



July 22, 2014

Tom Lorenz
Office of Energy Consumption and Efficiency Statistics
EI-22, Forrestal Building
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: Agency Information Collection Activities: Information Collection Extension: OMB Form EIA-846, OMB Control No. 1905-0169; Notice and Request for Comments; 79 Fed. Reg. 29756 (May 23, 2014)

Dear Sir:

The American Chemistry Council appreciates the opportunity to comment on an Agency Information Collection Extension submitted for approval to the Office of Management and Budget (OMB) pursuant to the Paperwork Reduction Act (PRA), 44 U.S.C. §§ 3501 *et seq.*

The American Chemistry Council (ACC) represents the leading companies engaged in the business of chemistry. ACC members apply the science of chemistry to make innovative products and services that make people's lives better, healthier and safer. ACC is committed to improved environmental, health and safety performance through Responsible Care®, common sense advocacy designed to address major public policy issues, and health and environmental research and product testing. The business of chemistry is an \$812 billion enterprise and a key element of the nation's economy. It is the nation's largest exporter, accounting for twelve percent of all U.S. exports. Chemistry companies are among the nation's largest energy consumers.

Through this Agency Information Collection Extension, EIA intends to extend the Office of Management and Budget approval of the Manufacturing Energy Consumption Survey (MECS) by three years and shift the frequency of the MECS from every four years to every two years. Increasing the frequency of the MECS will result in needlessly increased burdens for respondents and the government without providing any significant benefit.

ACC fully supports the comments filed by the Council of Industrial Boiler Owners (CIBO), with whom we share many common members. Attached is a copy of CIBO's filing.



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If you have questions or need clarification, please contact me at 202-249-6416.

Sincerely,

A handwritten signature in black ink, appearing to read "Owen A. Kean".

Owen A. Kean

Senior Director

Regulatory and Technical Affairs