FERC-725G (OMB Control No.: 1902-0252)
Docket Nos. RM13-19 and RM14-3 (Final Rule, issued 7/17/2014), RIN: 1902-AE81
[updated 10/8/2014]

Supporting Statement for
FERC-725G, Mandatory Reliability Standards for the Bulk-Power System
for the Final Rule in Docket Nos. RM13-19 and RM14-3 (issued 7/17/2014)

NOTE: The reporting and recordkeeping requirements affected by the rulemaking in Docket Nos. RM13-19 and RM14-3[1] normally fall under FERC-725G (OMB Control No. 1902-0252). At the Notice of Proposed Rulemaking (NOPR) stage in these dockets, there was a pending and unrelated rulemaking (affecting other aspects of FERC-725G) which was being submitted for OMB review, and only one request per OMB Control Number can be pending OMB review at a time. As a result, and in order to submit the NOPR in RM13-19 timely, the supporting statement for the NOPR in RM13-19 was submitted under a new, temporary FERC-725Q (OMB Control No. 1902-0272), in ICR 201403-1902-002. The Final Rule in Docket RM13-19 (discussed in this supporting statement) is being submitted under FERC-725G.

The Federal Energy Regulatory Commission (Commission or FERC) is submitting a Final Rule[2] that approves a new Reliability Standard, PRC-025-1, governing generator relay loadability, including its data collection requirements for the FERC-725G, Mandatory Reliability Standards for the Bulk Power System (OMB Control No. 1902-0252). FERC-725G includes the requirements for the new Reliability Standard, PRC-025-1 (Generator Relay Loadability), submitted by the North American Electric Reliability Corporation (NERC), the Commission-approved Electric Reliability Organization (ERO).[3]

Background

On August 8, 2005, the Electricity Modernization Act of 2005 (Title XII of the Energy Policy Act of 2005) (EPAct 2005), was enacted into law.[4] EPAct 2005 added a new section 215 to the Federal Power Act (FPA) and requires a Commission-certified ERO to develop mandatory and enforceable Reliability

1 Unless otherwise stated, if only one of the docket numbers (RM13-19 and RM14-3) is mentioned later in this document, the material relates to both dockets.

2 The Final Rule (Order 799) was issued on 7/17/2014 and is available at http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13595372.

3 In addition, in the Final Rule, the Commission approves Reliability Standard PRC-023-3 (Transmission Relay Loadability), also submitted by NERC, which revises a currently-effective standard pertaining to transmission relay loadability. As stated by NERC on 12/17/13 in page 4 of its supplementary information filing in Docket No. RM 14-3-000, Requirement R1, Criterion 6 of Reliability Standard PRC-023-2 was removed and the applicability section was revised to exclude 'Elements that connect the GSU transformer(s) to the Transmission system that are used exclusively to export energy directly from a Bulk Electric System generating unit or generating plant.' These changes avoid overlap with the Requirements in proposed Reliability Standard PRC-025-1 that apply to these Facilities."
The burden and cost for the current Reliability Standard PRC-023-2 are already included in FERC-725G. This Final Rule does not affect the PRA-related burden and cost in FERC-725G for the PRC-023 standard, so they are not addressed further here.

4 The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2012).

Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight.[5]

Order No. 693, Docket No. RM06-16-000. On March 16, 2007, the Commission issued Order No. 693, a Final Rule that added part 40 to the Commission's regulations. The Final Rule stated that this part applies to all users, owners and operators of the Bulk-Power System within the United States (other than Alaska or Hawaii).[6] It also requires that each Reliability Standard identify the subset of users, owners and operators to which that particular Reliability Standard applies. Order No. 693 also requires that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

The Commission approved 83 of 107 proposed Reliability Standards, six of eight proposed regional differences, and the Glossary of Terms used in Reliability Standards as developed by NERC. NERC was certified by the Commission as the ERO responsible for developing and enforcing mandatory Reliability Standards.

