

FERC-717 (1902-0173) and FERC-516 (1902-0096)
Final Rule in Docket No. RM05-5-020 (issued 2/21/13)
RIN: 1902-AE50 (Updated 5/15/13)

SUPPORTING STATEMENT FOR
FERC-717 (Standards for Business Practices and Communication
Protocols for Public Utilities), and
FERC-516 (Electric Rate Schedule and Tariff Filings)
Final Rule (issued February 21, 2013) in Docket No. RM05-05-020

The Federal Energy Regulatory Commission (Commission or FERC) requests the Office of Management and Budget (OMB) to review and extend its approval of FERC-717 (Standards for Business Practices and Communication Protocols for Public Utilities) and FERC-516 (Electric Rate Schedule and Tariff Filings). Both are existing information collections, regarding revisions to requirements contained in 18 CFR Parts 35 and 38 of the Commission's regulations.

In the final rule in Docket RM05-5-020, FERC amends its regulations at 18 CFR 38.2 to incorporate by reference business practice standards adopted by the Wholesale Electric Quadrant (WEQ) of the North American Energy Standards Board (NAESB). FERC approves Phase II Demand Response Measurement and Verification (M&V) Standards and the Wholesale Energy Efficiency Measurement and Verification Standards.

FERC-516 and FERC-717

These information collections are impacted by the final rule and addressed in this consolidated supporting statement. The applicable entities are required to file tariff revisions to incorporate the new standards into their procedures. Tariff revisions are contained under the FERC-516. The FERC-717 information collection encompasses the business practices proposed in the rulemaking. Generally, there are two information collection requirements contained in the standards:

- Respondents must use certain criteria to measure the performance of demand response resources
- Respondents must develop an M&V plan that lays out specific methods for verifying the amount of energy efficiency a resource provides.

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NAESB began work on the development of business practice standards pertaining to the measurement and verification of demand response¹ products and services in July 2007,

¹ Demand response means a reduction in the consumption of electric energy by

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when the NAESB WEQ Demand Side Management - Energy Efficiency (DSM-EE) subcommittee began work on this issue. This effort led to the adoption and ratification by NAESB of initial measurement and verification standards early in 2009.

On April 17, 2009, NAESB filed a report (April 2009 Report) informing the Commission that it had adopted an initial set of business practice standards to categorize various demand response products and services and to support the measurement and verification of these products and services in organized wholesale electric markets (Phase I Demand Response M&V Standards).² The NAESB report recognized that these standards would need to be followed by the development of more detailed technical standards for the measurement and verification of demand response products and services in Independent System Operators ISOs and Regional Transmission Organizations RTOs.

On April 15, 2010, the Commission issued Order No. 676-F, incorporating by reference³ the Phase I Demand Response M&V Standards⁴ that categorize various demand response products and services and support the measurement and verification of these products and services in organized wholesale electric markets.⁵ The Commission stated that “[w]hile NAESB’s Phase I [Demand Response] M&V Standards represent a good first step, additional substantive standards would appear beneficial in creating transparent and consistent measurement and verification of demand response products and services in wholesale electric markets.”⁶ The Commission also stated that “we expect Phase II will address issues related to baseline development”⁷ The Commission anticipated that

customers from their expected consumption in response to an increase in the price of electric energy or to incentive payments designed to induce lower consumption of electric energy. 18 C.F.R. § 35.28(b)(4) (2011).

² Report, North American Energy Standards Board, Measurement and Verification of Demand Response Products, Docket No. RM05-5-017, at 2 (filed Apr. 17, 2009) (April 2009 Report).

³ Incorporation by reference makes compliance with these standards mandatory for public utilities subject to Part 38 of the Commission’s regulations.

⁴ See *Standards for Business Practices and Communication Protocols for Public Utilities*, Notice of Proposed Rulemaking, FERC Stats. & Regs. ¶ 32,646 (2009) (2009 NOPR).

⁵ *Standards for Business Practices and Communication Protocols for Public Utilities*, Order No. 676-F, FERC Stats. & Regs. ¶ 31,309 (2010).

⁶ Order No. 676-F, FERC Stats. & Regs. ¶ 31,309 at P 32.

