

Supporting Statement  
**FERC-550, Oil Pipeline Rate - Tariff Filings**

Proposed modifications as contained in the proposed rule in Docket No. RM12-15

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve **FERC-550, Oil Pipeline Rates – Tariff Filings**, for a three year period. FERC-550 is an existing collection and the Commission is proposing modifications to it in a proposed rule.

The following paragraphs, excerpted from the proposed rule, explain the proposed changes to oil pipeline tariff filings.

**Eliminating Paper Posting**

Consistent with the Commission’s goal to streamline its procedures to eliminate unnecessary regulatory obligations, the Commission proposes to eliminate the paper posting requirements of sections 341.0(a)(7), 341.7, and 341.3(c) of its regulations. Section 341.0(a)(7) currently provides that oil pipelines must post their tariffs by making them “available during regular business hours for public inspection in a convenient form and place at the carrier’s principal office and other offices of the carrier where business is conducted with affected shippers, or placing a copy on the Internet in a form accessible by the public.” Similarly, section 341.7 requires that “[c]oncurrences must be maintained at carriers’ offices and produced upon request.”<sup>1</sup> Lastly, section 341.3(c) lays out the requirements for “loose-leaf tariffs,” i.e., paper tariffs.

The Commission proposes to revise 341.0(a)(7) to eliminate the requirement that oil pipelines make their tariffs “available for public inspection in a convenient form and place at the carriers’ principal office and other offices where business is conducted.” Instead, consistent with the requirements for public utilities and interstate natural gas pipelines, the Commission proposes to mandate that oil pipelines electronically post their currently effective, pending and suspended tariffs on their public websites.<sup>2</sup> The Commission also proposes to revise section 341.7 of its regulations to eliminate the requirement that “concurrences be maintained at carriers’ offices” in paper form. In conjunction with these changes, the Commission proposes to update section 341.3 of its regulations by removing subsection 341.3(c), which references outdated “loose-leaf

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<sup>1</sup> 18 CFR 341.7 (2012). *See also* 18 CFR 341.0(a)(2) (defining a concurrence as the agreement of a carrier to participate in the joint rates or regulations published by another carrier).

<sup>2</sup> The terms of “effective,” “pending” and “suspended” are those used by Order No. 714 and eTariff, and for this document. The equivalent terms in 18 CFR 341.0(b)(4) (2012) are “current,” “proposed” and “suspended,” respectively. *See also* 18 CFR 35.7 (2012) (establishing the Public Utility Electronic Filing Requirements) and 18 CFR 284.12 (2012) (establishing the Natural Gas Electronic Filing Requirements).

tariffs.” These proposals should reduce the burden on interstate oil pipelines while increasing the ease of accessing oil pipeline tariffs for shippers and possibly the oil pipelines themselves.

### **Service of Filings**

The Commission proposes to revise section 341.1(a) of its regulations to become consistent with section 385.2010 of its regulations by eliminating an oil pipeline’s obligation to “serve tariff publications and justifications to each shipper and subscriber” by paper. Section 385.2010(f)(2) provides that, subject to certain limitations and exceptions, “service of any document in proceedings commenced on or after March 21, 2005, must be made by electronic means unless the sender and recipient agree otherwise or the recipient’s e-mail address is unavailable from the official service list.”<sup>3</sup> This proposed change will create a uniform service requirement for all Commission-regulated entities and eliminate any ambiguity regarding the Commission’s preferred mode of service. Moreover, this proposal should reduce the burden on interstate oil pipelines while increasing ease of tracking document filing activity and potentially reducing mailing and courier fees.

### **Index of Effective Tariffs**

As part of its efforts to eliminate unnecessary filing requirements, the Commission proposes to make changes to section 341.9 of its regulations, which specifies the information that an oil pipeline’s tariff index must contain and how it must be organized. Section 341.9(a) of the Commission’s regulations provides that each Commission-regulated “carrier must publish as a separate tariff publication under its FERC Tariff numbering system, a complete index of all effective tariffs to which it is a party....” Section 341.9(e) further provides that the “index must be kept current by supplements numbered consecutively. The supplements may be issued quarterly. At a minimum, the index must be reissued every four years.”

