



February 27, 2012

EPA Docket Center No. EPA-HQ-OAR-2004-0501
Air and Radiation Docket and Information Center
Environmental Protection Agency
Mail Code: 2822T, 1200
Pennsylvania Ave., NW, Washington, DC 20460

Comments Re: Agency Information Collection Activities; Proposed Collection; Comment Request; Reporting Requirements Under EPA's Green Power Partnership and Combined Heat and Power (CHP) Partnership, EPA ICR Number 2173.02 (Renewal)

Dear Administrator Jackson:

USCHPA is a trade association whose membership includes manufacturers, suppliers, and developers of combined heat and power (CHP) systems.¹ We appreciate the opportunity to comment on specific aspects of the proposed Information Collection Request scheduled for renewal in 2012 which will affect companies and institutions that voluntarily participate in the EPA's Green Power Partnership (GPP) or Combined Heat and Power Partnership (CHPP).

EPA specifically solicits comments to enable it to: 1) evaluate whether the collection of information is necessary and will have practical utility; 2) evaluate the accuracy of its burden assumption and validity of the information collected; 3) enhance the quality and utility of the information collected; and, 4) minimize the burden of the collection of information to responders.

USCHPA commends EPA for establishing and continuing to support the voluntary GPP and CHPP programs that encourage organizations to invest in clean, efficient energy technologies, including renewable energy and combined heat and power. USCHPA will restrict its comments to the CHPP. Since the program's founding, USCHPA has worked closely with the CHP Partnership to encourage deployment of cost-effective CHP projects in the United States. Since its inception in 2001, the CHPP has assisted more than 550 CHP projects, representing 5,320 megawatts (MW) of new CHP capacity, preventing the emission of 14.0 million metric tons of carbon dioxide equivalent. That is tantamount to removing 2.7 million passenger vehicles from the road.²

The CHPP is an important resource for the combined heat and power industry. The process by which information is collected from its Partners and the content of such information provides vital demographic information on the industry that can be utilized to encourage CHP market growth, reduce energy spending and consumption, and achieve higher levels of carbon emissions reductions.

1. Collection of Information Is Necessary and Practical

¹ Hereinafter CHP will refer to both CHP and WHR.

² EPA CHP Partnership www.epa.gov/chp/.

Participants in the CHPP agree to provide basic project data on operational and planned CHP projects once a year using a Microsoft Excel CHP Project Data Reporting Form. The form provides opportunity for participants to identify among other data points, the size of their project, fuel type, prime mover, and market application (e.g., agriculture, industrial, utility, etc.). The EPA CHP team uses the project data to determine proposed and new CHP activities, assess their environmental benefits, and determine where to focus efforts to facilitate project development. As such, collection of such information on an annual basis is necessary and practical to ensuring the CHPP meets its goal to encourage CHP investment and assure the credibility and accuracy of the power production and reduced carbon emissions levels reported on an individual basis, and collectively, by the Partnership.

2. Burden Assumptions Are Reasonable

USCHPA commends EPA for efforts to reduce reporting requirements for the voluntary partnership participants, in particular for permitting electronic submission of responses. EPA notes the average number of annual burden hours across the affected programs is 4.79 hours. The burden is greater for first-year Partners, averaging 2.5 hours for a Letter of Intent, a one-time burden for CHPP Partners, and 3.5 hours for the Partner Yearly Report for the CHPP, for a total of six hours. EPA notes the information submission, and thus the estimated burden hours, includes the initial and annual forms, as well as possible phone calls with EPA to clarify data submitted. The average and first-year burden estimates are reasonable. However, USCHPA supports further reduction of the stated burden hours as detailed in Item 4 to follow.

While USCHPA cannot speak to the impact of the information collection on small business, we are encouraged that EPA's request for comment from very small businesses that employ fewer than 25 signals recognition of the need to further mitigate the reporting burden for all the volunteer Partners.

3. Annual Reporting and Confidentiality Ensure the Quality and Utility of Collected Information

Annual reporting by the CHP Partners is sufficient to ensure that the information collected on CHP projects is timely and accurate without being unduly burdensome to the companies that volunteer to partner with EPA under the program. As the CHPP is comprised of competitor organizations it is critical that EPA continue to maintain the integrity of confidential business information (CBI) that may be submitted in the course of annual reporting, and limit requests for information that might inadvertently lead to the release of competitive data.

4. Minimizing the Burden of Response Is Appropriate

USCHPA recognizes the five to six hours necessary to complete reporting for the CHPP is not extreme. However, Partners would welcome further reduction of the burden. For example, on-line interactive versions of the reporting form and letter of intent that could be submitted directly with SSL encryption would reduce steps to completion and submission and might have ancillary benefits such as reduced paper and print consumption. USCHPA supports EPA's effort toward reducing compliance and paperwork requirements.

Thank you for the opportunity to comment.

Very truly yours,



Jessica H. Bridges
Executive Director