⁷ *Id.* P 37.

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the measurement and verification standards needed to accomplish this goal would be a focus of NAESB's Phase II measurement and verification standards development efforts.⁸

NAESB subsequently initiated specific plans to improve and adopt additional technical standards and filed a report⁹ with the Commission on May 3, 2011 (May 3 Report) that informed the Commission that NAESB had adopted a revised set of measurement and verification standards covering demand response (Phase II Demand Response M&V Standards) and explained its efforts to develop these standards.

In addition to the demand response standards, NAESB drafted and adopted business practice standards for the measurement and verification of energy efficiency¹⁰ in organized wholesale electric markets (Wholesale Energy Efficiency M&V Standards). NAESB indicated in the May 3 Report that the work took place between July 2009 and December 2010, and was considered in NAESB's DSM-EE subcommittee meetings and WEQ's Executive Committee meetings. The standards are designed to create a standard method for quantifying the energy reductions from energy efficiency measures. The Wholesale Energy Efficiency M&V Standards include six new definitions and 63 business practice standards. Included are definitions for energy efficiency baseline and demand reduction value. The standards contain criteria for the use of energy efficiency products in organized wholesale electric markets, general measurement and verification

⁸ *Id.* P 32.

⁹ *See supra* n.8.

¹⁰ Energy efficiency:

[r]efers to programs that are aimed at reducing the energy used by specific end-use devices and systems, typically without affecting the services provided. These programs reduce overall electricity consumption (reported in megawatthours), often without explicit consideration for the timing of program-induced savings. Such savings are generally achieved by substituting technologically more advanced equipment to produce the same level of end-use services (e.g. lighting, heating, motor drive) with less electricity. Examples include high-efficiency appliances, efficient lighting programs, high-efficiency heating, ventilating and air conditioning (HVAC) systems or control modifications, efficient building design, advanced electric motor drives, and heat recovery systems.

U.S. Energy Information Administration Glossary,
<http://www.eia.gov/tools/glossary/index.cfm?id=E> (last visited Feb. 6, 2013).

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plan requirements, and detailed criteria of acceptable measurement and verification methodologies.

A. JUSTIFICATION

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

In general, the Federal Power Act, section 205, 16 U.S.C. § 824d(a) 2006, requires the Federal Energy Regulatory Commission to ensure that the rates and charges for the wholesale sale of electric energy must be just and reasonable. Section 205 also requires that the rules and regulations affecting or pertaining to the rates and charges for the wholesale sale of electric energy be just and reasonable. FERC, in its Order No. 2000, established organized wholesale electric markets to help ensure that the wholesale sale of electric energy is just and reasonable.¹¹

FERC continues to assess and monitor the organized wholesale electric markets under its jurisdiction to ensure that ancillary resources that are technically capable of providing a service are treated comparably to supply resources offering that service. FERC recognizes that demand response and energy efficiency resources can make potentially important contributions towards a more robust and stable national electrical grid.

FERC regulates six organized wholesale electric markets, each operated by an independent system operator (ISO) or a regional transmission organization (RTO): ISO New England, Inc. (ISO-NE), New York Independent System Operator, Inc. (NYISO), PJM Interconnection, Inc. (PJM), Midwest Independent Transmission System Operator, Inc. (Midwest ISO), Southwest Power Pool (SPP), and the California ISO (CAISO). The accurate measurement of demand response and energy efficiency services and products would help RTOs and ISOs properly credit these resources for the benefits they provide. The standards adopted in the final rule apply to these organized wholesale electric markets. The standards help FERC ensure that the measurement of the contribution of demand response and energy efficiency resources is accurate, accountable, and verifiable.