The Commission proposes to eliminate the requirement that oil pipelines make a tariff filing setting forth an index of all effective tariffs to which it is a party and replace such requirement with an obligation that oil pipelines post the index of tariffs on their public websites. The Commission also proposes to simplify the information oil pipelines must include by requiring that the index of tariffs identify for each tariff: (1) the product being shipped and (2) the origin and destination points for that product. The Commission further proposes that oil pipelines update the index of tariffs within ninety days of any change.

This proposal would eliminate the need of an oil pipeline to make a tariff filing. The posting of index tariffs on an oil pipeline’s public website would also provide shippers with more current

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<sup>3</sup> 18 CFR 385.2010 (2012).

information. Importantly, this proposal would simplify what is required to be contained in the index of tariffs without negatively impacting the information provided to shippers. Similarly, many oil pipelines only have one or two tariffs on file with the Commission. For oil pipelines with a limited number of tariffs, the Commission questions the value of an index of tariffs and believes that such index provides little benefit to shippers. Therefore, the Commission proposes to require only oil pipelines with more than two tariffs to maintain an index of tariffs on their public websites. The Commission estimates that the proposed changes to the index of tariff requirements will eliminate approximately twenty-two unnecessary filings each year. These changes will still provide shippers and the public at large with current and useful information, without any negative impact.

### **Electronic Updates and Filing Requirements**

Many of the tariff filing and tariff maintenance requirements currently stated in Part 341 of the Commission's regulations are premised on the maintenance of paper records. Since the implementation of Order No. 714, however, some oil pipeline tariff filings are now obsolete. In light of these changes, as explained below, the Commission proposes removing the filing requirements for amendments to tariff provided for under section 341.4 of the Commission's regulations, including the amendment and suspension requirements.

### **Tariff Supplements**

Section 341.4(a)(1) of the Commission's regulations allows an oil pipeline's tariff to be supplemented only once.<sup>4</sup> The Commission believes that this provision is now outdated because it is practical for oil pipelines to modify electronic tariffs at any time. Accordingly, the Commission proposes to delete the provisions in section 341.4(a)(1).

### **Amended, Canceled or Reissued Tariff Supplement Data**

Section 341.4(a)(2) of the Commission's regulations sets forth the requirements for maintenance of oil pipeline tariffs that are amended, canceled, or reissued.<sup>5</sup> In Order No. 714, the Commission required oil pipelines to maintain Record Version Numbers for each tariff record.<sup>6</sup> Consequently, supersession data is now maintained electronically<sup>7</sup> and the provisions set forth in

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<sup>4</sup> 18 CFR 341.4(a)(1) (2012) (limiting supplements to one effective supplement per tariff, except for cancellation, postponement, adoption, corrections, and suspension supplements).

<sup>5</sup> 18 CFR 341.4(a)(2) (2012).

<sup>6</sup> Record Version Number is the representation of the version of the Tariff Record. See [Implementation Guide for Electronic Filing of Parts 35, 154, 284, 300 and 341 Tariff Filings](#) (*Implementation Guide*) located on the Commission web site.

<sup>7</sup> Tariff record supersession data includes the following: Record Current Status, Current Effective Date,

section 341.4(a)(2) are obsolete. Consequently, the Commission proposes deleting these provisions.

### **Cancelling Tariffs**

The Commission proposes to consolidate the instructions for cancellation of tariffs into Section 341.5 of the Commission's regulations.<sup>8</sup> Section 341.4(b) of the Commission's regulations requires oil pipelines to file supplements to an amendment to a tariff "when tariffs are canceled without reissue."<sup>9</sup> Section 341.5 of the Commission's regulations also details requirements in the event that an oil pipeline's tariff is canceled. Rather than addressing cancellation in two separate regulations, the Commission proposes to consolidate and simplify the requirements relating to oil pipeline tariff cancellations into section 341.5 of the Commission's regulations by detailing that if an oil pipeline tariff is no longer offered, then the oil pipeline must cancel such tariff within thirty days of the termination of the tariff.

