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# Supporting Statement for DOE's Title 17 Energy Financing Program

## **Part A: Justification**

**OMB No. 1910-5134**

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### *Collection Instruments:*

- Program Guidance for the Title 17 Energy Financing Program *Including the Energy Dominance Financing Program* (“Program Guide”)
- Part I Application Instructions and Attachments (“Part I Application”)
- Part II Application Instructions and Attachments (“Part II Application”)
- The Title 17 Clean Energy Financing Program Application Portal (“Application Portal”)

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## Introduction

The U.S. Department of Energy (the “Department” or “DOE”) requests reinstatement, with change, of a previously approved collection for which approval has expired under OMB Control Number 1910-5134 (the “ICR”). The ICR is utilized by the Department’s Office of Energy Dominance Financing (“EDF”) to administer the Title XVII (Title 17) Energy Financing Program.

The need to revise the ICR was triggered by the passage of the One Big Beautiful Bill Act, which expressly eliminated several loan application requirements such as “an analysis of how the proposed project will engage with and affect associated communities.” *See e.g.* Pub. L. 119–21, Sec. 50403(a), 139 Stat. 153 (Jul. 4, 2025). The aforementioned requirement was mandated by the Inflation Reduction Act of 2022. *See e.g.* Pub. L. 117–169, Sec. 50144(c), 136 Stat. 2045 (Aug. 16, 2022). Thus, prior to the passage of the One Big Beautiful Bill Act, a loan applicant would have been denied for their failure to submit the required plan, implemented as a Community Benefits Plan, otherwise a collection of information under the Paperwork Reduction Act. Other elements of the 1910-5134 ICR not impacted or otherwise amended by the One Big Beautiful Bill Act remain necessary to administer the Title XVII program.

This revision request is made in association with: (1) amendments to 10 C.F.R. part 609 through the “Energy Dominance Financing Amendments” Interim Final Rule (“IFR”) published at 90 *Fed. Reg.* 48705 on October 28, 2025; and (2) revisions to the Program Guidance for the Title 17 Energy Financing Program *Including the Energy Dominance Financing Program* (“Program Guide” formerly known as the “Program Guidance for Title 17 Clean Energy Financing Program”).

The IFR amended the Department’s loan guarantee regulations to directly implement the Energy Dominance Financing provisions of the One Big Beautiful Bill Act. The IFR expanded definitions, criteria, and other eligibility requirements of projects under the section 1706 program (now known as “Energy Dominance Financing Program.” The IFR was published in the *Federal Register*, and is set forth at 10 C.F.R. part 609.

The Program Guide was cleared by the Office of Management and Budget (“OMB”), Office of Information and Regulatory Affairs (“OIRA”) on March 13, 2026, under (RIN: 1901-ZA03). Accordingly, this request reflects changes to the Program Guide as the principle collection instrument, as well as the Part I Application, the Part II Application, and the Application Portal. The ICR collection instrument(s) describe the information that an applicant (“Applicant”) needs to submit to EDF. Alluded to above, and as directed by Congress, EDF no longer requires a Community Benefits Plan. Similarly, EDF has revised application requirements related to the lifecycle greenhouse gas emissions analysis and certain environmental evaluations in accordance with changes to the Council on Environmental Quality’s (“CEQ”) regulations and departmental objectives. Accordingly, the Department requests reinstatement of OMB Control Number 1910-5134.

The information collected through the ICR assists the Department in meeting its mission, public transparency and accountability obligations, and helps DOE deliver timely information on Title XVII program activities to OMB, Congress, and the public.

## A.1. Legal Justification

**Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.**

Title XVII of the Energy Policy Act of 2005 created the Title XVII program. Pub. L. 109–58, Title XVII—Incentives for Innovative, 119 Stat. 1117 (Aug. 8, 2005). The Title XVII program, as amended, is codified at 42 U.S.C. § 16511 *et seq.*

Among other things, Congress requires “(1) programmatic, technical, and financial factors the Secretary will use to select projects for loan guarantees; (2) policies and procedures for selecting and monitoring lenders and loan performance; and (3) any other policies, procedures, or information necessary to implement title XVII of the Energy Policy Act of 2005.” § 16515(b)(1)-(3). These requirements are the basis for the regulations set forth at 10 C.F.R. part 609; the Program Guide; and the Title XVII applications materials.

