

FERC-545 (OMB No. 1902-0154), FERC-549 (1902-0086), FERC-550 (1902-0089)  
Dockets RM07-16 and RM01-5-000 (Order issued 2/7/2013)  
(Updated 7/22/2013)

Supporting Statement for  
**FERC-545 (Gas Pipeline Rates: Rate Change Non-Formal),  
FERC-549 (Gas Pipeline Rates: NGPA Title III and NGA Blanket Certificate  
Transactions), and  
FERC-550 (Oil Pipeline Rates: Tariff Filings),  
as revised by Dockets RM07-16 and RM01-5<sup>1</sup>**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve, for a three-year period, changes made in Dockets RM07-16 and RM01-5-000<sup>1</sup> to the following:

1. FERC-545 (Gas Pipeline Rates: Rate Change Non-Formal), OMB Control No. 1902-0154,
2. FERC-549 (Gas Pipeline Rates: NGPA Title III and NGA Blanket Certificate Transactions), OMB Control No. 1902-0086, and
3. FERC-550 (Oil Pipeline Rates: Tariff Filings), OMB Control No. 1902-0089.

The recent issuances in RM07-16 and RM01-51 affect subsets of the 3 OMB Control Nos. FERC is submitting this consolidated supporting statement to OMB with one ICR for each of the 3 separate OMB Control Numbers.

In this order in Docket Nos. RM07-16, RM01-5<sup>1</sup>, and RM12-3, FERC is revising the companies' front-end registration process with respect to the filing of electronic tariffs (eTariff). We expect the approach to be expanded later to future filings requiring a company registration account. If those actions trigger the PRA, separate submittals will be made to OMB at that time. These procedures are expected to take effect no sooner than 7/12/2013. These changes are being made for the tariff and rate filings that are submitted by interstate and intrastate natural gas pipelines and oil pipelines, similar to the company registration requirements established for electric utilities in Docket No. RM12-3.<sup>2</sup> Only the front-end administrative process of preparing to make an eTariff filing is changing (e.g., establishing the Company Identifier and identifying agents); other components of the filing requirements are not affected by this order and are not changing.

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<sup>1</sup> The Commission issued an order on 2/7/2013, on "Revisions to Company Registration and Establishing Technical Conference," available at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13174100>, with information on the requirements. On 3/8/2013, the Commission issued a Notice of Technical Conference (at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13199806>), with a supplemental notice issued on 4/12/13 (at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13232905>). The Tech. Conference was held on 4/16/2013.

A Notice of "Information Collection Activities and Request for Comments" (at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13174410>; 78FR10614, 2/14/2013) was issued on 2/8/2013, requesting comments on issues related to the Paperwork Reduction Act. Comments were due by 4/15/2013; no public comments were received. A 30-day notice was issued on 4/25/13 (at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13242489>).

<sup>2</sup> FERC-920 (OMB No. 1902-0255) was modified in Order 770 in Docket RM12-3 (EQR System Refresh, Electric Quarterly Report (EQR)). The corresponding ICR #201302-1902-003 was approved by OMB on 5/14/2013.

The Commission is revising the company and agent registration process for interstate and intrastate natural gas pipelines and oil pipelines with respect to the filing of electronic tariffs (eTariff). These procedures are expected to take effect beginning 8/5/2013.<sup>3</sup> To improve security and the filing process, the Commission is adopting a revised method of authenticating filings requiring the use of a company registration number. Under this system, the filer will maintain a list of eRegistered agents which it has authorized to submit filings on its behalf. A filer can designate multiple individuals as its agents. The agent will use its eRegistration account to log onto FERC Online.

General information about the filing requirements that are not modified by the order<sup>1</sup> is also provided in this supporting statement for background, under Questions 1 and 2.

## **A. Justification**

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

**FERC-550.** FERC-550 is required to implement the sections of the Interstate Commerce Act (ICA) (49 USC §§ 1, *et seq.*, 49 App. USC 1-85). The Commission's regulatory jurisdiction over oil pipelines includes:

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

The filing requirements for oil pipeline tariffs and rates, put in place by the FERC-550, provide the Commission with the information it needs to analyze the rates, practices, and service conditions of oil pipelines.

