

PUBLIC SUBMISSION

As of: 4/21/26, 9:02 AM
Received: April 19, 2026
Status: Pending_Post
Tracking No. mo6-kckp-t6y0
Comments Due: April 20, 2026
Submission Type: Web

Docket: DOE-HQ-2026-0463

Agency Information Collection Activities; Proposals, Submissions, and Approvals: Titled: DOE Loan Guarantees for Energy Projects

Comment On: DOE-HQ-2026-0463-0001

Agency Information Collection Activities; Proposals, Submissions, and Approvals

Document: DOE-HQ-2026-0463-DRAFT-0001

Comment on FR Doc # 2026-03184

Submitter Information

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Organization: Entered into the Record by Obelisk on April 19, 2026

General Comment

DOE (OMB Control No. 1910-5134)Docket: Agency Information Collection Extension — DOE Loan Guarantees for Energy Projects

Federal Register: 91 FR 7469 (Feb. 18, 2026); FR Doc. 2026-03184

Position: Support — with conditions

Closes: April 20, 2026Support — with conditions. Obelisk Tech Systems, Inc. supports continuation of the Title XVII Loan Guarantee evaluation function but OPPOSES OMB renewal of this ICR as currently presented because the notice does not satisfy the Paperwork Reduction Act (PRA) or OIRA review requirements now in force.

1. PRA necessity and practical utility — inadequately justified.

44 U.S.C. 3506(c)(3) and 5 CFR 1320.8(d) require the sponsoring agency to independently evaluate and certify (i) necessity, (ii) practical utility, (iii) accuracy of burden estimate, and (iv) minimization of burden. This notice recites the statutory invitation verbatim and offers no agency evaluation of any of the four factors. A recitation is not a certification. Under 5 CFR 1320.9 the agency — not the public — must certify; the record as published contains no such certification.

2. Burden methodology — undisclosed and facially implausible.

The notice reports 100 respondents, 13,250 burden hours, and \$3,371,100 (about \$33,711 per respondent). The methodology, wage-rate source, task decomposition, and confidence interval are not disclosed. Because Title 17 applicants already assemble voluminous commercial and technical documentation for their own financing purposes, the incremental federal burden is not separable from baseline business activity. Without a disclosed methodology the estimate cannot be tested and cannot support OMB approval under 5 CFR 1320.5(d)(1)(iv).

3. Missing cumulative-burden and alternatives analysis.

Neither the 60-day notice nor the Supporting Statement discloses cumulative burden across related DOE

collections (e.g., the Section 1706 Energy Dominance Financing overlay, OSBP capability intake, NEPA analytic inputs). PRA and OMB Circular A-123 (2026) internal-control quality-information requirements call for enterprise-level burden visibility before a three-year renewal.

4. White House review layer not demonstrated.

Under EO 12866 as supplemented by EO 14094 and OMB's 2025 interim guidance implementing EO 14215, significant regulatory actions and embedded information collections are expected to be submitted to OIRA prior to Federal Register publication. The notice contains no significance determination, no A-4 reference, and no OIRA submission record. That gap is a first-order administrative-record defect.

5. Small-business and underserved-applicant impact.

The HUBZone and small-business Title 17 applicant pipeline is suppressed by current information architecture that front-loads enterprise-counsel and enterprise-engineering assumptions into Parts 1 and 2 of the application. Under the Regulatory Flexibility Act (5 U.S.C. 601 et seq.) and 13 CFR 121, a meaningful small-entity alternative is required. None is disclosed.

6. Requested corrective actions before OMB approval.

(a) Publish the supporting statement, burden model, and per-task wage assumptions in full at regulations.gov and reginfo.gov before OMB disposition.

(b) Disclose whether any portion of this ICR is shared with or duplicates the Section 1706 Energy Dominance Financing intake; if so, consolidate.

(c) Add a small-business/HUBZone applicant pathway with scaled documentation burden and publish the differential burden estimate.

(d) Certify in writing the four PRA factors at 44 U.S.C. 3506(c)(3), with the signing official identified.

(e) Route the collection through OIRA with a written significance determination on the record.

7. Doctrine and consequence.

Process validity is the legal precondition of enforceability. An information collection that cannot be anchored to a disclosed methodology, a written certification, and a documented OIRA review path is vulnerable under APA 5 U.S.C. 706(2)(D) (procedure required by law), PRA 44 U.S.C. 3512 (public-protection provision), and GAGAS / OMB A-123 internal-control criteria. Obelisk preserves all procedural objections for the administrative record.

Respectfully submitted,

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CAGE 9S0L8 | UEI U34MSJ6A6413 | SEC EDGAR CIK 0002090527

Date: April 19, 2026

Attachments

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