Relay Protection Systems. Protective relays are devices that detect and initiate the removal of faults on an electric system. They are designed to read electrical measurements, such as current, voltage, and frequency, and can be set to recognize certain measurements as indicating a fault. When a protective relay detects a fault on an element of the system under its protection, it sends a signal to an interrupting device, such as a circuit breaker, to disconnect the element from the rest of the system. Impedance relays, which are the most common type of relays used to protect transmission lines, continuously measure voltage and current on the protected transmission line and operate when the measured magnitude and phase angle of the impedance (voltage/current) falls within the settings of the relay.

Development of Reliability Standards on Relay Loadability. Pursuant to its authority under section 215(d) of the FPA, on March 18, 2010, the Commission issued a Final Rule (Order No. 733) approving Reliability Standard PRC-023-1 (Transmission Relay Loadability), a standard that requires transmission owners, generator owners, and distribution providers to set load-responsive phase protection relays according to specific criteria to ensure that the relays reliably detect and protect the electric network from all fault conditions, but do not operate during non-fault load conditions.[7] In addition, under section 215(d)(5) of the FPA , the Commission directed NERC to (1) make certain modifications to

5 A reliability standard defines obligations or requirements of utilities and other entities that operate, plan and use the Bulk-Power System in North America. Meeting these requirements helps to ensure the reliable planning and operation of the bulk power system. Each NERC Reliability Standard details the purpose of the standard, the entities that must comply, and the specific actions that constitute compliance and how the standard will be measured.

6 The Bulk-Power System consists of the power plants, transmission lines and substations, and related equipment and controls, that generate and move electricity in bulk to points from which local electric companies distribute the electricity to customers.

7 *Transmission Relay Loadability Reliability Standard,* Order No. 733, 130 FERC ¶ 61,221 (2010), *order on reh'g and clarification,* Order No. 733-A, 134 FERC ¶ 61,127 (2011); *clarified*, Order No. 733-B, 136FERC61,185, (2011). Order No. 733-B issued concurrently with the Notice of Proposed Rulemaking.

Reliability Standard PRC-023, (2) submit a timeline for the development of a new Reliability Standard to address generator protective relay loadability, and (3) develop a new Reliability Standard addressing the issue of protective relay operation during stable power swings.

On September 30, 2013, NERC submitted a petition[8] seeking approval of Reliability Standard PRC-025-1 (Generator Relay Loadability) to respond to Commission directives in Order No. 733 to address generator protective relay loadability. NERC stated in its petition that the standard "is designed to prevent generator tripping when conditions do not pose a direct risk to the generator and associated equipment and will reduce the risk of unnecessary generator tripping – events that increase the severity of the disturbance." [9]

A. **Justification**

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

With the passage of EPAct 2005 Congress entrusted FERC with the authority to approve and enforce rules to assure reliability of the nation's Bulk-Power System. Section 1211 of EPAct 2005 created a new section 215 to the Federal Power Act (FPA) (16 U.S.C. 824o), which provides for a system of mandatory and enforceable Reliability Standards. Section 215(d)(1) of the FPA provides that the ERO must file each Reliability Standard or modification to a Reliability Standard that it proposes to be made effective, i.e., mandatory and enforceable, with the Commission. The law mandates that all users, owners, and operators of the Bulk-Power System in the United States will be subject to the Commission-approved Reliability Standards.

Section 215(d)(2) of the FPA provides that the Commission may approve, by rule or order, a proposed Reliability Standard or modification to a proposed Reliability Standard if it meets the statutory standard for approval, giving due weight to the technical expertise of the ERO. Alternatively, the Commission may remand a Reliability Standard pursuant to section 215(d)(4) of the FPA. Further, the Commission may order the ERO to submit to the Commission a proposed Reliability Standard or a modification to a Reliability Standard that addresses a specific matter if the Commission considers such a new or modified Reliability Standard appropriate to "carry out" section 215 of the FPA.[10] The Commission's action in this NOPR is based on its authority in accordance with section 215 of the FPA.