### **Suspension Supplements**

The Commission proposes to eliminate the filing requirements for oil pipeline suspension supplements required by section 341.4(f) of the Commission's regulations. Section 341.4(f) provides for oil pipelines a "suspension supplement must be filed for each suspended tariff or suspended part of a tariff within 30 days of the issuance of a suspension order."<sup>10</sup> Section 341.1(f) further provides that the suspension supplement, which must be served on all subscribers, "must include the date it is issued, a reproduction of the ordering paragraphs of the suspension order, a statement that the tariff or portion of the tariff was suspended until the date stated in the suspension order, a reference to the docket number under which the suspension order was issued, and a statement that the previous tariff publication remains in effect."

This suspension supplement tariff record filing was originally premised on the maintenance of a paper records and the service of such paper tariff records, which is now obsolete because of the electronic filing requirements of Order No. 714. Accordingly, the Commission proposes eliminating the current filing requirements of section 341.4(f) and replacing them with an obligation of oil pipelines to serve Commission suspension orders on individual pipeline subscriber lists. This will eliminate the tariff filing for the suspension supplement, as well as

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and FERC Order Date. See [eTariff Viewer](http://www.ferc.gov/) located on the Commission's web site at <http://www.ferc.gov/>.

8 18 CFR 341.5 (2012).

9 18 CFR 341.4(b) (2012). See also 18 CFR 341.3(b)(10)(ii) (2012) (detailing tariff reissuance requirements).

10 18 CFR 341.4(f) (2012).

subsequent filings an oil pipeline must make to remove a suspension supplement. The Commission estimates that this will eliminate approximately twelve filings each year.

### **Amendments to Tariffs**

The Commission proposes further revisions to section 341.4 of its regulations to treat all amendments to pending tariffs, whether ministerial or substantive, in the same manner as they are treated for public utilities and natural gas companies. Section 341.4(e) of the Commission's regulations limits an oil pipeline from filing more than three "correction supplements" to correct "typographical or clerical errors" per tariff. In contrast, the Commission's regulations do not allow an oil pipeline to make non-ministerial tariff changes without filing to withdraw any pending proposal and making a new tariff filing.

In the electronic filing environment established by Order No. 714, the Commission does not believe that it should limit the number of times an oil pipeline may make corrections to a tariff record. Therefore, the Commission proposes to revise section 341.4 of its tariff to treat all amendments to pending tariff records, whether ministerial or substantive, the same to allow an oil pipeline to file to amend or to modify a tariff record at any time during the pendency of the Commission acting on such tariff record. In addition, the Commission proposes creating a tariff record amendment process that parallels the existing business process for amending pending statutory tariff filings under its public utility and natural gas programs.<sup>11</sup> Under this proposal, an oil pipeline will be able to keep its requested effective date from its original tariff record filing, while giving interested parties a full comment period to address any issues relating to a proposed amendment. An amendment will toll the notice period as provided in section 341.2(b) of the Commission's regulations, for the original filing, and establish a new date for final Commission action.

### **Adoption**

Section 341.6(a) provides an oil pipeline must file a tariff and "notify the Commission when there is: (1) a change in the legal name of the carrier; (2) a transfer of all of the carrier's properties; or (3) a change in ownership of only a portion of the carrier's property." This filing must be made by the oil pipeline "as soon as possible but no later than [thirty] days following such occurrence." This filing is commonly known as an "Adoption Notice." Section 341.6(c) further provides that "when a carrier changes its legal name, or when ownership of all a carrier's properties is transferred, or when the ownership of a portion of a carrier's properties is transferred to another carrier, the adopting carrier must file and post an adoption notice." In these instances, the adopting oil pipeline must make a tariff filing within thirty days transferring

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<sup>11</sup> 18 CFR 35.17(b) and 18 CFR 154.205(b) (2012) (respectively).

into its Commission tariff records, the rates that the adopting oil pipeline is adopting (filing to bring tariffs forward).

