

Supporting Statement
**FERC-923 (Communication of Operational Information
between Natural Gas Pipelines and Electric Transmission Operators),
Final Rule¹, issued 11/15/2013, in Docket No. RM13-17-000**

Background

The Federal Energy Regulatory Commission (FERC or Commission) is revising its regulations (at new 18CFR 38.2 and 284.12(b)(4)) to provide explicit authority to interstate natural gas pipelines and public utilities that own, operate, or control facilities used for the transmission of electric energy in interstate commerce to share non-public, operational information with each other for the purpose of promoting reliable service and operational planning on either the pipeline's or public utility's system.² That information will not be submitted to FERC; rather the non-public, operational information will be shared voluntarily between transmission operators. FERC is not prescribing the content, medium, format, or frequency for the information sharing and communications; those decisions will be made by the transmission operators, depending on their needs and the situation.

In addition, FERC estimates that a total of 12 tariff filings may be submitted to FERC by a few of the electric and gas transmission operators to enable them to establish this type of communication.

This final rule will help maintain the reliability of interstate natural gas pipeline and public utility transmission service by permitting transmission operators to share the information that they deem necessary with each other to promote the reliability and integrity of their systems.

Since February 2012, the Commission has requested comment and conducted multiple technical conferences on various aspects of gas-electric interdependence and coordination in order to better understand the interface between the electric and natural gas pipeline industries and identify areas for improved coordination. On December 7, 2012, the Commission issued a Notice of Request for Comments and Technical Conference regarding information sharing and communication issues between the natural gas and

¹ The Final Rule is available at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13395565>, and related News Release, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13395701>. The Notice of Proposed Rulemaking (NOPR), available at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13308690>, and a related News Release, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13308924>, were issued on 7/18/2013.

² For ease of reference, we will refer to these entities collectively as "transmission operators."

electricity industries.³ In response, natural gas and electric industry participants described a variety of actions that are currently being taken to improve communications and information sharing between the two industries. While several entities acknowledged that system reliability and contingency planning could be further enhanced by the sharing of non-public, operational information directly between transmission operators, several transmission operators pointed out that there is general reluctance to share such information because of concerns that doing so could be a violation of current laws, regulations or tariffs, including the Commission's prohibition on undue discrimination. Accordingly, multiple industry participants requested that, in order to facilitate the exchange of information between transmission operators, the Commission should more clearly identify the types of operational information that may be shared between transmission operators and clarify that the sharing of such information does not violate the prohibition against undue discrimination.

On July 18, 2013, the Commission issued the NOPR and, in response, thirty-three parties filed comments. Of these, 30 supported or did not oppose the NOPR and three opposed it. In general, most commenters support the proposed rule to help promote the reliability and efficiency of the natural gas and electric systems by eliminating legal uncertainty regarding the ability of interstate natural gas pipelines and electric transmission operators to exchange non-public, operational information. Some commenters, particularly from the New England region, expressed urgency in the Commission's issuance of a final rule adopting the proposed regulations. For example, in filed comments, the New England States Committee on Electricity (NESCOE) urged the adoption of a final rule before next winter. NESCOE suggested that the implementation of these revisions in the near-term would provide regions like New England with certainty and flexibility to put in place what has the strong potential to be an effective and low cost reliability measure. ISO-NE also requested that the final regulations be effective as soon as possible. ISO-NE stated that this will allow it to make conforming changes to its Information Policy in time for the upcoming winter, where demand for gas for home heating competes with electric generation.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

In recent years, reliance on natural gas as a fuel for electric generation has steadily increased.⁴ This trend is expected to continue into the future, resulting in greater

³ *Coordination between Natural Gas and Electricity Markets*, Docket No. AD12-12-000 (Dec. 7, 2012) (Notice Of Request for Comments and Technical Conference) (<http://www.ferc.gov/EventCalendar/Files/20121207134434-AD12-12-000TC1.pdf>); 77 Fed. Reg. 74180 (Dec. 13, 2012) (<http://www.gpo.gov/fdsys/pkg/FR-2012-12-13/pdf/2012-30063.pdf>).

