

Supporting Statement
for the:

Electric Emergency Incident and Disturbance Report
OE-417
OMB NUMBER 1901-0288

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Office of Electricity Delivery and Energy Reliability
U.S. Department of Energy
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Supporting Statement for Form OE-417, Electric Emergency Incident and Disturbance Report OMB Number 1901-0288

The Department of Energy (DOE) is requesting a three-year approval for the Form OE-417, “Electric Emergency Incident and Disturbance Report.” The survey is designed to collect electric power emergency incidents and disturbances information.

Response to this survey is mandatory and the survey is sponsored by the Office of Electricity Delivery and Energy Reliability of DOE. The proposed form and instructions are included in this information collection request.

Since the previous approval in 2011, the form has been changed in the following ways:

- Streamlining data submissions by making the primary data collection mechanism the OE-417 website and removing email as a method for submitting OE-417 forms.
- In Alert criterion 4, restricting reporting to electrical islanding events of 100 MW or more, as this captures wide-area reliability events.
- In Line 4: Adding a clarification for respondents to identify the State and Counties impacted by the event and removing the Unknown checkbox
- In Line 8 and Line 9, adding a checkbox indicating zero demand impacted, and zero customers impacted
- In Line 20, a change of the question to provide the name of the assets which have been impacted during this event
- Removal of data collection elements in the current form of Line 21 and Line 22, as they are now captured through a more generic Line 20.

The information collection proposed in this supporting statement has been reviewed in light of applicable information quality guidelines. It has been determined that the information will be collected, maintained, and used in a manner consistent with the Office of Management and Budget (OMB), Department of Energy (DOE), and Energy Information Administration (EIA) information quality guidelines.

A.1 Legal Justification

The authority for the information collection is provided in the following provisions:

15 U.S.C. §772(b), of the Federal Energy Administration Act of 1974 (FEA Act), Public Law 93-275, outlines the types of individuals subject to the information collection authority delegated to the [Secretary] and the general parameters of the type of data which can be required. Section 772(b) states:

“All persons owning or operating facilities or business premises who are engaged in any phase of energy supply or major energy consumption shall make available to the [Secretary] such information and periodic reports, records, documents, and other data relating to the purposes of this Act, including full identification of all data and projections as to source, time, and methodology of development, as the [Secretary] may prescribe by regulation or order as necessary or appropriate for the proper exercise of functions under this Act.”

The functions of the FEA Act are set forth in 15 U.S.C. §764(b), of the FEA Act, which states that the Administrator shall, to the extent he is authorized by Section 764(a) of the FEA Act,

“(2) assess the adequacy of energy resources to meet demands in the immediate and longer range future for all sectors of the economy and for the general public;...

(9) collect, evaluate, assemble, and analyze energy information on reserves, production, demand, and related economic data;...

(12) perform such other functions as may be prescribed by law.”

As the authority for invoking Section 764(b) above, 15 U.S.C. §764(a), of the FEA Act in turn states:

“Subject to the provisions and procedures set forth in this Act, the [Secretary] shall be responsible for such actions as are taken to assure that adequate provision is made to meet the energy needs of the Nation. To that end, he shall make such plans and direct and conduct such programs related to the production, conservation, use, control, distribution, rationing, and allocation of all forms of energy as are appropriate in connection with only those authorities or functions:

(1) specifically transferred to or vested in him by or pursuant to this Act;...

(3) otherwise specifically vested in the Administrator by the Congress.”

Additional authority for this information collection is provided by 15 U.S.C. §790a of the FEA Act, which states that the Administrator:

“...[Shall] establish a National Energy Information System...[which] shall contain such information as is required to provide a description of and facilitate analysis of energy supply and consumption...

(b) ...the System shall contain such energy information as is necessary to carry out the Administration's statistical and forecasting activities..., and such energy information as is required to define and permit analysis of-

(1) the institutional structure of the energy supply system, including patterns of ownership and control of mineral fuel and nonmineral energy resources and the production, distribution, and marketing of mineral fuels and electricity;

(2) the consumption of mineral fuels, nonmineral energy resources, and electricity by such classes, sectors, and regions as may be appropriate for the purposes of this Act;

(3) the sensitivity of energy resource reserves, exploration, development, production, transportation, and consumption to economic factors, environmental constraints, technological improvements, and substitutability of alternate energy sources; . . .

(5) industrial, labor, and regional impacts of changes and patterns of energy supply and consumption...”

An additional authority for invoking Section 790(a) of the FEA Act above for this information collection is provided by the Public Utility Regulatory Policies Act of 1978 (16 U.S.C. 2601) which states:

The Congress finds that the protection of the public health, safety, and welfare, the preservation of national security, and the proper exercise of congressional authority under the Constitution to regulate interstate commerce require - . . .

