

**SUPPORTING STATEMENT FOR
FERC-516A “Standardization of Small Generator Interconnection
Agreements and Procedures”**

(Three Year Extension Requested through July 31, 2011)

The Federal Energy Regulatory Commission (Commission) requests that the Office of Management and Budget (OMB) review and extend its approval of FERC-516A “Standardization of Small Generator Interconnection Agreements and Procedures” (OMB No. 1902-0203) through July 31, 2011. Current authorization expires on July 31, 2008. There is a decrease in the reporting burden because the initial filings have been made and as more fully explained in item no. 12, filings made now are merely to amend procedures and agreements filed in the initial filing.

A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Under sections 205 and 206 of the Federal Power Act (FPA) the Commission is charged with ensuring just and reasonable electric transmission rates and charges as well as ensuring that jurisdictional providers do not subject any person to any undue prejudice or disadvantage.

With an ever increasing number of transmission interconnection-related disputes between jurisdictional transmission providers and small generators¹ it became clear that to reduce industry and Commission burden, the incorporation of Commission-approved standard pro-forma interconnection procedures and a single uniformly applicable interconnection agreement into open-access transmission tariffs (OATTS) was prudent. The requirement to provide these documents was instituted August 12, 2005, by Commission Order No. 2006² and codified in the Commission’s regulations in 18 CFR 35.28(f). These documents are the subject of this information collection requirement.

In Order No. 2006, the Commission (FERC) adopted "small generator" interconnection standards for energy resources up to 20 megawatts (MW) in capacity. The FERC's standards apply only to facilities subject to the jurisdiction of the Commission; mostly, these are

¹ “Small generators” are generating facilities having a capacity of no more than 20 MW.

² Standardization of Small Generation Interconnection Agreements and Procedures, Order No. 2006, 70 FR 34189 (May 12, 2005), FERC Stats. & Regs. ¶31,180 (2005).

systems that interconnect at the transmission level. The standards generally do not apply to distribution-level interconnection, which is regulated by state public utilities commissions. However, the Commission noted that its interconnection standards for small generators should serve as a useful model for state-level standards.

The effort to generically address Small Generator interconnection issues presented numerous challenges. The electric industry is faced with the competing needs for, on the one hand, maintaining electric system reliability and, on the other hand, encouraging increased generation, including generation using innovative technologies. To encourage small generators to participate in the interstate wholesale market, the Commission had to develop an interconnection process that is both affordable and the terms and conditions of the agreement had to be clear, but these goals cannot compromise the reliability of the electric system.

Entities seeking to interconnect generators have been hindered by the lack of standard interconnection procedures and agreements. Standard interconnection procedures limit opportunities for public utilities that own both generation and transmission to favor their own generation and help produce just and reasonable interconnection charges for generators. A standard interconnection agreement reduces market entry costs for generators and offers them access to regional energy markets on standard terms.

2. HOW, BY WHOM AND FOR WHAT PURPOSE IS THE INFORMATION TO BE USED AND THE CONSEQUENCES OF NOT COLLECTING THE INFORMATION

The requirement of jurisdictional transmission service providers to include proforma interconnection procedures and a standard interconnection application within their OATTS made it no longer necessary for small generators and transmission providers to draft these documents on an interconnection by interconnection³ basis. Instead these standard documents can be used by jurisdictional transmission providers and small generators when interconnection is sought, by authenticating each with the interconnection's location-specific information in order to institute interconnection. Most, if not all aspects of the interconnection are already set out in these documents making Commission approval unnecessary.

The FERC's standards set in Order No. 2006 include the Small Generator Interconnection Procedures (SGIP) document and the Small Generator Interconnection Agreement (SGIA).

³ An interconnection is defined as two or more electric systems having a common transmission line that permits a flow of energy between them. The physical connection of the electric power transmission facilities allows for the sale or exchange of energy.

