

FERC-725G4 (OMB Control No.: 1902-0282) and
FERC-725S (OMB Control No.: 1902-0270),
Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000
RIN: 1902-AF06

Supporting Statement for
**FERC-725G4, Mandatory Reliability Standards: Reliability Standard
PRC-010-1 (Undervoltage Load Shedding)¹ and
FERC-725S, Mandatory Reliability Standards: Emergency Preparedness
and Operations (EOP) Reliability Standards**

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review the information collection requirements in the Final Rule under Dockets RM15-7-000, RM15-12-000, RM15-13-000 under OMB Control Numbers 1902-0282 (FERC-725G4) and 1902-0270 (FERC-725S). This supporting statement is a consolidated document that covers the requirements of both information collections (FERC-725G4 and FERC-725S).

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

On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law. EPAAct 2005 added a new Section 215 to the Federal Power Act (FPA), which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight. In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO pursuant to FPA section 215.²

On March 16, 2007, the Commission issued Order No. 693, approving 83 of the 107 Reliability Standards filed by NERC, including initial versions of EOP-001, EOP-002, and EOP-003. In addition, the Commission directed NERC to develop certain modifications to the EOP standards. In Order No. 693, the Commission also approved several Undervoltage Load Shedding (UVLS)-related Reliability Standards, including PRC-010-0, PRC-021-1 and PRC-022-1. Also, the Commission directed NERC to modify Reliability Standard PRC-010-0 to develop an “integrated and coordinated” approach to all protection systems. Also in Order No.

¹ FERC-725G4 is a temporary collection number in order to submit this ICR and Final Rule to OMB timely. Long-term, the FERC-725G4 information collection requirements should be included in FERC-725G (Mandatory Reliability Standards for the Bulk-Power System: PRC Standards; OMB Control No. 1902-0252). However, there was another, unrelated ICR for FERC-725G, which was pending OMB review, and only one item can be pending at a time per OMB Control No. Therefore we are using the temporary collection number FERC-725G4.

² *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

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693, the Commission approved the NERC Glossary, including NERC's currently effective Special Protection System and Remedial Action Scheme definitions.

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 in Docket Nos. RM15-7, RM15-12, and RM15-13 approves the following changes to Reliability Standards EOP-011-1 and PRC-010-1, and the Remedial Action Scheme (RAS).

Reliability Standard EOP-011-1, to be included in FERC-725S:

The overall purpose of Reliability Standard EOP-011-1 is to address the effects of operating Emergencies by ensuring each Transmission Operator and Balancing Authority has developed Operating Plans to mitigate operating Emergencies, and that those plans are coordinated within a Reliability Coordinator area. Reliability Standard EOP-011-1 includes six requirements, associated measures and evidence retention requirements and is applicable to balancing authorities, reliability coordinators and transmission operators.

- Requirements R1 and R2 require transmission operators and balancing authorities to develop, maintain and implement reliability coordinator-reviewed operating plans to mitigate operating, capacity and energy emergencies. Requirement R1 specifies elements for the plans “as applicable,” which is intended to provide flexibility to account for regional differences and pre-existing emergency mitigation methods. NERC states that the requirement for transmission operators and balancing authorities to maintain operating plans includes the expectation that the plans are current and up-to-date;
- Requirement R3 requires reliability coordinators to review the operating plans submitted by transmission operators and balancing authorities and is designed to ensure that there is appropriate coordination of reliability risks identified in the operating plans. In reviewing operating plans, reliability coordinators shall consider compatibility, coordination and inter-dependency with other entity operating plans and notify transmission operators and balancing authorities if revisions to their operating plans are necessary;
- Requirement R4 requires transmission operators and balancing authorities to resolve any issues identified by the reliability coordinator and resubmit their revised operating plans within a time period specified by the reliability coordinator;
- Requirement R5 requires each reliability coordinator to notify balancing authorities and transmission operators in its area, and neighboring reliability coordinators, within thirty minutes of receiving an emergency notification; and

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- Requirement R6 requires a reliability coordinator with a balancing authority experiencing a potential or actual energy emergency to declare an energy emergency alert in accordance with Attachment 1.

