



**U.S. Department of Energy**  
**Office of Inspector General**  
**Office of Audits and Inspections**

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# SPECIAL REPORT

Allegations Related to the Energy Information  
Administration's Reporting Process

DOE/IG-0940

June 2015

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**Department of Energy**  
Washington, DC 20585

June 10, 2015

MEMORANDUM FOR THE SECRETARY

FROM:   
Gregory H. Friedman  
Inspector General

SUBJECT: INFORMATION: Special Report: "Allegations Related to the Energy Information Administration's Reporting Process"

BACKGROUND

The Energy Information Administration (EIA), created as part of the *Department of Energy Organization Act of 1977*, is the Department's statistical and analytical component. EIA is responsible for collecting, analyzing, and disseminating independent and impartial energy information to promote sound policy making, efficient markets, and public understanding of energy and its interaction with the economy and the environment. To this end, EIA manages a mandatory reporting program where energy suppliers are required to provide information related to inputs, production, stocks, and imports. EIA's data and analyses are widely used by Federal and state agencies, industry, media, researchers, consumers, and educators. Industry looks to EIA for official estimates on energy demand, supply, prices, markets, and financial indicators. In addition, media and the general public rely on EIA for the most comprehensive source of current and historical data and information on all aspects of U.S. energy.

The Office of Inspector General received a complaint alleging that the weekly and monthly data and statistics reported by EIA had been inappropriately altered for the past 10 to 15 years. The complainant asserted that the data had been skewed by the practice of adding data from fictitious companies, called "adjustment companies." In addition, the complainant stated that EIA inappropriately manipulated its results when the data did not come out to its liking. We initiated a special review focused on EIA's Weekly Petroleum Status Report (WPSR), widely considered EIA's most important and influential published report, to examine the facts and circumstances surrounding the allegations.

RESULTS OF AUDIT

The allegation that EIA had inappropriately skewed WPSR data was not substantiated. While we confirmed that EIA adjusted data reported by companies, such adjustments were required, according to EIA officials, to account for inventories of crude oil on Federal leases that were not reported and to correct suspected errors in data submitted by producers. In explanatory notes published with the WPSR, EIA disclosed the adjustments made to the data. Additionally,

adjustments to data are in accord with the Office of Management and Budget (OMB) Standards and Guidelines for Statistical Surveys, in which it is stated that agencies should edit data appropriately, based on available information, to mitigate detectable errors.

During the course of our review, however, we identified two areas of concern related to EIA's WPSR reporting process that increased the risk of publishing inaccurate reports. Specifically, we found that:

- EIA's written policies and procedures governing the development of the WPSR were neither complete, updated, nor had they been disseminated to EIA analysts; and
- EIA was relying on and publishing at least two estimated figures related to lease stocks data that could not be supported.

Management told us that over time, relevant documentation, such as manuals and support for estimates and adjustment figures, could not be found; and, with plans for developing and implementing a new information system, they decided not to expend effort maintaining current manuals. However, we found that the lack of documentation of WPSR policies and procedures was a long-standing problem predating plans for a new system. Further, the lack of documentation was contrary to EIA's organization-wide standards, which require documentation of all processes necessary to operate, maintain, and upgrade the systems, including maintaining up-to-date operations and programmer's maintenance manuals. Additionally, although an independent evaluation commissioned by EIA in 2009 had identified similar issues, EIA management had not developed a formal corrective action plan and had not implemented corrective actions to address many of the identified issues.

Our testing revealed that two adjustment figures related to lease stocks data used for weekly reports had not been amended in 30 years. These were adjustments of 10,300,000 and 330,000 barrel estimated figures used to correct for the incomplete coverage of companies that store crude oil on leases. EIA officials told us that they were unable to confirm the validity of these adjustments. In fact, these figures have been included in the WPSR so long that current EIA officials stated they had no idea what the figures were based on or how they were originally calculated. EIA officials noted they are currently in the process of reexamining the need to continue reporting lease stocks and the related adjustment estimates. They indicated that if the requirement for the reporting of crude oil lease stocks were eliminated, there could be some concern over the continuity of data provided to stakeholders within the crude oil market. EIA stated that it held meetings with stakeholders to discuss the possibility of making changes to lease stocks reporting.