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<sup>3</sup> A general description of the procedures can be found in the Commission's order titled "Revisions To Company Registration and Establishing Technical Conference" issued 2/7/2013 in Docket Nos. RM07-16-000 and RM01-5-000, 142 FERC ¶ 61,097 (2013) (<http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13174100>) and in Revisions to Electric Quarterly Report Filing Process, Order No. 770, 77 Fed. Reg. 71,288 (Nov. 30, 2012), FERC Stats. & Regs. ¶ 31,338, at PP 30, and 33-36 (2012) (Docket No. RM12-3-000) (OMB Control No. 1902-0255). At the conference on April 16, 2013, Commission staff made a presentation on the proposed changes. The Staff presentation and instructional video are available on the Commission's website; the staff presentation is included in ROCIS under Supplemental Documents. See <http://www.ferc.gov/EventCalendar/Files/20130412144329-CompanyRegistrationPresentation.pdf> for the Staff presentation, and <http://www.ferc.gov/docs-filing/etariff/company-reg/company-reg-04-16-13.htm> for the instructional video.

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**FERC-545.** FERC-545 is required to implement sections 4, 5, and 16 of the Natural Gas Act (NGA), (15 USC 717c 717o, PL 75 688, 52 Stat. 822 and 830). NGA Sections 4, 5, and 6 authorize the Commission to inquire into rate structures and methodologies and to set rates at a just and reasonable level. Specifically, a natural gas company must obtain Commission authorization for all rates and charges made, demanded, or received in connection with the transportation or sale of natural gas in interstate commerce. Under the NGA, a natural gas company's rates must be just and reasonable and not unduly discriminatory or preferential. The Commission may act under different sections of the NGA to effect a change in a natural gas company's rates. When the Commission reviews rate increases that a natural gas company has proposed, it is subject to the requirement of section 4(e) of the NGA. Under section 4(e), the natural gas company bears the burden of proving that its proposed rates are just and reasonable. On the other hand, when the Commission seeks to impose its own rate determination, it must do so in compliance with section 5(a) of the NGA. Under section 5, the Commission must first establish that its alternative rate proposal is both just and reasonable.

Section 16 of the NGA states that the Commission "shall have the power to perform any and all acts, and to prescribe, issue, make, amend, and rescind such orders, rules, and regulations as it may find necessary or appropriate to carry out provisions of [the NGA]." In other words, section 16 of the NGA grants the Commission the power to define accounting, technical and trade terms, prescribe forms, statements, declarations or reports and to prescribe rules and regulations.

Pipelines adjust their tariffs to meet market and customer needs. Commission review of these proposed changes is required to ensure rates remain just and reasonable and that services are not provided in an unduly or preferential manner. The Commission's regulation in 18 C.F.R. Part 154 specifies what changes are allowed and the procedures for requesting Commission approval.

The Commission uses the FERC-545 information to examine service and tariff provisions related to natural gas transportation and storage services. The following information is the subject of the FERC-545: (1) tariff filings and any related compliance filings; (2) rate case filings and any related compliance filings; (3) informational reports; (4) negotiated rates (5) non-conforming agreement filings and (6) NAESB Activity (tariff portion only).

**FERC-549.** FERC-549 is required to implement the statutory provisions governed by Sections 311 and 312 of the Natural Gas Policy Act (NGPA) (15 USC 3371-3372) and Section 7 of the Natural Gas Act (NGA) (15 U.S.C. 717f). The reporting requirements for implementing these provisions are contained in 18 Code of Federal regulations (CFR) Part 284.

Transportation by Interstate Pipelines. In 18 CFR 284.102(e), the Commission requires interstate pipelines to obtain proper certification in order to ship natural gas on behalf of intrastate pipelines and local distribution companies (LDC). This certification consists of a

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letter from the intrastate pipeline or LDC authorizing the interstate pipeline to ship gas on its behalf. In addition, interstate pipelines must obtain from its shippers certifications including sufficient information to verify that their services qualify under this section.

