



Representing the Interests of America's Industrial Energy Users since 1978

September 29, 2014

VIA E-MAIL

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

**Re: EIA September 17, 2014 Response to CIBO Comments on proposed changes to the
Manufacturing Energy Consumption Survey (MEC)
79 Fed. Reg. 29,756 (May 23, 2014)**

Dear Mr. Lorenz:

Thank you very much for considering the comments of the Council of Industrial Boiler Owners (CIBO) on the proposed changes to the MEC Survey.

Your September 17, 2014 Response reflects thoughtful consideration of CIBO's concerns. We would like to clarify a point about the burden estimate for the survey. In Section II.C.1 of our comments, CIBO states that the survey's request for data regarding petrochemical feedstock will create an additional, unjustified burden on respondents. CIBO intended to show that EIA's estimate of 9 burden hours per establishment is insufficient because each of the 237 questions in the survey (many of which require multiple responses) cannot possibly be accurately completed in an average time of only 2 minutes and 15 seconds per question. CIBO's intention was to show that 2 minutes and 15 seconds per question, and therefore 9 total hours per facility, severely underestimates the amount of time and effort needed to collect the data and properly respond to the MEC Survey. CIBO did not intend to imply that its member facilities require no more than 2 minutes and 15 seconds to answer each question. Your letter in response reflects this misperception of CIBO's position, in drawing the erroneous conclusion that based on CIBO's comments, the burden amounts to only an additional 16 minutes to answer seven questions.

Although the burden estimate issue will not affect EIA's revisions to the survey, CIBO appreciates the correction of the record. Reporting burdens faced by industrial facilities continue to increase and although the increased burden of the MEC Survey revisions taken alone may appear insignificant and only incremental, owners and operators face rising reporting burdens

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across the spectrum of laws and regulations. Every burden increase negatively affects their ability to focus their attention on running their facilities and businesses.

CIBO respectfully requests that this and other correspondence regarding this Federal Register notice be included in the official record of this proceeding.

Thank you for your consideration.

Sincerely yours,

/s/ Robert D. Bessette

Robert D. Bessette
President