Finally, we noted that although EIA stated it had procedures to identify and remedy anomalies in data reported by respondents, not all anomalies were fully vetted before publication of the WPSR. EIA officials concluded that the cost to implement more stringent measures to ensure the accuracy of each identified anomaly would be excessively expensive. Their explanation did not appear unreasonable given the relatively small number of anomalies observed and the tight timeframe of the reporting period.

The insufficiencies in process documentation and reliance on unsupported adjustment estimates for the WPSR increased the risk of publishing inaccurate reports. Ultimately, these weaknesses could have an impact on the overall petroleum market given EIA's wide customer base for its WPSR. EIA had taken several positive actions to assure the quality of its reported data. These included contacting respondents who report unusual weekly data for confirmation and working to replace its current outdated systems. Yet, our review found that additional improvements are needed to strengthen EIA's overall reporting process. As such, we made several recommendations designed to strengthen its reporting process.

### MANAGEMENT RESPONSE

EIA management agreed to take corrective actions in response to the report's recommendations. We consider EIA's comments and corrective actions, both taken and planned, to be responsive to our recommendations.

Management's comments are included in Appendix 2.

Attachment

cc: Deputy Secretary  
Administrator, Energy Information Administration  
Chief of Staff

# SPECIAL REPORT: ALLEGATIONS RELATED TO THE ENERGY INFORMATION ADMINISTRATION'S REPORTING PROCESS

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# ALLEGATIONS RELATED TO THE ENERGY INFORMATION ADMINISTRATION'S REPORTING PROCESS

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## DETAILS OF FINDING

The Office of Inspector General received a complaint alleging that the weekly and monthly data and statistics reported by the Energy Information Administration (EIA) had been inappropriately altered for the past 10 to 15 years. Our review focused on the Weekly Petroleum Status Report (WPSR), widely considered EIA's most important published report with the most influence on petroleum product markets. We did not substantiate the allegation that EIA had inappropriately skewed WPSR data. However, during the course of our review, we identified two areas for improvement related to EIA's WPSR reporting process that increased the risk of publishing inaccurate reports:

- EIA's written policies and procedures governing the development of the WPSR were not complete, not updated, and not disseminated to EIA analysts; and
- EIA was relying on and publishing at least two estimated figures related to lease stocks data that could not be supported.

Finally, we noted that although EIA stated it had procedures to identify and remedy anomalies in data reported by respondents, not all anomalies were fully vetted before publication of the WPSR. EIA officials concluded that the cost to implement stricter measures to ensure the accuracy of each anomaly identified would be excessively expensive. Their explanation did not appear unreasonable given the relatively small number of anomalies observed and the tight timeframe of the reporting period.

### Allegations Related to EIA's Reporting Process

We did not substantiate the allegation that EIA had inappropriately altered data for the past 10 to 15 years. Specifically, it was alleged that WPSR data had been skewed by the practice of adding data from fictitious companies called "adjustment companies," and EIA inappropriately manipulated results when the data did not come out to its liking. Our review focused on the WPSR, which has been published since 1980 and is widely considered EIA's most important published report with the most influence on the motor gasoline, distillate fuel oil, kerosene jet fuel, and other petroleum product markets. While we found that EIA adjusted data reported by companies, according to EIA officials and the WPSR explanatory notes, any adjustments made were intended to:

- Account for inventories of small, independent producers of crude oil on Federal leases that were not required to report their stocks (those that carry or store less than 1,000 barrels of crude oil);
- Account for companies that were required to report crude oil lease stocks and were not doing so; or
- Correct suspected errors in data submitted by producers.

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Specifically, we found that each week EIA included the same two adjustments to correct for the understatement of crude oil lease stocks. In the explanatory notes published with the WPSR, EIA disclosed that these adjustments, 10,300,000 barrels in one reporting district and 330,000 barrels in another, were necessary because small, independent producers of crude oil on Federal leases were not required to report their stocks. Adjustments to data are supported by the Office of Management and Budget (OMB) Standards and Guidelines for Statistical Surveys, which requires agencies to edit data appropriately, based on available information, to mitigate detectable errors.

As part of our review, we performed test work on 1 week of respondent data to ensure that information used to prepare the WPSR matched that submitted by the respondents to EIA. We reviewed a judgmental sample that included large quantities reported by respondents for the week, a diverse mix of products, and items identified by edit checks, and found that EIA was able to produce the supporting data. We determined that the data we reviewed was not improperly altered after it was submitted to EIA. Additionally, we verified that each of the respondents included in our sample were legitimate companies that would be required to report data to EIA. Nothing came to our attention to indicate that fictitious data was used to skew the data for the weekly reports.

