

Supporting Statement for
FERC-576, Report of Service Interruptions

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve **FERC-576, Report of Service Interruptions**, for a three year period. FERC-576 (OMB Control No. 1902-0004) is an existing Commission data collection, as stated by 18 Code of Federal Regulations (CFR), 260.9.

A. Justification

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

A natural gas company must obtain Commission authorization to engage in the transportation, sale, or exchange of natural gas in interstate commerce under the Natural Gas Act (NGA)¹. The NGA also empowers the Commission to oversee continuity of service in the transportation of natural gas in interstate commerce. The information collected under FERC-576 notifies the Commission of: 1) damage to jurisdictional natural gas facilities as a result of a hurricane, earthquake, or other natural disaster, or terrorist activity, 2) serious interruptions to service, and 3) damage to jurisdictional natural gas facilities due to natural disaster or terrorist activity, that creates the potential for serious delivery problems on the pipeline's own system or the pipeline grid.

In cases of emergency and pending the determination of any application on file with the Commission for a certificate of public convenience and necessity pursuant to section 7 of the Natural Gas Act, application may be made for a temporary certificate authorizing the construction and operation of extensions of existing facilities, interconnections of pipeline systems, or sales of natural gas that may be required to assure maintenance of adequate service, or to service particular customers².

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

Filings (in accordance with the provisions of section 4(d) of the NGA)³ must contain information necessary to advise the Commission when a change in service has occurred. 18 CFR 157.17 authorizes the Commission to issue an application for a temporary certificate authorizing the construction and operation of extensions of existing facilities, interconnections of pipeline systems, or sales of natural gas that may be required to assure maintenance of adequate service, or to service particular customers.

Respondents to the FERC-576 may submit the initial reports by e-mail to

¹ Public Law 75 688; 15 USC 717 & 15 USC 717(w)

² 18 CFR 157.17

³ 15 USC 717f(c)

pipelineoutage@ferc.gov. 18 CFR 260.9(b) requires that a report of service interruption or damage to natural gas facilities state: (1)The location of the service interruption or damage to natural gas pipeline or storage facilities; (2)The nature of any damage to pipeline or storage facilities; (3)Specific identification of the facilities damaged; (4)The time the service interruption or damage to the facilities occurred; (5)The customers affected by the service interruption or damage to the facilities; (6)Emergency actions taken to maintain service; and (7)Company contact and telephone number. The Commission may contact other pipelines to determine available supply, and if necessary, authorize transportation or construction of facilities to alleviate the problem in response to these reports.

A report required by 18 CFR 260.9(a)(1)(i) of damage to natural gas facilities resulting in loss of pipeline throughput of storage deliverability shall be reported to the Director of the Commission's Division of Pipeline Certificates at the earliest feasible time and also when pipeline throughput or storage deliverability has been restored.

In any instance in which an incident or damage report involving jurisdictional natural gas facilities is required by Department of Transportation (DOT) reporting requirements under the Natural Gas Pipeline Safety Act of 1968⁴, a copy of such report shall be submitted to the Director of the Commission's Division of Pipeline Certificates, within 30 days of the reportable incident⁵.

If the Commission failed to collect these data, it would lose the ability to monitor and evaluate transactions, operations, and reliability of interstate pipelines and perform its regulatory functions.

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

The FERC-576 filings must be emailed to pipelineoutage@ferc.gov or faxed to (202)-208-2853. These filings may not be e-filed in eLibrary.

For current information on the FERC-576 submission guidelines, go to <http://www.ferc.gov/docs-filing/efiling/filing.pdf>.

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.

⁴ 49 USC 60105(c)(B)

⁵ 18 CFR 260.9(d)

The Commission published a notice in the Federal Register⁶ to help identify any duplication of the information in FERC-576. No comments were received. No similar information can be used or modified.

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

The Commission does not mitigate the burden imposed upon the small entities by the FERC-576. The required information within a FERC-576 filing remains consistent for all entities regardless of their size. Additionally, the available filing methods remain constant for small and “larger” entities alike.

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

If the Commission failed to collect these data, it would lose the ability to monitor and evaluate transactions, operations, and reliability of interstate pipelines and perform its regulatory functions. Moreover, the Commission cannot collect the FERC-576 data less frequently due to statutory requirements to monitor emergency situations. The information collection cannot be discontinued nor collected less frequently due to statutory requirements. The Commission must review reports concerning any disruptions in service of the transportation of natural gas in wholesale markets. The timing and frequency of data filed with the Commission under FERC-576 is determined by the respondent and when an interruption of service occurs. The consequences of not collecting this information are that the Commission’s ability to fulfill its statutory mandate under the NGA and its own rules of practice and procedure would be hindered.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances related to this collection.