To eliminate unnecessary filings, the Commission proposes consolidating the Adoption Notice filing and the filing to integrate the tariff records of the adopting carrier. To implement this change, the Commission proposes modeling sections 341.6(a) on section 154.603 of the Commission's natural gas regulations. Section 154.603 provides that "[w]henver the tariff . . . of a natural gas company on file with the Commission is to be adopted by another company or person as a result of an acquisition, or merger . . . the succeeding company must file with the Commission, and post within 30 days after such succession, a tariff filing . . . bearing the name of the successor company." The Commission estimates that this proposal will eliminate approximately fifteen Adoption Notice filings each year.

## **1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY**

The Commission's regulatory jurisdiction over oil pipelines includes:

- the regulation of rates and practices of oil pipeline companies engaged in interstate transportation;
- the establishment of equal service conditions to provide shippers with equal access to pipeline transportation; and
- the establishment of reasonable rates for transporting petroleum and petroleum products by pipeline.

The filing requirements for oil pipeline tariffs and rates<sup>12</sup> put in place by the FERC-550 data collection provide the Commission with the information it needs to analyze the rates, practices, and service conditions of oil pipelines. As a result, the Commission can implement statutory directives for the Federal regulation of these carriers. Major statutory and rate-making milestones in the Commission's regulation of oil pipelines rates are attached to this package, "*Historical Background of Oil Pipeline Ratemaking.*"

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

The Commission uses information provided through the FERC-550 collection to analyze proposed tariffs, rates, fares, and charges of oil pipelines and other carriers in connection with the transportation of crude oil and petroleum products. The Commission uses this information to

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<sup>12</sup> 18 CFR Parts 341-348.

determine whether the proposed tariffs and rates are just and reasonable. If the FERC-550 information were not collected, the Commission could not determine whether the proposed rates of oil pipelines are just and reasonable.

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

In Order No. 714<sup>13</sup>, the Commission adopted regulations requiring that tariff and tariff-related filings be made electronically. The Commission provided that the conversion from paper to electronic tariff filings in the eTariff system would begin in April 2010 with pipelines and utilities filing baseline tariffs according to a six-month, staggered filing schedule. Since it completed the transition into eTariff, the Commission has been receiving, analyzing and acting on oil pipeline tariff filings by using more information technology than before. The greater use of information technology has eliminated the use of courier services and paper to submit tariff information the Commission requires. The Commission has also made available the eTariff viewer on the world wide web to help the public with its research of tariffs and rates filed with the Commission. The eTariff viewer allows people to view oil tariffs previously available only in paper. FERC-550 information in oil tariffs filings continues to also be available through the Commission's eLibrary. The eLibrary contains all documents submitted to and issued by the Commission since 1981.

This proposed rulemaking would further reduce the burden on pipelines as we are revising our regulations to reflect today's electronic environment. We are eliminating some filings and streamlining others due to the technology currently available.

**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**

The FERC-550 tariff filing requirements are reviewed every three years as the Commission's authorization from OMB to collect this data nears its expiration date. The information filed in each tariff under the FERC-550 authorization is specific to the filing pipeline and its operations. There are no similar sources of information that can be used or modified for the Commission's oil pipeline rate regulation.

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<sup>13</sup> RM01-5-000 (Issued July 8, 2004, 69 FR 43929).

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

The proposed rule does impact some small oil pipeline companies. However, the Commission expects that these companies will see a reduction in burden over time due to the modified requirements.