The Measures describe the evidence which entities have to be able to produce to demonstrate compliance with the Requirements. The Evidence Retention (Section 1.2) explains how long the records must be retained and says in part:

- Each Transmission Operator will have a dated Operating Plan(s) developed in accordance and reviewed by its Reliability Coordinator for Requirement R1.
- Each Balancing Authority will have a dated Operating Plan(s) developed in accordance with Requirement R2 and reviewed by its Reliability Coordinator for Requirement R2.
- Each Reliability Coordinator will have documentation that it reviewed Transmission Operator and Balancing Authority Operating Plans within 30 calendar days of submittal for Requirement R3.
- Each Responsible Entity will have documentation with an Operating Plan(s) version history showing that it responded and updated the Operating Plan(s) within the timeframe identified by its Reliability Coordinator in accordance with Requirement R4.
- Each Responsible Entity with an Emergency notification from a Balancing Authority or Transmission Operator within its Reliability Coordinator Area will have evidence to display communication and coordination requirements called for with Requirement R5.
- Each Reliability Coordinator, with a Balancing Authority experiencing a potential or actual Energy Emergency within its Reliability Coordinator Area, will have evidence that it declared an Energy Emergency Alert as called for with Requirement R6.
- If a Responsible Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the duration specified above, whichever is longer;
- The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

Reliability Standard EOP-011-1 also includes the following revised definition of Energy Emergency:

Energy Emergency—A condition when a Load-Serving Entity or Balancing Authority has exhausted all other resource options and can no longer meet its expected Load obligations.

NERC explains that the revised definition is intended to clarify that an energy emergency is not limited to a load-serving entity and, based on a review of the impact on the body of NERC

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Reliability Standards, “does not change the reliability intent of other requirements of Definitions.”

Reliability Standard PRC-010-1, to be included in FERC-725G4:

NERC states that Reliability Standard PRC-010-1 is a single, comprehensive standard that addresses the same reliability principles outlined in the four currently effective UVLS-related Reliability Standards. NERC explains that the purpose of Reliability Standard PRC-010-1 is to “establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs” as directed by the Commission in Order No. 693. Also, according to NERC, Reliability Standard PRC-010-1 replaces the applicability to and involvement of “Regional Reliability Organization” in Reliability Standards PRC-020-1 and PRC-021-1 and consolidates the four currently-effective UVLS-Related Standards into one comprehensive standard. NERC states that Reliability Standard PRC-010-1 “reflects consideration of the 2003 Blackout Report recommendations,” particularly in Recommendation 21 for NERC to “make more effective and wider use of system protection measures”. Additionally, Recommendation 21C states that “NERC determine the goals and principles needed to establish an integrated approach to relay protection for generators and transmission lines, as well as of UFLS [Under Frequency Load Shedding] and UVLS programs.”³

Reliability Standard PRC-010-1 incorporates a definition of UVLS Program, which reads:

Undervoltage Load Shedding Program (UVLS Program): An automatic load shedding program, consisting of distributed relays and controls, used to mitigate undervoltage conditions impacting the Bulk Electric System (BES), leading to voltage instability, voltage collapse, or Cascading. Centrally controlled undervoltage-based load shedding is not included.

NERC explains that “to ensure that the applicability of the Reliability Standard covers undervoltage-based load shedding systems whose performance has an impact on system reliability, a UVLS Program must mitigate risk of one or more of the following: voltage instability, voltage collapse, or Cascading impacting the Bulk Electric System. By focusing on the enumerated risks, the definition is meant to exclude locally-applied relays that are not designed to mitigate wide-area voltage collapse.” NERC states that the UVLS Program definition “clearly identifies and separates centrally controlled undervoltage-based load shedding, which is now addressed by the definition of Remedial Action Scheme.”

