

**Request to OMB for Approval of a Non-Substantive Change**

The Federal Energy Regulatory Commission (FERC or Commission) is requesting OMB approval of a non-substantive change to the required reporting of Simultaneous Transmission Import Limit (SIL) values, as described below. [Supplemental documents in OMB's ROCIS provide additional background material.]

SIL studies<sup>1</sup> are a part of the Commission's reporting requirements included in FERC-919 and have OMB approval under OMB Control No. 1902-0234. Order No. 697<sup>2</sup> (issued 6/21/2007, in Docket RM04-7-000) and subsequent orders<sup>3</sup> contain SIL study requirements. The SIL study is one of many inputs into the initial and triennial market power studies, and while a significant number of MBR sellers rely on such studies, only a small portion of MBR sellers actually prepare such studies each year.

Based on feedback from industry and the completion of the first post-Order No. 697 three-year cycle of updated market power analyses, FERC has consolidated previous Commission direction for calculating SIL values into one document ["Order On Simultaneous Transmission Import Limit Values For The Northwest Region And Providing Direction On Submitting Studies," issued on 6/17/2011 (posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=12683738>; 135 FERC ¶ 61,254), with directions provided in paragraph 4, Appendix B, etc.]. With the consolidated direction, FERC has issued a required, standardized reporting format for certain transmission studies and a table to facilitate sellers' reporting of the components of the SIL values. The consolidated direction and standardized formats are expected to reduce:

- industry questions, filing burden, and delays and costs associated with the need to correct and re-file materials;
- FERC staff time required for review of the filings; and
- the time other members of the public spend analyzing the filed data.

[However, at this time, FERC is not revising the burden estimates.]

No data elements are being changed from those already approved by OMB.

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<sup>1</sup> SIL studies are used as a basis for calculating import capability to serve load in the relevant geographic market when performing market power analyses. SIL values quantify a study area's simultaneous import capability from its aggregated first-tier area.

<sup>2</sup> *Market-Based Rates for Wholesale Sales of Electric Energy, Capacity and Ancillary Services by Public Utilities*, Order No. 697, FERC Stats. & Regs. ¶ 31,252, *clarified*, 121 FERC ¶ 61,260 (2007), *order on reh'g*, Order No. 697-A, FERC Stats. & Regs. ¶ 31,268, *clarified*, 124 FERC ¶ 61,055, *order on reh'g*, Order No. 697-B, FERC Stats. & Regs. ¶ 31,285 (2008), *order on reh'g*, Order No. 697-C, FERC Stats. & Regs. ¶ 31,291 (2009), *order on reh'g*, Order No. 697-D, FERC Stats. & Regs. ¶ 31,305 (2010).

<sup>3</sup> More information on Market-Based Rates and the Order No. 697 'family' of orders is available at <https://www.ferc.gov/industries/electric/gen-info/mbr.asp>.