Rates and Charges for Intrastate Pipelines. 18 CFR 284.123(b) provides that intrastate gas pipeline companies and local distribution companies not subject to Commission jurisdiction pursuant to section 1(c) of the NGA with blanket transportation authority pursuant to 18 CFR 284.224 file for Commission approval of rates for services performed in the interstate transportation of gas. An intrastate gas pipeline company may elect to use rates contained in one of its then effective transportation rate schedules on file with an appropriate state regulatory agency for intrastate service comparable to the interstate service OR file proposed rates and supporting information showing the rates are cost based and are fair and equitable. 150 days after the application is filed the rate is deemed to be fair and equitable unless the Commission either extends the time for action, institutes a proceeding, or issues an order providing for rates it deems to be fair and equitable.

18 CFR 284.123(e) requires that within 30 days of commencement of new service any intrastate pipeline engaging in the transportation of gas in interstate commerce must file a statement that includes the interstate rates and a description of how the pipeline will engage in the transportation services, including operating conditions. If an intrastate gas pipeline company changes its operations or rates it must amend the statement on file with the Commission. Such amendment is to be filed not later than 30 days after commencement of the change in operations or change in rate election.

Market-Based Rates for Storage. In 2006, the Commission established criteria for obtaining market-based rates for storage services offered under 18 CFR 284.501-505.<sup>4</sup> First, the Commission modified its market-power analysis to better reflect the competitive alternatives to storage. Second, pursuant to the Energy Policy Act of 2005, the Commission promulgated rules to implement section 4(f) of the Natural Gas Act, to permit underground natural gas storage service providers that are unable to show that they lack market power to negotiate market-based rates in circumstances where market-based rates are in the public interest and necessary to encourage the construction of the storage capacity in the area needing storage services, and where customers are adequately protected. These revisions were intended to facilitate the development of new natural gas storage capacity while protecting customers.

Failure to have this information available would mean the Commission is unable to perform its regulatory functions and to monitor and evaluate transactions and operations of interstate pipelines and blanket marketing certificate holders.

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<sup>4</sup> A storage service provider may apply for market-based rates by filing appropriate supporting data when it files it for either (1) a certificate application (covered separately under FERC-546 and not affected by this clearance package), (2) as part of its request for NGPA section 311 rate authorization (FERC-549), or (3) in a request for declaratory order for authority to charge market-based rates (FERC-545).

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

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

**FERC-545.** The Commission reviews the FERC-545 materials to determine whether proposed transportation and sales rates and terms and conditions of service are just and reasonable. The Commission uses the FERC-545 information to monitor rates and terms and conditions of service related to jurisdictional transportation, natural gas storage, and unbundled sales activities of jurisdictional companies. In addition to fulfilling the Commission's obligations under the NGA, the FERC-545 enables the Commission to monitor the activities and evaluate transactions of the natural gas industry to ensure competitiveness and improved efficiency of the industry's operations. In summary, the Commission uses the FERC-545 information to (1) ensure adequate customer protections under section 4 of the NGA; (2) review rates and terms and conditions of service changes by natural gas companies for the transportation of gas and natural gas storage; (3) provide general industry oversight; and (4) supplement documentation during its audits process.

**FERC-549.** The Commission uses the data to examine service and tariff provisions for the transportation and/or sale of natural gas in interstate commerce filed in compliance with Commission orders. Specifically, the Commission uses the data to ensure compliance with Sections 311 and 312 of the NGPA, Section 7 of the NGA and Part 284 of the Commission's regulations. The information collected or maintained is used by the Commission to monitor jurisdictional transportation activities and the unbundled sales of intrastate and Hinshaw pipelines and to ensure the integrity of the gas sales market that remains subject to the Commission's jurisdiction.

Failure to collect this information would prohibit the Commission from monitoring and properly evaluating pipeline transactions and meeting statutory obligations under both the NGPA and the NGA.

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

**FERC-550, FERC-545, and FERC-549.** The Commission earlier implemented the capability for electronic filing of all tariff submissions. This change described in the order and notices<sup>1</sup>

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will improve the security of submitting those electronic filings and improve the pipelines' process of appointing and modifying agents with the authority to make a filing on the pipeline's behalf. This process provides filing companies with greater control over the agents eligible to make specific types of filings on their behalf and eliminates the need that exists under the current Company Registration system to share the company registration password among employees.

