

Supporting Statement for  
**FERC-545A (Gas Pipeline Rates: Rate Change Non-Formal, in RM96-1-038)<sup>1</sup> and  
FERC-549C (Standards for Business Practices of Interstate Natural Gas Pipelines),  
as revised by NOPR in Docket No. RM96-1-038**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve changes to FERC-549C (Standards for Business Practices of Interstate Natural Gas Pipelines) and (new, temporary collection number) FERC-545A (Gas Pipeline Rates: Rate Change Non-Formal, in RM96-1-038),<sup>1</sup> as stated in the NOPR (Notice of Proposed Rulemaking) in Docket No. RM96-1-038.

Please note that this NOPR in Docket No. RM96-1-038 affects two separate OMB Control Numbers:

1. FERC-545A (Gas Pipeline Rates: Rate Change Non-Formal, in RM96-1-038),<sup>1</sup> OMB Control No. 1902-TBD; and
2. FERC-549C (Standards for Business Practices of Interstate Natural Gas Pipelines), OMB Control No. 1902-0174.

The Commission is submitting this consolidated supporting statement to OMB with one ICR for each of the 2 separate OMB Control Numbers. The FERC-549C is affected because the NOPR proposes to amend FERC's regulations to incorporate by reference, with certain enumerated exceptions, the latest version (Version 3.0) of business practice standards adopted by the Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board (NAESB) and applicable to natural gas pipelines. The FERC-545A accounts for the required tariff revision each interstate pipeline company will file with the Commission.

NAESB is a consensus standards organization composed of representatives of all segments of the natural gas industry and the electric power industry. Since 1996, these standards have established nationwide timelines that the industry and the Commission have determined are necessary to establish a more efficient and integrated pipeline grid.

## **Background**

### **A. Justification**

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<sup>1</sup> The information collection requirements (ICR) would normally be included in FERC-545 (OMB Control No.: 1902-0154). The Commission used FERC-545 in the NOPR in Docket RM96-1-038. However, another unrelated item (in Docket PL15-1) is currently pending OMB review under FERC-545, and only one item per OMB Control Number can be pending OMB review at a time. This submittal to OMB for the NOPR in RM96-1-038 will be made under a temporary collection number (and temporary placeholder), FERC-545A (OMB Control No. 1902-TBD), to enable FERC to submit this package timely to OMB for review under the Paperwork Reduction Act. Long-term, the FERC-545A reporting and recordkeeping requirements will be included in FERC-545.

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

**Docket RM96-1-038.** The NOPR says in part [footnotes omitted]:

“On November 14, 2014, NAESB filed a report informing the Commission that it had adopted and ratified Version 3.0 of its business practice standards applicable to natural gas pipelines.... The Version 3.0 Standards added the modifications to support efforts to harmonize gas-electric scheduling coordination that NAESB had separately filed and that the Commission incorporated by reference in Order No. 809. In addition, the Version 3.0 Standards contain revisions to the capacity release standards regarding posting requirements for offers to purchase released capacity that were the subject of the Commission’s order to show cause in Docket No. RP14-442-000. Other revisions in the Version 3.0 Standards are: (1) revisions to the standards to define “Operating Capacity” and “Design Capacity” in response to the Commission request in Order No. 587-V; (2) elimination of the WGQ Interpretations, which the Commission declined to incorporate by reference; (3) modifications to standards to reflect the interpretations; (4) modifications for maintenance purposes, which includes changes to eliminate the appearance of the electronic data interchange in the imbalance trading process; (5) modifications to reflect new data elements; and (6) edits for clarity and to increase user-friendliness. The Version 3.0 standards have also been revised to include 29 minor corrections.

On July 7, 2015, NAESB filed a report informing the Commission that it has made errata corrections to the WGQ Version 3.0 Business Practice Standards. These corrections incorporate a 9:00 AM Central Clock Time (CCT) start to the gas operating day, consistent with the Commission’s findings in Order No. 809 and also correct other minor errors.

In this NOPR, the Commission proposes to incorporate by reference, in its regulations, Version 3.0 of the NAESB WGQ’s consensus business practice standards, with certain exceptions. The Commission proposes that the implementation date for these standards coincide with the implementation of the Gas-Electric Coordination standards on April 1, 2016.