“(2) a program to improve the wholesale distribution of electric energy, the reliability of electric service, the procedures concerning consideration of wholesale rate applications ... the participation of the public in matters ... and to provide other measures with respect to the regulation of the wholesale sale of electric energy, ”

A.2 Needs and Uses of Data on the Electric Power Industry

The electric power industry¹ in the United States currently consists of traditionally regulated entities² (also known as electric utilities), as well as non-traditional participants that include unregulated entities³ and electric power marketers. At the end of 2012, there were 2,924 traditionally regulated and unregulated entities and retail electric power marketers.⁴ However, the physical operation of the entire electrical system is handled by 107 balancing authorities⁵ located within the United States.⁶

The Form OE-417 reports will enable DOE to monitor electric emergency incidents and disturbances in the United States (including all 50 States, the District of Columbia, Puerto Rico, U.S. Virgin Islands, and the U.S. Territories). The information will assist the Government by helping to prevent the physical or virtual disruption of the operation of the electrical energy critical infrastructure.

Currently, DOE's Office of Electricity Delivery and Energy Reliability (OE) uses Form OE-417, "Emergency Incident and Disturbance Report," to monitor major system incidents on electric power systems and to conduct after-action investigations on significant interruptions of electric power. The information is used to meet DOE national security responsibilities and requirements

¹ Collectively, the industry owned and operated 1,025 gigawatts of generating capability, produced over 3.9 trillion kilowatthours of electricity, and earned revenues of \$353 billion during 2009. In addition, the industry consumed 934 million tons of coal, 67 million barrels of oil products and 7.1 trillion cubic feet of natural gas making the industry the single largest consumer of fossil fuels.

² A regulated entity is a corporation, person, agency, authority, or other legal entity or instrumentality that is regulated by Federal, State, or local regulatory bodies and owns and/or operates facilities for the generation, transmission, distribution, or sale of electric energy. Included are entities that provide electricity within a designated franchised service area and file forms listed in the Code of Federal Regulations, Title 18, Part 141. Note: Facilities that qualify as cogenerators or small power producers under the Public Utility Regulatory Policies Act (PURPA) are not considered regulated entities.

³ An unregulated entity is defined as a corporation, person, agency, authority, or other legal entity or instrumentality that is not regulated by Federal, State, or local regulatory bodies and is involved in the electric power industry. Unregulated entities include qualifying cogenerators, qualifying small power producers, and other generators (including independent power producers). Included are entities without a designated franchised service area and do not file forms listed in the Code of Federal Regulations, Title 18, Part 141.

⁴ U.S. Energy Information Administration Form EIA-861, 2012, tables: utility_data_2012, balancing_authority_2012, <http://www.eia.gov/electricity/data/eia861/index.html>

⁵ North American Electric Reliability Corporation, Compliance Registry of Balancing Authorities November 2014: http://www.nerc.com/pa/comp/Registration%20and%20Certification%20DL/NERC_Compliance_Registry_Matrix_Excel20141126.xls

⁶ These Reliability Authorities operate under the oversight of the North American Electric Reliability Corporation (NERC) and cover all of the United States and Canada along with a small part of Mexico. The operational and planning standards for the balancing authorities are established and overseen by NERC and the Federal Energy Regulatory Commission (FERC) under 16 USC 824o, commonly referred to as Section 215 of the Federal Power Act.

contained in the National Response Framework.⁷ The information may also be used in developing legislative recommendations and reports to Congress; and coordinating Federal efforts regarding activities such as incidents/disturbances in critical infrastructure protection; continuity of electric industry operations; and the continuity of operations of the government.

The information submitted may also be used by the Department's Office of Energy Policy and System Analysis and the Energy Information Administration to analyze significant interruptions of electric power.

A.2.1 Overview of Data Uses

The Form OE-417 alerts DOE to electrical emergency incidents and disruptions. The ability of the Department to quickly respond to energy emergencies that may impact the nation's infrastructure and to help alleviate or prevent further disruptions is dependent on the prompt response to this data requirement. As such, the timely initial filing of Schedule 1 of this form is of paramount importance.

Emergency electric incidents and disturbances leading to interruptions of power, such as rotating blackouts, could lead to disruptions of critical infrastructures such as natural gas or petroleum product pipelines, petroleum refineries, water supplies, and telecommunications systems. The national security, economic prosperity, and social well-being of the nation depends on the continuing reliability of our increasingly complex and interdependent infrastructures, the key one of which is electric power.

A unique characteristic of electric power is that it cannot be stored for future use.

Electric energy suppliers, therefore, must build and maintain generating and transmission facilities capable of meeting the demand levels for electric power at all times. Tracking disturbances that impact the integrated generating and transmission facilities is an important Federal task along with examining issues associated with insufficient capacity reserves. (This form does not track or monitor planned generating power plant units' outages.)