For this proposal, the Commission developed a web site based Transition application that will permit companies that already have a Company Identifier to quickly transition to the new security system and assigning of agents without having to enter or re-enter any data, and receive confirmation of the effectiveness of the update within minutes. Details are available in the instructional video and staff presentation.<sup>3</sup>

**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-550, FERC-545, and FERC-549.** The Commission issued an order<sup>2</sup> earlier requiring electric utilities to implement this new front-end administrative process; these notices<sup>1</sup> are implementing that front-end administrative process for interstate and intrastate natural gas and oil pipelines. Similar data are not available elsewhere.

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

**FERC-550, FERC-545, and FERC-549.** The burden imposed by the new front-end administrative process is minimal and being imposed on gas and oil pipelines filing tariffs and rates with FERC. The Commission developed a web site based Transition application that will permit companies that already have a Company Identifier to quickly transition to the new security system and assigning of agents without having to enter or re-enter any data, and receive confirmation of the effectiveness of the update within minutes.

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

**FERC-550, FERC-545, and FERC-549.** The pipelines are required to perform the front-end process once. Thereafter changes are only required if the pipeline chooses to establish or modify its agent(s).

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

The **FERC-550, FERC-545, and FERC-549** present no special circumstances.

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

**FERC-550, FERC-545, and FERC-549.** The Commission issued a Notice of “Information Collection Activities and Request for Comments”<sup>5</sup> on 2/8/2013, with comments on Paperwork Reduction Act issues due by 4/15/2013. The Commission received no public comments. The Commission issued a 30-day Notice on 4/25/2013<sup>6</sup>.

At the technical conference on April 16, 2013, Commission staff made a presentation on the proposed changes. The Staff presentation and instructional video are available on the Commission’s website; the staff presentation is included in ROCIS under Supplemental Documents.<sup>3</sup>

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

**FERC-550, FERC-545, and FERC-549.** There are no payments or gifts to respondents.

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

**FERC-550, FERC-545, and FERC-549.** The data are public, and the pipelines are so informed through the Commission’s instruction manual. In general, for all submittals to the Commission, filers may submit specific requests for confidential treatment to the extent permitted by law; details are available in 18 C.F.R. Section 388.112.

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

**FERC-550, FERC-545, and FERC-549.** These collections do not include any questions of a sensitive nature.

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

**FERC-550, FERC-545, and FERC-549.** The Commission projects the average annual burden and cost of compliance with the *new requirements* in the notice<sup>1</sup> to be:

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<sup>5</sup> <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13174410>; 78FR10614, 2/14/2013

<sup>6</sup> <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13242489>

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<b>Data Collection, revised by RM07-16 and RM01-5<sup>1</sup></b>	<b>Number of Respondents<sup>7</sup></b>	<b>Hours Per Response (1 Response Per Respondent)</b>	<b>Total Hours</b>	<b>Total Cost<sup>8</sup></b>
FERC -545-- NGA Pipelines	169	1	169	\$6,082
FERC-549 -- NGPA Pipelines	107	1	107	\$3,851
FERC -550 -- Oil Pipelines	193	1	193	\$6,946

We estimate that each pipeline will have the initial implementation burden of one hour and may annually review or make revisions to their list of designated agents. The total new annual burden and cost for all of the 469 respondents (for FERC-545, -549, and -550) for this requirement are: 469 hours or \$16,879.

FERC is not adjusting the current estimates for the existing requirements (e.g., no. of respondents, burden) at this time. FERC is only modifying the estimates due to the annual program increase caused by the new notice<sup>1</sup>.

**FERC-550, FERC-545, and FERC-549.** The current OMB-approved annual estimates in ROCIS and reginfo.gov follow.

<b>Data Collection</b>	<b>Annual Number of Responses</b>	<b>Annual Total Burden Hours</b>	<b>Annual Total Burden Hour Cost for Industry</b>
FERC -545, Gas Pipeline Rates: Rate Change (Non-formal) <sup>9</sup>	1,982	280,276	\$19,341,847
FERC-549, NGPA Title III Transactions and NGA Blanket Certificate Transactions <sup>10</sup>	441	2,176	\$126,208

<sup>7</sup> As of April 5, 2013.