⁴ See, e.g., Energy Information Administration, *Fuel Competition in Power Generation and*

interdependence between the natural gas and electric industries.⁵ Several events over the last few years, such as the Southwest Cold Weather Event,⁶ demonstrated the crucial interconnection between natural gas pipelines and electric transmission operators and the need for robust communication between these industry sectors to ensure that both systems operate safely and effectively for the benefit of their customers.

As highlighted further in # 8 below, the Commission has compiled inputs from various entities to better understand the interface between the electric and natural gas pipeline industries and identify areas for improved coordination and communication between their operators. Specifically, and after several regional and national conferences, it was established that further sharing of non-public, operational information between transmission operators could enhance system reliability and contingency planning in both industries. However, some members of the public have indicated that there is a real or perceived prohibition (statutory and/or regulatory) on the sharing of certain non-public information. For example, several transmission operators pointed out that there is general reluctance to share information because of concerns that doing so could be a violation of current laws (Federal Power Act and/or Natural Gas Act), regulations or tariffs. Electric generators expressed concern about the communication of generator-specific information between an electric transmission operator and a pipeline operator without the generator's knowledge. Other comments expressed concern regarding the potential harm to industry participants or the potential for improper use of material resulting from increased communication.⁷

This proceeding seeks to address those concerns, and the Commission is revising its regulations to authorize expressly the exchange of non-public, operational information between electric transmission operators and interstate natural gas pipelines.

The new regulations are in 18CFR:

Elasticities of Substitution (June 2012). Other references are provided in the NOPR.

⁵ See, e.g., North American Electric Reliability Corporation, 2013 Special Reliability Assessment: Accommodating an Increased Dependence on Natural Gas for Electric Power; Phase II: A Vulnerability and Scenario Assessment for the North American Bulk Power System at 1 (May 2013).

⁶ Additional information on the Southwest Cold Weather Event (of February 1-5, 2011) is available on [ferc.gov](http://www.ferc.gov) (Report at <http://www.ferc.gov/legal/staff-reports/08-16-11-report.pdf>, and Presentation at <http://www.ferc.gov/EventCalendar/Files/20110915110000-A-4-presentation.pdf>).

⁷ Industry comments, including those presented on 10/17/2013 (described and excerpted in part, in # 8 below), have served to confirm the need for the communications between the electric and gas transmission operators.

- 38.2 which applies to any public utility that owns, operates, or controls facilities used for the transmission of electric energy in interstate commerce subject to a No-Conduit Rule, and
- 284.12(b)(4), which applies to any interstate pipeline.

The new sections 38.2 and 284.12(b)(4) will authorize public utilities providing transmission service and interstate natural gas pipelines to share non-public, operational information when such information is for the purpose of promoting reliable service or operational planning.

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

Note that this non-public information will be communicated and shared between transmission operators and is not being submitted to FERC. The only information being submitted to FERC is the estimated 12 tariff filings to enable the communications.

Entities from both electric and natural gas industries have already begun efforts to improve coordination, however further sharing of non-public, operational information between transmission operators could enhance system reliability and contingency planning in both industries. The information sharing and communications between industry entities are voluntary; there are restrictions on providing the non-public information to third parties or marketing entities.

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

FERC is removing actual or perceived impediments to the information sharing and communications of non-public, operational between transmission operators. The permitted communications are voluntary. FERC is not prescribing the content, medium, format, or frequency for the information sharing and communications; those decisions will be made by the transmission operators, depending on their needs for maintaining reliability or operational planning.

The estimated 12 tariff filings to enable the above information communications and sharing will be submitted through FERC's electronic eTariff system.