We also did not substantiate the allegation that EIA inappropriately manipulated results when the data did not come out to its liking. Instead, we found that EIA had a process in place to correct suspected data errors. Specifically, EIA had the ability to replace certain company-reported information with a calculated "expected mean" figure. This process, called "data imputation," was intended to correct reporting errors and was disclosed and explained in the appendices of EIA's published reports. Petroleum survey respondents, on a weekly and monthly basis, were required to submit information related to their inputs, production, stocks, and imports to EIA. This information was then screened for various common errors by a computer processing system, which flagged instances when companies failed to report data, reported incomplete data, or reported data that failed edit checks. Analysts with technical petroleum expertise then examined the data that had been flagged. If data did not appear accurate, the analysts would first attempt to contact companies to verify its accuracy. If companies did not provide a reasonable explanation for outlying data, EIA would make the decision to impute the data and replace the suspect data with the calculated "expected mean" figure.

We performed tests to ensure the legitimacy of data imputations. We reviewed spreadsheets of petroleum data from EIA's data system for multiple weeks. We took a sample of data that had been modified from their original values submitted by survey respondents. We verified there were reasonable analyst explanations for each entry justifying the imputation of data. In addition, we interviewed multiple members of EIA's analytical staff who stated they followed the same process for data imputation.

### **Weekly Reporting Process Controls and Oversight**

Although we did not substantiate the allegations, during the course of our review, we identified two areas of concern related to EIA's WPSR reporting process that increased the risk of publishing inaccurate reports.

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## **Policies and Procedures**

While EIA had developed an operations manual governing the creation and development of the WPSR in 2011, we found that it was not complete, had not been updated, and had not been made available to EIA employees. At the beginning of our inquiry, EIA officials appeared to be unaware of the existence of the manual. EIA officials informed us on numerous occasions that they did not maintain specific policies and procedures governing the weekly reporting process. At the time, EIA officials told us they considered the Explanatory Notes appendix from the weekly report to be their documentation of WPSR policies and procedures. However, 5 months after our review had been initiated, an official located an operations manual for the Weekly Petroleum Supply Reporting System from 2011.

The operations manual provided by EIA officials was created by a support services contractor with the intent to document the contractor's activities supporting EIA's weekly reporting operations. As such, this document was focused on the contractor's required activities and did not cover the complete scope of the Federal analysts' duties and responsibilities. Upon review, we concluded that while the operations manual addressed a number of key WPSR-related processes, such as detailed weekly reporting system navigation and scripted telephone procedures for following up on flagged respondent data, it did not include all elements of EIA's weekly reporting process and had not been updated despite periodic changes to the system. Additionally, management informed us that the operations manual had not been distributed to existing analysts or new hires that joined the group.

The absence of comprehensive written WPSR policies and procedures violated EIA's organization-wide documentation standards, which required that its essential business processes be adequately documented and kept up-to-date so they could be operated efficiently and effectively by anyone with the necessary skills, information input, and technical resources. Additionally, EIA's lack of written policies and procedures regarding evaluations of relied upon adjustments, estimates, and statistical methodologies was not consistent with the OMB Standards and Guidelines for Statistical Surveys, which state that agencies must institute appropriate content/subject matter, statistical, and methodological review procedures.

To benchmark the reporting process implemented at EIA, we visited another Federal agency that also had responsibility for its own mandatory weekly reporting program. We found that the other agency had extensive written policies and procedures with a significant portion of its processes made available to the public on its website for transparency. This is in stark contrast to EIA's incomplete, undistributed manual for its weekly reporting process.

