

Supporting Statement for
FERC-577, Natural Gas Projects: Environmental Review and Compliance
With proposed changes in FERC Docket No. AD12-2-000
(OMB Control. No. 1902-0128)

The Federal Energy Regulatory Commission (FERC or Commission) requests the Office of Management and Budget (OMB) review and approve changes to the FERC-577.

In Docket No. AD12-2-000 the Commission has revised two documents related to environmental review and compliance for natural gas pipelines subject to FERC's jurisdiction:

- Upland Erosion Control, Revegetation, and Maintenance Plan (Plan)
- Wetland and Waterbody Construction and Mitigation Procedures (Procedures)

Total reporting burden under FERC-577 is expected to increase by 762 hours per year due to the changes to the Plan and Procedures. Both the Plan and Procedure documents (with the revisions incorporated) are attached to the clearance package as part of this submittal.

This supporting statement describes the FERC-577 collection in general and provides additional detail about the revised Plan and Procedures.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Section 102 (2)(c) of National Environmental Policy Act of 1969 (Pub.L 91-190) (42 U.S.C. 4321) requires that all Federal agencies:

- Consider the environmental impact of its decisions regarding those activities that are major federal actions significantly affecting the quality of human environment
- Produce a detailed statement on the environmental impact of the proposed actions that addresses any adverse environmental effects which cannot be avoided
- Produce alternatives to the proposed action.

The Commission's regulations implementing NEPA in 18 CFR Part 380 require applicants seeking authorization to construct and abandon facilities to provide a detailed environmental report with their application that describes the impact the project is likely to have and the measures the applicant will implement to mitigate

those impacts. This environmental report consists of at least twelve separate reports, each addressing a particular resource area.

Section 311(d) of EAct 2005 amended the Natural Gas Act (NGA) to require the Commission to develop and implement regulations for the pre-filing process, which is designed to identify and resolve environmental and other issues while a proposed project is in its early stages of design. The purpose of the regulations was to make the use of the pre-filing process mandatory for prospective applicants seeking authorization to site and construct a liquefied natural gas (LNG) terminal, and to require that prospective applicants begin FERC's pre-filing review process at least 6 months prior to filing an application.

The Commission's pre-filing regulations (18 CFR 157.21) were promulgated in Order 665 and became effective in October 2005. The regulations outline the requirements for initiating the pre-filing process and timelines for the submittal of environmental information. The regulations also state that the mandatory pre-filing procedures that apply to the prospective applicant for authorization of an LNG terminal, as defined in EAct 2005, also apply to any pipeline and other natural gas facilities necessary to transport re-gasified LNG to or from an LNG terminal. Prospective applicants for other types of natural gas facilities can continue to use the pre-filing process on a voluntary basis, but they would be subject to the requirements and timelines in the pre-filing regulations. As part of the pre-filing process, prospective applicants are required to produce and file the same information required under Part 380 for a formal application with the Commission. The pre-filing information is considered preliminary and may be revised and updated multiple times as the project design is modified and new information becomes available.

The Plan and Procedures the Commission is modifying are referred to at 18 Code of Federal Regulations (CFR) 380.12(i)(5) and 380.12(d)(2), respectively, as well as 18 CFR 157.206(b)(3)(iv). The Plan and Procedures identify the staff's baseline mitigation measures for minimizing erosion, enhancing revegetation, and minimizing the extent and duration of disturbance on wetlands and waterbodies during the construction of FERC jurisdictional natural gas projects.

The changes to the Plan and Procedures fall into two categories: One, clarifications to existing reporting requirements; and two, new statements and requirements.

Clarifications. In this category the Commission:

- Clarified the terminology in the applicability section so that respondents know if they need to respond and so that they do not have to ask as many questions of Commission staff.