<sup>8</sup> The Commission calculated the hourly average cost (\$35.99/hour for salary plus benefits) using Bureau of Labor Statistics (BLS), Occupational Employment Statistics data for May 2011 (for NAICS 221100 - Electric Power Generation, Transmission and Distribution, at [http://bls.gov/oes/current/naics4\\_221100.htm#00-0000](http://bls.gov/oes/current/naics4_221100.htm#00-0000)) for the support staff.

<sup>9</sup> FERC-545 includes items such as: Standard Rate Case Issues (e.g., Compliance, Cost of Service, Settlement); Reports (e.g., Annual, Reconciliation); Negotiated Rates; Non-Conforming Agreements; and NAESB Business Practice Standards Version 2 Tariff Filing.



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<b>Data Collection</b>	<b>Annual Number of Responses</b>	<b>Annual Total Burden Hours</b>	<b>Annual Total Burden Hour Cost for Industry</b>
FERC -550, Oil Pipeline Rates: Tariff Filings	512	5,632	\$385,500

### 13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

**FERC-550, FERC-545, and FERC-549.** There are no capital or start-up costs for the new requirement that are not associated with the burden hours. All of the costs are related to burden hours and are detailed in #12, above.

### 14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

**Consolidated for FERC-550, FERC-545, and FERC-549.** The following consolidated federal cost relates only to the new requirements imposed by the Notice.<sup>1</sup>

	<b>Number of Hours</b>	<b>Estimated Annual Federal Cost (\$) <sup>11</sup> [rounded]</b>
PRA Administration Cost <sup>12</sup>	-	\$2,250
Data Processing, Analysis, and Respondent Support	131.25 hours averaged for Years 1-3 <sup>13</sup>	\$9,188 averaged over Years 1-3
<b>FERC Total</b>		<b>\$11,438</b>

For the 3 ICRs, the additional annual federal cost is being divided on a weighted basis (and rounded) for the total of 469 additional annual responses:

- FERC-545—(169/469)\*\$11,438=\$4,122 in additional cost
- FERC-549—(107/469) \*\$11,438=\$2,610 in additional cost
- FERC-550—(193/469)\*\$11,438=\$4,707 in additional cost

**FERC-550, FERC-545, and FERC-549.** The current OMB-approved annual estimates for

<sup>10</sup> FERC-549 includes Transportation by Interstate Pipelines (18 CFR 284.102(e)); Rates and Charges for Intrastate Pipelines (18 CFR 284.123(b), (e)); Code of Conduct (18 CFR 284.288 & 284.403); and Market Based Rates (18 CFR 284.501-505)

<sup>11</sup> Based on 2013 cost per FTE of \$145,818 for 1 year or 2,080 hours, rounded to \$70/hour.

<sup>12</sup> For the PRA Administration Cost the Commission bases this cost upon an average of 24 hours per clearance.

<sup>13</sup> We anticipate providing approximately 5 hrs. per day of support for the first three months of implementation (for a total of 325 hours) plus an ongoing effort of 25 hours per year. (The ongoing effort for the last 9 months of Year 1 would be an additional 18.75 hours.). The total in Year 1 would be 343.75 hours (\$24,062, rounded), with a total of 25 hours (\$1,752) in each subsequent year. The average over Years 1-3 would be 131.25 hours and \$9,187.50 per year.

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federal cost that are displayed in ROCIS metadata and reginfo.gov are:

- FERC-545, \$2,872,388
- FERC-549, \$1,396,821
- FERC-550, \$855,807

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

**FERC-545, FERC-549, and FERC-550, Program Changes due to RM07-16 and RM01-5, order issued 2/7/2013.** To improve security and the filing process, the Commission is revising the company front-end registration process for interstate and intrastate natural gas pipelines and oil pipelines with respect to the filing of electronic tariffs (eTariff). These procedures are expected to take effect no sooner than 7/12/2013. The additional estimated burden per pipeline is 1 hour/year.