Reliability Standard PRC-010-1 applies to planning coordinators and transmission planners because “either may be responsible for designing and coordinating the UVLS

³ See references to Recommendations 21 and 21C throughout the NERC petition for the PRC-010-1 Reliability Standard (<http://www.nerc.com/FilingsOrders/us/NERC%20Filings%20to%20FERC%20DL/PRC-010-1%20UVLS%20Petition.pdf>)

Program...[and] also applies to Distribution Providers and Transmission Owners responsible for the ownership, operation and control of UVLS equipment as required by the UVLS Program established by the Transmission Planner or Planning Coordinator.” NERC explains that the planning coordinator or transmission planner that establishes a UVLS Program is responsible for identifying the UVLS equipment and the necessary distribution provider and transmission owner (referred to as “UVLS entities” in the Applicability section) that performs the required actions.

NERC states that Reliability Standard PRC-010-1 “applies only after an entity has determined the need for a UVLS Program as a result of its own planning studies.” NERC explains that the eight requirements in Reliability Standard PRC-010-1 meet four primary objectives:

- the standard requires applicable entities to evaluate a UVLS Program’s effectiveness prior to implementation, including coordination with other protection systems and generator voltage ride-through capabilities;
- applicable entities must comply with UVLS program specifications and implementation schedule;
- applicable entities must perform periodic assessment and performance analysis; and
- applicable entities must maintain and share UVLS Program data.

The PRC-010-1 Reliability Standard requirements follow in detail:

- Requirement R1 requires each planning coordinator or transmission planner that is developing a UVLS Program to evaluate the viability and effectiveness of its program before implementation to confirm its effectiveness in resolving the undervoltage conditions for which it was designed, and that it is integrated through coordination with generator ride-through capabilities and other protection and control systems. Also, the planning coordinator or transmission planner must provide the UVLS Program specifications and implementation schedule to the applicable UVLS entities;
- Requirement R2 requires UVLS entities to meet the UVLS Program’s specifications and implementation schedule provided by the planning coordinator or transmission planner or address any necessary corrective actions in accordance with Requirement R5;
- Requirement R3 requires each planning coordinator or transmission planner to perform periodic comprehensive assessments at least every 60 calendar months to ensure continued effectiveness of the UVLS program, including whether the program resolves identified undervoltage issues and that it is integrated and coordinated with generator voltage ride-through capabilities and other specified protection and control systems;
- Requirement R4 requires each planning coordinator or transmission planner to commence a timely assessment of a voltage excursion subject to the UVLS Program, within twelve calendar months of the event, to evaluate whether the UVLS Program resolved the undervoltage issues associated with the event;

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- Requirement R5 requires a planning coordinator or transmission planner to develop a corrective action plan for any program deficiencies identified during an assessment performed under either Requirement R3 or R4, and provide an implementation schedule to UVLS entities within three calendar months of its completion;
- Requirement R6, a planning coordinator must update the data necessary to model its UVLS Program for use in event analyses and program assessments at least each calendar year;
- Requirement R7 requires each UVLS entity to provide data to its planning coordinator, according to the planning coordinator's format and schedule, to support maintenance of the UVLS Program database; and
- Requirement R8 requires a planning coordinator to provide its UVLS Program database to other planning coordinators and transmission planners within its Interconnection, and other functional entities with a reliability need, within thirty calendar days of a written request.

The Measures describe the evidence that entities must be able to produce to demonstrate compliance with the Requirements. The Evidence Retention (Section 1.3, Data Retention) explains how long entities must retain data.

NERC stated that PRC-010-1 and the revised definition of UVLS Program shall become effective on the first day of the first calendar quarter that is twelve months after the date that the Commission approves the standard and definition. NERC also approves the retirement of PRC-010-0, PRC-020-1, PRC-021-1, and PRC-022-1⁴ at midnight of the day immediately prior to the effective date of PRC-010-1. Further, NERC explains that Reliability Standard PRC-010-1 addresses reliability obligations that are set forth in Requirements R2, R4 and R7 of currently-effective Reliability Standard EOP-003-2. Since NERC has to retire EOP-003-2⁵ in the petition seeking approval of Reliability Standard EOP-011-1 (Docket No. RM15-7-00, discussed here), concurrent Commission action on the two petitions will prevent a possible reliability gap.