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

As detailed in #8 below, the Commission has issued multiple notices and held several conferences to obtain public feedback and comments on the situation, challenges, issues, and possible areas for improvement in natural gas and electric communications. The operational information the transmission operators may choose to share is non-public and in many cases current or time-sensitive operational data. The tariff filings are generally public. The information is not publicly available elsewhere.

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

The SBA (Small Business Administration) has established a size standard for electric utilities, electric power distribution, and electric bulk power transmission and control, stating that a firm is small if, including its affiliates, it is primarily engaged in the transmission, generation and/or distribution of electric energy for sale and its total electric output for the preceding fiscal year did not exceed four million megawatt hours.⁸ For pipeline transportation of natural gas, the SBA defines a small entity as having a maximum annual receipt of \$25.5 million dollars.⁹

The information sharing is voluntary (regardless of size) and between transmission operators that believe sharing the non-public, operational information is useful for the purposes of reliability and operational planning. The Commission estimates a total of 39 “small” entities¹⁰ (or 12.8% of the total of 304 entities), and an average annual cost for each entity of \$376.¹¹

None of the 8 entities that are expected to make the tariff filings is “small”.

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

⁸ 13 CFR 121.201, Sector 22, Subsector 221, Utilities & n.1.

⁹ Based on 13 CFR 121.201, Sectors 48-49, Subsector 486, Pipeline Transportation, the annual receipts indicate the maximum allowed for a concern and its affiliates to be considered “small.”

¹⁰ Based on the SBA definitions and including affiliates, the number of “small” entities is estimated to be:

- for Public Utility Transmission Operators, 31 small public utilities and
- for Interstate Natural Gas Pipelines, eight small interstate natural gas pipelines.

¹¹ The information sharing and communications permitted in this Final Rule are voluntary. For small entities which do not serve or take service from natural gas-fired electric generators, no such communications are necessary or required and their burden will effectively be zero. For small entities which do not wish to participate in communications among transmission operators serving or being served by natural gas-fired electric generators, their burden is also zero.

The frequency and content of the information being shared is not mandated by FERC; rather it is determined by the affected entities based on operational circumstances. (FERC, however, estimates the frequency of this information sharing to be 12 times per year, based on operational circumstances and needs.) The goal of the inter-industry communications is to promote operational planning and reliability on either the interstate natural gas pipeline's or utility's system.

The requirement to submit the tariff filing to FERC enables the transmission operators to have these inter-industry communications to improve operational planning and reliability on either the interstate natural gas pipeline's or utility's system.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances.

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

On February 15, 2012, the Commission issued a notice in Docket No. AD12-12-000 requesting comments on various aspects of gas-electric interdependence and coordination in response to questions posed by members of the Commission. In order to better understand the interface between the electric and natural gas pipeline industries and identify areas for improved coordination, the questions covered a variety of topics including market structure and rules, scheduling, communications, infrastructure and reliability. In response to the notice, the Commission received comments from 79 entities, with some raising concerns that current laws, regulations, or tariffs may hinder the sharing of such information.

During August 2012, the Commission convened five regional conferences for the purpose of exploring these issues and obtaining further information from the electric and natural gas industries regarding coordination between the industries. Representatives from a cross-section of both industries attended the regional conferences, with total attendance exceeding 1,200 registrants. Among the topics discussed at the conferences were communications, coordination, and information-sharing. Participants at multiple conferences again expressed concern that Commission rules and policies could be impeding further efforts to improve communication between the industries. Some natural gas pipelines and Regional Transmission Organizations and Independent System Operators (RTOs/ISOs) also noted that, although they make significant amounts of operational information publicly available, there is reluctance to share information on a

more granular level because of concerns about violating statutory prohibitions against undue preference for any customer or customer class.¹²

On November 15, 2012, the Commission issued an order directing further technical conferences and reports. In the November 15 Order, the Commission acknowledged the concerns regarding communications between the two industries, but found that there was little specific discussion of potential clarifications or potential changes to the Commission's regulations. The Commission, therefore, directed Commission staff to convene a technical conference to identify areas in which additional Commission guidance or potential regulatory changes could be considered.¹³