## **Weekly Adjustments**

During the course of our review, we found that EIA was relying on and publishing at least two estimated figures related to lease stocks data that could not be supported. Specifically, the two adjustments described previously had been in place for more than 30 years. Officials told us they had not been able to confirm the validity of the 10,300,000 and 330,000 barrel estimated figures used to correct for the incomplete coverage of companies that store crude oil on leases. In fact, these adjustment figures have been included in the WPSR for so long that current EIA

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officials stated they had no idea what the figures were based on or how they were originally calculated. EIA officials told us that since 2010, they have improved the collection of lease stocks data from selected entities that were previously required to, but had not been reporting, thus reducing the need to correct for unreported crude oil lease stocks. This could result in an over-estimation of the lease stocks figures, if respondents are now reporting volumes that were at least partially intended to be estimated by the adjustments. The overall adjustment of 10,630,000 barrels represented almost 2.7 percent of the approximately 400,000,000 barrel reported inventory of commercial U.S. crude oil. EIA indicated that elimination of the adjustments would cause a noticeable change to the weekly data that stakeholders would question. However, in our opinion, EIA's stated position does not provide sufficient justification for continuing to report adjustments in the weekly reports without disclosure of the unsupported nature of the adjustments.

A 2012 study of lease stocks data, commissioned by EIA, confirmed there was no documentation that explained the methodology used to establish the adjustment amounts. The study recommended actions to help validate the accuracy of the adjustments. In response to the 2012 study, EIA reexamined the need to continue reporting lease stocks data. EIA told us it had determined that statistics on lease stocks had limited value, were challenging to collect, and were a burden placed on industry, and, as a result, it has considered eliminating collection of lease stocks data in 2016. This change would also eliminate the need for the adjustments in question. As previously noted, EIA officials believed that if the requirement for the reporting of all crude oil lease stocks were eliminated (a reduction of roughly 30 million barrels from the total reported commercial inventory), there could be some concern over the continuity of data provided to stakeholders within the crude oil market. EIA indicated that it held meetings with stakeholders to discuss the possibility of making changes to lease stocks reporting.

### **Contributing Factors**

EIA officials stated they did not maintain updated written policies and procedures governing Federal analysts' duties and responsibilities because they were in the process of replacing the system that they have used for the past 30 years to produce the WPSR. These officials stated that they started envisioning a new system more than 2 years ago, believing it would be fully implemented no earlier than 2016. However, they were unable to provide planning or budget documentation that supported an implementation date. Additionally, EIA officials indicated that over time, relevant documentation such as manuals and support for estimates and adjustment figures had disappeared. Despite this, and the fact that the new system was not intended to be complete for some time, EIA decided there was no reason to expend time and effort ensuring that they had up-to-date manuals for the old system. Regardless of the implementation date for this new system, it would be prudent for EIA to maintain and update relevant policies and procedures to help ensure the accuracy of the weekly reporting process at all times.

Further, while EIA commissioned an independent evaluation of its reporting process and had been aware of issues with their policies and procedures, and weekly adjustments for a number of years, it failed to take formal action to mitigate or eliminate many of the identified issues or implement recommended best practices. Specifically, in 2009, EIA management hired a contractor to evaluate the weekly reporting process due to the importance of the WPSR, its historical

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underinvestment, and known issues with calculations and dissemination. The review focused on EIA's business processes, information technology, statistical methods, physical/cybersecurity, and report interpretation. Based on this review of EIA's processes, tools, and methods in place at the time, the contractor issued the WPSR Business Activity Review Report that identified 80 specific findings with the WPSR process that were labeled "urgent" or "high" priority, as well as corresponding best practices or remedies that the review team recommended as corrective actions. Some of the urgent or high priority findings were similar to the findings in this report, noting there were no documented policies and procedures, and statistical methods had not been routinely reviewed, evaluated, and updated. However, EIA officials had not developed a corrective action plan or taken formal corrective actions to address many of these concerns. EIA officials stated that a corrective action plan was not developed due to program reorganization, funding cuts, and plans for a new system. EIA officials also asserted that despite not developing a formal corrective action plan, changes have been made to the WPSR process since the review that address some of the concerns noted.

### **Impact and Path Forward**

EIA has a responsibility to collect, analyze, and disseminate accurate, independent, and impartial energy information to promote sound policy making, efficient markets, and public understanding of energy and its interaction with the economy and the environment. EIA strives to be the gold standard for energy information, with one of its guiding principles being accuracy. However, the overall lack of process documentation for Federal analysts and the reliance on two unsupported adjustment figures related to lease stocks data for the WPSR increase the risk of inaccurate reporting of petroleum data to the public. Ultimately, these weaknesses could have an impact on the overall petroleum market given EIA's wide customer base for its WPSR. As an example, there have been isolated instances where errors were discovered in the WPSR after publication that significantly affected the petroleum markets after the corrections were made public. These instances, though rare, are reported on by national media and can erode the public's confidence in EIA's ability to collect and report accurate data. While EIA has taken positive steps, such as contacting respondents that report unusual weekly data for confirmation and working to replace its current outdated systems, our review found that additional improvements are needed to strengthen EIA's overall reporting process.