- Provided better guidance on reuse and disposal planning requirements.
- Clarified what types of activities require a respondent to submit a variance request to the Commission.
- Provided further guidance regarding post-construction vegetation management.
- Clarified what items should be discussed in quarterly reports to the Commission.
- Clarified that site-specific construction plans can include detailed narrative justifications (instead of detailed construction and engineering diagrams).
- Simplified the spill prevention and response procedures.
- Modified the concrete coating activity requirements.
- Clarified guidance regarding access road use.

New Statements or Requirements. In this category the Commission:

- Included three new pre-construction planning requirements and a wildlife/livestock requirement
- Included a new record maintenance requirement related to drain tile damage.
- Included a new statement in the pre-construction schedule filing.
- Included new guidance regarding waterbody crossing installations.
- Included best management practices regarding horizontal directional drilling.
- Included a new statement about burning woody debris
- Included new criteria related to monitoring and recording the success of wetland revegetation.
- Included a new reporting requirement to the Commission if wetlands fail to revegetate after 3 years.

Many of the above changes will reduce the number of variance or data requests respondents would otherwise file with the Commission. Other changes will require additional reporting or recordkeeping time.

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

The Commission collects environmental information from companies in connection with proposals to construct new natural gas facilities or to modify, expand or abandon existing facilities. The information is collected during the pre-filing process (before the filing of an application), during the application review, and after the Commission's authorization of a project (to ensure compliance with the Commission Order).

Environmental concerns play a significant role in the review of applications for natural gas infrastructure. In considering applications, FERC has to consider both the benefits of a proposed project and its environmental impact. The environmental information collected by the Commission and its independent analysis of that information is critical to the decision-making process.

FERC-577 data collections are required for statutory purposes and cannot be discontinued. The consequences of not collecting this information are that the Commission would be unable to fulfill its statutory mandates under its Rules of Practice and Procedure, and in compliance with EPAct 2005, NGA, and NEPA.

The Plan and Procedures apply to FERC jurisdictional natural gas companies during the construction of FERC jurisdictional natural gas projects. The Plan and Procedures are necessary to establish a standard and consistent metric for environmentally acceptable construction and mitigation practices for jurisdictional natural gas projects. The Plan and Procedures also provide standard post-construction reporting requirements that allow FERC staff to monitor compliance and ensure jurisdictional projects are acceptably restored. The Plan and Procedures are widely established and understood by pipeline owners/operators, construction contractors and environmental consultants. State and federal resource agencies across the country have accepted project implementation of the FERC Plan and Procedures as appropriate environmental impact minimization, mitigation, and restoration practices for interstate pipeline construction.

Without the Plan and Procedures, there would be significant uncertainty with regards to FERC's expectations for acceptable construction and mitigation practices. The processing of applications would be delayed, compliance would be difficult to assess on a seemingly moving target of environmental requirements, and the industry, resource agencies, and stakeholders would lack a consistent metric from which to build expectations and assess potential environmental impact from these projects.

Specific to the new pieces of burden, the new residential construction planning requirements clearly communicate long-standing FERC staff expectations that were previously difficult to locate (could only be found in old staff guidance documents). Inclusion in the Plan will provide clearer expectations that are easily assessable to improve consistency in the field, particularly on "automatic" type projects that do not receive FERC staff's pre-construction review or construction inspections. Without this requirement, frequent data requests and inconsistent compliance will continue.

New planning requirements for winter construction were added at the request of gas companies and industry associations to clearly communicate FERC staff's

expectations for the unique conditions presented when constructing during winter weather and frozen soil conditions. Winter construction is becoming more and more prevalent recently than in years past and presents new challenges to gas companies and project planners. While we acknowledge that appropriate procedures are highly dependent on the project location and seasonal considerations, the new requirement notes the major topic areas for a winter construction plans and requires the information early in the NEPA review process. We believe this new requirement will improve compliance and ensure that projects constructed through the winter will minimize impacts on soils, vegetation, wetlands, and waterbodies. Without this requirement, winter construction plans may be inconsistent or provided late in the construction process and subject to less rigorous review and analysis to ensure environmental protection.

