

Supporting Statement for
**FERC-725G, Transmission Relay Loadability Mandatory Reliability Standards
For the Bulk-Power System**

As Proposed in Docket No. RM11-16-000
(A Notice of Proposed Rulemaking issued September 15, 2011)

The Federal Energy Regulatory Commission (Commission or FERC) is submitting a Notice of Proposed Rulemaking (NOPR) that affects the requirements under the following information collection: **FERC-725G, Transmission Relay Loadability Mandatory Reliability Standards for the Bulk Power System** (OMB Control No. 1902-0252). FERC-725G is an existing data collection (reporting and record retention requirements), as contained in 18 Code of Federal Regulations, Part 40, for which the Commission seeks OMB review.

Background

On August 8, 2005, The Electricity Modernization Act of 2005 (Title XII of the Energy Policy Act of 2005) (EPAAct 2005), was enacted into law.¹ EPAAct 2005 added a new section 215 to the Federal Power Act (FPA) and requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight.²

Final Rule, Order No. 693, Docket No. RM06-16-000

On March 16, 2007, the Commission issued Order No. 693, a Final Rule that added part 40 to the Commission's regulations. The Final Rule stated that this part applies to all users, owners and operators of the Bulk-Power System within the United States (other than Alaska or Hawaii).³ It also requires that each Reliability Standard identify the subset of users, owners and operators to which that particular Reliability Standard applies. Order No. 693 also requires that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

The Commission approved 83 of 107 proposed Reliability Standards, six of the eight proposed regional differences, and the Glossary of Terms used in Reliability Standards as developed by the North American Electric Reliability Corporation (NERC). NERC was certified by the

1 The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2000).

2 A reliability standard defines obligations or requirements of utilities and other entities that operate, plan and use the bulk power system in North America. Meeting these requirements helps to ensure the reliable planning and operation of the bulk power system. Each NERC Reliability Standard details the purpose of the standard, the entities that must comply, and the specific actions that constitute compliance and how the standard will be measured.

3 The bulk-power system consists of the power plants, transmission lines and substations, and related equipment and controls, that generate and move electricity in bulk to points from which local electric companies distribute the electricity to customers.

Commission as the ERO responsible for developing and enforcing mandatory Reliability Standards. Those Reliability Standards meet the requirements of section 215 of the FPA and Part 39 of the Commission's regulations. However, although the Commission believed that it is in the public interest to make these Reliability Standards mandatory and enforceable, the Commission also found that much work remained to be done.

Relay Protection Systems

Protective relays are devices that detect and initiate the removal of faults on an electric system.⁴ They are designed to read electrical measurements, such as current, voltage, and frequency, and can be set to recognize certain measurements as indicating a fault. When a protective relay detects a fault on an element of the system under its protection, it sends a signal to an interrupting device(s) (such as a circuit breaker) to disconnect the element from the rest of the system.

Impedance relays are the most common type of relays used to protect transmission lines. Impedance relays continuously measure local voltage and current on the protected transmission line and operate when the measured magnitude and phase of the impedance (voltage/current) falls within the settings or reach of the relay.⁵ Impedance relays can also provide backup protection and protection against remote circuit breaker failure.

The sequence in which protective relays operate is important. For example, on a transmission line, coordination of protection through distance settings and time delays ensures that the relay closest to a fault can operate before a relay farther away from the fault.⁶ If the more distant relay operates first, it will disconnect both the transmission equipment necessary to remove the fault and "healthy" equipment that should remain in service.

On March 18, 2010, the Commission issued a Final Rule approving Reliability Standard PRC-023-1 (Transmission Relay Loadability), a Standard that requires transmission owners, generator owners, and distribution providers to set load-responsive phase protection relays according to specific criteria to ensure that the relays reliably detect and protect the electric network from all fault conditions, but do not operate during non-fault load conditions.⁷ In addition, under section 215(d)(5) of the FPA, the Commission directed the ERO to develop modifications to the

4 A "fault" is defined in the NERC Glossary of Terms used in Reliability Standards as "[a]n event occurring on an electric system such as a short circuit, broken wire, or an intermittent connection."

5 The "reach" of the relay refers to the length of the transmission line for which the relay is set to protect and is generally used in reference to impedance relays.

6 "Coordination of protection" is defined by the Institute of Electrical and Electronics Engineers (IEEE) Std. C37.113-1999, "IEEE Guide for Protective Relay Applications to Transmission Lines" as "[t]he process of choosing settings or time delay characteristics of protective devices, such that operation of the devices will occur in a specified order to minimize customer service interruption and power system isolation due to a power system disturbance."