Adoption of the Version 3.0 Standards will continue the process of updating and improving NAESB’s business practice standards for the benefit of the entire wholesale natural gas market.

As the Commission found in Order No. 587, adoption of consensus standards is appropriate because the consensus process helps ensure the reasonableness of the standards by requiring that the standards draw support from a broad spectrum of industry participants representing all segments of the industry. Moreover, because the industry has to conduct business under these standards, the Commission’s regulations should reflect those standards that have the widest possible support. In section 12(d) of the National Technology Transfer and Advancement Act of 1995 (NTT&AA), Congress affirmatively requires federal agencies to use technical standards developed by voluntary

consensus standards organizations, like NAESB, as a means to carry out policy objectives or activities.”

***General Background on the Collections (including items not affected by the NOPR in Docket RM96-1-038).***

**FERC-545A (and FERC-545).**

*Please note that FERC-545A is a new and temporary collection number (and placeholder) being used for this NOPR only because another unrelated item is currently pending OMB review under FERC-545. <sup>1</sup> The following background applies to the FERC-545A temporary collection number and to the FERC-545, to which the requirements identified as FERC-545A here, should go long-term.*

FERC-545A is required to implement sections 4, 5, and 16 of the Natural Gas Act (NGA), (15 USC 717c, 717d and -717o, PL 75 688, 52 Stat. 822 and 830). NGA Sections 4, 5, and 6 authorize the Commission to inquire into rate structures and methodologies and to set rates at a just and reasonable level. Specifically, a natural gas company must obtain Commission authorization for all rates and charges made, demanded, or received in connection with the transportation or sale of natural gas in interstate commerce.

Under the NGA, a natural gas company’s rates must be just and reasonable and not unduly discriminatory or preferential. The Commission may act under different sections of the NGA to effect a change in a natural gas company’s rates. When the Commission reviews rate increases that a natural gas company has proposed, it is subject to the requirement of section 4(e) of the NGA. Under section 4(e), the natural gas company bears the burden of proving that its proposed rates are just and reasonable. On the other hand, when the Commission seeks to impose its own rate determination, it must do so in compliance with section 5(a) of the NGA. Under section 5, the Commission must first establish that its alternative rate proposal is both just and reasonable.

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

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

The Commission sets rates for interstate pipeline services in a number of proceedings. For example, when a pipeline files to increase its rates, it makes a filing with the Commission under

section 4 of the NGA. These types of filings are referred to as general section 4 rate cases. In the proceedings, the Commission reviews all of a pipeline's rates and services. A pipeline can file a general section 4 rate case anytime it wishes, provided the pipeline did not agree otherwise in a settlement. A pipeline must demonstrate that the new rates it proposes to charge are just and reasonable. When a rate increase filing is made pursuant to section 4, the application is typically suspended and set for hearing by a Commission Order.

**FERC-549C.** The business practice standards under FERC-549C are required to carry out the Commission's policies in accordance with the general authority in Sections 4, 5, 7, 8, 10, 14, 16, and 20 of the Natural Gas Act (NGA) (15 U.S.C. 717c-717w), and sections 311, 501, and 504 of the Natural Gas Policy Act of 1978 (NGPA) (15 U.S.C. 3301-3432). The Commission adopted these business practice standards in order to update and standardize the natural gas industry's business practices and procedures as well as to improve the efficiency of the gas market and the means by which the gas industry conducts business across the interstate pipeline grid.

In various orders since 1996<sup>2</sup>, FERC has adopted regulations to standardize the business practices and communication methodologies of interstate natural gas pipelines to create a more integrated and efficient pipeline industry. In general, when and if NAESB develops new or revises existing business practice standards for the wholesale natural gas industry (e.g., consensus standards developed by the Wholesale Gas Quadrant (WGQ), an accredited standards organization under the auspices of the American National Standards Institute (ANSI)), if the Commission finds the standards appropriate it incorporates them by reference into its regulations as mandatory FERC requirements. The process of standardizing business practices in the natural gas industry began with a Commission initiative to standardize electronic communication of capacity release transactions. The outgrowth of the initial Commission standardization efforts produced working groups composed of all segments of the gas industry and ultimately, the Gas Industry Standards Board (GISB), a consensus organization open to all members of the gas industry was created. GISB was succeeded by the North American Energy Standards Board (NAESB), which is composed of four quadrants, including a wholesale natural gas quadrant and a wholesale electric quadrant.<sup>3</sup>