The SGIP contains the technical procedures that the small generator and utility must follow in the course of connecting the generator with the utility's lines. The SGIA contains the contractual provisions for the interconnection and spells out who pays for improvements to the utility's electric system, if needed to complete the interconnection. The standards include provisions for three levels of interconnection:

- The "10-kilowatt (kW) Inverter Process," for certified, inverter-based systems no larger than 10 kW;
- The "Fast Track Process," for certified systems no larger than 2 MW; and
- The default "Study Process," for all other systems no larger than 20 MW.

The standards include technical screens for each level of interconnection. Notably, the FERC standards do not require systems to have an external disconnect switch. Utilities and customers must follow specific timelines, and guidelines for interconnection and study fees are established. Customers must obtain liability insurance "sufficient to insure against all reasonably foreseeable direct liabilities given the size and nature of the generating equipment being interconnected, the interconnection itself, and the characteristics of the system to which the interconnection is made." Additional liability insurance must be obtained "only if necessary as a function of owning and operating a generating facility."

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED INFORMATION TECHNOLOGY TO REDUCE THE BURDEN AND TECHNICAL OR LEGAL OBSTACLES TO REDUCING BURDEN

The use of improved information technology is not applicable here. The initial filings were made by all transmission providers to amend their OATTs (by August 12, 2005) to include the required documents. Only the burden of maintaining the documents within the OATT and the drafting of situation-specific procedures and nonconforming agreements remain for industry implementation and Commission review and action.

However, there have been recent initiatives to convert the OATTs to electronic filing as well as other documents filed with the Commission, in particular:

- Order No. 703, "Filing via the Internet" 73 Fed. Reg. 65659 (November 23, 2007) the Commission revised its regulations for implementing the next version of its system for filing documents via the Internet, eFiling 7.0. The Final Rule allows the option of filing all documents in Commission proceedings through the eFiling interface except for specified exceptions, and of utilizing online forms to allow "documentless" interventions in all filings and quick comments in P (Hydropower Project), PF (Pre-Filing NEPA

activities for proposed gas pipelines), and CP (Certificates for Interstate Natural Gas Pipelines) proceedings.

- In a Supplemental Notice of Proposed Rulemaking issued on April 17, 2008 the Commission proposes to revise its previous Notice of Proposed Rulemaking for electronic tariff filing. The revised proposal would require that all tariffs and tariff revisions and rate change applications for the public utility, natural gas pipeline, and oil pipeline industries be filed electronically according to a set of standards developed in conjunction with the North American Energy Standards Board. These standards will enable the Commission to develop a tariff database for use by the Commission staff, the industry, and the public to view and research tariffs, and also provides companies the flexibility to design or purchase software for making tariff filings that best fits their business needs. Upon the effective date of a final rule in this proceeding, the Commission will no longer accept tariff filings submitted in paper format.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2.

This is the first renewal of FERC-516A, as the Commission's initial OMB authorization nears expiration. This collection is very specific to interstate electric transmission tariffs regulated by the Commission. Current staff involvement with the tariffs and regulated entities has not resulted in locating any similar sources of information that could be used or modified in connecting small generators to the grid.

5. METHODS USED TO MINIMIZE THE BURDEN IN THE COLLECTION OF INFORMATION ON SMALL ENTITIES

This information collection was instituted first and foremost to reduce existing burden on small entities, namely the small generator requiring new transmission interconnection. Prior to the institution of this collection, small generators executed case-by-case drafting of interconnection procedures and applications from scratch, for each interconnection instance. Jurisdictional transmission providers benefit from this collection as they need make only one Commission filing to incorporate the already approved Commission interconnection agreement and procedures within their OATTs. They no longer need to negotiate these aspects with each individual small generator requiring interconnection to their transmission system.

6. CONSEQUENCE TO FEDERAL PROGRAM IF COLLECTION WERE CONDUCTED LESS FREQUENTLY

The information collection requires only the initial filing to incorporate the required documents in the jurisdictional OATTS and then the filing on occasion of nonconforming agreements and procedures on an as-needed basis.

If the collection were collected less frequently, the Commission would be unable to perform its review as directed the Federal Power Act in a timely and accurate manner.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

FERC-516A is comprised of the initial filing and then any subsequent filing when there are non-conforming agreements and procedures that are not maintained by the Commission. In addition, these documents are not prepared using a standardized format that would necessitate the display of an OMB control number that could be updated as renewals occur.