7 *Transmission Relay Loadability Reliability Standard*, Order No. 733, 130 FERC ¶ 61,221 (2010), *order on reh'g and clarification*, Order No. 733-A, 134 FERC ¶ 61,127 (2011); *clarified*, Order No. 733-B, 136FERC61,185, (2011). Order No. 733-B is issuing concurrently with this Notice of Proposed Rulemaking.

Standard to address certain issues identified by the Commission. At issue in the immediate proceeding is a revised Reliability Standard that addresses Commission directives in that order and will replace the currently effective PRC-023-1.

NOPR in Docket No. RM11-16-000

In a March 18, 2011 filing (NERC Petition), NERC requests Commission approval of both its proposed Reliability Standard PRC-023-2 and its proposed NERC Rules of Procedure Section 1700 – Challenges to Determinations.

NERC states that the proposed Reliability Standard requires transmission owners, generator owners, and distribution providers to verify relay loadability using methods that achieve “the reliability goal of this Standard in an effective and efficient manner familiar to the responsible entities.”⁸ The proposed Standard also applies to out-of-step blocking systems as well as to load-responsive phase protections systems. NERC specifically identifies the benefits of proposed Reliability Standard PRC-023-2, as including (a) consistent identification of operationally critical circuits operated below 200 kV that must comply with the Requirements of the Standard, and (b) providing transmission operators, planning coordinators, reliability coordinators, and the ERO with more information regarding the criteria selected by entities for verifying relay loadability.⁹

Proposed Reliability Standard PRC-023-2 contains six requirements with the stated purpose of ensuring that protective relay settings do not limit transmission loadability; do not interfere with system operators’ ability to take remedial action to protect system reliability; and are set to reliably detect all fault conditions and protect the electrical network from these faults.¹⁰ The proposed Reliability Standard also includes two attachments. Attachment A specifies the protection systems that are subject to and excluded from the Standard’s Requirements. Attachment B specifies the criteria for determining the circuits which must comply with Requirements R1 through R5.

This NOPR proposes to approve Reliability Standard PRC-023-2 which will replace currently effective Reliability Standard PRC-023-1 approved by the Commission in Order No. 733. Rather than creating entirely new requirements regarding the setting of protective relays, the proposed Reliability Standard instead modifies and improves the existing Reliability Standard. Modified reporting and record retention requirements proposed in the NOPR have been accounted for and burden estimates are contained below.

A. Justification

⁸ NERC Petition at 42. The NERC petition is available on the Commission’s eLibrary document retrieval system at http://elibrary.ferc.gov/idmws/docket_search.asp, and searching on docket number RM11-16.

⁹ NERC Petition at 5.

¹⁰ Reliability Standard PRC-023-2, Section A.3 (Purpose).

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

With the passage of EPAct 2005 Congress entrusted FERC with the authority to approve and enforce rules to assure reliability of the Nation's Bulk Power System. Section 1211 of EPAct 2005 created a new section 215 to the Federal Power Act (FPA), which provides for a system of mandatory and enforceable Reliability Standards. Section 215(d)(1) of the FPA provides that the ERO must file each Reliability Standard or modification to a Reliability Standard that it proposes to be made effective, *i.e.*, mandatory and enforceable, with the Commission. The law mandates that all users, owners, and operators of the Bulk-Power System in the United States will be subject to the Commission-approved Reliability Standards.

Section 215(d)(2) of the FPA provides that the Commission may approve, by rule or order, a proposed Reliability Standard or modification to a proposed Reliability Standard if it meets the statutory standard for approval, giving due weight to the technical expertise of the ERO. Alternatively, the Commission may remand a Reliability Standard pursuant to section 215(d)(4) of the FPA. Further, the Commission may order the ERO to submit to the Commission a proposed Reliability Standard or a modification to a Reliability Standard that addresses a specific matter if the Commission considers such a new or modified Reliability Standard appropriate to "carry out" section 215 of the FPA.¹¹ The Commission's action in this NOPR is based on its authority in accordance with section 215 of the FPA.

On August 14, 2003, a blackout that began in Ohio affected significant portions of the Midwest and Northeast United States, and Ontario, Canada (2003 blackout). This blackout affected an area with an estimated 50 million people and 61,800 megawatts of electric load.¹² The subsequent investigation and report completed by the U.S.-Canada Power System Outage Task Force (Task Force) concluded that a substantial number of lines disconnected when backup distance and phase relays operated under non-fault conditions. The Task Force determined that the unnecessary operation of these relays contributed to cascading outages at the start of the blackout and accelerated the geographic spread of the cascade.¹³ Seeking to prevent or minimize the scope of future blackouts, both the Task Force and NERC made recommendations to ensure that protective relays do not contribute to future blackouts.

