

Appendix I:

**Total Responses by Subpart and
Responses per Respondent by Subpart**

**Greenhouse Gas Reporting Program
ICR Renewal**

August 2019

Total Responses Determination

This Appendix documents the methodology used to determine the Total Responses and Responses per Respondent values associated with the Information Collection Request (ICR) burden estimates for the Greenhouse Gas Reporting Program (GHGRP). The Total Responses per subpart and Responses per Respondent per subpart values are included in Exhibit 6-1 of the ICR Supporting Statement. Beginning with EPA ICR 2300.18, the Total Responses per subpart is defined as the number of individual pieces of data (i.e., data count) entered into e-GGRT by reporters on a subpart basis.

As this was the first time using this methodology to determine the number of Total Responses by subpart, EPA first evaluated the consistency of the e-GGRT data counts by subpart over several reporting years by querying e-GGRT for data entered in reporting years 2015, 2016, and 2017. The most recent values (2017) and prior year values (2015, 2016) were reviewed and compared to identify and explain any significant variability year-to-year. Very limited variability was identified among the three years reviewed. Based on this review, and the relative consistency in total responses year-to-year, 2017 response counts were used for the Total Responses by subpart in this ICR. The use of 2017 data counts allowed EPA to maintain consistency with the respondent counts and costs included in Exhibit 6-1 of the Supporting Statement, all of which are 2017 values.

The number of Total Responses by subpart was then divided by the number of Respondents per subpart to arrive at the number of Responses per Respondent for each subpart. The number of Total Responses by subpart was also added together to arrive at the number of Total Responses for the program. The result is a much larger number of Total Responses than in the previous ICR, as well as changes in the Responses per Respondent values by subpart. However, this new methodology is solidly grounded in actual reported data and is therefore considered more accurate than estimates found in previous GHGRP ICRs.