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY, SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS

The Commission's procedures require that a rulemaking notice be published in the Federal Register, thereby allowing all regulated entities, state commissions, federal agencies, and other interested parties an opportunity to submit comments, or suggestions concerning the proposal. The rulemaking procedures also allow for public conferences to be held as required.

In accordance with 5 CFR 1320.8(d), the Commission's notice to renew its OMB approval of the FERC-516A, a notice of the proposed information collection and request for comments was published in the Federal Register on January 30, 2008⁴. No comments were received in response to this notice.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts have been made to respondents.

⁴ The notice appeared at 73 FR 5528-5529.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information collected and submitted under FERC-516A is public information and therefore not considered to be confidential. Specific requests for confidential treatment to the extent permitted by law will be considered in accordance with 18 CFR 388.112.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE THAT ARE CONSIDERED PRIVATE

There are no questions of a sensitive nature that are considered private.

12. ESTIMATED BURDEN OF THE COLLECTION OF INFORMATION

The estimated information collection burden is based on the Commission’s experience with the information collection since the issuance of Order No. 2006 and is as follows.

Number of Respondents Annually (1)	Number of Responses per Respondent (2)	Average Burden Hours per Response (3)	Total Annual Burden Hours (1)x(2)x(3)
238 (recordkeeping)	1	1	238
40 filing of Non-Conforming Agreements	1	25	1,000
Total			1,238

The reporting burden for FERC-516A is 1,238 hours. There was a one-time start-up estimate and corresponding cost to comply with Order No. 2006 requirements that was included when the Commission first sought authorization for this information collection in 2005. The estimated burden of the continuing requirement to maintain procedures and agreement documents in transmission provider OATT’s is included above as is the filing of non-conforming interconnection procedures and agreements that occur on occasion.

Current OMB inventory*: 6,426 hours
 Proposed Program Changes: -5,188 hours
 Proposed Adjustments: 0 hours

13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

Total Respondent Burden Hours	÷	Number of Hours per Staff year	x	Cost per Staff Employee ⁵	=	Total Annualized Cost
1,238	÷	2,080	x	\$126,384	=	\$75,222

The estimated total cost to respondents is \$75,223 (rounded off) [1,238 hours divided by 2,080 hours⁶ per year, times \$126,384⁷ equals \$75,223]. The average cost per respondent is \$316.06 (rounded).

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimated annualized cost to the Federal Government is shown below:

<u>Operation</u>	<u>Total Cost</u>
a) Data clearance (FERC FY 2008)	\$ 2,430
b) Data analysis 4.0 FTEs x \$126,384	\$505,536
 Total Cost in one year of operation	 <u>\$507,966</u>

The estimate of the cost to the Federal government is based on salaries for professional and clerical support.

15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

⁵ The “Cost per Staff Employee” estimate is based on the estimated annual allocated cost per Commission employee for fiscal year 2008. The estimated \$126,384 “cost” consists of approximately \$102,029 in salaries and benefits and \$24,355 in overhead.

⁶ Number of hours an employee works per year.

⁷ Average annual salary per employee. (Erroneously shown as \$124,384 in the Federal Register Notice.)

There is a decrease of 5,188 hours in the respondent burden from the Commission's last OMB submission due to the accomplishment of the incorporation of interconnection procedures and agreements into the OATTs. The remaining burden is for the maintenance of these documents and that associated with the preparation of non-conforming documents. The burden estimate is based on recent Commission experience with the filings.

16. TIME SCHEDULE FOR INFORMATION COLLECTION AND PUBLICATION

This is not an information collection for which results are published.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date for OMB approval of the information collected. This is an initial submission to the Commission and then maintenance of that submission. Subsequent filings on an occasional basis are for non-conforming agreements and procedures. It would be unduly burdensome to update the OMB expiration dates for these documents.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The information collected for this reporting requirement is not used for statistical purposes. Therefore, item No. 19(i) "effective and efficient statistical survey methodology" is not applicable to this information collection.

B. Collection of Information Employing Statistical Methods

This is not a collection of information employing statistical methods.