The rapid evolution of information technology in the electric power industry has national security implications due to the interdependent networks of physical and information infrastructures. Information technology has changed the way the Nation's business is transacted, the way government operates, and the way government addresses national security. The Form OE-417 is the critical alert mechanism for informing DOE of electrical emergency incidents or disturbances so the physical and virtual disruption of the operation of any critical infrastructure

⁷ National Response Framework (NRF) is now administrated by the Department of Homeland Security and DOE is responsible for Emergency Support Function – 12 (ESF-12), Energy under the NRF.

can be prevented.

Form OE-417 and Projected Impacts from Changing Industry

The Form OE-417 was last revised in 2011 and many changes that have occurred in the electric power industry since the forms last renewal. The industry is still undergoing changes and DOE will watch for any systemic alteration in electrical system control and oversight. The industry has established a training and certification process which has switched the industry from the historical control area concept of physical system oversight to one in which various authorities (operation, balancing, scheduling, etc.) handle the former responsibilities. The North American Electric Reliability Corporation (NERC) released version 5 of its Reliability Functional Model in May of 2010. The NERC Reliability Functional Model provides a framework for how the NERC Reliability Standards are developed, administered and enforced.

Currently, the Form OE-417 is designed to identify and track emergency incidents from:

- Entities that have Balancing Authorities (BA) and/or regional Reliability Coordinator (RC) functions. They are responsible for the physical operations and reliability coordination.
- All electric utilities' physical and electronic security, suspected, malicious, or intentional threats.

Form OE-417 reports will enable DOE to monitor electric emergency incidents and disturbances so the Government may help prevent the physical or virtual disruption of the operation of any critical infrastructure.

A.2.2 Overview of Data Collection

The Form OE-417 cannot follow a scheduled reporting date, since the reporting requirement is driven by actual or projected disturbance incidents that do not happen on a regular recurring basis.

Reporting coverage for the Form OE-417 includes all 50 States, the District of Columbia, Puerto Rico, the U.S. Virgin Islands, and the U.S. Territories. DOE is maintaining the reporting functions for electric utilities, BA, and RCs. Incident events reporting, such as suspected or actual threats, vandalism, and/or cyber-attacks or total loss of power, would be required for all respondents. However, it is the expectation that very few, if any, reports would be filed in any given year from most respondents. In addition, there are 119 entities - NERC established BA⁸

⁸ There are 107 Balancing Authorities (BA) in the contiguous United States. Balancing Authorities are a defined NERC Functional Entity and is defined by NERC The responsible entity that integrates resource plans ahead of time, maintains load-interchange-generation balance within a Balancing Authority Area, and supports Interconnection frequency in real time.

and RC⁹ that are responsible for the physical operations and reliability coordination of these business entities that will file the form. All of these functions are located within existing electric utilities or in those business entities that were established by the Federal Energy Regulatory Commission (FERC).

The entities that have BA responsibilities are considered the primary filer of this form. However, they do need information on individual load and counts of customers lost that come from the electric utilities found within their area. (Many of these electric utilities are full requirement or partial requirement customers of other electric utilities - that is, they do not generate, but receive their power under one or more contracts; which are usually long-term agreements). DOE would welcome any joint filing activity where the BA and these electric utilities file a combined report or all information passed to the BA who then files a single report. An example of this activity would be cooperative power suppliers (generating and transmission) filing for their member distribution cooperatives. Another would be joint filings by BA and the controlling RC. DOE requests that it be notified of those that plan to file jointly and of those electric utilities that want to file separately. (Notification can be done at the time of the filing.)

DOE will continue to have the option to conduct special investigations of incidents affecting the electric power industry. Such investigations could involve one or more electric utilities or BA or other entities participating in the electric power industry. Any utility or business entity that participates in the electric power industry could be notified by DOE that they would need to provide technical information concerning a particular incident.¹⁰ These special investigations are infrequent and reports are released to the public.¹¹

The following information to be collected on emergency events includes important variables covering each major part of an electric power disturbance incident:

⁹There are 12 Reliability Coordinators within the contiguous United States. The Reliability Coordinator is the entity with the highest level of authority and who is responsible for the reliable operation of the Bulk Electric System, has the Wide Area view of the Bulk Electric System, and has the operating tools, processes and procedures, including the authority to prevent or mitigate emergency operating situations in both next-day analysis and real-time operations. The Reliability Coordinator has the purview that is broad enough to enable the calculation of Interconnection Reliability Operating Limits, which may be based on the operating parameters of transmission systems beyond any Transmission Operator's vision.

¹⁰ The Federal Energy Administration Act of 1974 (Pub. L. No. 93-275) and the DOE Organization Act (Pub. L. No. 95-91) provide other authorities.