Remedial Action Scheme (RAS):

NERC approves an effective date for the revised Reliability Standards and the revised definition of "Remedial Action Scheme" on the first day of the first calendar quarter that is twelve months after Commission approval. NERC also approves that for entities with existing

4 Reliability Standards PRC-010-0, PRC-021-1, and PRC-022-1 were approved in Order 693 (issued March 16, 2007 in Docket No. RM06-16) and are included in FERC-725A (Mandatory Reliability Standards for the Bulk-Power System; OMB Control No. 1902-0244).

Reliability Standard PRC-020-1 was never approved or enforced by FERC (i.e. has no burden applied to any collection).

5 Reliability Standard EOP-003-2 (approved in Order 763, issued May 7, 2012, in Docket No. RM11-20-000) is included in FERC-725A (Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0244).

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schemes that become newly classified as “Remedial Action Schemes” resulting from the application of the revised definition, the entities will have additional time of up to twenty-four months from the effective date to be fully compliant with all applicable Reliability Standards. Further, NERC asks the Commission to take final action concurrently with the NERC petition on approved Reliability Standard PRC-010-1 (Docket No. RM15-12-000, discussed here) because “[t]he proposed definitions of UVLS Program and Remedial Action Scheme in each project have been coordinated to cover centrally controlled UVLS as a Remedial Action Scheme. Final action by the Commission is needed contemporaneously on both petitions to facilitate implementation and avoid a gap in coverage of centrally controlled UVLS.”

As also mentioned later in Question #6, the consequences of not collecting these data would be the Commission’s inability to conduct adequate planning for operating emergencies and an inability to respond to those emergencies, which is critical for the reliability operation of the bulk power system. Reliability Standard EOP-011 updates basic compliance obligations for those potentially having to operate with emergency conditions. Similarly, under voltage load-shedding mechanics serve a vital role in preventing cascading power outages when large unexpected events occur on the power system. PRC-010-1 and the RAS definition put into place revised compliance expectations and definitions for those needing to plan the power system to respond to potential bulk power system emergencies. Without these standards, these actions would go unperformed.

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

These collections do not require information to be filed with the Commission. However, they do contain information collection and record retention requirements for which using current technology is an option.

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

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. Under this proceeding, Reliability Standards EOP-011-1, PRC-010-1, and RAS

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redefinition do not duplicate any filing requirements (other than those being replaced as described in this Final Rule).

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

FERC estimates that there are 15⁶ small entities applicable to this rule. FERC considers the impact of the rule to be minimal. In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden. Detailed information regarding these options is available in NERC's Rule of Procedure at Sections 507 and 508⁷.

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

If the requirements of these standards (and revision of RAS) were performed less frequently, NERC would not be provided any information to allow assessment of the compliance with the requirements of each of these standards (and the revision of RAS), thereby nullifying the purpose of the standard. Adequate planning for operating emergencies and responding to those emergencies is critical for the reliability operation of the bulk power system. Reliability Standard EOP-011 updates basic compliance obligations for those potentially having to operate with emergency conditions. Similarly, under voltage load-shedding mechanics serve a vital role in preventing cascading power outages when large unexpected events occur on the power system. PRC-010-1 and the RAS definition puts into place revised compliance expectations and definitions for those needing to plan the power system to respond to potential bulk power system emergencies.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There is one special circumstance as described in 5 CFR 1320.5(d)(2) related to this information collection. For Reliability Standard PRC-010-1, the applicable entity shall retain documentation as evidence for six calendar years. Industry felt strongly that a six-year cycle was technically sound and much less burdensome and costly when considering possible options such

⁶ 31.9% of affected entities

⁷

[http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20140701_updated_20140602%20\(updated\).pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20140701_updated_20140602%20(updated).pdf)

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as: (a) performing the engineering work more frequently and retaining the records for a shorter period (such as 3 years), or (b) performing the engineering work less frequently and retaining the records for a longer period (six years). There is a very limited group of engineers that have the technical skill set to perform the work, and it does not need to be performed as often as every three years. Industry said that performing the engineering work less frequently and retaining the records for six years was a much less onerous, burdensome, and expensive solution.

Audits are usually performed every 3 years, so the data retention requirements otherwise generally present no special circumstances.

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

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders developing and reviewing drafts and providing comments.⁸ The NERC-approved reliability standards were then submitted by NERC to the FERC for review and approval.

