FERC-916 (OMB Control No. 1902-0224):

For ease of comparison, we are providing the following information on the burden and cost:

- 1. currently approved in the OMB inventory and system,
- 2. this request (for clearance extension through 7/2012), and
- 3. the related entries in OMB's ROCIS system.

Please note that OMB's ROCIS system truncates and/or rounds off certain components of the calculations for burden and cost. In addition, FERC's calculations are best estimates for annual figures, averaged over a three-year period; they have also been rounded.

	Number of Respondents	Number of Responses Per	Average Burden Hours Per	Total Annual Burden		Annual Costs to			
Annual	Annually	Respondent	Response	Hours	Annual Private	Federal			
Estimates	(1)	(2)	(3)	(1)x(2)x(3)	Sector Costs (\$)	Gov't. (\$)			
Current Clearance, approved by OMB through 07/2009 ¹									
	222	1	2	444		\$0 Error:			
						Reference			
						source not			
					\$418,248 ²	found			
This Request, for approval through 7/2012									
						\$1,480Error:			
					\$84,825Error:	Reference			
					Reference source	source not			
	222	1	1	222	not found	found [,]			
This request (for extension through 7/2012), as compared to existing OMB approval (expiring 7/2009) Error: Reference source not found. Error: Reference source not found.									

¹ These figures are from the OMB Notice of Action (NOA) dated 7/12/2006, the associated FERC supporting statement (ICR No. 200605-1902-013, on FERC Docket No. RM06-14-000 (Final Rule)), and the OMB ROCIS system,

In this clearance package, the current estimate submitted for industry cost is \$84,825 (staff cost of \$3,774 plus storage cost of \$81,051), reflecting the increased use, and less expensive cost, of electronic storage. Similar to the current federal cost figure, the estimated burden on government for analysis is *de minimus*, as the information collection merely requires entities to retain documents, not to file them. Any associated burden on the government would be caused by case-specific FERC compliance audits of entities with the requirement. The change in the federal cost is due to including the estimated annual federal cost for Forms Clearance review (\$1,480).

For comparison purposes, the current figures (noted above, in OMB's inventory) from the supporting statements are subtracted from the figures for this clearance request.

² For the current inventory, OMB's system shows estimated annual public and federal costs of \$0. However, the estimated annual costs included in the associated FERC supporting statement were: a)industry cost of \$418,248 [444 staff hours @ \$17 an hour, for a total staff cost of \$7,548; plus storage cost of 222 entities @ \$925 per year x 2, for a storage cost of \$410,700], and b)federal cost of \$0. As stated, "[t]here will be no costs to the Federal Government unless a specific entity is the subject of an investigation. Then, the costs will vary per entity and due to the scope of the investigation and the corresponding staffing requirements."

					-\$333,823Error:	+\$1,480 ^{Error:}
					Reference source	Reference source not
	no change	no change	-1	-222	not found	found