The Task Force determined that one of the principal reasons why cascading outages spread beyond Ohio was the operation of zone 3/zone 2 relays in response to overloads rather than true faults.¹⁴ The Task Force identified fourteen 345 kV and 138 kV transmission lines that disconnected because of zone 3/zone 2 relays applied as remote circuit breaker failure and backup protection. Among these relays were several zone 2 relays in Michigan that were set to

¹¹ See 16 U.S.C. 824o(d)(5) (2006).

¹² U.S.-Canada Power System Outage Task Force, Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations, (April 2004) (Final Blackout Report), available at <http://www.ferc.gov/industries/electric/indus-act/reliability/blackout.asp>.

¹³ *Id.* at 80.

¹⁴ *Id.* at 73.

overreach their protected lines by more than 200 percent without any intentional time delay.¹⁵ The Task Force stated that although these and the other relays operated according to their settings, they operated so quickly that they impeded the natural ability of the electric system to hold together and did not allow time for operators to try to stop the cascade.¹⁶ The Task Force described the unnecessary operation of these relays as the “common mode of failure that accelerated the geographic spread of the cascade.”¹⁷ The Task Force also indicated that as the cascade progressed beyond Ohio it spread because of dynamic power swings and the resulting instability.¹⁸

Pursuant to section 215 of the Federal Power Act, the Commission proposes to approve Reliability Standard PRC-023-2 submitted to the Commission for approval by NERC. The proposed Reliability Standard requires transmission owners, generator owners, and distribution providers to set relays according to specific criteria in order to ensure that the relays reliably detect and protect the electric network from fault conditions, but do not limit transmission loadability or interfere with system operators’ ability to protect system reliability. The Commission also proposes to approve NERC Rules of Procedure Section 1700 – Challenges to Determinations. This proposed rule provides Registered Entities a means to challenge determinations made by planning coordinators under Reliability Standard PRC-023.

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

Prior to enactment of section 215, FERC had acted primarily as an economic regulator of wholesale power markets and the interstate transmission grid. In this regard, the Commission acted to promote a more reliable electric system by promoting regional coordination and planning of the interstate grid through regional independent system operators (ISOs) and regional transmission organizations (RTOs), adopting transmission pricing policies that provide price signals for the most reliable and efficient operation and expansion of the grid, and providing pricing incentives at the wholesale level for investment in grid improvements and assuring recovery of costs in wholesale transmission rates.

The passage of the Electricity Modernization Act of 2005 added to the Commission’s efforts identified above, by giving it the authority to strengthen the reliability of the interstate grid through the grant of new authority pursuant to section 215 of the FPA which provides for a system of mandatory Reliability Standards developed by the ERO, established by FERC, and enforced by the ERO and Regional Entities.

¹⁵ *Id.* at 80.

¹⁶ *Id.*

¹⁷ *Id.*

¹⁸ *Id.* at 81.

The proposed rule in FERC-725G would approve a revised Reliability Standard that modifies an existing requirement regarding setting protective relays according to specific criteria in order to ensure that the relays reliably detect and protect the electric network from all fault conditions, but do not limit transmission loadability or interfere with system operators' ability to protect system reliability. Proposed Reliability Standard PRC-023-2 requires entities to set transmission relays according to specified criteria and to retain evidence of compliance. It also requires planning coordinators to implement a test to determine which sub-200 kV facilities are critical to the reliability of the power system and subjects such facilities to the requirements of the proposed Standard. The proposed Reliability Standard requires entities to maintain records subject to review by the Commission and NERC to ensure compliance with the Reliability Standard.

Without this Reliability Standard in place (and its corresponding reporting and record retention requirements) the Bulk-Electric System would be at a greater risk of uncontrolled outages.

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

The subject NOPR does not require any information to be submitted directly to the Commission. However, the Commission does support the use of improved technology in complying with the reporting and record keeping requirements of the proposed Reliability Standard. The Commission has not considered any specific legal obstacles related to the burden that could be removed in order to reduce burden. However, FERC staff works with NERC staff and standards drafting teams in an effort to carry out directives effectively and efficiently and to produce standards that can be approved by the Commission in an efficient manner.