A new requirement for blasting plans is important to ensure project planners are aware of best management practices that are commonly employed for blasting activities, but not expressly stated in any other FERC guidance documents. Similarly, a new wildlife/livestock planning requirement will assist applicants in identifying this land use issue and developing mitigation early in the review process to minimize landowner complaints and environmental harm. Livestock and wildlife movement are common concerns, particularly in the west on federally managed lands.

A new record maintenance requirement related to subsurface drainage repairs will improve the ability of FERC staff and project sponsors to address landowner complaints regarding drainage or drain tile damages. These types of complaints often do not arise until the next growing season or next wet season, long after construction personnel and environmental inspectors have left the project location. In the absence of records, it can be problematic to determine culpability and appropriate remediation requirements.

A new pre-construction planning requirement directs project sponsors to plan ahead to limit the amount and duration of open trench sections. This measure addresses a common stakeholder concern for large expanses of open trench/disturbed right-of-way and delays on restoration work that can put environmental resources at risk from excessive erosion, sedimentation into wetlands and waterbodies, or wildlife/livestock injuries. The FERC has declined in the past to prescribe a quantitative limit as a baseline measure due to the highly variable nature of projects and ground conditions across the country. However, by establishing a planning requirement that conveys our general expectations, we can reduce the burden and environmental risks associated with handling this issue as a compliance matter during active construction when contractor resources have less flexibility to adjust, and project delays can incur significant expense to the project sponsor.

New guidance regarding waterbody crossings during dry or frozen conditions will allow larger stretches of right-of-way to be restored more quickly. The new language also conveys FERC's expectation to maintain downstream flow in the event that the dry stream begins to flow after a storm event. This new addition will minimize downstream sedimentation, reduce variance requests, and improve construction efficiency.

We included best management practices regarding horizontal directional drilling. Typically, we require no clearing or limited hand clearing along drilling paths depending on the site specific needs of the driller (e.g. tracking wires, test water source, frac monitoring, and access). Inclusion of the new language will provide project sponsors with greater clarity on staff expectations, reduce data requests, and improve resource protection and compliance for automatic type projects.

A new statement allowing burning woody debris in wetlands is important to reduce variance requests for a practice we generally find acceptable when done in accordance with applicable state, local, and Corps of Engineers permit requirements. This statement in the Procedures will also allow project sponsors to reduce construction impacts to extensive and heavily vegetated wetland areas by reducing the number of trips into and out of wetlands with heavy equipment and trucks to remove woody vegetation. Without this language, companies may be less inclined to pursue a variance and would not routinely reduce equipment traffic in wetlands to minimize erosion, soil compaction, and unintentional soil transport into wetlands.

New criteria related to monitoring and recording the success of wetland revegetation provides a more achievable performance metric and addresses the variability in revegetation techniques (active seeding vs. passive regeneration). In addition, restoration to pre-construction cover is provided as an alternative to an off right-of-way comparison, as it is more common place for companies to retain this data today than in years past.

Finally, a new annual reporting requirement if wetlands fail to revegetate after three years provides staff with necessary feedback on wetland revegetation efforts to ensure successful restoration of these sensitive resources. Without this requirement, project sponsors and the FERC staff will not have a consistent means to keep track of these wetland restoration efforts that may extend for several years after the typical post-construction reporting timeframes.

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

The Commission is engaged in continuous efforts to determine the potential for and value of improved information technology to reduce the burden on stakeholders. As of January 2013, certificate applications and other related environmental materials can be filed electronically, along with a requirement for three hard copies to be delivered to staff as a courtesy. This represents a reduction from the previous requirement for an original and seven copies. At present, the majority of the filings in connection with the environmental review of projects are made electronically. However, due to their size and complexity, maps and engineering drawings that are submitted as required exhibits with an application may not readily lend themselves to the use of electronic media. As the Commission increases its use of electronic media for filing, storage, retrieval, and tracking of information and documents, greater uniformity in filing procedures, where practical, will greatly expedite and simplify conversion to electronic media.