NAESB<sup>4</sup> is a voluntary non-profit organization comprised of members from the retail and

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<sup>2</sup> FERC-549C was created in Order No. 587 (July 26, 1996, 61 FR 39053) because interstate pipelines were required to adopt certain standards for business practices that required changes in the day-to-day operations. In addition, these standards required pipelines to adopt certain mechanisms for electronic communication between the pipelines and those doing business with the pipelines.

<sup>3</sup> The other two quadrants address retail natural gas and electric issues, respectively.

<sup>4</sup> Additional information is available on NAESB's website at <http://www.naesb.org/>. NAESB described its standards development process as of 1/29/2013 in "Submittal of Modifications to the NAESB Public Key Infrastructure Standards and Other Standards to support the Public Key Infrastructure (Docket Nos. RM05-5-000 and RM05-5-022)," Appendix E, posted on [ferc.gov](http://ferc.gov) at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13165589>.

FERC-545A (OMB Control No. 1902-TBD) and FERC-549C (OMB Control No. 1902-0174)  
Docket No. RM96-1-038-000 (NOPR, Issued 7/16/2015); RIN 1902-AF08

wholesale natural gas and electric industries. NAESB's mission is to take the lead in developing standards across these industries to simplify and expand electronic communication and to streamline business practices. Its core objective is to promote a seamless North American marketplace for natural gas, as recognized by its customers, the business community, industry participants and regulatory bodies. NAESB's WGQ business practice standards are a product of this effort. In this process, industry participants seeking additional or amended standards (including principles, definitions, standards, data elements, process descriptions, technical implementation instructions) submit a request to the NAESB office, detailing the change, so that consideration can be given to amending the standards.

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

**FERC-545A** (and FERC-545): The NOPR in RM96-1-038 would require interstate gas pipelines to make a one-time tariff filing to reflect the changes in the updated NAESB standards.

The following information is the subject of the FERC-545A: (1) tariff filings and any related compliance filings; (2) rate case filings and any related compliance filings; (3) informational reports; (4) negotiated rates; (5) non-conforming agreement filings; and (6) NAESB Activity (tariff portion only). In summary, the Commission uses the FERC-545A (and FERC-545) information to (1) ensure there are adequate customer protections under section 4 of the NGA; (2) review rates and terms and conditions of service changes by natural gas companies for the transportation and storage of natural gas; (3) provide general industry oversight; and (4) supplement documentation during FERC's audits process.

The Commission reviews the FERC-545A (and FERC-545) materials to determine whether proposed transportation and sales rates and terms and conditions of service are just and reasonable. The Commission uses the information to monitor rates and terms and conditions of service related to jurisdictional transportation, natural gas storage, and unbundled sales activities of jurisdictional companies. In addition to fulfilling the Commission's obligations under the NGA, the information enables the Commission to monitor the activities and evaluate transactions of the natural gas industry to ensure competitiveness and improved efficiency of the industry's operations.

**FERC-549C.** The Commission requires the FERC-549C because the NOPR in Docket RM96-1-038 proposes to amend its regulations at 18 CFR 284.12 to incorporate by reference, with certain exceptions, Version 3.0 of business practice standards adopted by NAESB applicable to natural gas pipelines. The Version 3.0 standards also revise the codes used to identify receipt and delivery locations in the Index of Customers.

**FERC-545 and -549C.** Failure to collect this information would prohibit the Commission from monitoring and properly evaluating pipeline transactions and meeting statutory obligations under both the NGPA and the NGA.

Additionally, the incorporation by reference of consensus standards helps ensure the reasonableness of these standards proposed in this NOPR by demonstrating a broad support from industry participants representing all segments of the industry. Natural gas pipelines will need to file new tariffs with the Commission only if a) they do not currently offer multi-party transportation contracts and b) shippers request that the pipeline offer such contracts.