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8 NERC's petition and proposed standards are available on FERC's eLibrary system, by doing a docket search on RM13-19 and RM14-3. The petition is posted at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13364357; the attachments are found in separate files within eLibrary accession no. 20130930-5277.
NERC filed supplemental information on 12/17/2013; the filing is available at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13418800 . In addition, a separate file with links to the attachments to the NERC Petition is included in reginfo.gov and ROCIS.

9 Id at 4.

10 See 16 U.S.C. 824o(d)(5) (2006).

On August 14, 2003, a blackout that began in Ohio affected significant portions of the Midwest and Northeast United States, and Ontario, Canada (2003 blackout). This blackout affected an area with an estimated 50 million people and 61,800 megawatts of electric load.[11] The subsequent investigation and report completed by the U.S.-Canada Power System Outage Task Force (Task Force) concluded that a substantial number of lines disconnected when backup distance and phase relays operated under non-fault conditions. The Task Force determined that the unnecessary operation of these relays contributed to cascading outages at the start of the blackout and accelerated the geographic spread of the cascade.[12] Seeking to prevent or minimize the scope of future blackouts, both the Task Force and NERC made recommendations to ensure that these types of protective relays do not contribute to future blackouts.

In response to certain of these recommendations, NERC developed Reliability Standard PRC-023-1, which was approved by FERC in Order 733 on March 10, 2010. Order 733 also directed NERC to (1) make certain modifications to PRC-023-1, (2) develop a new Reliability Standard to address generator protective relay loadability, and (3) develop a new Reliability Standard addressing the issue of protective relay operation during stable power swings. This Final Rule[13] addresses NERC's proposal, submitted on September 30, 2013, to address the second part of Order 733.

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

The Final Rule approves a new Reliability Standard, PRC-025-1, governing generator relay loadability. According to NERC's filing and request for FERC approval:

> PRC-025-1 addresses generator Facilities protective relay loadability. The proposed Reliability Standard is designed to prevent generator tripping when conditions do not pose a direct risk to the generator and associated equipment and will reduce the risk of unnecessary generator tripping—events that increase the severity of disturbances.
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> Proposed PRC-025-1 requires Generator Owners, Transmission Owners, and Distribution Providers to apply an appropriate setting for load-responsive relays based on calculations or simulations for conditions established in Attachment 1 of the proposed Reliability Standard.[14]

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11 U.S.-Canada Power System Outage Task Force, Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations, (April 2004) (Final Blackout Report), available at http://www.ferc.gov/industries/electric/indus-act/reliability/blackout.asp.
12 *Id*. at 80.
13 The NOPR (issued 3/20/2014) is available on FERC's eLibrary at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13487725; a News Release is posted at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13488464.
14 NERC Petition at 4.

New Reliability Standard PRC-025-1 would require applicable entities to maintain records (e.g., in Measure M1 and Compliance section 1.2) subject to review by NERC or the Regional Entity[15] to ensure compliance with the Reliability Standard.

Reliability Standard PRC-025-1 Requirement R1 requires that "[e]ach Generator Owner, Transmission Owner, and Distribution Provider shall apply settings that are in accordance with PRC-025-1 – Attachment 1: Relay Settings, on each load-responsive protective relay while maintaining reliable fault protection...." PRC-025-1 has the following requirements for record creation and retention:

> M1. For each load-responsive protective relay, each Generator Owner, Transmission Owner, and Distribution Provider shall have evidence (e.g., summaries of calculations, spreadsheets, simulation reports, or setting sheets) that settings were applied in accordance with PRC-025-1 – Attachment 1: Relay Settings.
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> . . .
>
> C.1.2 Evidence Retention
>
> - The Generator Owner, Transmission Owner, and Distribution Provider shall retain evidence of Requirement R1 and Measure M1 for the most recent three calendar years.
> - If a Generator Owner, Transmission Owner, or Distribution Provider is found non-compliant, it shall keep information related to the noncompliance until mitigation is complete and approved or for the time specified above, whichever is longer.