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

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its regulatory responsibilities under the NGA in an effort to alleviate duplication. All Commission information collections are subject to analysis by Commission staff and are examined for redundancy.

The applicant proposing the project is the only source of the required information.

The information generated and reported as part of the Plan and Procedures is not available from any other sources.

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

The information requirements under FERC-577 apply only to natural gas companies that are or would be transporting natural gas in interstate commerce, or importing or exporting natural gas. Based on the Commission's experience, few of the companies regulated by the Commission fall within the Regulatory Flexibility Act's definition of a small entity.

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

FERC-577 data collections are required for statutory purposes and cannot be discontinued. The consequences of not collecting this information are that the Commission would be unable to fulfill its statutory mandates under its Rules of Practice and Procedure, and in compliance with EPAct 2005, NGA, and NEPA.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are two special circumstances related to this collection.

The amount and frequency of the information collection is highly variable and largely based on the completeness of an applicant's filings throughout the environmental review process. An applicant may have to file information more often than quarterly. Factors that affect information collection include the location and complexity of the project in addition to the level of stakeholder involvement.

FERC requires three paper copies for staff as a courtesy to assist with staff review, processing, and collaboration.

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

In accordance with the requirements of the Paperwork Reduction Act of 1995¹, the Commission issued a request for comments on the changes to the Plan and Procedures under FERC-577. The information collection and requests for comments were published in the Federal Register on August 7, 2013 (77 FR 47063).

The Commission received no comments directly related to the practical utility of the information or the accuracy of the burden estimates. The Commission did, however, receive 26 individual comment letters that suggested ways to clarify and improve the nature of the information collected. Comments were received from the natural gas industry, federal, state and local agencies, environmental consultants, inspectors, construction contractors, nongovernmental organizations and other interested parties with special expertise with respect to natural gas facility construction. The Commission analyzed all of the filed comments, and made revisions as appropriate.

¹ 42 U.S.C. 4321, et. seq.

We received comments from industry stakeholder groups including the Interstate Natural Gas Association of requesting that the Commission preserve the overall structure and performance-based nature of the Plan and Procedures, due to the wide acceptance and successful implementation of the established measures. Alternatively, we received comments from agencies and product manufacturers requesting more prescriptive requirements and less flexibility. Some stakeholder groups, nongovernmental organizations, and private individuals requested more specificity and restrictive practices that we were unable to incorporate into the revisions. The Plan and Procedures current structure represents a mix of quantitative requirements and qualitative performance based measures. FERC staff preserved this existing structure to provide the necessary flexibility for adaptation on projects across the United States and widely ranging site conditions, while ensuring the measures are achievable and implementable for linear construction projects.

Agency representatives including the Pennsylvania Department of Environmental Protection were also largely in support of the existing structure of the Plan and Procedures. Industry and agency representatives, as well as various stakeholder groups did request minor clarifications on a number of resource protection issues. Requests for clarifications were received from federal agencies (U.S. Fish and Wildlife Service, NOAA National Marine Fisheries Service, U.S. Environmental Protection Agency); state and local agencies (New York State Department of Environmental Conservation, Iowa Utilities Board, Iowa Office of Consumer Advocate, West Virginia Division of Natural Resources, City of New York); nongovernmental organizations (National Audubon Society, Delaware Riverkeeper Network, Pipeline Safety Coalition, Damascus Citizens for Sustainability and NYH2O, League of Women Voters, The Association of State Wetland Managers, Inc.); private individuals (Ed Wester, Karen Feridun, Emily Krafjack); and regulated companies (Equitrans, L.P., EnbridgeEnergy, Energy Transfer Partners L.P, WBI Energy Transmission, Inc., Spectra Energy Corporation, CMS Energy). Comments addressed topsoil protection, drain tile repair, agricultural restoration, wildlife protection, invasive species management, erosion control methods and materials, wetland and stream protection, and revegetation techniques.

In response, staff incorporated revisions to clarify best management practices and incorporate staff guidance that is frequently requested.