¹¹ The Department of Energy has initiated four special studies about incidents that happened in the 1990s. The three studies are: *The Cold Weather Snap of 1992*, *The Electric Power Outages in the Western United States, July 2-3, 1996* (DOE/PO-0050), and the *Report of the U.S. Department of Energy's Power Outage Study Team* (DOE/PO - March 2000 Final Report); and the *Final Report on August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations*, April 2004

- 1) Types of major emergency (i.e., physical attack, cyber-attack, transmission system interruption, generation inadequacy, distribution system interruption, and other),
- 2) Cause(s) of incident (i.e., complete electrical system failure, electrical system separation – islanding, inadequate electric resources to serve load, actual or suspected attack : physical, cyber/computer/telecom, or vandalism, transmission equipment, loss of high voltage transmission substation/switchyard, weather or natural disaster, operator action, fuel supply deficiency, , unknown causes, and other), and
- 3) Actions taken (i.e., shed firm load, reduced voltage, made public appeals, implemented a warning, alert, or contingency plan, shed interruptible load, repaired/restored, other).

Uses of Data:

The information is used by the Department of Energy:

- a) To track, on a timely basis, electrical emergency incidents and disturbances;
- b) To answer queries from the Congress, other Federal and State agencies, the electric power industry, and the general public;
- c) To monitor the electric power industry's health;
- d) As input to Office of Electricity Delivery and Energy Reliability's Electric Disturbance Events (OE-417) Annual Summaries¹²;
- e) As input to the Energy Information Administration's Electric Power Monthly's Appendix B Major Disturbances and Unusual Occurrences¹³; and
- f) To identify incidents that may require a technical examination of the underlying problems that lead to the event.

Publication data users include electricity-related trade associations; independent system operators; electric utility companies; unregulated power companies; energy service providers; wholesale electricity traders; electrical equipment companies; numerous local, State, and Federal government agencies; environmental associations; consumer groups; financial analysts; and the news media.

¹² The Annual Summary of the OE-417 events is available at:

https://www.oe.netl.doe.gov/OE417_annual_summary.aspx

¹³ Electric Power Monthly, Appendix B. Major Disturbances and Unusual Occurrences:

<http://www.eia.gov/electricity/monthly/>

A.3 Use of Technology and Reduction of Burden

DOE introduced an online version of the OE-417 form in January 2011 to give respondents an electronic reporting option. Since 2011, the online data system has been consistently updated and now features the ability for form respondents to completely manage and tailor their OE-417 form submission process to meet their unique needs. The 2014 recertification proposes that DOE will no longer accept normal form submissions via-email to more efficiently manage information submitted.¹⁴

The system features the ability to generate email notifications upon form submission to respondents defined by the system user, as well as ability to submit forms to the North American Electric Reliability Corporation and the Electricity Sector Information Sharing and Analysis Center (ES-ISAC) to meet NERC Reliability Standard requirements.

The online system has been upgraded in the past year to support the ability of companies to manage all respondents from a single organization, in that, one company can have a user account for each individual responsible for filling out the OE-417 form, with each user account under an organization account. The organization can then have total visibility of all forms previously submitted and in-process of being drafted.

DOE has posted the Form and Instructions on the web sites of the Office of Electricity Delivery and Energy Reliability (OE) and the Energy Information Administration (EIA).

A.4 Efforts to Reduce Duplication

Analysis of Similar Existing Information

DOE has determined that other sources cannot replace or approximate the information's timeliness or coverage of the current form OE-417.

The Federal Energy Regulatory Commission (FERC) has certified the North American Electric Reliability Corporation (NERC) to operate as the Electricity Reliability Organization under the Federal Power Act.¹⁵ FERC approved NERC Reliability Standard NERC Standard EOP-004-2,

¹⁴ In the event of a complete system failure or maintenance outage, respondents would still be able to submit forms via fax or phone to the Department of Energy Emergency Operations Center, which operates 24 hours a day, seven (7) days a week, and 365 days a year.

¹⁵ 16 U.S.C. 824o Electric Reliability

Event Reporting¹⁶ that requires entities under its jurisdiction to submit either an OE-417 or an EOP-004-2 Event report on the occurrence of an event.¹⁷

The information collected on EOP-004-2 is the minimum subset information necessary for NERC to complete its Reliability Oversight mission. Unfortunately, the EOP-004-2 Attachment 2 form does not collect the specific information collected on events under the current Form OE-417. DOE collects data to support both notification of the Secretary of Energy emergency energy events as well to support emergency response and restoration activities under the FEMA Emergency Support Function 12 – Energy. FERC collects data to support regulatory and compliance activities under its jurisdiction. Additionally, entities are not required to submit EOP-004-2 Attachment 2 forms to the Department of Energy, thus creating a situational awareness gap for Federal Entities if Form OE-417 was not recertified. Given DOE’s non-regulatory role in emergency support and FERC’s regulatory role in compliance with reliability standards, respondents may not provide complete information if there is not an established regulatory safe harbor provision. Finally, NERC has not publicly released system disturbance data collected under EOP-004-2 since approximately 2009.¹⁸ NERC stopped publicly reporting the system disturbance event reports that they received in 2009. The event history (from 1992 to 2009) can be found at the bottom of this page under System Disturbance Reports:

<http://www.nerc.com/pa/rrm/ea/Pages/EA-Program.aspx>

The Form OE-417 is the critical alert mechanism for informing DOE about electrical emergency incidents or disturbances so the physical and virtual disruption of the operation of any critical infrastructure can be prevented. DOE officials address the information reported on a real-time basis. They inform policymakers and others about the significance, as appropriate. Form EIA-930 collects data on the operations of balancing authorities across the US. The posted data are used to monitor the current status and trends of the electric power industry, and to support enhancement of electric system operations. The data collected on the OE-417 form are on discrete system events, such as physical attacks, electrical islanding, and losses of electricity customers which would not be captured on Form EIA-930 hourly submissions.

A.5 Provisions for Reducing Burden on Small Businesses

The DOE is mindful of the need to minimize burden on small business and, to that end, designs its information collections so that small operations are not unduly affected. The reporting entities for the OE-417 are expected to include no small businesses.

¹⁶ EOP-004-2, Event Reporting, <http://www.nerc.com/layouts/PrintStandard.aspx?standardnumber=EOP-004-2&title=Event%20Reporting&jurisdiction=United%20States>

¹⁷ FERC Form 725-A, <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13350054>

¹⁸ NERC System Disturbance Reports (at the bottom): <http://www.nerc.com/pa/rrm/ea/Pages/EA-Program.aspx>

A.6 Consequences of Less-Frequent Reporting

DOE needs to be informed of all electric power disturbances and incidents meeting the threshold levels identified earlier so that it can take appropriate actions. Less frequent reporting will not provide the Federal government with the information it needs to fulfill its mandates.

The rapid evolution of information technology in the electric power industry has national security implications due to the interdependent networks of physical and information infrastructures.¹⁹ Information technology has changed the way the Nation's business is transacted, the way government operates and the way government addresses national security.

The Form OE-417 is the critical alert mechanism for informing DOE about electrical emergency incidents or disturbances so the physical and virtual disruption of the operation of any critical infrastructure can be prevented. DOE officials address the information reported on a real-time basis. They inform policymakers and others about the significance, as appropriate.

The OE-417 provides important real-time alert information to DOE, trend information, and is used in historical publications. The information on Schedule 2 of the OE-417 form collects detailed information on system events, including specific locations of events (such as specific transmission circuits or substations impacted) or the sequence of events (for a physical attack event). This specific data would not be collected within the form EIA-930 data collection, which focuses on automated data collection of system operating data on a wide-area basis.

A.7 Compliance with 5 CFR 1320.5

The data are being collected consistent with the guidelines in 5 CFR 1320.5, except for requiring respondents to initially report information soon after an incident or disturbance. See items A.2 and A.6 for justification for timing of reporting. A final report is due up to 72-hours after an initial report to DOE.

A.8 Summary of Consultations outside the Agency

List of Respondents and Comments to Federal Register Consultation Notice Received in Response to Federal Register Vol. 79, No. 178 Monday, September 15, 2014

¹⁹ Emergency electric incidents and disturbances leading to interruptions of power, such as rotating blackouts, could lead to disruptions of critical infrastructures such as natural gas or petroleum product pipelines, water supplies, and telecommunications systems. The national security, economic prosperity and social well-being of the nation depends on the continuing reliability of our increasingly complex and interdependent infrastructures, a key one of which is electric power.

Table 1: List of Commenters

Numbe	Commenter	Affiliation	Acronym	Date
1	Federal Energy Regulatory Commission	Federal	FERC	10/01/2014
2	North American Electric Reliability	Non-Profit	NERC	10/21/2014
3	Utility Services, Inc.	Industry	UtilitySvcs	11/04/2014
4	Chelan County Public Utility District	Industry	Chelan	11/04/2014
5	Portland General Electric	Industry	PGE	11/13/2014
6	SNL Energy	Industry	SNL	11/14/2014
7	U.S. Bureau of Reclamation ²⁰	Federal	USBR	11/19/2014

Categories of Comments

Form OE-417

Specific Issues of Concern

- I. Proposal to collect Schedule 2 data under CIPSEA
- II. Proposal to Streamline data collection through OE-417 Online System
- III. Enhancements to Data Collection Criteria
- IV. Other Comments

I. Proposal to Collect Schedule 2 data under CIPSEA

Proposal

In the Federal Register Notice issued on September 15, 2014, OE proposed to collect data on Schedule 2 of form OE-417 under the Confidential Information Protection and Statistical Efficiency Act (CIPSEA) of 2002.