Section 50144 of the Inflation Reduction Act of 2022 amended Title XVII (in part) to introduce the section 1706 “Energy Infrastructure Reinvestment Financing” program. Section 1706 initially authorized the Secretary of Energy to make guarantees, including refinancing, for projects that (1) retool, repower, repurpose, or replace energy infrastructure that has ceased operations; or (2) enable operating energy infrastructure to avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases. At that time, Section 1706(d) also stated: “To apply for a guarantee under this section, an applicant shall submit to the Secretary an application at such time, in such manner, and containing such information as the Secretary may require, including [...] an analysis of how the proposed project will engage with and affect associated communities.” Pub. L. 117–169, 136 Stat. 2045, Aug. 16, 2022; 42 U.S.C. 16517(d)(2). (emphasis added)

On July 4, 2025, Congress passed, and the President signed into law the One Big Beautiful Bill Act. Section 50403 of the One Big Beautiful Bill Act further amended Title XVII, including its definitions, criteria, and other eligibility requirements related to the section 1706 program. Pub. L. 119–21, 139 Stat. 153, Jul. 4, 2025.<sup>1</sup>

Accordingly, the Department revised 10 C.F.R. part 609 to reflect the enactment of the One Big Beautiful Bill Act. And now, DOE is revising the Program Guide and application materials. Congress’s removal of the loan application requirement for “an analysis of how the proposed project will engage with and affect associated communities” makes the ongoing collection of this information unnecessary. In other words, the statutory amendments require the revision of the previously approved ICR. Similarly, application requirements related to the lifecycle greenhouse gas emissions analysis and certain environmental evaluations require revisions to reflect updated CEQ regulations and departmental objectives.

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<sup>1</sup> Attached are Pub. L. 117–169; Pub. L. 119–21 that make the collection necessary; the Energy Dominance Financing Amendments Interim Final Rule; and an unofficial markup of 42 U.S.C. 16517 and 10 C.F.R. part 609.

## 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.**

The information collected is utilized by the Department to administer the Title XVII program. The Department uses the collection instruments to obtain business, financial, and technical information from an Applicant (or prospective Borrower). The Department uses this information to review and ensure compliance with Title XVII program requirements, and other federal laws as applicable.

Congress has authorized this collection. DOE is required to have “(1) programmatic, technical, and financial factors the Secretary will use to select projects for loan guarantees; (2) policies and procedures for selecting and monitoring lenders and loan performance; and (3) [ ] other policies, procedures, or information necessary to implement title XVII of the Energy Policy Act of 2005.” § 16515(b)(1)-(3). Additionally, the Department is prohibited from issuing a loan, loan guarantee, or other forms of financial assistance unless it has determined that there is a “reasonable prospect of repayment of the principal and interest on the obligation” by the Borrower. *See* 42 U.S.C. § 16512(d). The Department uses the collection instruments to obtain data to meet these statutory requirements.

The Department’s teams of credit analysts, engineers, lawyers, risk managers, and other professionals rely on the information provided by Applicants to determine whether (and on what terms) to issue financial assistance to the Applicant and its proposed project. More specifically, DOE needs the data it collects to: evaluate the eligibility of a proposed borrowers and a proposed project under the requirements of the program; evaluate the financial, policy, and engineering merits of applications and proposed projects; and to structure the terms of the financial assistance to protect the federal government’s financial interests and achieve its policy objectives.

