processing	1228	\$91.16	\$111,944.48
Data dissemination	274	\$91.16	\$24,977.84
Data systems maintenance and enhancements	226	\$91.16	\$20,602.16
<b>Total Annual Cost</b>			<b>\$191,436.00</b>

### A.14. Changes in Burden

There is an estimated decrease of 162 annual burden hours. This decrease in annual burden hours was due to a reduction in the population size by 27 respondents, which in turn reduced the annual number of responses by 108.

**Table 3: Changes in Burden**

EIA-111, Quarterly Electricity Imports and Exports Report	Annual Reporting Frequency	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours
Previously Approved	4	180	720	1.5	1080
Requested	4	153	612	1.5	918
Difference	0	-27	-108	0	-162



### A.15. Reasons for Changes in Burden

The decrease in estimated annual burden is due to a decrease in the respondent frame. The EIA-111 respondents who were issued export authorizations and/or presidential permits must report until those permits expire or are rescinded. Export authorizations can expire after five years, ten years, or when the affiliated transmission facility is decommissioned. Presidential permits are valid until the affiliated transmission facility is decommissioned. The net change in new permits being issued, expiring permits, and the renewal of existing permits has resulted in a decrease in respondents and the estimated annual burden.

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

The data collected on this form will be released in EIA reports and will be made available on the EIA website.

### A.17. OMB Number and Expiration Date

The OMB number (OMB Number 1905-0208) and expiration date will be displayed on the data collection form and the instructions.

### A.18. Certification Statement

There are no exceptions to the certification statement identified in Item 19, "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I. This information collection request complies with 5 CFR 1320.9.