¹¹ *Regional Transmission Organizations*, Order No. 2000, FERC Stats. & Regs. ¶ 31,089 (1999), *order on reh'g*, Order No. 2000-A, FERC Stats. & Regs. ¶ 31,092 (2000), *aff'd sub nom.* Pub. Util. Dist. No. 1 of Snohomish County, Washington v. FERC, 272 F.3d 607 (D.C. Cir. 2001)

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

The information collection requirements contained in the final rule require organized wholesale electric markets to revise their tariffs as necessary to incorporate by reference the standards. Because the incorporation by reference is, in essence, a reference to standards maintained by another entity, minimal effort is required by the obligated entity. The purpose of incorporating the standards by reference is to ensure that all users and viewers of an entity's tariff are aware of the obligations placed on that entity, and that all obligated entities use the same set of standards. The consequence of not requiring an entity to revise its tariff is that it would promote ambiguity regarding the rights and responsibilities of that entity subject to the requirements of proposed standards, and decrease transparency that is essential to well-functioning and just and reasonable organized wholesale electric markets.

Over the last several years FERC has taken several actions concerning the participation of demand response in the organized wholesale electric markets operated by ISOs and RTOs. On April 15, 2010, FERC issued Order No. 676-F, incorporating by reference the NAESB's Phase I standards to support the measurement and verification of demand response services in organized wholesale electric markets. At that time, FERC noted that the Phase I standards were a "good first step" and that more transparency and consistency of measurement protocols would come from subsequent standard development. The set of NAESB-developed demand response standards (termed "Phase II") approved for incorporation by reference by the final rule in RM05-5-020 represents an effort to institute more specificity to the existing Phase I Demand Response M&V standards, as well as to refine the demand response standards' definitions and business practices.

The energy efficiency standards developed by NAESB and approved for incorporation by reference by FERC recognize the energy efficiency services available in some organized wholesale electric markets. These standards establish a standard method for quantifying the energy reductions associated with energy efficiency products and services. The standards consider technical requirements and incorporate documentation and reporting requirements applicable to installed energy efficiency measures.

FERC-516: The information from FERC-516 enables FERC to exercise its wholesale electric rate and electric power transmission oversight and enforcement responsibilities in accordance with the Federal Power Act. Sufficient detail must be obtained for FERC to

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make an informed and equitable decision concerning the appropriate level of rates, and to aid customers and other parties who may wish to challenge the rate proposed by the utility. Other more abbreviated data requirements are required where utility filings involve (1) non-rate increase applications, such as changes in the points where electricity is delivered to a customer, (2) formula rates, (3) settlement rates, and (4) qualifying small power producer rates. The final rule only requires certain entities to make a tariff filing to incorporate by reference the business practice standards discussed in this supporting statement.

FERC-717: The business practice requirements apply to all Public Utilities owning and/or controlling facilities used for the transmission of electricity in interstate commerce. These procedures enable FERC to ensure compliance with the functional unbundling established in the Commission's Open Access rulemaking.

The Commission uses the information in rate and tariff proceedings to review proposed rate and tariff changes by public utilities, for general industry oversight, and to supplement the documentation used during the Commission's audit process. The collection of this information is necessary to meet the legal requirements, namely the statutory obligations under section 205 and 206 of the FPA, to prevent unduly discriminatory practices.

Failure to issue these requirements would mean FERC is not meeting its statutory obligations and permitting discrimination in interstate transmission services provided by the public utilities. FERC believes the implementation of these data requirements will help FERC carry out its responsibilities under the Federal Power Act of promoting the efficiency of the electric industry's operations.

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

FERC has made no significant changes in the use of information technology for complying with the FERC-516 and FERC-717 since the last time these collections were submitted to OMB. However, filers are successfully using the Commission's eTariff system (fully implemented in 2010) for the electronic filing of tariffs. Applicable entities also continue to use OASIS (under the FERC-717 collection), providing the public online access to transmission service information.

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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.

FERC rules and data requirements are periodically reviewed in conjunction with OMB control number expiration dates. This includes a review of FERC's regulations and data requirements to identify duplication. The information to be submitted to FERC pursuant to this final rule is not readily available from other sources, and therefore, no use or other modification of the information can be made to perform oversight and review responsibilities under applicable legislation (e.g., Federal Power Act (FPA), Energy Policy Act of 1992 (EPAAct)).

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

The final rule only impacts ISOs and RTOs. These entities are not small entities.

The OASIS and Standards of Conduct requirements, unchanged in this proceeding, might otherwise impact small entities. The Commission would consider waivers for these types of entities.