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

**FERC-545A (and FERC-545).** In previous rulemakings,<sup>5</sup> the Commission implemented the capability and requirement for electronic filing of all tariff submissions. FERC also improved the security of submitting those electronic filings and the pipelines' on-line process of appointing and modifying agents with the authority to make a filing on the pipeline's behalf (providing filing companies with greater control over the agents eligible to make specific types of filings on their behalf).

**FERC-549C.** The information resulting from the FERC-549C data requirements will not be filed at FERC. Instead it will be posted on the pipelines' Internet sites, provided to third parties or retained. The Internet and current software allow easy access and use of data on the pipelines' Internet sites and for transmittal of information.

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

**FERC-545A and FERC-549C.** Commission filings and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements to identify duplication. No duplication of the information collection requirements has been found.

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

The Small Business Administration's (SBA) Office of Size Standards develops the numerical definition of a small business as matched to North American Industry Classification System Codes (NAICS). The SBA (in 13 CFR 121.101) has established a size standard for pipelines transporting natural gas, stating that a firm is a small entity if its annual receipts (including those of its affiliates) are \$27.5 million or less.<sup>6</sup>

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<sup>5</sup> More information is available on FERC's eTariff page at <http://www.ferc.gov/docs-filing/etariff.asp>.

<sup>6</sup> U.S. Small Business Administration, Table of Small Business Size Standards for Pipeline

**FERC-545A.** The FERC-545A is a filing requirement related to pipeline rate filing obligations for the transportation and storage of natural gas. The filing collects data from both large and small respondent companies. The data required impose the least possible burden for companies, while collecting the information required for processing the filings. Use of the Internet to file documents electronically is the primary method the Commission uses to minimize the FERC-545A burden.

The one-time compliance filings proposed in the NOPR must be filed electronically.

**FERC-549C.** The FERC-549C information collection will impact the proposed business standards, practices and procedures for the day-to-day operations of major and a few non-major natural gas companies. The business practice standards are designed to benefit all customers, including small businesses. The Commission allows for extensions of time and for waivers of the business practice standards. Such extensions or waivers are based upon a pipeline's individual circumstances, including the size of the pipeline. For smaller pipelines, the Commission has granted waivers of some of the standards when such pipelines have shown that complying with such standards would prove unduly burdensome.

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

FERC-545A is a one-time compliance filing, and FERC-549C is a one-time implementation plus ongoing operations. Failure to collect the information would prohibit FERC from properly monitoring and evaluating pipeline transactions and meeting statutory obligations under NGPA and NGA.

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

The FERC-545A and FERC-549C present no special circumstances.

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

As stated by NAESB in its submittal to FERC on 11/14/2014:<sup>7</sup>

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Transportation of Natural Gas, NAICS Code 486210, available at [https://www.sba.gov/sites/default/files/files/Size\\_Standards\\_Table.pdf](https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf), Subsector 486. Matched to North American Industry Classification System Codes, Natural Gas Pipeline Transportation, NAICS Code 486210, page 27, July 14, 2014, available at [https://www.sba.gov/sites/default/files/files/Size\\_Standards\\_Table.pdf](https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf), Subsector 486.

<sup>7</sup> The NAESB submittal is posted on FERC's eLibrary at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13685851>. NAESB also submitted an errata

“These standards build upon and supplement NAESB WGQ Version 2.1 Standards submitted to the Commission on July 23, 2013 and have not been the subject of Commission action. The development efforts in NAESB reflect the work of multiple market interests and some of the standards development activities that produced Version 3.0 had considerable industry debate before consensus was reached on the level of standardization and the text of the standards included. As stated in previous reports, NAESB supports a wide range of perspectives through a public process permitting all segments of the marketplace, regardless of membership status in NAESB, to equally voice their positions. As part of that process, balanced voting allows a disparate group to move towards consensus.”

In addition, FERC is providing an opportunity for public comment through this NOPR.

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

**FERC-545A and FERC-549C.** There are no payments or gifts to respondents.

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

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

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

There are no questions of a sensitive nature in the proposed reporting requirements.

