

**FERC-917 & FERC-918 (OMB # 1902-0233)
Notes on proposed burden change (8/2010)**

The current approved burden for OMB Control No. 1902-0233 is 157,036 hours, and the proposed burden is 132,114, a difference of 24,922 hours. The following information provides details on the related program changes and adjustments that are components of the difference.

Adjustments.

- *Increasing the number of respondents to 134 from 116 for many requirements.*

The number of respondents for most of the requirements is 116 in the current inventory. With a few exceptions (the areas being deleted below (for ATC-related standards) and the areas where the number of respondents is being changed to 6), the no. of respondents is increased by 18 to 134.

To provide a correct baseline for the burden related to current requirements in the OMB-approved inventory, we provide an estimate of the requirements and related burden that would have been imposed on the extra 18 respondents. They would each have had 1041 hours of annual burden from the following requirements of FERC-917 and FERC-918 (all of which have 1 response/respondent):

- FERC-917
 - Planning (Attachment K) [using the current inventory figure of 200 hrs./response]
 - Congestion studies [300 hrs./response]
 - Attestation of network resource commitment [1 hr./response]
 - Capacity reassignment [100 hrs./response]
 - Operational Penalty annual filing [10 hrs./response]
- FERC-918
 - Mandatory data exchanges [80 hrs./response]
 - Explanation of change of ATC values [100 hrs./response]
 - Reevaluate CBM and post quarterly [20 hrs./response]
 - Post OASIS metrics; requests accepted/denied [90 hrs./response]
 - Post planning redispatch offers and reliability redispatch data [20 hrs./response]
 - Post curtailment data [10 hrs./response]
 - Post Planning and System Impact Studies [5 hrs./response]
 - Posting of metrics for System Impact Studies [100 hrs./response]
 - Post all rules to OASIS [5 hrs./response]
 - Recordkeeping Requirements [40 hrs./response]

The 18 added respondents X 1081 hrs. per year would give an adjustment increase of 19,458 hours per year (for FERC-917, 611 hrs. X 18 respondents,

FERC-917 & FERC-918 (OMB # 1902-0233)**Notes on proposed burden change (8/2010)**

or +10998 hrs.; for FERC-918, 470 hrs. X 18 respondents, or +8460 hrs.).

- *Reducing number of respondents to 6 from 116 for some FERC-917 requirements.* The number of filers decreased to 6 from the original of 116 (-110 respondents), for the following items within FERC-917 (all of which have 1 response/respondent):
 - Conforming tariff changes (25 hrs./response) -- total reduced by 2750 hrs.
 - Revision of Imbalance charges (5 hrs. /response) -- total reduced by 550 hrs.
 - ATC revisions (40 hrs./response) -- total reduced by 4400 hrs.
 - Creditworthiness - include criteria in the tariff (40 hrs./response) -- total reduced by 4400 hrs.

The total of these adjustments/reductions is: (a) -110 respondents, and (b) -12,100 hours/year.

The net effect of these adjustments on the total burden is an increase of 7,358 burden hours.

Program changes are due to the incorporation and completion of: (1) one-time pro forma tariff changes by utilities in existence at that time; (2) completed development and comment solicitation of the required NERC/NAESB reliability standards and business practices; (3) the transfer of burden associated with the implementation of some of the NERC/NAESB business practices, in Order No. 729, issued November 11, 2009, to the Commission's FERC-725A information collection (OMB Control Number 1902-0244); and (4) a correction of an earlier arithmetic error in new burden calculation.

The program changes are:

- in FERC-918, 8880 hours program reduction for ATC-related standards that included:
 - NERC/NAESB Team to develop (1 respondent, 1 response each, 1,920 hours each, totaling 1920 hrs. per yr.)
 - Review and comment by utility (116 respondents, 1 response each, 20 hrs. per response, totaling 2320 hrs. per yr.)
 - Implementation by each utility (116 respondents, 1 response each, 40 hrs. per response, totaling 4640 hrs. per yr.)
- in FERC-917, Planning (Attachment K) was formerly 200 hours each response (134 respondents [as adjusted above], 1 response each, 134 responses per yr., 200 hrs. each, totaling 26800 hrs. per yr.), but the proposal reduces the burden per response by 50% to 100 hrs. each (134 respondents, 1 response each, 100

FERC-917 & FERC-918 (OMB # 1902-0233)

Notes on proposed burden change (8/2010)

hrs. per response, totaling 13400 hrs. per yr.), a program reduction of 13400 hours

- In addition, when the final rule in Docket Nos. RM05-25-000 & RM05-17-000 was submitted to OMB, there was an arithmetic error that caused the burden for FERC-918 to be overstated by +10,000 hours (a erroneous program increase). It stated for “Post curtailment data” that there were 116 respondents, 1 response each, 10 hours per response, for a total of 11,160. Rather the total for that requirement should have been 1,160 hours. Because the erroneous extra 10,000 hours was a program increase in 2007, we are taking it as a program decrease at this time in order to correct that number.

The net effect of the program changes is program decrease of 32,280 hours (-8880-13400-10000 hrs.).

Summary. The current approved burden for OMB Control No. 1902-0233 is 157,036 hours, and the proposed burden is 132,114, a difference of 24,922 hours. For the overall burden of OMB No. 1902-0233, there is an adjustment increase of 7,358 hrs. and a program decrease of 32,280 hours, for the net reduction of 24,922. The program decrease of 32,280 hours and adjustment increase of 7,358 hrs. are split between FERC-917 and FERC-918, as follows.

	Adjustment	Program Change
FERC-917	+10,998 -12100 [for a total of -1102]	-13400
FERC-918	+8460	-8880-10000 [for a total of -18880]
Total for OMB No. 1902-0233	+7,358	-32,280