Each project is unique, but historically projects receiving loan guarantees under Title XVII cost hundreds of millions of dollars, deploy innovative technology, and enter uncertain markets. In such complex situations and with such large sums of money at stake, the process for evaluating applications is necessarily deep and exacting. Because of scale and complexity, these projects typically take years to develop. The Department could not carry out the program without the data obtains through the collection. The Department uses, and seeks continued use of, the information it collects for planning, management, and evaluation of the program; to manage its funds and make projections of risks; and to answer congressional, OMB, and other inquiries. In other words, the information collected assists the Department in meeting its mission, public transparency and accountability obligations, and helps DOE deliver timely information on Title XVII program activities to Congress and the public.

### **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 Department requires Applicants to submit their applications in electronic form through an Application Portal, which can be accessed via an internet address that EDF provides upon request. As a result, 100% of the ICR is collected in electronic form. This collection method reduces hour and cost burdens on Applicants by allowing them to efficiently deliver, store, review, and amend their applications using contemporary methods and technologies.

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

**Describe efforts to identify duplication.**

Applicants provide much of the same financial and technical information as the Applicant would provide (or would have already provided) in the private sector when seeking financing for a project of similar complexity, size, and risk. For example, the Department requires Applicants submit: a description of the nature and scope of the project, including key milestones and location; a detailed estimate of the total project costs; a detailed overall financial plan for the project, including all sources and uses of funding, equity, and debt, and the liabilities of parties associated with the project; the Applicant's business on which the project is based and Applicant's financial model presenting project pro forma statements for the proposed term of the loan including income statements, balance sheets, and cash flows; an analysis of the projected market use for any product; etc. The information DOE seeks is predominately data that Applicants possess in the ordinary course of business or would have generated in some form for the purposes developing the project, raising equity and exploring other financing sources.

Certain elements of the Title XVII program are unique to the Department and the federal government, however. In this case, DOE strives to ensure applicants can utilize information already provided to other federal agencies (e.g. financial statements, permit applications) and in the same standard form if possible (e.g. an SF-LL). Because Applicants often will have already developed the same or similar information in the course of seeking private sector-capital for their projects, they are able to respond to DOE using existing information reducing potential burdens.

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

**If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

Most applications concern eligible projects larger than those a small business would typically undertake. Nevertheless, the Department has taken steps that may increase the attractiveness of its programs to small businesses. For example, there are no application fees under the Title XVII Program. Additionally, the Department encourages prospective Applicants to consult with program staff before applying. This allows prospective Applicants to better understand eligibility and program requirements before incurring the burdens associated with the preparation and submission of an application. Similarly, the Department's two-part application process (see A.6 below) helps Applicants avoid unnecessary burdens.

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

**Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Congress has authorized this collection to the extent Title XVII requires “(1) programmatic, technical, and financial factors the Secretary will use to select projects for loan guarantees; (2) policies and procedures for selecting and monitoring lenders and loan performance; and (3) any other policies, procedures, or information necessary to implement title XVII of the Energy Policy Act of 2005.” § 16515(b)(1)-(3). Without the collection instruments, DOE would be unable to successfully implement and administer the Title XVII program.

If a collection is not conducted, or conducted less frequently, the Department would be unable to fulfill its congressional mandates that include recent appropriations (the One Big Beautiful Bill Act and its Energy Dominance Financing provisions reauthorized guarantees up to a total principal amount of \$250 billion through September 30, 2028; the Energy and Water Development and Related Agencies Appropriations Act, 2026, appropriated \$150,000,000 for certain section 1703 projects).

The Department does, however, reduce burdens through the use of a two-part application process. The Department uses Part I of the application to screen for project eligibility and readiness to proceed before inviting an Applicant to submit Part II of the application. The initial review conducted under Part I may save Applicants the costs of submitting Part II for projects the Department does not expect to successfully proceed through the Title XVII program. Therefore, the Department believes requiring an Applicant to submit a single (two-part) application has appropriately reduced some burdens.