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

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized. There are no similar sources of information available that can be used or modified for these reporting purposes.

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

In Order No. 693, the Commission adopted policies to minimize the burden on small entities, including approving the ERO compliance registry process to identify those entities responsible

for complying with mandatory and enforceable Reliability Standards. The ERO registers only those distribution providers or load serving entities that have a peak load of 25 MW or greater and are directly connected to the bulk electric system or are designated as a responsible entity as part of a required under-frequency load shedding program or a required under-voltage load shedding program. Similarly, for generators, the ERO registers only individual units of 20 MVA or greater that are directly connected to the bulk electric system, generating plants with an aggregate rating of 75 MVA or greater, any blackstart unit material to a restoration plan, or any generator that is material to the reliability of the Bulk-Power System. Further, the ERO will not register an entity that meets the above criteria if it has transferred responsibility for compliance with mandatory Reliability Standards to a joint action agency or other organization.¹⁹

NOPR Proposal

In the NOPR, the Commission asserts that while a significant number of small entities will be affected by the proposed Reliability Standard, the impact will be minimal and not significantly affect small entities.

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

Protective relays are critical to ensuring the reliability of the Bulk-Electric System. The proposed information collection requirements are designed to monitor and ensure compliance with the proposed Reliability Standard. While less strict compliance requirements could be contemplated, the requirements proposed in PRC-023-2 have been debated, vetted, and approved by industry prior to coming to FERC for final approval and are designed to meet the purposes of the Reliability Standard. If anything less than these requirements were implemented it would increase the risk of outages on the grid and diminish the ability of FERC to meet its mandated reliability mission.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to this information collection.

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

Each Commission rulemaking (both NOPRs and Final Rules) are published in the Federal Register, thereby affording all public utilities and licensees, state commissions, Federal

¹⁹ To be included in the compliance registry, the ERO determines whether a specific small entity has a material impact on the Bulk-Power System. If these small entities should have such an impact then their compliance is justifiable as necessary for Bulk-Power System reliability.

agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collection of data. The notice procedures also allow for public conferences to be held as required.

The NOPR in Docket No. RM11-16 was noticed in the Federal Register on September 21, 2011 (76 FR 58424).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts have been made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission generally does not consider the data filed to be confidential.

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 COLLECTION OF INFORMATION

In the final rule approving currently effective Reliability Standard PRC-023-1 (Order 733), the Commission aggregated the burden hours in terms of the number of hours per terminal that would have to be reviewed by an engineer for compliance with the requirements. The resulting hours were aggregated into the recordkeeping category, even though some of the requirements in the standard more closely fall under “reporting”.

The table below contains the burden estimate from Order 733, followed by an estimate of the burden imposed by this NOPR and a summary of the changes to the inventory for this collection. The NOPR estimate below regarding the number of respondents is based on the NERC compliance registry as of July 29, 2011.

Current Inventory and Proposed Changes²⁰

FERC-725G Data Collection	Number of Respondents Annually (1)	Number of Responses Per Respondent (2)	Average Burden Hours Per Response (3)	Total Annual Hours (1x2x3)

²⁰ Some figures in this table have been rounded or truncated as necessary.

Current Inventory	678	1	Reporting:	0	339,200
			Record keeping:	500.295	
Proposed changes to inventory due to the NOPR in Docket No. RM11-16					
R1 criterion 1.10: TOs, GOs, and DPs must analyze and document criterion 1.10 compliance	645	1	<i>Analysis for compliance documents</i>	8	5,160
			<i>Record Retention</i>	2	1,290
R2: TOs, GOs, and DPs must perform analysis and retain evidence of compliance	645	1	<i>Analysis for compliance documents</i>	8	5,160
			<i>Record Retention</i>	2	1,290
R4 and R5: TOs, GOs, and DPs must distribute updated lists and retain evidence that lists were distributed	645	1	<i>Reporting (dist. of list)</i>	10	6,450
			<i>Record Retention</i>	10	6,450
R6: PC must perform assessment, distribute list of circuits and retain evidence of testing and distribution ²¹	72	1	<i>Reporting (assessment and dist. of list)</i>	20	1,440
			<i>Record Retention</i>	10	720
Total	717				27,960
Summary of changes					
Agency Adjustment	+39	-	Record Retention	500.295	+19,512

²¹ This applies to the portion of R6 that deals with testing for sub-100 kV facilities as described in the text. In addition it includes burden hours associated with adding Regional Entities to the list of entities to receive a list of circuits from the planning coordinator.

