

2011

SUPPORTING STATEMENT

OMB Control No. 0572-0140

Electric System Emergency Restoration Plan

A. JUSTIFICATION

1. Circumstances that make this collection of information necessary.

The term “critical infrastructure” is defined in section 1016(e) of the USA Patriot Act of 2001 (42 U.S.C. 5195c(e)) as “systems and assets, whether physical or virtual, so vital to the United States that the incapacity or destruction of such systems and assets would have a debilitating impact on security, national economic security, national public health or safety, or any combination of those matters.” Electric power systems have been identified in Presidential Decision Directive 63 (PDD-63) as one of the critical infrastructures of the United States. The United States electric power system consists of three distinct components: generation facilities, transmission facilities (including bulk transmission and subtransmission facilities) and distribution facilities. Generation facilities means the generation plant and related facilities, including the building containing the plant, all fuel handling facilities, and the stepup substation used to convert the generator voltage to transmission voltage, as well as related energy management (dispatching) systems. Transmission facilities mean all electrical lines and related facilities, including certain substations, used to connect distribution facilities to generation facilities. They include bulk transmission and subtransmission facilities. Bulk transmission facilities means the transmission facilities connecting power supply facilities to the subtransmission facilities, including both the high and low voltage sides of the transformer used to connect to the subtransmission facilities, as well as the supervisory control and data acquisition systems. Subtransmission facilities means the transmission facilities that connect the high voltage side of the distribution substation to the low voltage side of the bulk transmission or generating facilities, as well as related supervisory control and data acquisition facilities. Distribution facilities means all electrical lines and related facilities beginning at the consumers meter base, and continuing back to and including the distribution substation.

The other critical infrastructures identified in PDD-63 are all dependant to some degree upon the full and continuous functioning of the electric power system. Further, damage to or loss of critical or significant parts of the United States electric power system can cause enormous damage to the environment, loss of life and economic loss and can affect the national security of the United States. Such damage or loss can be caused by an act of nature or an act by man, ranging from an accident to an act of terrorism. Of particular concern are physical and cyber threats from terrorists.

Protecting America's critical infrastructure is the shared responsibility of Federal, state, and local government in active partnership with the private sector. Homeland Security Presidential Directive 7 (HSPD-7) established a national policy for Federal departments and agencies to identify and prioritize United States critical infrastructure and key resources and to protect them from terrorist attacks. The Department of Homeland Security's Directorate of Information Analysis and Infrastructure Protection (IAIP) is the lead organization in coordinating the national effort to secure the nation's critical infrastructure. This IAIP function will give state, local, and private entities one primary contact within the Federal government for coordinating protection activities, including vulnerability assessments, strategic planning efforts, and exercises. Rural Utilities Service (RUS) and, more importantly, RUS electric borrowers must be diligently proactive in electric infrastructure security.

A substantial portion of the electric infrastructure of the United States resides in, and is maintained by, rural America. RUS is uniquely coupled with the electric infrastructure of rural America and its electric borrowers serving rural America. To ensure that the electric infrastructure in rural America is adequately protected, RUS requires that all electric borrowers conduct a Vulnerability and Risk Assessment (VRA) of their respective systems and utilize the results of this assessment to enhance an existing Emergency Restoration Plan (ERP) or create an ERP.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate that actual use the Agency has made of the information received from the current collection.

The VRA is utilized to identify specific assets and infrastructure owned or served by the electric utility, determine the criticality and risk level associated with such assets and infrastructure including a risk versus cost analysis, identify threats and vulnerabilities, if any, review existing mitigation procedures, and assist in the development of new and additional mitigation procedures, if necessary. The ERP provides written procedures detailing response and restoration efforts in the event of a major system outage resulting from a natural or man made disaster. An annual exercise of the ERP will ensure operability and employee competency and serve to identify and correct deficiencies in the existing ERP. The exercise may be implemented singly by an individual borrower, or by an individual borrower as a participant in a multi-party (to include utilities, government agencies and other participants or combination thereof) tabletop execution or actual implementation of the ERP. (Tabletop means a hypothetical emergency response scenario in which participants will identify the policy, communication, resources, data, coordination, and organizational elements associated with an emergency response).

Electric borrower's systems maintain an ERP as part of prudent utilities practices. These ERP's are essential to continuous operation of the electric systems. RUS requires that each electric borrower provide an annual self-certification, in writing, that an ERP exists and that an initial VRA has been performed. If the certification is not received, additional loan funds would not be approved. Self-certification is performed annually.

3. 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, and the basis for the decision for adopting this means of collection.

The RUS is committed to complying with the E-Government Act, to promote the use of the Internet and other information technologies to provide increased opportunities for citizen access to Government information and services, and for other purposes. Due to the immediate need for the information from RUS borrowers in order to ensure safety of Electric Infrastructure, the Agency will collect this one time submission and on an annual basis, allow borrowers to provide a letter of certification.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

This certification of an ERP is an annual submission and is required for each borrower. No similar information already exists; therefore there is no duplication of information.

5. If the collection of information impacts small businesses or other small entities (item 5 of OMB Form 83-I), describe any methods used to minimize burden.

The self-certification is being requested in a simple format consisting of no more than one page. This information is minimal on small business or other small entities. The information requested is the minimum required to protect the Government's security on the loans made to borrowers.