ATTACHMENT A

Federal Power Act - Sections 205 and 206

RATE AND CHARGES; SCHEDULES; SUSPENSION OF NEW RATES

SEC. 205(a) all rates and charges made, demanded, or received by any public utility for or in connection with the transmission or sale of electric energy subject to the jurisdiction of the

Commission, and all rules and regulations affecting or pertaining to such rates or charges shall be just and reasonable, and any such rate or charge that is not just and reasonable is hereby declared to be unlawful.

(b) No public utility shall, with respect to any transmission or sale subject to the jurisdiction of the Commission, (1) make or grant any undue preference or advantage to any person or subject any person to any undue prejudice or disadvantage, or (2) maintain any unreasonable difference in rates, charges, service, facilities, or in any other respect, either as between localities or as between classes of service.

(c) Under such rules and regulations as the Commission may prescribe, every public utility shall file with the Commission, within such time and in such form as the Commission may designate, and shall keep open in convenient form and place for public inspection schedules showing all rates and charges for any transmission or sale subject to the jurisdiction of the Commission, and the classification, practices, and regulations affecting such rates and charges, together with all contracts which in any manner affect or relate to such rates, charges, classifications, and services.

(d) Unless the Commission otherwise orders, no change shall be made by any public utility in any such rates, charges, classification, or service, or in any rule, regulation, or contract relating thereto, except after sixty days' notice to the Commission and to the public. Such notice shall be given by filing with the Commission and keeping open for public inspection new schedules stating plainly the change or changes to be made in the schedule or schedules then in force and the time when the change or changes will go into effect. The Commission, for good cause shown, may allow changes to take effect without requiring the sixty days' notice herein provided for by an order specifying the changes so to be made and the time when they shall take effect and the manner in which they shall be filed and published.

(e) Whenever any such new schedule is filed the Commission shall have authority, either upon complaint or upon its own initiative without complaint at once, and, if it so orders, without answer or formal pleading by the public utility, but upon reasonable notice to enter upon a hearing concerning the lawfulness of such rate, charge, classification, or service; and, pending such hearing and the decision thereon the Commission, upon filing with such schedules and delivering to the public utility affected thereby a statement in writing of its

reasons for such suspension, may suspend the operation of such schedule and defer the use of such rate, charge, classification, or service, but not for a longer period than five months beyond the time when it would otherwise go into effect; and after full hearings, either completed before or after the rate, charge, classification, or service goes into effect, the Commission may make such orders with reference thereto as would be proper in a proceeding initiated after it had become effective. If the proceeding has not been concluded and an order made at the expiration of such five months, the proposed change of rate, charge, classification, or service shall go into effect at the end of such period, but in case of a proposed increased rate or charge, the Commission may by order require the interested public utility or public utilities to keep accurate account in detail of all amounts received by reason of such increase, specifying by whom and in whose behalf such amounts are paid, and upon completion of the hearing and decision may by further order require such public utility or public utilities to refund, with interest, to the persons in whose behalf such amounts were paid, such portion of such increased rates or charges as by its decision shall be found not justified. At any hearing involving a rate or charge sought to be increased, the burden of proof to show that the increased rate or charge is just and reasonable shall be upon the public utility, and the Commission shall give to the hearing and decision of such questions preference over other questions pending before it and decide the same as speedily as possible.

(16 U.S.C. 824d)

FIXING RATES AND CHARGES; DETERMINATION OF COST OF PRODUCTION OR TRANSPORTATION

SEC. 206. (a) Whenever the Commission, after a hearing had upon its own motion or upon complaint, shall find that any rate, charges, or classification demanded, observed, charged, or collected by any public utility for any transmission or sale subject to the jurisdiction of the Commission, or that any rule, regulation, practice, or contract affecting such rate, charge, or classification is unjust, unreasonable, unduly discriminatory or preferential, the Commission shall determine the just and reasonable rate, charge, classification, rule, regulation, practice, or contract to be thereafter observed and in force, and shall fix the same by order.