Without this Reliability Standard (and its corresponding reporting and record retention requirements), the Bulk-Electric System would be at a greater risk of uncontrolled outages due to unnecessary generator tripping.

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

The Reliability Standard does not require any information to be submitted to the Commission. However, the Commission does support the use of improved technology in complying with the reporting and record keeping requirements of the standard.

The medium for reporting and recordkeeping requirements is not specified in PRC-025-1, so it is at the discretion of the entities.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED

15 The review (and retention of any audit records) by NERC or the Regional Entity is included in the overall reliability program oversight and monitoring burden under FERC-725 (OMB Control No. 1902-0225).

OR MODIFIED FOR USE FOR THE PURPOSE(S) 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 responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized.

In addition, as described more fully below, the ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders collaborating to develop and review draft standards, provide comments, and vote, with the final proposed standard submitted to the FERC for review and approval. During that process, duplication of data, if any, would be considered.
There are no similar sources of information available that can be used or modified for these reporting purposes.

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

In Order No. 693, the Commission adopted policies to minimize the burden on small entities, including approving the ERO compliance registry process to identify those entities responsible for complying with mandatory and enforceable Reliability Standards. The ERO registers only those distribution providers or load serving entities that have a peak load of greater than 25 MW and are directly connected to the bulk electric system or are designated as a responsible entity as part of a required under-frequency load shedding program or a required under-voltage load shedding program. Similarly, for generators, the ERO registers only individual units of greater than 20 MVA that are directly connected to the bulk electric system, generating plants with an aggregate rating of greater than 75 MVA , any blackstart unit material to a restoration plan, or any generator that is material to the reliability of the Bulk-Power System. Further, the ERO will not register an entity that meets the above criteria if it has transferred responsibility for compliance with mandatory Reliability Standards to a joint action agency or other organization.[16]

Detailed information regarding transferred responsibility options are available in NERC's Rules of Procedure at sections 507 and 508.[17]

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

16 To be included in the compliance registry, the ERO determines whether a specific small entity has a material impact on the Bulk-Power System. If these small entities should have such an impact then their compliance is justifiable as necessary for Bulk-Power System reliability.
17 Available at http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20140701_updated_20140602.pdf.

Protective relays are critical to ensuring the reliability of the Bulk-Electric System. The proposed information collection requirements are designed to monitor and ensure compliance with the proposed Reliability Standard. While less strict compliance requirements could be contemplated, the proposed requirements have been debated, vetted, and approved by industry prior to coming to FERC for approval and are designed to meet the purposes of the Reliability Standard. If anything less than these requirements were implemented, it would increase the risk of outages on the grid and diminish the ability of FERC to meet its mandated reliability mission.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to this information collection.

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

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders collaborating to develop and review draft standards, provide comments, and vote, with the final proposed standard submitted to the FERC for review and approval.[18]

In addition, each Commission rulemaking (both at the NOPR and Final Rule stages) is published in the Federal Register, thereby affording all public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collection of data. FERC issued an NOPR on 3/20/2014[19] requesting public comments. There were no comments on issues related to the Paperwork Reduction Act (PRA). Other

18 Details of the current ERO standard processes are available on the NERC website at http://www.nerc.com/comm/SC/Documents/Appendix_3A_StandardsProcessesManual.pdf.
19 The NOPR (79 FR 17077, 3/27/2014) is posted in FERC's eLibrary at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13487725; a News Release is available at http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13488464.

comments, not related to the PRA,[20] were supportive of the FERC's proposals and are addressed in the Final Rule; links to those comments are provided in footnote 20.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts have been made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The records that must be created and maintained for potential audit under Reliability Standard PRC-025-1 are generally not provided to the FERC. Instead, they are submitted to or retained for monitoring or audit by the "Compliance Enforcement Authority," as listed in the proposed PRC-025-1 Standard (NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards).