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

**Changes due to the NOPR in RM96-1-038.** The following estimates of reporting burden are related only to this NOPR in RM96-1-038 and anticipate the costs to pipelines for compliance



with the Commission’s proposals in this NOPR.<sup>8</sup> The burden estimates are primarily related to start-up to implement these standards and regulations and will not result in ongoing costs.

One-Time Effects of NOPR in Docket RM96-1-038 (rounded)						
	Number of Respondents <sup>9</sup> (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)= (3)	Average Burden & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent <sup>10</sup> (\$) (5)÷(1)
FERC-545A <sup>11</sup>	165	1	165	10 hrs.; \$837	1,650 hrs.; \$138,056	\$837
FERC-549C <sup>12</sup>	165	1	165	22 hrs.; \$1,841	3,630 hrs.; \$303,722	\$1,841
<b>Totals</b>					5,280 hrs.; \$441,778	

<sup>8</sup> We note that although this NOPR proposes a minor revision to 18 CFR section 260.8, the NOPR states that the Commission is not including Form No. 567 (OMB No. 1902-005) as part of its burden estimate because it estimates that the substitution of proprietary codes for common codes in the system flow diagrams submitted under section 260.8 will not increase the burden of filing that form. The same is true with regard to the identical revisions the Commission is proposing to sections 157.14 and 157.18, Form No. 537 (OMB No. 1902-0060). Likewise, the Commission estimates that its proposed revision to Form 549B (OMB No. 1902-0169), see <http://www.ferc.gov/docs-filing/forms.asp>, which changes the point record for Point identification Code Qualifier (Item ID yj) and Point Identification Code (Item ID yk) will not increase the burden of filing that form.

<sup>9</sup> The number of respondents is the number of entities in which a change in burden from the current standards to the proposed exists, not the total number of entities from the current or proposed standards that are applicable.

<sup>10</sup> Wage data is based on the Bureau of Labor Statistics data for 2012 (“May 2012 National Industry-Specific Occupational Employment and Wage Estimates, [for] Sector 22 - Utilities” at [http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm)) and is compiled for the top 10 percent earned. For the estimate of the benefits component, see <http://www.bls.gov/news.release/ecec.nr0.htm>.

<sup>11</sup> The mean hourly cost of tariff filings and implementation for interstate natural gas pipelines is \$83.67. This represents the average wage (salary and benefits for 2,080 annual work-hours) of the following occupational categories: “Legal” (\$128.02 per hour), “Computer Analyst” (\$83.50 per hour), and “Office and Administrative” (\$39.49 per hour). Wage data is available from the Bureau of Labor Statistics at [http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm) and is compiled for the top 10 percent earned. For the estimate of the benefits component, see <http://www.bls.gov/news.release/ecec.nr0.htm>.

<sup>12</sup> The mean hourly cost of tariff filings and implementation for interstate natural gas pipelines is \$83.67. It is composed of the skill sets and related hourly costs described above.

**FERC-545A.** For this submittal, we are averaging the one-time implementation burden over Years 1-3. Using that approach, each of Years 1-3 would impose a total of:

- 550 hours/yr. (or 1,650 hrs./3 yrs.)
- \$46,019/yr. (or \$138,056/3 yrs.)

Then after Year 3, the FERC-545A burden associated with the averaged implementation burden would be removed from the inventory.

**FERC-549C.** For this submittal, we are averaging the one-time implementation burden and cost over Years 1-3. Using that approach, each of Years 1-3 would impose:

- 1,210 hrs./yr. (or 3,630 hrs./3 yrs.)
- \$101,241/yr. (\$303,722/3 yrs.)

Then after Year 3, the FERC-549C burden associated with the averaged implementation burden would be removed from the inventory.

See #15, below, for an explanation of the estimated changes to burden as implemented in the NOPR in RM96-1-038 and for the proposed new inventory figures.

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

**FERC-545A and FERC-549C.** There are no capital or start-up costs for the requirements in the NOPR in RM96-1-038 that are not associated with the burden hours. All of the costs are related to burden hours and are detailed in #12 and #15.