(b) Whenever the Commission institutes a proceeding under this section, the Commission shall establish a refund effective date. In the case of a proceeding instituted on complaint, the refund effective date shall not be earlier than the date 60 days after the filing of such complaint or later than 5 months after the expiration of such 60-day period. In the case of a proceeding instituted by the Commission on its own motion, the refund effective date shall not be earlier than the date 60 days after the publication by the Commission of notice of its intention to initiate such proceeding nor later than 5 months after the expiration of such 60-

day period. Upon institution of a proceeding under this section, the Commission shall give to the decision of such proceeding the same preference as provided under section 205 of this Act and otherwise act as speedily as possible. If no final decision is rendered by the refund effective date or by the conclusion of the 180-day period commencing upon initiation of a proceeding pursuant to this section, whichever is earlier, the Commission shall state the reasons why it has failed to do so and shall state its best estimate as to when it reasonably expects to make such decision. In any proceeding under this section, the burden of proof to show that any rate, charge, classification, rule, regulation, practice, or contract is unjust, unreasonable, unduly discriminatory, or preferential shall be upon the Commission or the complainant. At the conclusion of any proceeding under this section, the Commission may order the public utility to make refunds of any amounts paid, for the period subsequent to the refund effective date through a date fifteen months after such refund effective date, in excess of those which would have been paid under the just and reasonable rate, charge, classification, rule, regulation, practice, or contract which the Commission orders to be thereafter observed and in force: Provided, That if the proceeding is not concluded within fifteen months after the refund effective date and if the Commission determines at the conclusion of the proceeding that the proceeding was not resolved within the fifteen-month period primarily because of dilatory behavior by the public utility, the Commission may order refunds of any or all amounts paid for the period subsequent to the refund effective date and prior to the conclusion of the proceeding. The refunds shall be made, with interest, to those persons who have paid those rates or charges which are the subject of the proceeding.

(c) Notwithstanding subsection (b), in a proceeding commenced under this section involving two or more electric utility companies of a registered holding company, refunds which might otherwise be payable under subsection (b) shall not be ordered to the extent that such refunds would result from any portion of a Commission order that (1) requires a decrease in system production or transmission costs to be paid by one or more of such electric companies; and (2) is based upon a determination that the amount of such decrease should be paid through an increase in the costs to be paid by other electric utility companies of such registered holding company: Provided, That refunds, in whole or in part, may be ordered by the Commission if it determines that the registered holding company would not experience any reduction in revenues which results from an inability of an electric utility company of the holding company to recover such increase in costs for the period between the refund effective date and the effective date of the Commission's order. For purposes of this subsection, the terms "electric utility companies" and "registered holding company" shall have the same meanings as provided in the Public Utility Holding Company Act of 1935, as amended.

(d) The Commission upon its own motion, or upon the request of any State commission whenever it can do so without prejudice to the efficient and proper conduct of its affairs, may investigate and determine the cost of the production or transmission of electric energy by means of facilities under the jurisdiction of the Commission in cases where the Commission has no authority to establish a rate governing the sale of such energy.

ATTACHMENT B**Title 18: Conservation of Power and Water Resources****§ 35.28 (f) *Standard generator interconnection procedures and agreements***

(1) Every public utility that is required to have on file, a non-discriminatory open access transmission tariff under this section must amend such tariff by adding the standard interconnection procedures and agreement contained in Order No. 2003, FERC Stats. & Regs. & 31,146 (Final Rule on Generator Interconnection), as amended by the Commission in Order No. 661, FERC Stats. & Regs. ¶31,186 (Final Rule on Interconnection for Wind Energy), and the standard small generator interconnection procedures and agreement contained in Order No. 2006, FERC Stats. & Regs. ¶31,180 (Final Rule on Small Generator Interconnection), or such other interconnection procedures and agreements as may be approved by the Commission consistent with Order No. 2003, FERC Stats. & Regs. & 31,146 (Final Rule on Generator Interconnection) and Order No. 2006, FERC Stats. & Regs. ¶31,180 (Final Rule on Small Generator Interconnection).

(i) The amendment to implement the Final Rule on Generator Interconnection required by the preceding subsection must be filed no later than January 20, 2004.