The Commission generally does not consider the data to be confidential; however there are provisions in 18 CFR § 385.112 that provide filers submitting any information to FERC with an opportunity to request confidential treatment.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE.

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20 The comments are available in FERC's eLibrary at:

- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13518208 (Mark Eliason)
- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13516767 (Daniel Shin)
- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13519850 (G. Wilkowski)
- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13520232 (NERC)
- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13527634 (Edison Electric Institute and Electric Power Supply Association)
- http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13527569 (Edison Electric Institute and Electric Power Supply Association), which states in part [footnote omitted] "Therefore, the Trades strongly support the Commission's proposal in the NOPR to approve the proposed Reliability Standards and all associated parts. EEI and EPSA believe that the Commission's proposal is responsive to the portion of the Order that it was intended to address. The Trades further commend NERC and the associated Drafting Team for their conscientious attention to detail ensuring only those relays which might negatively impact the reliability of the Bulk Electric System are addressed. This further ensures that complying entities can commit more of their time and resources to facilities critical for reliability. The Trades believe this completes the effort to address one of the last remaining concerns resulting from the 2003 Blackout Report. We also note the level of Industry support for the final versions of these two Reliability Standards noting a continued effort by the Industry to address difficult issues and concerns identified by the Commission, while finding technical solutions that reduce risk to the BES in ways that are effective and sensible."

IC Title	Responses	Time Burden (Hours)
Transmission Relay Loadability Mandatory Reliability Standard[21]	741	399,549
PRC-019-1 Reliability Standard	738	6,642
PRC-024-1 Reliability Standard	738	6,642
PRC-019-1 Reliability Standard (One-time)	738	5,904
PRC-024-1 Reliability Standard (One-time)	738	5,904
Current FERC-725G Total, pre-implementation of Final Rule in RM13-19	3,693	424,641

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

For this Final Rule in RM13-19, all of the PRA-related industry costs are related to burden hours and are addressed in #15; there are no PRA-related capital or start-up costs.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

Reliability Standard PRC-025-1 does not require any information to be filed with the Commission. The Regional Entities and NERC do most of the data processing, monitoring, auditing, and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0225) and is not part of this FERC-725G request. Therefore, the only costs to the Federal Government for the FERC-725G are those associated with PRA-related costs (e.g., researching and preparing estimates, requesting and maintaining clearance from OMB).

FERC-725G	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings	0	$0
Paperwork Reduction Act Administrative Cost[22]		$5,092

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

21 Includes both reporting and recordskeeping requirements.

22 The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings (not just this final rule in Docket No. RM13-19), and other changes to the collection.

NERC stated in its petition requesting FERC approval that the proposed standard "is designed to prevent generator tripping when conditions do not pose a direct risk to the generator and associated equipment and will reduce the risk of unnecessary generator tripping – events that increase the severity of the disturbance." NERC further stated that the proposed standard is intended to address the second part of the Commission's Order No. 733 directives, requiring development of a standard governing generator protective relay loadability.

In this Final Rule in RM13-19, the Commission approves Reliability Standard PRC-025-1 and revisions to PRC-023-2.[23] Reliability Standard PRC-025-1 will impose new requirements to set certain generator protective relays in accordance with prescribed criteria, and will apply to transmission owners, distribution providers, and generator owners with applicable relays. Affected entities will have to ensure that their relays are set in accordance with these criteria and maintain records or other evidence demonstrating their compliance with the standard's requirements.

Reliability Standard PRC-025-1 does not require responsible entities to file information with the Commission. However, the Reliability Standard requires applicable entities to develop and maintain certain information, subject to audit by NERC or a Regional Entity. In particular, transmission owners, generator owners and distribution providers must "have evidence" to show that each of its load-responsive protective relays is set according to one of the options in Attachment 1 to Reliability Standard PRC-025-1.