Program Change	-	-	Reporting	25.398	+18,210
			Record Retention	13.598	+9,750
New proposed inventory					
New Proposed Inventory	717	1	Reporting	25.398	18,210.4
			Record Retention	513.893	368,461.3
				Total Hours	386,672

Key: TO = Transmission owner; GO = Generation owner; DP = Distribution provider; and PC = Planning coordinator

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

The Commission’s cost estimate for the current inventory is based on an estimated hourly rate for engineers of \$120/hr. The estimated cost in the current inventory is as follows:

- Number of line terminals to be reviewed: 53,000
- Number of hours per terminal: 6.4
- Hourly rate for review by engineers: \$120

Total Cost for review = (terminals to be reviewed x hours per terminal) x hourly rate for review by engineers = (53,000 x 6.4) x (\$120/hour) = **\$40,704,000**

In this NOPR the Commission is updating the number of applicable entities based on a recent review of the NERC compliance registry. The number of entities added to the inventory is 39. Applying the current inventory hours per response (500.295 hours) to the 39 new entities yields a total of 19,512 hours (39 times 500.295 = 19,512 (rounded)). At \$120/hour, the total additional cost of adding these entities (related to the agency adjustment) is **\$760,968**.

The additional costs per entity (related to the program change) added by the NOPR are as follows:

- Reporting: 18,210 hours @ \$120/hr = \$2,185,200
- Record Retention: 9,750 @ \$28/hr = \$273,000
- Total cost = **\$2,458,200** (\$2,185,200 + \$273,000)

The proposed total cost for FERC-725G is **\$43,923,168** (\$40,704,000 + \$760,968 + \$2,458,200).

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost to the Federal Government is based on 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 apply to activities which benefit the whole organization rather than anyone particular function or activity.

The proposed Reliability Standard does not require any information to be filed with the Commission and audits are performed by the applicable compliance enforcement entity (ERO or regional entity). Therefore, the only costs to the Federal Government are those associated with maintaining proper clearance from OMB to continue with the collection. The cost for this activity on an annual basis is estimated at \$1,575.

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

The modifications to the existing Reliability Standard PRC-023-1, and the corresponding burden increase, are a result of two things: one, FERC directives given to NERC when FERC approved the existing Reliability Standard; and two, an increase of 39 in the estimated number of entities that must comply with this collection. The estimated cost to comply with the information collection requirements is also increasing due to the increase in the burden hours (more fully discussed in question 13).

The FERC directives led NERC to propose version two of Reliability Standard PRC-023 which make modifications and improvements to the existing standard. The revised standard includes new and modified requirements that, if approved, are estimated to increase the burden on applicable entities by a total of 27,960 hours (program change), or approximately 39 hours per entity (for each of the 717 entities). NERC states that the proposed Reliability Standard requires transmission owners, generator owners, and distribution providers to verify relay loadability using methods that achieve “the reliability goal of this Standard in an effective and efficient manner familiar to the responsible entities.”²² The proposed Standard also applies to out-of-step blocking systems as well as to load-responsive phase protections systems. NERC specifically identifies the benefits of proposed Reliability Standard PRC-023-2, as including (a) consistent identification of operationally critical circuits operated below 200 kV that must comply with the Requirements of the Standard, and (b) providing transmission operators, planning coordinators, reliability coordinators, and the ERO with more information regarding the criteria selected by entities for verifying relay loadability.²³

The increase in the number of applicable entities is thought to be due to changes in the number of entities contained in the NERC Compliance Registry. The previous version of the Reliability was based on the NERC compliance Registry as of March 3, 2009. The current estimate is based on the NERC compliance registry as of July 29, 2011.

²² NERC Petition at 42.

²³ NERC Petition at 5.

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

The filed proposed Reliability Standard is available on the Commission's eLibrary document retrieval system (<http://elibrary.ferc.gov/idmws/search/fercgensearch.asp>) in Docket No. RM11-16-000 and in addition, the Commission requires that all Commission-approved Reliability Standards be available on the ERO's website, with an effective date.

17. DISPLAY OF THE EXPIRATION DATE

It is not appropriate to display the expiration date for OMB approval of the information collected. The information will not be collected on a standard, preprinted form which would avail itself to that display.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use the data collected under the Reliability Standard for statistical purposes, as is described in the certification submitted with this collection to OMB for review.

B. COLLECTION OF INFORMATION EMPLOYING STATISTICAL METHODS.

This is not a collection of information employing statistical methods.