Comments

1. FERC, NERC, UtilitySvcs, and SNL provided comments on the proposal to collect Schedule 2 data under CIPSEA.
2. FERC questioned if NERC would still receive submissions of Schedule 2 data if Schedule 2 was protected under CIPSEA. NERC questioned if entities using the online system would still be able to voluntarily choose whether to share Schedule 2 data under CIPSEA to fulfill their mandatory reporting obligation to NERC under Reliability Standard EOP-004-2. UtilitySvcs questioned if the proposed changes to Schedule 2 would remove the ability of respondents to email forms to a list of designated contacts upon the submission

²⁰ Comments submitted by the U.S. Bureau of Reclamation were submitted beyond the closing date of the Federal Register Notice of 11/14/2014. However, these comments are included as they propose non-material changes.

of the form to DOE. SNL questioned the legality and practicality of applying CIPSEA to only a portion of the form as data collected on Schedule 2 has been subject to public records requests for nearly 14 years.

3. SNL believes it is in the public interest to have all the relevant details, with appropriate redactions to protect propriety and law enforcement concerns, available.

Response

4. DOE has decided not to pursue protection of Schedule 2 data under CIPSEA at this time. DOE is intends to protect Schedule 2 data as previously approved by OMB.
5. Maintaining the current data protection for Schedule 2 will allow respondents to voluntarily choose to share data with NERC to fulfil mandatory reporting obligations. This removes the potential administrative workflow problem of utilities completing an OE-417 form, and taking a separate action of emailing the form directly to NERC to satisfy mandatory reporting obligations.
6. Respondents will maintain the option to share completed OE-417 forms with designated lists of contacts.

II. Proposal to streamline data collection through OE-417 Online System

Proposal

7. In the Federal Register Notice issued on September 15, 2014, OE proposes to streamline data collection activities by focusing the vast majority of respondents to register and use the Online OE-417 data collection system.
8. If the system is unavailable or respondents are unable to access the system due to a network problem, respondents would be able to submit forms via Fax or Phone should an incident occur.

Comments

9. Chelan comments that it would prefer for DOE to continue to allow OE-417 form submissions via email or as an alternative it should consider development of an XML web interface to facilitate automated responses.

Response

10. DOE proposes to remove email submissions as available OE-417 form submission method as it encourages users to use the online data system to manage and track their submissions over time. The system allows for better user control of data submitted and allows DOE

greater internal control and distribution of data collected.

11. Each form which is currently submitted through alternative methods (email, phone, and fax) is batch uploaded to the online system on a weekly basis, as the system allows for better long term storage, management, analysis, and tracking of submissions for both administrators (OE) and system users (respondents).
12. DOE agrees that it will continue to evaluate new and improved methods to collect OE-417 data which reduce burden on survey respondents and increase efficiency and maintain current data security policies.
13. From the period of 2012 through 2014, Chelan has submitted one event using the online OE-417 system.

III. Enhancements to Data Collection Criteria

Proposal

14. In the Federal Register Notice issued on September 15, 2014, OE did not propose to change any form filing requirements for form OE-417.

Comments

15. PGE comments that there is currently no threshold for reporting electrical islanding events. PGE has experienced situations that required one hour Emergency Alert reporting on inconsequential islanding situations such as when a small (0.3 MW) electrical island was formed to allow Department of Forestry personnel to clear trees damaged in a wildfire. This island had no impact on the reliability of the greater electric system.
16. PGE proposes to add a threshold to Criterion number 4 to eliminate the need to report inconsequential, non-emergency events.
17. PGE bases its proposal on the NERC Event Analysis Process²¹ which requires the reporting of islanding events of 100MW or more.²²

Response

18. DOE agrees with PGE proposal to restrict reporting on criterion 4 to islanding events of 100 MW or more, as this captures wide-area reliability events.
19. Updates have been made to both the OE-417 form and OE-417 instructions to ensure data collection only capture electrical islanding events of large, wide-spread nature.

²¹ Version 2 of the NERC Event Analysis Process is available at: http://www.nerc.com/pa/rmm/ea/EA%20Program%20Document%20Library/Final_ERO_EA_Process_V2.1.pdf

²² The lowest level for reporting an electrical system separation (island) is Category 1e:

1.e. Unintended BPS system separation that results in an island of 100 MW to 999 MW. Excludes BPS radial connection, and non-BPS (distribution) level islanding.

IV. Other Comments

Proposal

20. In the Federal Register Notice issued on September 15, 2014, OE proposed minor edits to the form and instructions of the OE-417 form.

Comments

21. USBR proposed two minor typographical changes to the of the OE-417 form. USBR proposed changes to the Methods of Filing response instructions at the top of the OE-417 form and indicated a typographical error in the Specific Instructions section of the OE-417 instructions.

Response

22. DOE has corrected the typographical errors in the OE-417 form and the OE-417 instructions as identified.

A.9 Payments or Gifts to Respondents

No payments or gifts are made to the respondents.

A.10 Provisions for Confidentiality of Information

The information reported on Schedule 1 will be considered “public information” and may be publicly released in company or individually identifiable form.