In addition, each FERC rulemaking (both proposed and final rules) is published in the Federal Register thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the approved collections of data. The NOPR was published in the Federal Register for comment.

Peak Reliability asserts that the “inflexible” 30-day period for reliability coordinator reviews of operating plans in Reliability Standard EOP-011-1 Requirement R3.1 is not reasonable. According to Peak Reliability, because transmission operators have an “open ended” opportunity to submit operating plans under the provision, reliability coordinators cannot schedule in advance the needed resources to perform a proper review in the 30-day window. Peak Reliability notes that, in its experience, many entities update their plans at the end of the year, creating a large spike in review work at that time. Peak Reliability, therefore, recommends revising Requirement R3.1 to include language requiring “a mutually agreed predetermined schedule” to ensure that the reliability coordinator can efficiently allocate its resources and provide a thorough review of submitted operating plans.

⁸ Details of the ERO standards development process are available on the NERC website at http://www.nerc.com/docs/standards/sc/Standard_Processes_Manual_Approved_May_2010.pdf.

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The Commission is not persuaded by Peak Reliability’s comments that the 30-day review period in Requirement R3.1 is unduly onerous. No reliability coordinator other than Peak Reliability expressed concern about the 30-day review period for operating plans in Requirement R3.1. NERC explains that transmission operators and balancing authorities must update their operating plans on an “ongoing and as-needed basis.” The need for registered entities to update operating plans to address evolving bulk electric system conditions should prevent reliability coordinators from being overwhelmed or unduly burdened by operating plan submissions. However, if Peak Reliability experiences an “end of the year spike in workload,” as a reliability coordinator, Peak Reliability can adjust its resource allocation to accommodate such known “spikes” in activity. Accordingly, we conclude the 30-day review period in Requirement R3.1 is reasonable and reject Peak Reliability’s recommendation for language requiring a “mutually agreed predetermined schedule.”

Final Rule. The final rule was published in the Federal Register on 11/25/2015 (80 FR 73647). It addresses all of the comments received (PRA-related and non-PRA-related).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no gifts or payments given to the respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rules of Procedure⁹, “...a Receiving Entity shall keep in confidence and not copy, disclose, or distribute any Confidential Information or any part thereof without the permission of the Submitting Entity, except as otherwise legally required.” This serves to protect confidential information submitted to NERC or Regional Entities.

Responding entities do not submit the information collected under the Reliability Standard to FERC. Rather, they maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

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.

This collection does not include any questions of a sensitive nature.

⁹ Section 1502, Paragraph 2, available at NERCs website.

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12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The estimated public reporting burden due to this Final Rule in Dockets RM15-7-000, RM15-12-000, and RM15-13-000 follows. The burden due to this Final Rule is in addition to the baseline of burden covered in FERC-725A for the existing versions of the standards which are being retired, replaced, or combined. (See Footnotes 4 and 5 for more information.)

The following tables detail the burden changes for each standard (EOP-011-1 [going into FERC-725S] and, PRC-010-1 [going into FERC-725G4]).

As mentioned in the Final Rule, Commission staff estimates that five percent of all distribution providers (23) and transmission providers (9) have under voltage load shedding programs that fall under the approved Reliability Standard.

FERC-725S, as modified by Rel. Std. EOP-011-1 in the Final Rule						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
RC ¹⁰ tasks necessary for EOP-011-1 compliance	11	1	11	1,500 hrs.; \$92,387 ¹¹	16,500 hrs.; \$1,016,257	\$92,387

FERC-725G4, as implemented by Rel. Std. PRC-010-1 in the Final Rule						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
DP ¹² – Requirement 2	23	1	23	36 hrs.; ¹³ \$1,960.32	828 hrs.; \$45,087.36	\$1,960

¹⁰ RC=Reliability Coordinator

¹¹ The 1,500-hour figure is broken into 1,300 hours at the engineer wage rate and 200 hours at the clerk wage rate. These estimates assume that the engineer's wage rate (plus benefits) will be \$66.35/hr., and the clerk's wage rate (plus benefits) will be \$30.66/hr. These figures are taken from the Bureau of Labor Statistics, data for May 2014 (and posted April 1, 2015), at http://www.bls.gov/oes/current/naics2_22.htm; Occupation Code: 17-2071 (engineer) and 43-4071 (clerk).