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

This self-certification is required from each RUS electric borrower and is submitted annually. This certification will be kept on file at the Washington headquarters. If this information were not collected in the time-frame specified in the rule, vulnerabilities may exist in the electric system infrastructure. The result would be increase risk public safety and may affect the Government loan security.

7. Explain any special circumstances that would cause an information collection to conduct in a manner:

a. Requiring respondent to reporting information more than quarterly.

There is no request to collection this information more than quarterly.

b. Requiring written response in less than 30 days.

There is no requirement to respond in less than 30 days.

c. Requiring more than an original and two copies.

There is not requirement of more than original and two copies to be submitted.

d. Requiring respondent to retain records for more than 3 years.

Record retention requirements shall be in accordance with 7 CFR 1767.

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.

This collection is not a survey.

f. Requiring the use of a statistical data classification that has not be reviewed and approved by OMB.

This collection does not employ statistical sampling.

g. Requiring a pledge of confidentiality that is not supported by authority established in statute or 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.

This is no requirement of a pledge of confidentiality.

h. Requiring respondents to submit proprietary trade secret, 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.

There is no requirement to submit propriety trade secrets.

8. If applicable, identify the date and page number of publication in the Federal Register of the agency's notice soliciting comments on the information collection. Summarize public comments received and describe actions taken by the agency in response to these comments. Describe efforts to consult with persons outside the Agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, reporting format (if any), and on data elements to be recorded, disclosed, or reported.

As required by 5 CFR 1320.8(d), a notice requesting public comments was published on November 26, 2010, in the *Federal Register*, at 75 FR 72780. The comment period ended January 25, 2011 and no comments were received on this information collection.

The following individuals have been consulted to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, etc.:

Jason Merchant
Newberry Electric Cooperative
P.O. Box 477
Newberry, SC 29108
(803) 276-1121

Overall the borrower believes that the collection of information requested is necessary and not too burdensome and materials such as CFR and Website are very accessible.

Jimmy Cook
Woodruff Electric Cooperative Corporation
P.O. Box 1619
Forrest City, AR 72336-1619
(870) 633-2262

Overall the borrower believes that the collection of information requested is necessary and not too burdensome and materials such as CFR and Website are very accessible. Instructions and record keeping instructions are explained by GFR or Program staff are clear and useful.

Terry Rubenthaler
Midwest Energy Cooperative
P.O. Box 127
Cassopolis, 49031-0127
(269) 445-1031

Overall the borrower believes that the collection of information requested is necessary and not too burdensome and materials such as CFR and Website are very accessible. The borrower had a restoration plan before it was required by RUS.

In addition to the individuals listed above, the Agency periodically reviews its procedures to determine if any paperwork requirements can be eliminated without lessening the Government's security of the Agency's loans portfolio. Agency staff, including General Field Representatives, often discusses paperwork requirement issues with our borrowers, national trade organizations, and supplemental lenders at various meetings, conferences, etc.

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

Payments or gifts are not provided to respondents.

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

The information collection does not require confidentiality. Information submitted to RUS by borrowers is covered by the provisions of the Freedom of Information Act (5 U.S.C. 552).

11. Provide additional justification for any question of a sensitive nature, such as sexual behavior or attitudes, religious beliefs, and other matters that are commonly considered private.

There are no questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information.

This information collection consists of 338 hours of burden to the public as shown on the attached Summary of Information Collection. RUS estimates that approximately 50 percent of this time, or 15 minutes, is professional time, and the balance of 15 minutes is clerical time. If an hourly rate of \$44.55 is attributed to professional time, and \$14.62 to clerical time, the costs to the public are as follows:

COST TO THE PUBLIC

Professional	15 mins (.25 hr.) x \$44.55/hr. x 676 responses =	\$7528.95
Clerical	15 mins (.25 hr.) x \$14.62/hr. x 676 responses =	<u>\$2470.78</u>
	Total cost to the Public	\$9999.73

The Department of Labor, Bureau of Labor Statistics, Standard Occupational Classification wage rates were used as the basis for the cost estimates. The hourly earnings for General Manger is \$44.55 and Office and Administrative Support Occupations is \$14.62.

13. Provide an estimate of the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

a. Total capital and start-up cost component (annualized over its expected useful life); and

There are no capital or start-up costs associated with this collection.

b. Total operation and maintenance and purchase of services component.

There are no operation and maintenance or purchase of services components associated with this collection.

14. Provide estimates of annualized cost to the Federal Government.

RUS will receive approximately 676 responses and is estimated to take 15 minutes for review and processing by RUS. Costs are calculated at a rate of \$48.35 hr. for professional time (GS 13 Step5).

COST TO THE GOVERNMENT

Professional 15 mins. (.25 hr.) x \$48.35/hr. x 676 responses = \$8171.15

15. Explain the reasons for any program changes or adjustments reported in items 13 or 14 of the OMB Form 83-1.

This information collection request is for a regular three-year clearance of an extension of a currently approved collection, without change.

16. For collection of information whose results will be published, outline plans for tabulation and publication.

The results of this collection of information are not intended for publication.

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

No such approval is requested.

18. Explain each exception to the certification statement identified in item 19 on OMB 83-1.

There are no exceptions to the certification statement.

B. COLLECTIONS OF INFORMATION EMPLOYING STATISTICAL METHODS

This information collection does not employ statistical methods.