Our estimate below regarding the number of respondents is based on the NERC compliance registry as of January 31, 2014. According to the NERC compliance registry, NERC has registered 539 distribution providers, 903 generator owners and 344 transmission owners. However, under NERC's compliance registration program, entities may be registered for multiple functions, so these numbers incorporate some double counting. The number of unique entities[24] responding to the new Reliability Standard, PRC-025-1 is approximately 1,019[25] entities registered as a transmission owner, a distribution provider, or a generator owner that is also a transmission owner and/or a distribution owner.

The Commission estimates the annual reporting burden and cost related to the Final Rule in RM13-19 as follows:

23 The revisions to PRC-023-2 will result in a change in how relay settings are calculated for certain kinds of relays, but will not result in changes to reporting or recordkeeping requirements which are already covered under FERC-725G.

24 The calculation is made by eliminating the duplicative counting of respondents, affected by Reliability Standard PRC-025-1 and that serve in more than one role listed in the standard.

25 This estimate assumes all of the unique entities apply load-responsive protective relays.

FERC-725G, additions in Final Rule in RM13-19 and RM14-3						
	Number and Type of Respondents[26] (1)	**Annual Number of Responses per Respondent (2)**	**Total Number of Responses**	**Avg. Burden & Cost Per Response[27] (3)**	**Total Annual Burden Hours & Total Annual Cost (1)x(2)x(3)**	**Cost per Respondent**
(One-time) Review & documentation of relay settings to ensure compliance	1,019 GO/DP/TO	1	1,019	20 hrs. & $1,192.40	20,380 hours & $1,215,056	$1,192
(On-going) Record Retention (of compliance records for R1 and M1, for 3 years or until mitigation complete)	1,019 GO/DP/TO	1	1,019	2 hrs. & $57.90	2,038 hours & $59,000	$57.90

Averaging the one-time burden and cost (related to RM13-19) over Years 1-3 for the purposes of this PRA-related supporting statement gives an average cost and burden per year for Years 1-3 (for the total of 1,019 entities) of:

- burden of 8,831.33 hours [(20,380/3)+2,038]
- cost of $464,018.67 [($1,215,056/3)+ $59,000].

After Year 3, the one-time implementation burden and cost (occurring in Year 1 but being averaged over Years 1-3 here) would be removed from reginfo.gov and ROCIS, leaving total annual burden and cost of 2,038 hours and $59,000 for the 1,019 entities, for the burden and cost related to this final rule in RM13-19.

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26 GO = Generator Owner, DP = Distribution Provider, TO = Transmission Owner, each of whom applies load-responsive protective relays at the terminals of the Elements listed (in the Standard) at 3.2, Facilities.

27 The estimated hourly costs (salary plus benefits) are based on Bureau of Labor and Statistics (BLS) information (at http://bls.gov/oes/current/naics3_221000.htm#17-0000) for an electrical engineer ($59.62/hour for review and documentation), and for a file clerk ($28.95/hour for record retention).

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

FERC-725G	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses[28]	4,712	3,693	0	1,019
Annual Time Burden (Hr.)[29, 30]	433,472	424,641	0	8,831
Annual Cost Burden ($)	$0	$0	$0	$0

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

There is no data published in response to the subject Reliability Standard.

17. DISPLAY OF THE EXPIRATION DATE

The expiration date is displayed in a table posted on ferc.gov at http://www.ferc.gov/docs-filing/info-collections.asp.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use the data collected under the Reliability Standard for statistical purposes, as is described in the certification submitted with this collection to OMB for review.

28 Each of the 1,019 respondents has one-time burden (burden hours being averaged over Years 1-3 for this supporting statement), and each has ongoing burden.
29 Averaging the one-time burden and cost over Years 1-3 for the purposes of this PRA-related supporting statement (for the total of 1,019 entities)
30 The estimates for the additional burden and the new total include both one-time burden (averaged over Years 1-3) and ongoing burden.