## **A.7. Compliance with 5 CFR 1320.5**

**Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines:**

- (a) requiring respondents to report information to the agency more often than quarterly;**
- (b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- (c) requiring respondents to submit more than an original and two copies of any document;**
- (d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;**
- (e) in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- (f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;**
- (g) that includes a pledge of confidentiality that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with**

**the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**

**(h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information’s confidentiality to the extent permitted by law.**

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

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

**If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency’s notice, required by 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.**

On February 18, 2026, the Department published in the *Federal Register* an initial notice and request for comment on the proposed information collection (91 FR 7469). That public comment period concluded on April 20, 2026. One comment was received. The Department has considered the comment, which among other things requested DOE publish the basis of its proposed certification to OMB. The comment specifically requested DOE publish this supporting statement, its burden model, and per-task wage assumptions before OMB disposition. The docket web page associated with this ICR will contain this Supporting Statement. It will be docketed under DOE-HQ-2026-0463, or found at [www.regulations.gov/docket/DOE-HQ-2026-0463](http://www.regulations.gov/docket/DOE-HQ-2026-0463).

As explained below, DOE anticipates approximately the same number of respondents to the program. Where DOE once estimated 92 applicants, it now assumes 100 applicants. DOE also anticipates approximately the same number of burden hours to produce an application. DOE notes that applicants provide much of the same financial and technical information in the private sector when seeking financing for a project of similar complexity, size, and risk. For this reason, DOE reverted to a prior estimate of 132.5 hours per application, excluding 14 hours attributable to a change in law (the elimination of the statutory requirement for an applicant to submit “an analysis of how the proposed project will engage with and affect associated communities” implemented in the form of a required “Community Benefits Plan”). See Pub. L. 119–21, Sec. 50403, 139 Stat. 153 (Jul. 4, 2025). Finally, DOE applied 2025 hourly wage rates (published by the U.S. Bureau of Labor Statistics) by functional categories to estimate the cost burden to an applicant (\$\$33,711).

The Department also published changes to 10 C.F.R. part 609 through the “Energy Dominance Financing Amendments” Interim Final Rule (“IFR”) at 90 *Fed. Reg.* 48705 on October 28, 2025. OIRA determined the IFR was a “significant regulatory action” under section 3(f) of E.O. 12866. The IFR was also determined to be an

“E.O. 14192 deregulatory action” under E.O. 14192, “Unleashing Prosperity Through Deregulation,” 90 FR 9065 (February 6, 2025) because it eliminates the loan application requirement to submit “an analysis of how the proposed project will engage with and affect associated communities.” As previously stated, this application requirement was introduced by the IRA and incorporated into part 609. 88 FR 34419 (May 30, 2023). Therefore, prior to passage of the OBBBA, an energy infrastructure reinvestment project application would have been denied if it failed to include an analysis of how the proposed project will engage with and affect associated communities. DOE previously estimated “14 hours per response” for the inclusion of information regarding an applicant’s community benefits plan; and “89 respondents” to the information collection request annually. *Id.* at 88 FR 34426. This IFR eliminates the application requirement, and associated burdens, from part 609, making it a E.O. 14192 deregulatory action.”

90 *Fed. Reg.* 48705, 48708 (Oct. 28, 2025).

That IFR invited public participation and comments from all interested persons. The IFR also alluded to the forthcoming revision to the information collection request. No comments were received on cost and hour burdens.

## **A.9. Payments or Gifts to Respondents**

**Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.**

No payment or gift to Applicants is being proposed under this ICR. Providing the information requested by DOE is a necessary prerequisite, as described above, to receiving financial assistance under the Title XVII program.

## **A.10. Provisions for Protection of Information**

**Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Department seeks information that Applicants are likely to deem proprietary trade secrets and confidential business information. Applicants understand that the collection is necessary and customary when seeking financing, whether in the private or public sector, for projects of such size, complexity, and risk. As explained above, the Department must obtain this information to evaluate the financial and technical merits of the proposed project and prospective Borrower.