While the Plan and Procedures represent a baseline standard, the more stringent measures may result on a project specific basis as a result of the NEPA review, and other required state and federal permitting reviews.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts are offered to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The majority of the information collected is not confidential. However, the Commission’s regulations require that information on the location and nature of cultural resources that could be affected be filed as privileged material to protect the resource. Applicants are also required to provide the names and addresses of affected landowners. This information is also treated as privileged material.

Some information required by the Commission in FERC-577 is comprised of detailed maps and engineering drawings which may contain Critical Energy Infrastructure Information (CEII). CEII as defined in section 388.113 of the Commission’s regulations includes information about proposed or existing natural gas facilities that could be used by a person planning an attack on critical energy infrastructure. The Commission’s procedures in Section 388.112 are designated to ensure that CEII is not placed in the Commission’s public records.

In addition, applicants may ask that the Commission treat certain information as proprietary for business reasons.

The revised Plan and Procedures do not contain confidential information.

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

There are no questions of a sensitive nature that are considered private related to the FERC-577.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The current estimated average annual public reporting burden and cost for FERC-577 follow.

Number of Respondents Annually (1)	Number of Responses Per Respondent (2)	Average Burden Hours Per Response (3)	Total Annual Burden Hours (1)x(2)x(3)
92	16	193	284,096

The burden estimates are based on the number of actual filings and Commission staff experience with those filings.

The estimated annual cost associated with the burden hours is \$19,886,720 (284,096 hours x \$70/hour² = \$19,886,720).

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up, capital, or operations and maintenance costs associated with the FERC-577.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

Below is the Federal cost estimate for the existing requirements under FERC-577.

Type of Cost	Number of Employees (FTEs)	Estimated Annual Federal Cost ³
PRA Administration Cost ⁴		\$2,250
FTE	34	\$4,957,812
FERC Total		\$4,960,062

The Commission doesn't expect that the revisions to the Plan and Procedures will change total FERC cost.

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

The FERC-577 burden is changing due to revisions to the Plan and Procedures. The revisions to the Plan and Procedures are primarily modifications and clarifications to the content of information collections required by the current versions.

For example, revisions to Plan sections III.I and VII.B.2 clarify staff's expectations for the content of winter construction plans and quarterly activity reports. Revisions to Plan section III.F standardize staff's expectations regarding wildlife and livestock protection measures and blasting plans. A revision to

² Based on average wages and benefits for an employee at FERC. The Commission assumes that employees working on information collection activities for this collection receive, on average, similar wages and benefits.

³ Based on 2013 cost per FTE of \$145,818

⁴ The PRA Administration Cost is based on the Commission's estimated staff time and resources to comply with the requirements of the PRA.

Procedure section VI.D.5 clarifies the wetland revegetation success criteria used for monitoring and reporting which will require respondents to adjust the way they report this information. Such revisions do not constitute entirely new information collections; however, we estimate the revisions will increase reporting burden by adjusting the existing ways to comply with previously applicable instructions and requirements; training personnel to respond to the modified collection of information; and completing and reviewing these collections.

We estimate that certain revisions will reduce reporting burden on jurisdictional natural gas companies by providing guidance that is frequently requested during report preparations; directions to provide information that frequently results in data requests; and improved flexibility to reduce variance requests for construction practices the staff has determined are acceptable.

For example, frequently requested guidance on beneficial reuse of construction materials is provided in revised Plan sections II.B.17 and III.E. Identification of baseline expectations for residential construction practices is provided in revised Plan section III.H. We expect variance requests will be reduced via revisions to Procedure section V.B.3.g that addresses construction through waterbodies that are dry or frozen, and Procedure section VI.B.2.f that addresses burning of woody debris in wetlands. Additionally, we expect revisions to Procedure section II.A to reduce reporting burden on jurisdictional entities, permitting detailed justifications rather than site-specific plans for reduced workspace setbacks at waterbodies and wetlands, and expanded wetland construction rights-of-way.