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## RECOMMENDATIONS

To strengthen its overall reporting process, we recommend that EIA:

1. Update and maintain written policies and procedures for the weekly reporting process and develop controls to ensure they are used by employees and contractors;
2. Develop controls over adjustments for lease stocks data to ensure the adjustments are (a) supported by accurate and complete data and (b) validated on a periodic basis;
3. Pending a final determination on the future of lease stocks reporting, develop an interim solution for disclosing the unsupported nature of the crude oil lease stocks adjustments until such time as either the adjustment figures are supported by accurate data or lease stocks reporting is in fact discontinued; and
4. Develop a corrective action plan to address previously identified weaknesses, including those identified in the 2009 WPSR Business Activity Review Report.

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## **MANAGEMENT RESPONSE**

EIA management agreed to take corrective actions in response to the report's recommendations. Specifically, EIA indicated that it had developed a comprehensive user manual documenting the policies, procedures, and systems used to develop the WPSR, which will be reviewed with all WPSR analysts to ensure consistent application of policies and procedures. Additionally, EIA reiterated its plan to stop collecting lease stocks data and eliminate the estimated lease stocks adjustment. Pending this change to EIA's reporting process, which is expected to be effective in 2016, EIA also agreed to add an additional footnote to the crude oil tables in the WPSR to make the nature of this estimated adjustment more explicit. Finally, EIA has agreed to address and incorporate the remaining recommendations from the 2009 WPSR Business Activity Review Report which have not yet been addressed, as part of an office-wide update to its statistical data collection and processing practices.

## **AUDITOR COMMENTS**

EIA's comments and corrective actions, both taken and planned, are responsive to our recommendations. While EIA did not agree to develop controls over adjustments for lease stocks data to ensure the adjustments are (a) supported by accurate and complete data and (b) validated on a periodic basis as stated in our second recommendation, we consider EIA's plan to alternatively stop collecting lease stocks data and eliminate the estimated lease stocks adjustment to be responsive to our recommendation. However, until these changes are approved by OMB and implemented by EIA, we continue to believe that the adjustments reported in the WPSR should be validated and supported by accurate and complete data. Therefore, this recommendation will remain open until such time as the unsupported lease stocks adjustment is removed from the WPSR.

Management's comments are included in Appendix 2.

## **OBJECTIVE, SCOPE, AND METHODOLOGY**

### **Objective**

We initiated a special review to examine the facts and circumstances surrounding the allegations related to the Energy Information Administration's (EIA) Weekly Petroleum Status Report (WPSR).

### **Scope**

The special review was performed from March 2014 through June 2015 at the Department of Energy (Department) Headquarters in Washington, DC. We conducted industry benchmarking in June 2014 at another Federal agency in Washington, DC. The audit was conducted under the Office of Inspector General project number A14HQ037.

### **Methodology**

To accomplish the objective, we:

- Reviewed applicable laws, regulations, and guidance pertaining to EIA's weekly reporting process.
- Interviewed EIA officials to determine the weekly reporting process.
- Judgmentally selected and reviewed two complete weeks of WPSR respondent data maintained by EIA within its WPSR database. This selection was made based on obtaining one set of data prior to the beginning of our review and another set of data collected during the review.
- Performed test work on respondent data from one of the two selected weeks to ensure that data used to prepare the WPSR matched the source data submitted by the respondents to EIA. We judgmentally sampled specific respondent data elements based on large volumes of quantities reported, a diverse mix of product codes and items that were flagged by edit checks. Due to EIA's storage practices, we did not verify our second week of data because the source documents had already been archived. Because a judgmental sample was used, results cannot be projected over the entire population.
- Performed test work to determine whether weekly data was altered inappropriately. We judgmentally sampled specific respondent data elements from the two selected weeks of data maintained by EIA within its WPSR database. This data was based on large volumes of quantities reported, items that were flagged by edit checks, and various noted anomalies. Because a judgmental sample was used, results cannot be projected over the entire population.

- Reviewed the findings included in the 2009 WPSR Business Activity Review Report.
- Performed industry benchmarking for the weekly reporting process with another Federal agency.