Pursuant to the November 15 Order, on December 7, 2012, the Commission issued a Notice of Request for Comments and Technical Conference to be held on February 13, 2013 on information sharing and communication issues between the natural gas and electricity industries.¹⁴ The Commission asked interested parties to file comments prior to the technical conference on three questions related to communications and information sharing. Twenty-seven comments were filed in response to the December 7 Notice, and more than 350 persons, representing a cross-section of industry, registered for the technical conference.

On July 18, 2013, the Commission issued a Notice of Proposed Rulemaking in Docket RM13-17.^{1,15} In response to the NOPR, 34 comments and reply comments were received from Regional Transmission Organizations and Independent System Operators (RTOs/ISOs), electric utilities, interstate natural gas pipelines, LDCs, state regulators, generators, and other parties. The Commission responds to the comments in the Final Rule, but no filed comments addressed the proposed Information Collection Statement, including the estimated public reporting burden.

12 See FERC Staff Report on Gas-Electric Coordination Technical Conferences (Nov. 2012), available at <http://www.ferc.gov/legal/staff-reports/11-15-12-coordination.pdf> (November 15 Staff Report).

13 *Coordination between Natural Gas and Electricity Markets*, 141 FERC ¶ 61,125 (2012) (November 15 Order).

14 *Coordination between Natural Gas and Electricity Markets*, Docket No. AD12-12-000 (Dec. 7, 2012) (Notice Of Request for Comments and Technical Conference) (<http://www.ferc.gov/EventCalendar/Files/20121207134434-AD12-12-000TC1.pdf>); 77 Fed. Reg. 74180 (Dec. 13, 2012) (<http://www.gpo.gov/fdsys/pkg/FR-2012-12-13/pdf/2012-30063.pdf>).

15 On 7/30/2013, FERC submitted the NOPR to OMB (ICR 201307-1902-006) for FERC-923; OMB issued its decision on 10/23/2013.

Representatives of the RTOs/ISOs made presentations at a recent Commission meeting on 10/17/2013 in separate Docket No. AD12-12. Their presentations gave further evidence of the need for the final rule in RM13-17. Links to the RTO/ISO presentations follow:

- ISO New England, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373125>
- PJM, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373151>
- California Independent System Operator Corporation, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373167>
- ERCOT, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373186>
- MISO, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373196>
- New York ISO, at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373217>
- Southwest Power Pool (SPP), at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13373224>

In those presentations, many of the RTOs/ISOs talked of their efforts to expand communications and coordination and/or the need for continuing improvements in those areas. Their presentations included the following information.

- SPP said that “[r]epresentatives from SPP's Operations team met with the two primary gas pipeline operators in the SPP region as well as a gas marketing company involved in the region. SPP has observed numerous beneficial outcomes from these meetings, including: (1) a greater familiarity between SPP Operations and the pipeline companies' operations team with improved communications for both normal and emergency operational scenarios, (2) insight helpful to SPP's development of gas data displays and other SPP operations tools, and (3) the beginning stages of development for a weather-alert process to improve coordinated awareness of and preparedness for adverse weather conditions that could impact reliability....
SPP spent the summer months furthering its efforts of outreach and interaction with gas-industry professionals and development of tools to enhance operational awareness, all as overseen by SPP's Task Force. SPP's efforts in this regard will continue as it prepares for the upcoming winter season.”
- MISO
 - “MISO kicked off a 6-month coordination field trial with ANR Pipeline Company this October.
 - The field trial aims to further coordination between industries, enhance operator situational awareness and improve reliability.”
- California Independent System Operator Corporation said that “[d]uring the summer of 2013, the ISO continued its efforts to enhance coordination with natural gas pipeline operators. As a result of additional discussions this summer,

gas pipeline operators are now utilizing the ISO's notifications that restrict maintenance on the electric system. Gas pipeline operators have informed the ISO that, based on the location of the ISO's restricted maintenance notice, they are voluntarily restricting their work in that specific area. They will respond to ISO restricted maintenance notices by ceasing non-critical work and, in connection with critical work, contacting the ISO if they have specific questions regarding the precise location or timing of the ISO's concerns....