We revised terminology to be inclusive of prior notice, advanced notice, and automatic authorization projects to address the wider net of project types subject to the Plan and Procedure requirements. The revisions clarify applicability for projects constructed under the Commission's blanket certificate program (18 CFR 157, Subpart F) and construction of facilities for transportation services under the Natural Gas Policy Act (NGPA) section 311 (18 CFR 284, Subpart A). We expect these clarifications to improve the efficiency of the environmental review process, and reduce labor hours required of jurisdictional natural gas companies to prepare reports.

We implement a new record retention requirement regarding drainage system repairs or improvements (see revised Plan section VII.B.1.e). In addition, we also put in place a new annual report for affected wetlands that do not successfully revegetate within three years after construction (see revised Procedure section VI.D.6). We expect this revision to result in a minor increase in reporting burden due to the low incidence of wetland revegetation failure.

We expect that the revisions will lead to additional filings for blanket certificate projects, subject to our prior notice regulations (see revised “Applicability” discussions in section I of the Plan and Procedures). Such filings include winter construction plans noted in revised Plan section III.I, and the pre-construction filings noted in section II of the Procedures (e.g., hydrostatic testing information, waterbody crossing schedules, spill prevention and response procedures, plans for major waterbody crossings, horizontal directional drill crossings, and justifications for any variances). This would not reflect entirely new reporting burdens however, as this information is typically requested by staff during review of these projects to ensure compliance with blanket certificate standard conditions in 18 CFR 157.206.

Overall, in consideration of the revisions to reporting requirements and the increased efficiency that would be realized during the environmental review process, we expect the net effect of the revised Plan and Procedures to constitute a minor increase in information collection burden.

The estimate below was updated using workload completion data prepared by FERC’s Division of Gas – Environment and Engineering for fiscal year 2012. The estimate previously provided in the July 31, 2012 Notice of Availability was based on fiscal year 2011 workload completion data.⁵ Respondents include companies that filed project applications under Natural Gas Act (NGA) Section 7, blanket certificate prior notice filings and annual reports, and NGPA 311 advanced notification filings and annual reports.

Modification to FERC-577, OMB Control No. 1902-0128	Average No. of Respondents Annually	Average No. of Filings Per Year⁶ (a)	Average Change in Burden Hrs. per Filing (rounded) (b)	Total Annual Change in Burden Hrs. for all Filings Types (a x b)
Upland Plan	81 Natural Gas	218	7.64	1,667

⁵We found upon further review of the previous estimate that we did not account for all of the filings in the fiscal year 2011 data. We corrected the previous error in the estimates shown here. The net effect of using the 2012 data (along with accurate accounting) is an increase of 509 hours from the July 31, 2012 notice.

⁶ NGA 7, Blanket Certificate, and NGPA 311 filings. Filings were excluded if they qualified as categorical exclusions under the National Environmental Policy Act or were otherwise categorized as “environment not involved.”

	Companies			
Wetland and Waterbody Procedures	81 Natural Gas Companies	218	-4.15	-905
Total				762

The total estimated annual cost burden to prepare new or modified information collections based on the Plan and Procedure revisions is \$53,340 (762 hours x \$70/hr⁷).

We expect the estimated burden would reduce in subsequent years, as companies adjust to the modified information collections and have trained their personnel to collect information per the revised Plan and Procedures.

The following table illustrates the net change to the FERC-577.

FERC-577	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	1,472	1,472	-	-
Annual Time Burden (Hr)	284,858	284,096	-	762
Annual Cost Burden (\$)	-	-	-	-

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

FERC does not publish any data as part of this collection.

17. DISPLAY OF EXPIRATION DATE

The information collected as part of the FERC-577 (including the revised Plan and Procedures) is not collected on formatted/printed forms. Thus, the subject data requirements do not have an appropriate format to display an OMB expiration date.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

Because the data collected is not submitted on a standardized form, the Commission does not display the expiration date. In addition, the Commission does not use statistical survey methodology for these information collections.

⁷ Estimated average annual cost (wage plus benefits) per employee.