We conducted this performance audit in accordance with generally accepted Government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives. Accordingly, we assessed significant internal controls and compliance with laws and regulations to the extent necessary to satisfy the audit objective. In particular, we assessed the Department's implementation of the *GPRRA Modernization Act of 2010* and determined that it had established performance measures for the management of the weekly reporting process. Because our review was limited, it would not necessarily have disclosed all internal control deficiencies that may have existed at the time of our audit. Finally, we conducted an assessment of computer-processed data relevant to our audit objective and found it to be reliable.

Management waived an exit conference.

## MANAGEMENT COMMENTS

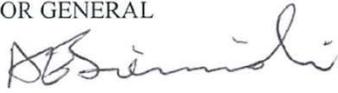


## Department of Energy

Washington, DC 20585

MAY 5 2015

MEMORANDUM FOR RICKEY R. HASS  
 DEPUTY INSPECTOR GENERAL FOR AUDITS AND  
 INSPECTIONS  
 OFFICE OF INSPECTOR GENERAL

FROM: ADAM SIEMINSKI   
 ADMINISTRATOR  
 ENERGY INFORMATION ADMINISTRATION

SUBJECT: Management Response to the Office of Inspector General Draft  
 Special Report on "Allegations Related to the Energy  
 Information's Reporting Process"

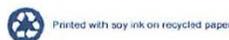
The Energy Information Administration (EIA) appreciates the opportunity to provide comments on the Office of Inspector General's (OIG) draft special report. The OIG made several helpful recommendations for EIA management to improve the weekly petroleum supply reporting process. EIA's response to each of these specific OIG recommendations is below.

**RECOMMENDATION 1:** *Update and maintain written policies and procedures for the weekly reporting process and develop controls to ensure they are used by employees and contractors.*

**Management Response:** Based on the OIG's preliminary draft findings, EIA consolidated various existing documents to develop a comprehensive user manual documenting the policies, procedures, and systems used to develop the WPSR. This manual will be maintained by the Petroleum and Biofuels Statistics (PBS) management team and will be reviewed with all WPSR analysts to ensure consistent application of policies and procedures.

**RECOMMENDATION 2:** *Develop controls over adjustments for lease stocks data to ensure the adjustments are (a) supported by accurate and complete data and (b) validated on a periodic basis.*

**Management Response:** A PBS-commissioned study conducted in 2012 concluded that total lease stocks inventory changes were inconsequential to the U.S. crude oil supply and demand balance because short-term storage of field production on leases are not yet commercially available inventories and are subsequently accounted for in collected pipeline and tank farm inventory data. EIA presented plans to stop collecting lease stocks data and eliminate the estimated lease stock adjustment at a petroleum industry stakeholder workshop held in January 2015, and this proposal received a positive response. EIA plans to eliminate adjustments to lease stocks data and will propose that to



the Office of Management and Budget as part of our comprehensive survey forms package to be effective in 2016.

**RECOMMENDATION 3:** *Pending a final determination on the future of lease stocks reporting, develop an interim solution for disclosing the unsupported nature of the crude oil lease stocks adjustments until such time as either the adjustment figures are supported by accurate data or lease stocks reporting is in fact discontinued.*

**Management Response:** A description of the estimated lease stocks adjustment is included in the WPSR explanatory notes section that accompanies the weekly publication. EIA plans to add an additional footnote to our crude oil tables to make the nature of this estimate more explicit, pending our plan to remove lease stocks from crude oil inventory data as described above in Recommendation 2.

**RECOMMENDATION 4:** *Develop a corrective action plan to address previously identified weaknesses, including those identified in the 2009 WPSR Business Activity Review Report.*

**Management Response:** Based on the findings from the 2009 WPSR Business Activity Review Report, PBS has implemented 28 key recommendations and has made them part of our current and ongoing business practices. EIA is addressing the remaining recommendations within the broader context of an office-wide update to our statistical data collection and processing practices. Our plan is to address and incorporate many of the remaining recommendations from the 2009 report as part of this comprehensive effort as well as the comprehensive survey forms package to be effective in 2016.

## **FEEDBACK**

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Office of Inspector General (IG-12)  
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If you want to discuss this report or your comments with a member of the Office of Inspector General staff, please contact our office at (202) 253-2162.