Looking beyond the coming winter, the Commission should continue to provide electric and gas system operators as much flexibility as possible to tailor their coordination activities to the specific facts they may face. In this manner, the Commission can promote coordination activities between electric transmission providers and natural gas pipelines as well as allow regions to identify and solve regional issues.”

- ISO NE supported allowing the sharing of non-public information and “[r]equested that the regulations be effective prior to the upcoming winter”.

The public comments, presentations, staff reports, notices, and agendas, etc. are available in FERC's eLibrary system.¹⁶

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The sharing of the non-public data occurs between transmission operators; the data are not provided to FERC. Recipients of the non-public, operational information are subject to a No-Conduit Rule that prohibits subsequent disclosure of that information to a third party or marketing function employee.

The tariff filings are generally public information. Filers may request special treatment under 18 CFR 388.112.

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

¹⁶Users may perform a docket search on Dockets AD12-12 and RM13-17, in the FERC's eLibrary system at <http://elibrary.ferc.gov/idmws/search/fercadvsearch.asp>.

The voluntary sharing of the non-public, operational information occurs between transmission operators; the data are not provided to FERC. The content and frequency of the data being shared is determined by the entities involved based on reliability needs and the operational situation.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The communications and information sharing are voluntary, take place between various industry entities (and are not submitted to the Commission), and are intended to promote reliable service and operational planning. While the extent of such communications likely will vary significantly across the country, the estimates below represent an expected average.

In addition to the communications between entities, tariffs may be submitted to FERC to remove current prohibitions on these communications. Tariffs are normally included under other OMB Control Nos. for gas and electric entities, however the tariffs related to this final rule are included here in FERC-923.

FERC-923, Communication of Operational Information Between Natural Gas Pipelines and Electric Transmission Operators, Final Rule in Docket No. RM13-17¹⁷					
Type of Entity (1)	No. of Respondents (2)	Number of Responses Per Respondent (3)	Average Burden Hours per Response (4)	Total Annual Burden Hours (2)*(3)*(4)=(5)	Total Annual Cost (\$ (5)*(\$ /hr)=(6)¹⁸

¹⁷ Columns 5 and 6 are rounded.

¹⁸ For communications, the estimated hourly cost (for salary plus benefits) is \$60.41; estimated annual costs are \$125,647 (based on 2,080 hours per year). It is based on data from the Bureau of Labor Statistics Occupational Outlook Handbook, 2012-2013 edition for the top 10% of “Power Plant Operators, Distributors, and Dispatchers” (at <http://www.bls.gov/ooh/>).

For tariff filings, the average hourly cost (for salary plus benefits) is \$44.25. This hourly estimate will be used for Public Utility Transmission Operators and Interstate Natural Gas Pipelines. It is based on data provided by the Bureau of Labor Statistics Occupational Outlook Handbook, 2012 – 2013 edition for the median for “Lawyers,” “Paralegal and Legal Assistants,” and “Secretaries and Administrative Support” (at <http://www.bls.gov/ooh/>). The estimated annual costs (salary plus benefits) for Lawyers, Paralegal and Legal Assistance, and Secretaries and Administrative Support are \$160,398, \$66,401, and \$49,303, respectively. The hourly cost (based on 2080 hours per year) is \$77.11, \$31.92 and \$23.70 for the three occupations, respectively.

For the estimate of the benefits component, see <http://www.bls.gov/news.release/ecec.nr0.htm>.