Summary table of changes to burden hours, with current approved inventory, as listed in ROCIS and reginfo.gov:

	<b>Burden Hours</b>	<b>Number of Responses</b>
<b>FERC-545</b>		
Current Inventory	280,276	1,982
Program Increase (from Notice in RM07-16 and RM01-5-000 <sup>1</sup> )	+169	+169
<b>Net New Inventory</b>	<b>280,445</b>	<b>2,151</b>
<b>FERC-549</b>		
Current Inventory	2,176	441
Program Increase (from Notice in RM07-16 and RM01-5-000 <sup>1</sup> )	+107	+107
<b>Net New Inventory</b>	<b>2,283</b>	<b>548</b>
<b>FERC-550</b>		
Current Inventory	5,632	512
Program Increase (from Notice in RM07-16 and RM01-5-000 <sup>1</sup> )	+193	+193
<b>Net New Inventory</b>	<b>5,825</b>	<b>705</b>

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

**FERC-545, FERC-549, and FERC-550.** There are no publications of the information.

## 17. DISPLAY OF EXPIRATION DATE

**FERC-545, FERC-549, and FERC-550.** The expiration dates are displayed on the Office of the Secretary of the Commission's *Implementation Guide for Electronic Filing of Parts 35, 154, 284, 300, and 341 Tariff Filings* for electronic filing. See <http://www.ferc.gov/docs-filing/etariff/implementation-guide.pdf>; the Commission will update the expiration dates on the guide when OMB issues decisions.

The expiration dates will be posted in the CID Instruction Manual (rather than on the first public input screen). The manual is included in ROCIS and [reginfo.gov](http://reginfo.gov) under Supplementary Documents and will be posted on [ferc.gov](http://ferc.gov).

**Making changes to the public input screen.** The following gives an overview of the steps (for federal and contractor resources) which are required to make changes, additions, and deletions to the first public input screen for CID. These steps are required to maintain system integrity, even if the change is only to one OMB expiration date on a system screen. The steps include:

1. document changes, screens, and pages where changes are needed
2. get FERC approval
3. issue work request to IT contractor
4. program, test, and re-compile
5. document the changes made to the program and system
6. post revised program, screens, etc. to web

To change or add an OMB expiration date on the public input screen, ballpark estimates of the associated cost<sup>14</sup> follow:

- for the first system, a total estimated cost of \$2,140 (including federal and contractor costs)
- for other systems needing that same change, a total estimated cost of \$1,070 (including federal and contractor costs).

That cost would be incurred each time an OMB expiration date for the information collection needs to be updated, regardless of whether the changes affect the CID component of the information collection.

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<sup>14</sup> Note that the estimated costs that are provided are part of the existing FERC budget and resources (and are not additional resources that would be requested).

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**Making changes to the Instruction Manual.** In contrast, it is estimated to take a total of 1-2 hours of federal and contractor effort (an estimated total cost of \$170)<sup>14</sup> to update the Instruction manual when an OMB expiration date changes.

**Summary.** CID requirements are a very small component of eTariff and EQR information collections. Other components of those collections (unrelated to and not affecting CID) may have multiple rulemakings during a year and corresponding changes to the OMB expiration date (rather than just a renewal and update of the OMB expiration date once every three years). The effort and cost would need to be incurred each time components of those larger rulemakings change, triggering a change to the OMB expiration date, even if the change doesn't affect CID.

In addition, the approach of updating the change (e.g., OMB expiration date) on the public input screen is at least 12 times the cost and takes much longer than the approach of updating the Instruction Manual.

Therefore to provide public information more timely and more efficiently, FERC is posting detailed information, which is required by the Paperwork Reduction Act and OMB's implementing regulations at 5CFR1320 (e.g., the FERC information collection nos., OMB Control Nos., and OMB expiration dates), in the Instruction Manual for the CID process. That manual will be posted on the [ferc.gov](http://ferc.gov) site. The manual will be updated as necessary to reflect OMB Control Nos. and OMB expiration dates.

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

**FERC-545, FERC-549, and FERC-550.** These information collections do not employ statistical methods.