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

The Commission collects the FERC-550 information when oil pipelines propose to change or establish tariffs and rates. There is no set timeframe or filing cycle for submittal of the FERC-550. The information arrives when a pipeline seeks Commission review of proposed tariffs and rates. As described previously, the Commission needs the FERC-550 data for its oil ratemaking work. If the FERC-550 data were not collected as part of a rate change filing, the Commission would be unable to fulfill its statutory mandate.

## **7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION**

Under some circumstances filers may be required to submit information regarding their tariffs on a more than quarterly basis. These are not reoccurring filings but are event drive (e.g. something about a particular tariff changes). The Commission uses information provided through the FERC-550 collection to analyze proposed tariffs, rates, fares, and charges of oil pipelines and other carriers in connection with the transportation of crude oil and petroleum products. The Commission uses this information to determine whether the proposed tariffs and rates are just and reasonable. Updated tariffs allow the Commission to fulfill its statutory obligations related to regulating oil pipelines.

The Commission believes that all other provisions described in 5 CFR 1320.5(d)(2)(iv) are satisfied.

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

The Commission solicits public comment on the proposed changes to the information collection requirements as part of the proposed rule. The proposed rule was published in the Federal Register on October 29, 2012 (76 FR 65513).



Prior to developing this proposed rulemaking the FERC performed extensive outreach with both representatives of both pipelines and shippers to get an idea of what changes they would like to see. This outreach was very helpful as it helped the FERC in developing a rulemaking which we hope will have widespread acceptance from both the pipeline and shipper community.

**9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS**

The Commission makes no payments or gifts to respondents as part of this collection.

**10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

An entity seeking confidential treatment of the information must ask the Commission to treat this information as confidential and non-public, consistent with the Commission’s regulations at 18 CFR 388.112. Generally, the Commission does not consider this information to be confidential.

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

There are no questions of a sensitive nature that are considered private.

**12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION**

Current FERC-550 Burden Hour Inventory

The following table contains the current inventory

	<b>Number of Respondents (A)</b>	<b>Number of Responses Per Respondent (B)</b>	<b>Total Number of Responses (A)x(B)=(C)</b>	<b>Average Burden Hours per Response (D)</b>	<b>Estimated Total Annual Burden (C)x(D)</b>
<b>FERC-550</b>					
Oil pipeline companies	128	4	512	11	5,632

Changes to Burden due to the Proposed Rule

The Commission’s estimate of the change in Public Reporting Burden and cost related to the proposed rule in Docket RM12-15-000 follow.

The proposed regulations will eliminate or reduce several filing requirements as obsolete and no longer necessary. The eliminated or reduced filings include the filing of Index of Tariffs, reduced number of adoption filings, eliminated suspension supplements, and reduced number of filings necessary to amend incorrect filings. Based upon a review of the filings made by interstate oil pipelines since eTariff was implemented in April 2010, the Commission estimates a reduction of 99 tariff filings and 1,082 burden hours per year, as shown in the table below.

<b>RM12-15, FERC-550</b>	<b>Reduction in Filings</b>	<b>Est. Hours per Filing</b>	<b>Total Hours</b>	<b>Total Cost Reduction<sup>14</sup></b>
Revised 341.4, Amendments to tariff filings	50	11	550	\$30,250
Revised 341.6, Adoption of the tariff by a successor.	15	11	165	\$9,075
Elimination of 341.4(f) (Suspension Supplements)	12	11	132	\$7,260
Revised 341.9, Index of Tariffs	22	11	242	\$13,310
<b>Total</b>	<b>99</b>		<b>1,089</b>	<b>\$59,895</b>

The Commission proposes to revise Part 341’s tariff posting requirements for interstate oil pipelines from paper to electronic format. There is no change in burden for the pipelines to maintain the status of their tariffs for public inspection, as that requirement is unchanged. The Commission recognizes that there will be a one-time increased burden involved in the initial implementation associated with purchasing software and updating websites to post their tariff electronically. We estimate a one-time additional cost of \$250 per respondent for non-labor costs (\$41,750 total cost). Additionally we estimate a one-time hourly burden of 20 hours per respondent for updating the web sites for posting of the tariffs.