Public Utility Transmission Operator, communications	167 ¹⁹	12 ²⁰	0.50	1002	\$60,531
Interstate Natural Gas Pipelines, communications	137 ²¹	12	0.50	822	\$49,657
Public Utility Transmission Operator (tariff change)	4 ²²	2	8 ²³	64	\$2,832
Interstate Natural Gas Pipelines (tariff change)	4 ²⁴	1	8 ²⁵	32	\$1,416
Total				1,920	\$114,436

There is a total of 3,660 ‘responses’ per year, 3,648 of which is communications between transmission operators and not submitted to FERC. Of those 3,660 responses, only 12 [(4*2)+(4*1)] are tariff filings and are submitted to FERC.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up, capital, or other non-labor hour costs. All costs are related to burden and included in #12.

19 The estimate for the number of respondents is based on the North American Electric Reliability Corporation (NERC) Compliance Registry as of April 30, 2013, minus the Transmission Operators within ERCOT. Using the Small Business Administration (SBA) definition, 31 of the 167 Public Utility Transmission Operators are considered “small.”

20 The Commission estimates an annual average per entity of 12 responses (including electric and gas emergency and/or operational contacts).

21 The 2012 filings of the FERC Forms 2 and 2A indicated that there are 137 interstate natural gas pipelines. Of those pipelines, eight (8) are considered small using the definition of the Small Business Administration (at 13 CFR 121.301), including the affiliates.

22 Of the 167 Public Utility Transmission Operators, the Commission estimates that four will make tariff filings.

23 The Commission estimates that the Public Utility Transmission Operator will require eight work hours to file the amendment to the tariff from a team that consists of a “Lawyer,” a “Paralegal and Legal Assistant,” and a “Secretary and Administrative Support.”

24 Of the 137 interstate natural gas pipelines, the Commission estimates that four will make tariff filings.

25 The Commission estimates that an Interstate Natural Gas Pipeline will require eight work hours to file the amendment to the tariff from a team that consists of a “Lawyer,” a “Paralegal and Legal Assistant,” and a “Secretary and Administrative Support.”

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimated annual federal costs follow.

Type of Cost	Estimated Annual Federal Cost ²⁶
Review and Processing of 12 additional tariff filings, triggered by RM13-17 ²⁷	\$20,190
PRA Administration Cost ²⁸	\$2,250
FERC Total	\$22,440

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

Based on public comments received since 2/15/2012, the Commission is removing perceived or actual barriers for information sharing between interstate natural gas and electric transmission operators for the purposes of reliability and operational planning. The information sharing and communications are voluntary between industry participants and are not provided to FERC.

The estimated additional tariff filings will be submitted to FERC.

The following table illustrates the burden changes and the estimated burden inventory figures as modified by the final rule in RM13-17.

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	3,660	0	0	3,660
Annual Time	1,920	0	0	1,920

26 Based on 2013 cost (salary plus benefits) per FTE (Full Time Equivalent) of \$145,818.

27 We estimate the review and processing of each additional tariff filing will take an average of 24 workhours. The total federal cost (salary plus benefits) of processing the additional 12 tariff filings is estimated to be \$20,190 $\{[(12 \text{ filings} * 24 \text{ hrs./filing}) / 2080 \text{ hrs./yr.}] * \$145,818/\text{yr.}\}$.

28 The PRA (Paperwork Reduction Act) Administration Cost is based on the Commission's estimated staff time and resources to comply with the requirements of the PRA.

Burden (Hr.)				
Annual Cost				
Burden (\$)	0	0	0	0

Of the estimated 3,660 ‘responses’ per year,

- 3,648 are voluntary communications between transmission operators, which are not submitted to FERC, and
- 12 are tariff filings, which are submitted to FERC.

All costs are related to burden and not capital or start-up costs, so 0 is indicated above. The burden costs are described in #12.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

The Commission does not publish the data.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date because there is no information collected on a preformatted form or in any format that would allow for such a display.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for this collection.