

FERC-916 (OMB No. 1902-0224)
Addendum to Clearance Package
9/14/2009

The FERC-916 covers the record retention requirements (similar to the FERC-915 for the electric side). The FERC-916 does not cover the burden or cost of creating the records or of providing them to someone.

During the 60-day and 30-day public comment periods, we did not receive any comments from the public on the burden.

The estimated change to the burden for FERC-916 (reduction of 1 hour per respondent per year) is due the following factors.

1. During the last clearance of the FERC-916 for the final rule in FERC Docket No. RM06-14, FERC increased the record retention period to 5 years from 3 years. That required changes to the companies' procedures (for paper and electronic records that were retained), as well as programming changes for electronic records. It might also have necessitated changes to the companies' off-site storage contracts to lengthen the retention period. That work has been completed, and companies have familiarity with the requirements.
2. Since the changes required in 2006 (by RM06-14, no. 1 above) have been completed, no substantive changes have been, or are being, made.
3. In the last three years, the industry trend has been for companies to maintain and retain their records electronically.
4. The cost of electronic storage has gone down in the last 3 years.

Therefore, companies would have reduced cost and burden of record retention, due to the economies of being able to retain a large amount of data on a small electronic medium, when compared to paper with the associated, required file cabinets, rental of storage space, etc.

Therefore we estimated a reduction of 1 hour per respondent per year.