### **14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT**

**FERC-545A and FERC-549C.** The following federal costs relate only to the new requirements proposed by the NOPR.

	<b>Number of Hours or FTE's</b>	<b>Estimated Annual Federal Cost (\$)<sup>13</sup></b>
PRA <sup>14</sup> Administration Cost <sup>15</sup>	-	\$ 5,193.

<sup>13</sup> Based on FERC's Fiscal Year 2015 average cost per FTE (salary plus benefits) of \$149,489 per year (or 2,080 work hours), rounded to \$72.00 per hour.

<sup>14</sup> Paperwork Reduction Act of 1995 (PRA)

<sup>15</sup> The PRA Administration Cost is \$ 5,193, and includes preparing supporting statements, notices, and other activities associated with Paperwork Reduction Act compliance.

Data Processing and Analysis, Sub-Total <sup>16</sup>	1 <sup>17</sup>	\$149,489
<i>FERC-545</i>	0.25	\$37,372.25
<i>FERC-549C</i>	0.75	\$112,116.75
<b>FERC Total</b>	?	\$154,682

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

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

Data Collection	Annual Number of Responses	Annual Total Burden Hours	Cost Burden (\$)
FERC -545A	0	0	0
FERC-549C	491	57,803	0

**The NOPR in RM96-1-038 and this supporting statement.**

**FERC-545.** The NOPR in RM96-1-038 would require interstate gas pipelines to make a one-time tariff filing to reflect the changes.

**FERC-549C.** In the NOPR in RM96-1-038, the Commission is proposing to approve changes to the NAESB standards. The resulting burden change is primarily related to start-up to implement these standards and regulations. The proposed changes include:

- modifying WGQ Standard 4.3.23 to add “Request to Purchase Releasable Capacity” as a subcategory of information contained in a transportation service provider’s information posting website
- adding new WGQ Standard 5.3.73, containing requirements regarding requests to purchase capacity that is releasable
- using proprietary codes to identify the location of points of receipt and delivery and requiring pipelines to post on their websites information on each of the proprietary points (and no longer using the current common code database which industry decided is not worth the expense and effort) that can be used to determine which points are interconnecting points between pipelines
- approving NAESB’s approach of separately reporting both “Design Capacity” and “Operating Capacity” as part of the reporting data set, because they are not synonymous

<sup>16</sup> The estimate of federal FTE’s and the indicated split between FERC-545A and FERC549C is based on staff’s experience and the fact that the FERC-545A filings are one-time filings, with the FERC-549C requirements both one-time and on-going.

<sup>17</sup> The 1 FTE we are estimating here in connection with the issuance of a notice of proposed rulemaking in Docket No. RM96-1-038 if adopted as a final rule would replace the 1 FTE previously estimated in connection with the issuance of Order No. 809 and does not represent an additional FTE. Compliance with this rule will eliminate the need to separately comply with Order No. 809.

and this will provide shippers and the Commission with added information. Accordingly, the Commission proposes to incorporate by reference revised WGQ Standards 0.3.18, 0.3.20, and 0.3.21, and Dataset 0.4.2, as the revised standards and dataset meet the Commission’s past concerns and no longer conflict with section 284.13(d) of the Commission’s regulations.

**Summary table** of changes to burden hours, with current approved inventory, as listed in ROCIS and reginfo.gov follow. (The additional implementation burden due to the NOPR in RM96-1-038 is being averaged over Years 1-3, as discussed in #12 above.)

	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Change Due to Agency Discretion</b>
<b>FERC-545A</b>				
Annual Number of Responses	165	0	0	+165
Annual Time Burden (Hr.)	550	0	0	+550
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0
<b>FERC-549C</b>				
Annual Number of Responses	656	491	0	+165
Annual Time Burden (Hr.) <sup>18</sup>	59,013	57,803	0	+1,210
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

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

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

**17. DISPLAY OF EXPIRATION DATE**

**FERC-545A and FERC-549C.** The expiration dates are displayed on ferc.gov with links to the updated table from <http://www.ferc.gov/docs-filing/info-collections.asp> .

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

<sup>18</sup> Averaging the one-time burden and cost over Years 1-3 for the purposes of this PRA-related supporting statement (for the total number of entities)

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There are no exceptions in this collection.