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

ISOs and RTOs are required to comply with the requirements in the final rule. The Commission expects the information requirements to impose the least possible burden while collecting the information that will be used for promoting the efficiency of the electric industry's operations. By adopting and incorporating these standards by reference into the Commission's regulations, it permits industry to use the NAESB consensus process to suggest further modifications and enhancements to business practices and the standards, as industry considers necessary, subject to the FERC's approval. If the data were not collected, the Commission and Industry would be placed at a disadvantage by not having the most current data available for competitive and regulatory purposes.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

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FERC-717 and FERC-516 are consistent with the guidelines in 5 CFR 1320.5(d).

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

In the proposed rule the Commission sought public comment on various aspects of the new business practice standards, including the burden estimates provided. Further, as already noted, the NAESB WEQ business practice standards are developed and voted on by industry representatives prior to submission to FERC. For final approval, 67 percent of the WEQ's general membership must ratify the standard.

In response to the proposed rule, 21 entities filed comments.¹² None of the commenters provided input or questioned the information collection burden estimates. Two commenters recommend against adopting the Demand Response M&V standards and five comments recommend against adopting the Energy Efficiency M&V standards. The Commission acknowledges in the final rule the commenters' concerns but recognizes that the NAESB standards development process is based on industry consensus. Further, the Commission finds in the final rule that the standards as presented are incremental improvements and incorporation by reference does not foreclose stakeholders from pursuing their concerns and further enhancements through RTO and ISO or NAESB processes. The Commission, therefore, incorporated the standards.

For a full summary of the comments and the Commission's responses, see the final rule document attached to this package.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents under any circumstance.

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

All data filed are public information and, therefore, not confidential. However, a company may request confidential treatment of some or all parts of the information

¹² The names of entities that filed comments are listed in the Appendix to the final rule. The final rule is attached to this clearance package.

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requirement under the FERC regulations at 18 CFR 388.112. Each request for confidential treatment will be reviewed by the Commission on a case-by-case basis.

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

There are no questions of a sensitive nature in the reporting requirements.

12. ESTIMATED BURDEN COLLECTION OF INFORMATION

The current burden for the FERC-516 is 497,398 hours. The majority of these hours (approximately 400,000) are due to general tariff filings related to the electric utility industry. Respondents make tariff filings anytime they wish to modify existing rates or services, or when the Commission directs. The remaining burden hours are due to recent one-time tariff filing requirements, a recent rulemaking (Variable Energy Resources in Docket RM10-11), and the Electric Quarterly Report.¹³

The current burden for the FERC-717 is 183,716 hours. The majority of these hours (172,556) are due to reporting requirements associated with the Commission Open Access Same-Time Information System (OASIS). OASIS provides transmission customers with equal and timely access to information about transmission and ancillary services provided in the tariffs.

The information collection requirements of this proposed rule will only be applicable to the six ISOs/RTOs. The burden estimate is based on the projected costs for the industry to implement revisions to the WEQ Standards currently incorporated by reference into the Commission's regulations at 18 CFR 38.2 and to implement the new standards adopted by NAESB that the Commission proposes to incorporate by reference. The burden estimate also includes a tariff filing with the Commission.

A. FERC-717 program increase: final rule in RM05-5-020. The one-time burden estimate in the final rule is shown in the first table. After implementation, the Commission intends to remove the burden hours associated with this final rule.

¹³ The burden for the Electric Quarterly Report (EQR) is currently double counted in FERC-516 and FERC-920. FERC will be removing the burden hours (approximately 66,000) from the FERC-516 at a future date.

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Data Collection	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)
FERC-717 Demand Response Standards	6	1	6	9	54
FERC-717 Energy Efficiency Standards	6	1	6	12	72
TOTAL	6	N/A	12	N/A	126

B. FERC-717 program decrease: removal of hours for prior versions of the Standards. The following table shows the completed implementation burden hours, the ICR, Docket Number and when the work was due to be completed for previous versions of the NAESB standards that have not been (but need to be) removed from the FERC-717.