Information on Schedule 2 of the form will not be disclosed to the public to the extent that it satisfies the criteria for exemption under the Freedom of Information Act (FOIA), 5 U.S.C. § 552, the DOE regulations, 10 C.F.R. § 1004.11, implementing the FOIA, and the Trade Secrets Act, 18 U.S.C. § 1905.

In accordance with the Federal Energy Administration Act, the DOE provides company-specific protected data to other Federal agencies when requested for official use. The information reported on this form may also be made available, upon request, to another component of DOE; to any Committee of Congress, the U.S. General Accountability Office, or other Federal agencies authorized by law to receive such information. A court of competent jurisdiction may obtain this information in response to an order. The information may be used for any non-statistical purposes such as administrative, regulatory, law enforcement, or adjudicatory purposes.

The data collected on Form OE-417, Electric Emergency Incident and disturbance Report, will be used by DOE to meet its overall national security and National Response Framework responsibilities.

A.11 Justification for Sensitive Questions

There are no questions of a sensitive nature.

A.12 Estimate of Respondent Burden Hours and Cost

Training Assumptions:

- 2,924 Respondents – 12 U.S. reliability coordinators, 107 balancing authorities, and 2,924 regulated utilities.
- Year 1 to 3 – 2.0 hour refresher training (to include training on the on-line form) per BA/RC and utility respondent; 5,848 hours over each year.
- Total training time per year – 5,848 hours

Table 2: Estimated Training Hours Assumptions

Total Number of Potential Respondents	Total Training Hours Per Respondent	Total Estimated Training Hours
2,924	2.0	5,848

Reporting Assumptions:

- 300 Reports per year –The burden assumed in 2011 OMB submission was 300 reports annually. Based on the level of actual reporting (196 events in 2012, 174 events in 2013, and 110 events through May 2014) the burden estimate has been calculated at 300 reports annually to accommodate normal, possible updates, and final filings for events.
- Schedule 1 - 300 reports x 10 minutes = 3,000 minutes or 50 hours
- Schedule 2 - 300 reports x 2 hours = 600 hours
- Schedule 2 Follow-up (additional follow-up for significant reports) – 25 respondents; 25 reports x 1 hour = 25 hours
- Annual total for actual responses = 675 hours per year
- Notifications to DOE about suspected or actual criminal actions (cyber-attacks, threats, vandalism) are not considered accountable burden events. DOE has general and specific obligations for national security and law enforcement actions/support under various Presidential Directives, memorandum of agreements and inter-agency understandings.

Table 3: Reporting Assumptions

Estimated Number of Reports	Estimated hours for Schedule 1	Estimated hours for Schedule 2	Follow Up hours	Annual total hours for actual responses
300	50	600	25	675

Using the above estimates, the average estimated annual burden with training estimates, per year, is estimated to be 6,523 hours annually (5,848 Total estimated training hours + 675 annual total hours for actual responses) =6,523).

Table 4: Burden Summary Table

Annual Number of Responses	Total Estimated Training Hours	Annual total hours for Responses	Annual Burden Hours	Average Cost per Hour	Estimated Annual Cost to Respondents
300	5,848	675	6,523	\$69.33	\$452,240

The estimated annual cost to all combined respondents of the reporting burden is estimated to be \$452,240.

An average cost per hour of \$69.33 is used because that is the average loaded (salary plus benefits) cost for a DOE employee. DOE assumes that the survey respondent workforce completing Form OE-417 is comparable with the DOE workforce.

A.13 Annual Reporting and Record Keeping - Cost

There are no capital or start-up cost components associated with this data collection for reporting and record keeping. The information is maintained in the normal course of business within the Office of Electricity Delivery and Energy Reliability. Therefore, other than the cost of burden hours there are no additional costs for annual reporting and record keeping. Table 5 presents and Estimate for the number of hours Reporting and Record keeping, while Table 6 provides the Estimated costs for the Estimated hours in Table 5.

Table 5: Estimated Hours for Reporting and Recordkeeping

	Annual Estimated Hours for Reporting²³	Annual Estimated Hours for Recordkeeping²⁴
2011 Estimate ²⁵	--	--
2014 Estimate	30	24

²³ This activity is undertaken in the normal course of business within the Office of Electricity Delivery and Energy Reliability

²⁴ This activity is undertaken in the normal course of business within the Office of Electricity Delivery and Energy Reliability

²⁵ Estimates for these activities were not provided in the 2011 Supporting Statement submission

Table 6: Estimated Costs for Reporting and Recordkeeping

Reporting and Recordkeeping Costs	2011 Estimate	2014 Estimate
-- Annual Cost for Reporting	Activity covered by normal course of OE business	Activity covered by normal course of OE business
-- Annual Cost for Recordkeeping	Activity covered by normal course of OE business	Activity covered by normal course of OE business
Annual Reporting and Record Keeping Costs	\$0	\$0

A.14 Annual Cost to the Federal Government

The annual costs, including personnel, for development/maintenance, collection, processing, analysis, and publication are estimated to be approximately \$150,000 annually. Table 7 provides a comparison of 2011 Costs to 2014 costs, while Table 8 provides an overview of estimated hours for various Survey management functions, including System Development, Maintenance, and Support of the OE-417 online system (which includes processing and helping users address system issues), Project Management of Online System projects, and Annual Form follow-up hours.