¹² DP = distribution provider and TP = transmission planner.

¹³ The 36 hour figure is broken into 24 hours at the engineer wage rate and 12 hours at the clerk wage rate. These estimates assume that the engineer's wage rate (plus benefits) will be \$66.35/hr. and the clerk's wage rate (plus

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TP ¹³ - Requirement 2	3	1	3	36 hrs.; ¹⁴ \$1,960.32	108 hrs.; \$5,880.96	\$1,960
DP - Requirement 2 Data Retention	23	1	23	12 hrs.; \$367.92 ¹⁵	276 hrs.; \$8,462.16	\$368
TP – Requirement 2 Data Retention	3	1	3	12 hrs.; \$367.92	36 hrs.; \$1,103.76 ¹⁶	\$368
TOTAL					1,248 hrs.; \$60,534.24	

The approved revisions to the Remedial Action Scheme (RAS) definition and approved Reliability Standards are not expected to result in changes to the scope of systems covered by the approved Reliability Standards and other Reliability Standards that include the term Remedial Action Scheme. Therefore, the Commission does not expect the approved revisions to the RAS to affect applicable entities' current reporting burden.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up or other non-labor costs.

Total Capital and Start-up cost: \$0

Total Operation, Maintenance, and Purchase of Services: \$0

All of the costs in the final rule are associated with burden hours (labor) and described in Questions #12 and #15 in this supporting statement.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

benefits) will be \$30.66/hr. These figures are taken from the Bureau of Labor Statistics, data for May 2014 (and posted April 1, 2015), at http://www.bls.gov/oes/current/naics2_22.htm; Occupation Codes 17-2071 (engineer) and 43-4071 (clerk).

14 *Id.*

15 The wage rate for a clerk will be \$30.66/hr. These figures are taken from the Bureau of Labor Statistics, data for May 2014 (and posted April 1, 2015), at http://www.bls.gov/oes/current/naics2_22.htm; Occupation Codes 43-4071 (clerk).

16 Note that there was an inadvertent mathematical error in the NOPR which was corrected in the final rule, in this supporting statement, and in this submittal to OMB.

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The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

The estimated annualized cost to the Federal Government for FERC-725S and FERC-725G4 (as related to the requirements in the Final Rule in RM15-7-000, RM15-12-000 and RM15-13-000) follows:

FERC-725S	Number of Employees (FTEs)	Estimated Annual Federal Cost
FERC-725S Analysis and Processing of filings	0	\$0
Paperwork Reduction Act Administrative Cost ¹⁷		\$5,193
TOTAL		\$5,193

FERC-725G4	Number of Employees (FTEs)	Estimated Annual Federal Cost
FERC-725G4 Analysis and Processing of filings	0	\$0
Paperwork Reduction Act Administrative Cost ¹⁸		\$5,193
TOTAL		\$5,193

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

This section illustrates the burden inventory prior to implementation of the Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000. The existing OMB-approved annual burden is:

- FERC-725S (OMB Control No. 1902-0270): 3,980 hours [details in first table below]
- FERC-725G4 (OMB Control No. 1902-0282): 0 hours.

17 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), and other changes to the collection.

18 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), and other changes to the collection.

FERC-725G4 (OMB Control No.: 1902-0282) and
 FERC-725S (OMB Control No.: 1902-0270),
 Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000
 RIN: 1902-AF06

FERC-725S, Existing Burden Estimate for Reliability Standard EOP-010-1 Prior to Implementation of the Final Rule						
Reliability Standard Number	Type of Respondents	Number of Respondents¹⁹ (1)	Number of Responses per Respondent (2)	Average Burden Hours Per Response (3)	Total Annual Burden Hours (1)x(2)x(3)	Total Annual Cost²⁰
EOP-010-1 (R1)	Reliability Coordinator	16	1	20	320	\$19,200 (\$60/hr)
EOP-010-1 (R3)	Transmission Operator	183	1	20	3,660	\$219,600 (\$60/hr)
TOTAL					3,980	\$238,800

FERC-725G4 is a new (and temporary) collection and, thus, has no existing burden approved by OMB. Any burden hours and cost applied to FERC-725G4 is intended eventually to reside in FERC-725G (OMB Control No. 1902-0252).