ICR Number	FERC Docket Number	Completed Burden Hours Remaining in Inventory	Number of Associated Responses	Due Date of One-Time Collection
200312-1902-004	RM01-10-000	11,895	183	September 2004
200604-1902-006	RM05-5-000	5,280	220	July 2006
200707-1902-003	RM96-1-027	7,260	220	November 2007
200912-1902-003	RM05-5-013	5,280	176	January 2011
201004-1902-005	RM05-5-017	72	6	May 2010

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Total		29,787	799	
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For some of the ICRs, the Commission did not count a distinct response for each aspect of the collection. This leads to the actual number of responses removed from the inventory as 352 under agency discretion.

C. FERC-717 agency adjustment.

We discovered that in 2010 (ICR# 200912-1902-003) we had reduced the burden hours per response below the baseline hours for the existing information collection requirements incorrectly. In this submission we are adjusting the numbers (44,591 hours) to correct be more realistic with the existing requirements.

D. FERC-717 Summary table of burden changes:

	Burden Hours
Current Inventory	183,716
Program Increase, due to final rule in RM05-5-020	+126
Program Decrease, due to completion of various earlier collections	-29,787
Agency Adjustment	44,591
New Inventory	198,646

E. FERC-516 program increase: final rule in RM05-5-020. The one-time burden estimate in the final rule is shown in the first table. After implementation (tariff filing), the Commission intends to remove these burden hours associated with the final rule. The final rule requires entities to submit tariff modifications to the Commission. FERC estimates that each entity will submit one tariff modification for each type of NAESB standard contained in this rule. The Commission estimates each tariff filing to require 5 hours. The total change is 12 responses at 5 hours per response leading to a total of 60 additional hours. The final rule requires entities to submit tariff modifications to the Commission. FERC estimates that each entity will submit one tariff modification for each type of NAESB standard contained in this rule. The Commission estimates each tariff filing to require 5 hours. The total change is 12 responses at 5 hours per response leading to a total of 60 additional hours. In the proposed rule submission to OMB the Commission

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indicated an additional 6 responses, as opposed to the 12 additional responses shown below. We use 12 responses because it better account for the actual number of tariff filings each respondent must make (one per each type of standard). The total number of additional hours did not change from the proposed rule to the final rule. The Commission shows 12 responses in this submittal.

Data Collection	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)
FERC-516	6	2 ¹⁴	12	5	60

F. The following table shows only the cost associated with the burden imposed by the final rule.

Data Collection	Annual Burden Hours (1)	Estimated Hourly Cost (\$) (2)	Estimated Total Annual Cost to Respondents (\$) (1) X (2)
FERC-516	60	\$59	\$3,540
FERC-717	126	\$59	\$7,434

The estimated hourly cost figure of \$59 is a composite estimate of wages plus benefits that includes legal, technical and support staff rates. It is based on data from the Bureau of Labor Statistics at http://bls.gov/oes/current/naics3_221000.htm and <http://www.bls.gov/news.release/ecec.nr0.htm>.

13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

There are no non-labor types of costs associated with the either the FERC-516 or the FERC-717.

¹⁴ The Commission assumes one tariff filing per type of standards.

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FERC is removing the cost burden associated with the FERC-717 because it pertains to start-up/capital costs that were incurred at the start of this collection but are no longer relevant.

There are no other non-labor costs associated with the FERC-516 or the FERC-717.

All of the costs in the final rule are associated with labor and are not shown in ROCIS metadata. The FERC-717 collection lists a cost of \$27,432,374. This cost is associated with other aspects of the FERC-717 collection and is not being altered by this final rule.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimated annualized cost to the Federal Government, for FERC-516 and FERC-717, as relates to the requirements in the final rule in RM05-5-020 follows:

	Number of Employees (FTEs)¹⁵	Estimated Annual Federal Cost¹⁶
Paperwork Reduction Act Administration Cost ¹⁷	-	\$1,588
FERC-516 Analysis and Processing of filings [\$143,540 /year]	0.15	\$21,531
FERC-717 Analysis and Processing of filings [\$143,540 /year]	0.40	\$57,416
FERC Total for Final Rule		\$80,535

Base on the above table, the total additional Federal Cost for the FERC-516 is \$22,325 [(\$1,588/2) + \$21,531=\$22,325]; and for the FERC-715 is \$58,210 [(\$1,588/2) + \$57,416=\$58,210]. These additional costs will be added to the existing Federal costs for a total of \$2,066,618 for the FERC-516 and \$706,365 for the FERC-717.