The Department protects an Applicant’s trade secret and confidential business information from public disclosure to the maximum extent permitted by law, including under the Trade Secrets Act, 18 U.S.C. 1905, which prohibits federal employees from unauthorized disclosure of such information, and under the Freedom of Information Act’s exemption from disclosure for trade secret and confidential business information (5 U.S.C. § 552a). An Applicant’s trade secret and confidential business information is deemed “Confidential Unclassified Information” information under DOE policy (DOE O 471.7) and is to be labeled as such by DOE personnel to guard against inadvertent public disclosure and to limit distribution to only those within the U.S. Government who have a need to know. The Program Guide provides detailed instructions to Applicants about how to mark trade secret and business confidential information such that DOE can readily recognize it as subject to a claim of confidentiality and accord it appropriate protections. Finally, the Department stores Applicant information on DOE’s computer

systems, which are protected by government IT security measures and allow access only to authorized personnel.

### **A.11. Justification for Sensitive Questions**

**Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

No questions of a personally sensitive nature (such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private) are requested or collection.

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

Total number of unduplicated respondents: 100

Reports filed per respondent: 1

Total annual responses: 100

Total annual burden hours: 13,250 hours

Average Burden

Per Collection: 132.5 hours

Per Applicant: 132.5 hours

The forgoing estimates are based on DOE's years of experience administering the Title XVII program and other loan, loan guarantee, and financial assistance programs. DOE receives feedback working alongside Applicants to collect the information. The estimates are based on DOE's experience, Applicant feedback, and details described below regarding the functional/occupational categories of personnel working for the Applicant whom would typically be involved in furnishing the required information and the time required of each category.

The information DOE seeks is predominately data that Applicants possess in the ordinary course of business or would have generated in some form for the purposes developing the project, raising equity and exploring other financing sources. Thus, the Department's hour burden estimate considers (1) the time it takes Applicants to assemble, organize and upload into the application portal information they

already have, as well as (2) information that is unique to the federal government, the Department, and the Title XVII program.

The burden hours per response (132.5 hours). DOE reviewed and reverted back to a prior estimate of 132.5 hours per application, excluding 14 hours attributable to a change in law (the elimination of the statutory requirement for an applicant to submit “an analysis of how the proposed project will engage with and affect associated communities” implemented in the form of a required “Community Benefits Plan”). See Pub. L. 119–21, Sec. 50403, 139 Stat. 153 (Jul. 4, 2025).

**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
OMB Control Number 1910-5134 <ul style="list-style-type: none"> <li>• Program Guide</li> <li>• Part I Application</li> <li>• Part II Application</li> <li>• Application Portal</li> </ul>	Applicants for Title XVII Program loan guarantee (business or other for-profit)	100	100	132.5	13,250	1
<b>TOTAL</b>		<b>100</b>	<b>100</b>		<b>13,250</b>	

**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’.**

The Department estimates the cost for the hour burden of the information collection is \$33,711 per Title XVII Applicant, totaling \$3,371,100. This estimate is based on the last revision and extension request to OMB. DOE reviewed and reverted back to a prior estimate of (132.5 hours) distributed in the same amounts across the same functional/occupational categories of personnel.

In the following table, the Department breaks out the various functional/occupational categories involved in preparing and submitting an application, the estimated amount of time for the activities in each functional/occupational category, and an estimate of the hourly wage rate of the personnel in each functional/occupational working for a hypothetical and typical Applicant.

These figures are multiplied and added to produce the estimated total cost per Applicant. Then, multiplying the estimated cost of \$33,711 per Applicant (x) times the estimated 100 annual Applicants EDF expects produces an annual combined cost estimate for 100 Applicants equal to \$3,371,100.