(ii) The amendment to implement the Final Rule on Small Generator Interconnection required by the preceding subsection must be filed no later than August 12, 2005.

(iii) The amendment to implement the Final Rule on Interconnection for Wind Energy required by the preceding subsection must be filed no later than December 30, 2005.

(iv) Any public utility that seeks a deviation from the standard interconnection procedures and agreement contained in Order No. 2003, FERC Stats. & Regs. & 31,146 (Final Rule on Generator Interconnection), as amended by the Commission in Order No. 661, FERC Stats. & Regs. ¶31,186 (Final Rule on Interconnection for Wind Energy), or the standard small generator interconnection procedures and agreement contained in Order No. 2006, FERC Stats. & Regs. ¶31,180 (Final Rule on Small Generator Interconnection), must demonstrate that the deviation is consistent with the principles of either Order No. 2003, FERC Stats. & Regs. & 31,146 (Final Rule on Generator Interconnection) or Order No. 2006, FERC Stats. & Regs. ¶31,180 (Final Rule on Small Generator Interconnection).

(2) The non-public utility procedures for tariff reciprocity compliance described in paragraph (e) of this section are applicable to the standard interconnection procedures and agreements.

(3) A public utility subject to the requirements of this paragraph pertaining to the Final Rule on Generator Interconnection may file a request for waiver of all or part of the requirements of this paragraph, for good cause shown. An application for waiver must be filed either:

(i) No later than January 20, 2004, or

(ii) No later than 60 days prior to the time the public utility would otherwise have to comply with the requirements of this paragraph.

(4) A public utility subject to the requirements of this paragraph pertaining to the Final Rule on Small Generator Interconnection may file a request for waiver of all or part of the requirements of this paragraph, for good cause shown. An application for waiver must be filed either:

(i) No later than August 12, 2005, or

(ii) No later than 60 days prior to the time the public utility would otherwise have to comply with the requirements of this paragraph.

[Order 888, 61 FR 21693, May 10, 1996, as amended by Order 2003, 68 FR 49929, Aug. 19, 2003; Order 2006, 70 FR 34240, June 13, 2005; Order 661, 70 FR 75014, Dec. 19, 2005; Order 676, 71 FR 26212, May 4, 2006; Order 890, 72 FR 12492, Mar. 15, 2007]

ATTACHMENT C

UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

[Docket No. IC08-516A-000; FERC-516A]

COMMISSION INFORMATION COLLECTION ACTIVITIES, PROPOSED
COLLECTION; COMMENT REQUEST; EXTENSION

(January 22, 2008)

AGENCY: Federal Energy Regulatory Commission.

ACTION: Notice.

SUMMARY: In compliance with the requirements of section 3506(c)(2)(a) of the Paperwork Reduction Act of 1995 (Pub. L. No. 104-13), the Federal Energy Regulatory Commission (Commission) is soliciting public comment on the specific aspects of the information collection described below.

DATES: Comments on the collection of information are due March 31, 2008.

ADDRESSES: Copies of sample filings of the proposed information collection can be obtained from the Commission's website (<http://www.ferc.gov/docs-filings/elibrary.asp>) or from the Federal Energy Regulatory Commission, Attn: Michael Miller, Office of the Executive Director, ED-34, 888 First Street NE, Washington, DC 20426. Comments may be filed either in paper format or electronically. Those parties filing electronically do not need to make a paper filing. For paper filing, the original and 14 copies of such comments should

be submitted to the Secretary of the Commission, Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426 and refer to Docket No. IC08-516A-000.

Documents filed electronically via the Internet must be prepared in WordPerfect, MS Word, Portable Document Format, or ASCII format. To file the document, access the Commission's website at <http://www.ferc.gov>, choose the Documents & Filings tab, click on eFiling, then follow the instructions given. First time users will have to establish a user name and password. The Commission will send an automatic acknowledgement to the sender's e-mail address upon receipt of comments.

All comments may be viewed, printed or downloaded remotely via the Internet through FERC's homepage using the eLibrary link. For user assistance, contact FERConlinesupport@ferc.gov or toll-free at (866) 208-3676 or for TTY, contact (202) 502-8659.