¹⁵ FTE = Full-Time Equivalent or 2,080 work hours per year.

¹⁶ Based on 2012 cost per FTE of \$143,540

¹⁷ For the data clearance cost, the Commission bases this cost on an average of 24 hours per clearance per year. The data clearance cost represents the activities and efforts of FERC staff to comply with the Paperwork Reduction Act of 1995. FERC divided this cost equally amongst the two collections.

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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 expects the burden to increase minimally due to the adoption of the Demand Response M&V and Energy Efficiency M&V business practice standards. Adoption of these standards is intended to improve the methods and procedures used to accurately measure demand response and energy efficiency resource performance. Additionally, these standards should help ISOs and RTOs to properly credit demand response and energy efficiency resources for their services.¹⁸

There is also a minimal increase in burden associated with the respondents filing tariff revisions (FERC-516) to incorporate provisions of the new standards. The final rule requires entities to submit tariff modifications to the Commission. FERC estimates that each entity will submit one tariff modification for each type of NAESB standard contained in this rule. The Commission estimates each tariff filing to require 5 hours. The total change is 12 responses at 5 hours per response leading to a total of 60 additional hours. In the proposed rule submission to OMB the Commission indicated an additional 6 responses, as opposed to the 12 additional responses shown below. We use 12 responses because it better accounts for the actual number of tariff filings each respondent must make (one per each type of standard). The total number of additional hours did not change from the proposed rule to the final rule. The Commission shows 12 responses in this submittal.

The Commission is adjusting the burden hours in the FERC-717 to correct an error in the burden from a previous submission.

Lastly, the Commission is removing completed information collection burden from the FERC-717.

¹⁸ The Commission has also sought ISO and RTO proposals regarding their measurement and verification methodologies, including in Order No. 745, *Demand Response Compensation in Organized Wholesale Energy Markets*, 76 Fed. Reg. 16,658 (Mar. 24, 2011), FERC Stats. & Regs. ¶ 31,322, at P 93-95 (2011), *order on reh’g*, Order No. 745-A, 137 FERC ¶ 61,215, at P 123 (2011).

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The following two tables show the total burden hours and costs for each collection and the impact of the changes discussed in detail in item 12 above.

FERC-516	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	5,415	5,403	-	12
Annual Time Burden (Hr)	497,458	497,398	-	60
Annual Cost Burden (\$)	0	0	-	-

FERC-717	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	146	534	-36	-352
Annual Time Burden (Hr)	198,646	183,716	44,591	-29,661
Annual Cost Burden (\$)	0	27,432,374	-25,883,352	-1,549,022

With the clearance package, the cost to industry is displayed using the unit of burden hours. In accordance with the “ROCIS HOW TO Guide for Agency Users of the Information Collection Request (ICR) Module”, users should not report as a dollar cost any burden reported in hours¹⁹. Therefore, Commission staff corrected the industry’s annual cost burden within the ROCIS metadata to show that the Commission associates no cost to capital investment or other non-labor costs. The Commission estimates the monetary cost, where applicable, related to the burden hours in Question #12 (above). The current package had some completed non-labor costs and other costs that are associated with burden hours. Both are being removed in this submittal.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

¹⁹ https://www.rocis.gov/rocis/jsp/common/ROCIS_HOW_TO_Guide_for_AGENCY_Users_of_ICR_Module-03192012_v2.pdf, p.37

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The Commission does not intend to publish any results associated with this collection.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date for OMB approval of the information collected pursuant to this rulemaking affecting FERC-516 and FERC-717. The substance of the requirements for FERC-717 is incorporated by reference into FERC's regulations at 18 CFR (making the standards mandatory). However the standards themselves are copyrighted by NAESB, so the OMB Control Number and expiration date is not displayed in the standards. The information collected via the tariff revision for FERC-516 is not collected on a form that displays the expiration date.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There is no stated record retention requirement as part of this rulemaking. Also, the data collected for these reporting requirements are not used for statistical purposes.