## ESTIMATED COST BURDEN TO APPLICANT

FUNCTION	RATE	HOURS	TOTAL COST
Collecting information	\$ 95	40.0	\$ 3,800
Compiling information	\$ 95	40.0	\$ 3,800
Management review	\$ 347	20.0	\$ 6,940
Legal review	\$ 867	20.0	\$ 17,340
Submitting information	\$ 41	10.0	\$ 410
Other labor/services	\$ 41	2.5	\$ 103
General expense*	n/a	n/a	\$ 1,318
<b>TOTAL</b>			<b>\$ 33,711</b>

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

For consistency with prior burden estimates, and the estimates provided in the published interim final rule, DOE used the U.S. Bureau of Labor Statistics’ 2025 data set regarding employer costs for total employee compensation. EDF also drew from its 10+ years of institutional knowledge and experience administering the Title XVII program and other loan programs, including its experience working with hundreds of prospective Applicants as they prepared and/or submitted applications.

As explained above, the Department will no longer require a Community Benefits Plan. Prior to the passage of the One Big Beautiful Bill Act, DOE used the Community Benefits Plan and the other information to determine eligibility. Similarly, the Department has revised its application requirements related to the lifecycle greenhouse gas emissions analysis and certain environmental evaluations.

Note: a greenhouse gas emissions analysis is still required under certain Title XVII programs (i.e. section 1703, but not section 1706); and certain environmental data and environmental evaluations are still required to ensure compliance with applicable Federal, State, and local requirements. In accordance with Executive Order 14192 of January 31, 2025, “Unleashing Prosperity Through Deregulation,” the Department estimated the reduction in burden from the elimination of the Community Benefits Plan as a total cost savings of over \$300,000 (2025\$). This estimate was developed in part by the Loan Guarantees for Clean Energy Projects” interim final rule published in the Federal Register at 88 FR 34419 on May 30, 2023. The 2023 interim final rule estimated “14 hours per response” for the inclusion of information regarding an applicant’s community benefits plan.

### 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.**

The Department estimates the cost for the hour burden of the information collection is \$33,711 per Title XVII Applicant, see the response above for details.

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

### Provide estimates of annualized cost to the Federal government.

The Department estimates that it incurs annual costs of \$72,500,000 in utilizing the information it collects through applications under the Title XVII program.

The Department derived this estimate from its Cost Estimation Model and from its experience originating loans under the Title XVII program. DOE most recently updated its Cost Estimation Model in 2021. The Cost Estimate Model suggests the cost to originate a single loan as \$1,450,000 over an assumed 24-month period from receipt of the Application through loan closing. Annualized, this is \$725,000 per Application.

Note: the circumstances regarding each Application vary greatly, therefore DOE ascribes a +/- 45% confidence level to this estimate, resulting in a range of \$400,000 to \$1,050,000 annually per Application. Multiplying the middle of that range (\$725,000) by DOE's estimate of 100 Applications per year yields \$72,500,000 as its estimate of annual cost (with a confidence range from \$36,800,000 and \$96,600,000).

## A.15. Reasons for Changes in Burden

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

The revision in burden hours is driven by the elimination of the Community Benefits Plan requirement. The Department will no longer require a Community Benefits Plan, which was estimated at 14 hours per application. As explained above, DOE anticipates approximately the same number of respondents to the program. Where DOE once assumed 92 applicants, it now estimates 100 applicants given recent appropriations and program expiry dates. DOE anticipates approximately the same number of burden hours to produce an application, and approximately the same number of applicants. However, there is a net increase in total time burden, attributable to the increased number of applicants; and a net increase in total cost burden attributable to increases in employer costs for total employee compensation from 2020 to 2025 across all occupational categories and functions.

	Requested	Program Change Due to Agency Discretion	Change Due to Adjustment in Agency Estimate	Previously Approved
Total Number of Responses	100	0	+8 responses	92
Total Time Burden (Hr)	13,250	0	+ 1,060	12,190
Total Cost Burden	\$3,371,100	0	+\$880,200	\$2,490,900

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

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

The Department does not intend to publish the information collected for statistical use. No complex analytical techniques are employed. The Department does report on the Title XVII program from time to time, but does so on an aggregated basis (e.g. total number of applications approved in FY26).

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

**If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.**

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

### **A.18. Certification Statement**

**Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.**

There are no exceptions to the certification statement in Item 19 of the OMB Form 83-I to which this Supplemental Statement pertains.