Implementation of the Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000.

The burden due to this Final Rule is in addition to the baseline of burden covered in FERC-725A for the existing versions of the standards that are being retired, replaced, or combined. The existing versions of these standards (e.g. PRC-010-0, PRC-020-1, PRC-021-1, and PRC-022-1) will be retired and eventually removed from the information collection burden included in FERC-725A. Some of the burden associated with these standards will be duplicated in FERC-725G4 since the implementation of PRC-010-1 is meant to replace some (but not all) of the retired standards and their respective burden. The same is also true for the existing versions of an EOP standard (EOP-003-2) and their inclusion in FERC-725A. They also will be retired and eventually removed from FERC-725A. Their burden is also partially duplicated in the burden of EOP-011-1. (See Footnotes 4 and 5 for more information.)

¹⁹ This number was calculated by adding all the applicable entities while removing double counting caused by entities registered under multiple functions.

²⁰ The estimated hourly loaded cost (salary plus benefits) for an engineer is assumed to be \$60/hour, based on salaries as reported by the Bureau of Labor Statistics (BLS) (http://bls.gov/oes/current/naics2_22.htm). Loaded costs are BLS rates divided by 0.703 and rounded to the nearest dollar (<http://www.bls.gov/news.release/eccec.nr0.htm>).

FERC-725G4 (OMB Control No.: 1902-0282) and
 FERC-725S (OMB Control No.: 1902-0270),
 Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000
 RIN: 1902-AF06

As explained in the Final Rule, “the Commission approves Reliability Standards EOP-011-1 (Emergency Operations) and PRC-010-1 (Undervoltage Load Shedding). NERC explains that the Reliability Standards consolidate, streamline, and clarify the existing requirements of certain currently-effective Emergency Preparedness and Operations (EOP) and Protection and Control (PRC) standards. The Commission also approves NERC’s revised definition of the term “Remedial Action Scheme” as set forth in the NERC Glossary of Terms Used in Reliability Standards (NERC Glossary), and modifications of specified Reliability Standards to incorporate the revised definition. Further, the Commission approves the assigned violation risk factors and violation severity levels, approved implementation plans, and the retirement of certain currently effective Reliability Standards. The Commission discusses concerns regarding several of NERC’s proposals and, depending on the comments provided in response, the Commission may direct NERC to develop further modifications to address the concerns and possibly delay the retirement of one currently-effective standard.”

Reliability Standard EOP-011-1 replaces a combined total of 40 requirements or subparts that are found in Reliability Standards EOP-001-2.1b, EOP-003.1 and EOP-003-2. Accordingly, the requirements in Reliability Standard EOP-011-1 do not create any new burdens for applicable balancing authorities or transmission operators because the requirements in Reliability Standard EOP-011-1 are already burdens or tasks imposed on this set of registered entities by Reliability Standards EOP-001-2.1b, EOP-003.1 and EOP-003-2 under FERC-725A (1902-0244). Reliability Standard EOP-011-1 requires reliability coordinators to perform the additional tasks of reviewing, correcting, and coordinating their balancing authorities’ and transmission operators’ operating procedures for emergency conditions; that new additional burden for RCs is included here and in #12.

For PRC-010-1, we estimate that only five percent of all distribution providers and transmission providers in the NERC registry have under voltage load shedding programs that fall under the Reliability Standard.

Summary of Current and New Burden.

FERC-725S	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	210	199	0	11
Annual Time Burden (Hr)	20,480	3,980	0	16,500
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

FERC-725G4 (OMB Control No.: 1902-0282) and
FERC-725S (OMB Control No.: 1902-0270),
Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000
RIN: 1902-AF06

FERC-725G4	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	52	0	0	52
Annual Time Burden (Hr)	1,248	0	0	1,248
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information.

17. DISPLAY OF EXPIRATION DATE

The expiration dates are 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 for this reporting requirement for statistical purposes.