Table 7: Comparison of 2011 Cost Estimate to 2014 Cost Estimate

Annual Cost to the Federal Government	Estimate
2011 Cost Estimate	48,000
2014 Cost Estimate	\$162,000

Table 8: Estimated Hours for Survey Functions

	OE-417 System Development Maintenance, and Support Hours	Project Management of Online System Projects²⁶	Annual Form Follow-up Hours²⁷
2011 Estimate	--	--	25
2014 Estimate	1,280	40	25

²⁶ This activity is undertaken in the normal course of business within the Office of Electricity Delivery and Energy Reliability

²⁷ This activity is undertaken in the normal course of business within the Office of Electricity Delivery and Energy Reliability

Table 9: Estimated Annual Burden Accounting

Operations and Maintenance	2011 Estimate	2014 Estimate
-- Form submission follow-up	Activity covered by normal course of OE business	Activity covered by normal course of OE business
-- Online System Development, Maintenance, and Support	Activity covered by normal course of OE business	\$150,000 ²⁸
-- Online System Project Management / Oversight	Activity covered by normal course of OE business	Activity covered by normal course of OE business
-- Online System Hosting	Activity covered by normal course of OE business	\$12,000
-- Other Costs (<i>not accounted for above</i>)	\$48,000	<i>Not applicable</i>
Total Costs to Federal Government	\$48,000	\$162,000

A.15 Changes in Burden

The total respondent community burden has decreased by 704 from 7,227 hours to 6,523 hours since the 2011 submission due to a decrease in survey respondents from the 2011 recertification. The estimated number of reports has stayed consistent at approximately 300 submissions annually and DOE continues to estimate that it will take 10 minutes to account for additional data some respondents report in the first filing of the report. This estimated time for Schedule 1 is (10 minutes) is consistent with the 2011 recertification of Form OE-417.

²⁸ This task is performed by contractor support.

Table 10: Changes in Burden

Category	2011 Recertification	2014 Recertification	Difference due to Adjustment	Difference due to Program Change
Potential Respondents	3,276 respondents	2,924 respondents	-352 respondents	N/A
Reports	300 reports	300 reports	No change	N/A
Training Hours	6,552 hours	5,848hours	-704 hours	N/A
Schedule 1 Hours	50	50	No Change	N/A
Schedule 2 Hours	600	600	No Change	N/A
Schedule 2 follow-up hours ²⁹	25	25	No Change	N/A
Total Estimated Hours	7,227 hours	6,523 hours	-704 hours	N/A

A.16 Collection, Tabulation, and Publication Plans

Table 11: Proposed Electric Power Data Collection by Schedule

Form	Mailing Date	Form Due Date	Elements Collected
OE-417, Schedule 1	Per critical incident	1 hour after incident	Emergency alert check-off
OE-417 Schedule 1	Per other types of Incidents	6 hour after incident	Normal alert check-off
OE-417 Schedule 1	As changes to critical information become available	After initial submission of Schedule 1 as necessary	Update check-off
OE-417, Schedule 1 and 2	Per incident	72 hours after incident	Final report check off and Narrative details - more detailed estimates of impact and any attachments

²⁹ See Table 3, Reporting Assumptions.

Table 12: Publication Plans

Form	Elements Published
OE-417, Schedule 1	<p>The elements to be published on the Office of Electricity Delivery and Energy Reliability’s Electric Disturbance Events (OE-417) Annual Summaries page are the following:</p> <ol style="list-style-type: none"> 1. Date Event Began 2. Time Event Began 3. Date Final Report Received / Event Ended 4. Time Final Report Received / Event Ended 5. Respondent Name 6. Area Affected (County/ Counties) 7. Area Affected (State / States) 8. North American Electric Reliability Corporation Region 9. Event Type 10. Event Sub-classification 11. Demand Loss 12. Peak Customers Affected
OE-417, Schedule 1	<p>The elements to be published in the <i>Electric Power Monthly</i> are: geographical location by State, company name, amount of demand (load) lost, count of customers affected, time and date of incident, length of incident until restoration (amount of time), and type of emergency.</p>

A.17 OMB Number and Expiration Date

The OMB number and expiration date will be displayed on the form.

A.18 Certification Statement

OE-417 meets all certification requirements of the "Certification for Paperwork Reduction Act Submissions," of OMB Form 83-I.