FOR FURTHER INFORMATION CONTACT: Michael Miller, the Commission's Information Collection Officer, may be reached by telephone at (202) 502-8415, by fax at (202) 273-0873, and by e-mail at michael.miller@ferc.gov.

SUPPLEMENTARY INFORMATION: The information collected under the requirements of FERC-516A "Small Generator Interconnection Agreements" (OMB No. 1902-2003) is used by the Commission to enforce the statutory provisions of sections 205 and 206 of the Federal Power Act (FPA), as amended by Title II, section 211 of the Public Utility Regulatory Policies Act of 1978 (PURPA)(16 U.S.C. 825d). FPA sections 205 and 206 require the Commission to remedy undue discriminatory practices within interstate electric utility operations.

The Commission amended its regulations in 2005 with Order No. 2006 to require public utilities that own, control, or operate facilities used for the transmission of electric energy in interstate commerce to amend their Open Access Transmission Tariffs (OATT) to include a Commission-approved *pro forma* interconnection procedures document and a standard interconnection agreement for the interconnection of generating facilities having a capacity of no more than 20 MW (Small Generators).⁸

Prior to Order No. 2006, the Commission's policy had been to address interconnection issues on a case-by-case basis. Although a number of transmission providers had filed interconnection procedures as part of their OATTs, many industry participants remained dissatisfied with existing interconnection policies and procedures. With an increasing number of

⁸ ? Standardization of Small Generator Interconnection Agreements and Procedures.

Order No. 2006, 70 FR 34189 (May 12, 2005), FERC Stats. & Regs. ¶ 31,180 (2005).

interconnection-related disputes, it became apparent that the case-by-case approach was an inadequate and inefficient means to address interconnection issues. This prompted the Commission to adopt, in Order No. 2006, a single set of procedures for jurisdictional transmission providers and a single uniformly applicable interconnection agreement for transmission providers to use in interconnecting with Small Generators.

With the incorporation of these documents in their OATTs, there is no longer a need for transmitting utilities to file case-by-case interconnection agreements and procedures with the Commission. However, on occasion, circumstances warrant non-conforming agreements or a situation-specific set of procedures. These non-conforming documents must be filed in their entirety with the Commission for review and action.

Action: The Commission is requesting a three-year extension of the current expiration date.

Burden Statement: Public reporting burden for this collection is estimated as:

Number of Respondents Annually (1)	Number of Responses Per Respondent (2)	Average Burden Hours Per Response (3)	Total Annual Burden Hours (1)x(2)x(3)
238 (maintenance of documents)	1	1	238
40 (filing of non-conforming agreements)	1	25	1000
TOTAL			1238

There was a one-time start-up cost to comply with Order No. 2006 requirements that was included when the Commission first sought authorization for this information in 2005. The estimated burden of the continued requirement to maintain the procedures and agreement documents in transmission providers' OATTs is reflected herein as is the filing of non-conforming interconnection procedures and agreements that occur on occasion.

The estimated total cost to respondents is \$74,032.40. [1,238 hours divided by 2080 hours⁹ per year, times \$124,384¹⁰ equals \$74,032.40]. The average cost per respondent is \$311.06

The reporting burden includes the total time, effort, or financial resources expended to generate, maintain, retain, disclose, or provide the information including: (1) reviewing instructions; (2) using technology and systems for the purposes of providing the information; (3) completing and reviewing the information; and (4) filing the information.

The cost estimate for respondents is based upon salaries for professional and clerical support, as well as direct and indirect overhead costs. Direct costs include all costs directly attributable to providing this information, such as administrative costs and the cost for information technology. Indirect or overhead costs are costs incurred by an organization in support of its mission. These costs

⁹ Number of hours an employee works each year.

¹⁰ Average annual salary per employee.

apply to activities which benefit the whole organization rather than any one particular function or activity.

Comments are invited on: (1) the accuracy of the agency's burden estimate of the information collection, including the validity of the methodology and assumptions used to calculate the reporting burden; and (2) ways to enhance the quality, utility and clarity of the information to be collected.

Kimberly Bose
Secretary