<b>RM12-15, FERC-550</b>	<b>No. of Pipelines with Tariffs</b>	<b>Estimated Additional One-Time Burden per</b>	<b>Total Estimated Additional One-Time</b>

<sup>14</sup> The cost figure is based on management analyst work at \$38.50 per hour. We adjusted the \$38.50 figure to account for benefits resulting in a loaded figure of \$55 per hour (\$38.5/0.704). We obtained wage and benefit information from Bureau of Labor Statistics information at [http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm) and <http://www.bls.gov/news.release/ecec.nr0.htm>.

		<b>Filer (Hr.)</b>	<b>Burden (Hr.)</b>
Revisions to 18 CFR Part 341—one time burden increase	167	20	3,340

Total additional one-time hourly burden cost = \$183,199 (\$1,097 per respondent\*167 respondents = \$183,199).<sup>15</sup>

Net Change to Burden Hour Inventory

As indicated above, 92 filings and 1,082 total burden hours are being removed from this collection. Further, there is a one-time burden increase per company of 20 hours and \$250 (a total of 3,340 hours and \$47,750 respectively) over three years for this submittal to OMB (3,340 hours/3 = 1,113.33 hours and \$47,750/3 = \$13,916).

The change in burden averaged over the next three years is shown in the following table:

<b>FERC-555</b>	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Change Due to Agency Discretion</b>
Annual Number of Responses	580	512	-	68
Annual Time Burden (Hr)	5,656	5,632	-	24
Annual Cost Burden (\$)	13,916	0	-	13,916

**13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS**

The Commission estimates a one-time non-labor cost burden per respondent of \$250 associated with software and possible website development.

We average the one-time cost per respondent over three years yielding \$83.33 per year.

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<sup>15</sup> The cost figure is based on 5 hours of computer analyst work (\$39.02/hour) and 15 hours of management analyst work (\$38.50/hour) resulting in a total of \$772.60. We adjusted the \$772.60 figure to account for benefits resulting in a loaded figure of \$1,097 (\$772.60/0.704). We obtained wage and benefit information from the Bureau of Labor Statistics (at [http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm) and at <http://www.bls.gov/news.release/ecec.nr0.htm>).

#### **14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT**

The Commission estimates that the increased Federal cost due to the proposed rule is \$1,588. This cost is for Paperwork Reduction Act administration.<sup>16</sup>

The Commission estimates a net reduction in the number of FERC filings. However, the Commission estimates that any change in Federal cost to analyze and process filings due to the proposed rule will be *de minimis*.

The existing annual Federal Cost for the FERC-550 is \$862,828 and is based on 6 full time equivalent employees plus the Paperwork Reduction Act Administration Cost (\$143,540 X 6 = \$861,240 + 1,588 = \$862,828).

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

The Burden to each respondent is estimated to increase in the very short term by 20 hours (and \$250) as they reprogram their websites to handle this information. After the first year the burden is estimated to decrease by 8.4 hours. This burden hour decrease is due to two reasons: The wholesale elimination of some filings; and the streamlining of others, to include allowing pipelines to post some information on their public websites instead of having to make a filing with the FERC.

#### **16. TIME SCHEDULE FOR PUBLICATION OF DATA**

The Commission does not publish data associated with this collection. Tariff filings are available publicly through the Commission's eTariff system.

#### **17. DISPLAY OF EXPIRATION DATE**

The types of filings associated with this collection do not avail themselves to a display of the expiration date.

#### **18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

The Commission does not use statistical methods for this collection.

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<sup>16</sup> The Commission bases the cost of Paperwork Reduction Act administration on an average of 24 hours per clearance per year. The cost represents the activities and efforts of FERC staff to comply with the Paperwork Reduction Act of 1995.

FERC-550 (OMB Control No. 1902-0089)  
Docket No. RM12-15; Issued October 18, 2012  
RIN: 1902-AE60