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

In accordance with OMB requirements⁷, the Commission published a 60-day notice⁸ and a 30-day notice⁹ to the public regarding this information collection on 5/14/2012 and 8/2/2012 respectively. Within the public notice, the Commission noted that it would be requesting a three-year extension of the public reporting burden with no change to the existing requirements concerning the collection of data. No comments were received.

⁶ 77 FR 28369 (3/14/2012)

⁷ 5 CFR 1320.8(d)

⁸ 77 FR 28369

⁹ 77 FR 46086

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to FERC-576 respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission does consider the information collected in FERC-576 reports to be confidential. The Commission considers requests for information submitted in accordance with section 260.9 under FOIA on a case by case basis of analysis.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

The Commission does not consider any of the questions within the FERC-576 of a sensitive nature that would be considered private.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission estimates the Public Reporting Burden for this information collection as:

FERC-576: Report of Service Interruptions					
	Number of Respondents (A)	Number of Responses Per Respondent (B)	Total Number of Responses (A)x(B)=(C)	Average Burden Hours per Response (D)	Estimated Total Annual Burden (C)x(D)
Submittal of original email	40	2	80	1	80
Submittal of damage reports	40	1	40	0.25	10
Submittal of DOT incident report	40	1	40	0.25	10
TOTAL	N/A	N/A	160	N/A	100

The following table shows the costs associated with the burden hours.

FERC-576	Annual Burden Hours (1)	Estimated Hourly Cost (\$) (2)	Estimated Total Annual Cost to Respondents (\$) (1) X (2)
	100	\$69.01 ¹⁰	\$6,901

The total estimated annual labor cost to respondents is \$6,901. The Commission bases

¹⁰ \$143,540 (2012 FTE average salary)/2080 hours/year = \$69.01 per hour

the total estimated annual cost upon the annual burden hours (100) and estimated hourly cost (\$69.01). FERC based the figure of \$69.01 upon the 2012 average FERC annual employee salary plus benefits (\$143,540). FERC uses \$143,540 to represent the cost to respondents because for certain collections FERC assumes that the typical respondent FTE cost in the industry resembles FERC’s costs of performing the same function (if the Commission were similarly tasked). Since FERC has ready access to FERC salary costs per year, FERC uses the average employee salary plus benefits to provide an estimated annual cost figure. The average estimated hourly cost per respondent is \$69.01. There are no start-up costs because FERC-576 is an existing information collection.

13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

There is no cost burden to respondents that is not related to the burden hours in item 12. More specifically, there are no additional capital or start-up costs associated with FERC-576 that are not already accounted for in item 12.

Total Capital and Start-up Cost	\$0
Total Operation, Maintenance, and Purchase of Services	\$0

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of Filings	0	\$0 ¹¹
Data Clearance Cost		\$1,588
FERC Total		\$1,588

The Commission bases its estimate of the “Analysis and Processing of filings” cost to the Federal Government on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision making, and review of any actual filings made in response to the information collection.

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

The Commission outlines the difference between the total requested annual time burden and the previously approved annual time burden below:

FERC-576	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion

¹¹ While the information collection is mandated by 15 USC 717, the Commission expends minimal effort in the analysis of these data.

Annual Number of Responses	160	160	0	0
Annual Time Burden (Hr)	100	100	0	0
Annual Cost Burden (\$)	0	0	-6,307	0

The format, labels, and definitions of the table above follow the ROCIS system’s “ICR Summary of Burden” for the meta-data.

The Commission is removing the annual cost burden figure that appears in ROCIS because it is associated with labor hours. The Commission only reports in ROCIS costs not associated with labor hours.

The requirements within FERC-576 did not change. Thus, there is no substantive change in burden from the last date of submittal.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information. The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate for the Commission to display the expiration date for OMB approval of the FERC-576 because the information is not collected on a standard form.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

For item (c) of the certification to OMB please see Item 5 of this supporting statement.

The FERC-576 does not include a record retention requirement. Therefore, the Commission does not indicate the record retention period as stated in item in item (f) of the OMB certification.

The Commission does not use the data collected for this reporting requirement for statistical purposes. Therefore, the Commission does not use as stated in item (i) of the certification to OMB "effective and efficient statistical survey methodology." The information collected is case specific to each information collection.