

Supporting Statement for
FERC-715, Annual Transmission Planning and Evaluation Report

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve **FERC-715, Annual Transmission Planning and Evaluation Report**, for a three year period. FERC-715 (OMB Control No. 1902-0171) is an existing Commission data collection, as stated by 18 Code of Federal Regulations (CFR), 141.300.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Energy Policy Act of 1992 provided the Commission authority with which it may mandate bulk power transmission owners to provide access to their transmission grids to third parties when requested. This allowed transmission systems to be more accessible to outside customers. In spite of the added accessibility, transmission owners retained a flexibility of service that transmission customers did not also receive. Moreover, timely permission to use the transmission grid did not occur since the Commission had to review requests on a case-by-case basis. To remedy these problems, the Commission issued Order No. 888¹. Order No. 888 required utilities owning bulk power transmission facilities to treat any of their own wholesale and purchases of energy over their own transmission facilities under the same transmission tariffs they apply to others.

The Energy Policy Act of 2005 further granted significant new responsibilities and authority to discharge these responsibilities by modifying the Federal Power Act (FPA), the Natural Gas Act, and the Public Utility Regulatory Policies Act of 1978 (PURPA). These new responsibilities included (but not limited to):

- Overseeing the reliability of the nation's electricity transmission grid;
- Implementing new tolls (including penalty authority) to prevent market manipulation;
- Providing rate incentives to promote electric transmission investment;
- Supplementing state transmission siting efforts in national interest electric transmission corridors and;
- Reviewing certain holding company mergers and acquisitions involving electric utility facilities as well as certain public utility acquisitions of generating facilities.

FPA Section 213² requires each transmitting utility that operates non-radial integrated transmission system facilities rated above 100 kilovolts (kV) to submit annually:

- Contact information for the FERC-715;
- Base case power flow data (if it does not participate in the development and use of regional power flow data);
- Transmission system maps and diagrams used by the respondent for transmission planning;

¹ 75 FR 61080

² 16 USC 842l (Chapter 12)

- A detailed description of the transmission planning reliability criteria used to evaluate system performance for time frames and planning horizons used in regional and corporate planning;
- A detailed description of the respondent's transmission planning assessment practices (including, but not limited to, how reliability criteria are applied and the steps taken in performing transmission planning studies); and
- A detailed evaluation of the respondent's anticipated system performance as measured against its stated reliability criteria using its stated assessment practices.³

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

The FERC-715 enables the Commission to use the information as part of their regulatory oversight functions which includes:

- The review of rates and charges;
- The disposition of jurisdictional facilities;
- The consolidation and mergers;
- The adequacy of supply and;
- Reliability of nation's transmission grid

The FERC-715 enables the Commission to facilitate and resolve transmission disputes. Additionally, the Office of Electric Reliability (OER) uses the FERC-715 data to help protect and improve the reliability and security of the nation's bulk power system. OER oversees the development and review of mandatory reliability and security standards and ensures compliance with the approved standards by the users, owners, and operators of the bulk power system. OER also monitors and addresses issues concerning the nation's bulk power system, including assessments of resource adequacy and reliability.

Without the FERC-715 data, the Commission would be unable to evaluate planned projects or requests related to transmission.

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

The Commission allows the FERC-715 application to be eFiled within eLibrary.

For current information on the FERC-715 submission guidelines, go to <http://www.ferc.gov/docs-filing/efiling/filing.pdf>. For more specific guidance on filing the FERC-715, go to <http://www.ferc.gov/docs-filing/forms.asp#715>.

³ <http://www.ferc.gov/docs-filing/forms/form-715/overview.asp>

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 published a notice within the Federal Register⁴ to help identify any duplication of the information in FERC-715. The Commission received no comments regarding this collection. No similar information can be used or modified. There are no other Federal agencies responsible for the collection of power flow simulation data, transmission line diagrams, or detailed transmission planning reports.

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

The Commission uses eFiling for the FERC-715 as a means of reducing burden for respondents including small entities.

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

The Commission continually uses the information collected to review reliability issues and market structure relationships. The Commission also uses the data to review merger analysis. The United States Department of Justice (DOJ) uses the data for merger analysis and transmission line relief (TLR) calculation. The Energy Information Administration (EIA) uses the data to model various electricity markets. Finally, state regulatory authorities and potential transmission customers use the data to assess whether transmission capacity is available. The Commission would be unable to perform its mandated review in a timely and accurate manner if they collected this information less frequently.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances related to this collection.

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

In accordance with OMB requirements, the Commission published a 60-day notice^{Error: Reference source not found} and a 30-day notice⁵ to the public regarding this information collection on 11/4/2015 and 3/7/2016 respectively. Within the public notice, the Commission noted that it would be requesting a three-year extension of the public reporting burden with no change to the existing requirements concerning the collection of

⁴ 80 FR 68312

⁵ 81 FR 11781

data. The Commission received 0 comments regarding this information collection.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to FERC-715 respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission considers the information collected in FERC-715 filings to be Critical Energy Infrastructure Information (CEII). The Commission releases this information only to requestors that file a request for CEII under the appropriate regulations.⁶

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

The Commission does not consider any of the questions within the FERC-715 of a sensitive nature that would be considered private.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission estimates the Public Reporting Burden for this information collection as:

FERC-715: Annual Transmission Planning and Evaluation Report						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response⁷ (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
Annual Transmission Planning and Evaluation Report	115	1	115	160 \$11,520	18,400 \$ 1,324,800	\$11,520
TOTAL			115		18,400 \$ 1,324,800	\$11,520

⁶ 18 CFR 388.113

⁷ The estimates for cost per response are derived using the following formula: Average Burden Hours per Response * \$72 per Hour = Average Cost per Response. The hourly cost figure comes from the FERC average salary plus benefits of \$149,489. Subject matter experts found that industry costs for salary plus benefits are similar to Commission costs.

13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

There are no non-labor start-up costs. All costs are related to burden hours and are addressed in Questions #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

	Number of Employees (FTEs)	Estimated Annual Federal Cost
PRA ⁸ Administration Cost ⁹	-	\$5,193
Data Processing and Analysis ¹⁰	0.048	\$7,175
FERC Total		\$12,368

The Commission bases its estimate of the “Analysis and Processing of filings” cost to the Federal Government on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision making, and review of any actual filings made in response to the information collection.

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

The requirements within FERC-715 did not change. Thus, there is no significant change in burden from the last date of submittal. The increase in the number of filers is due primarily to yearly fluctuations in filing activity. Filers can elect to collaborate and to submit a single, regional filing in lieu of multiple company-specific filings or to report changes in an entity’s reporting status.

The following table shows the total burden of this collection of information. The format, labels, and definitions of the table follow the ROCIS submission system’s “Information Collection Request Summary of Burden” for the metadata.

FERC-715	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	115	110	5	0

⁸ Paperwork Reduction Act of 1995 (PRA).

⁹ The PRA Administration Cost is \$5,193, and includes preparing supporting statements, notices, and other activities associated with Paperwork Reduction Act compliance.

¹⁰ The FTE cost figure uses the 2015 FERC average salary plus benefits (\$149,489/year or \$72/hour). The estimated annual federal cost is calculated as follows: 0.048 * \$149,489 = \$7,175.

Annual Time Burden (Hr)	18,400	17,600	800	0
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. The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

The Commission provides a summary and instructions regarding the FERC-715 on the FERC website (<http://www.ferc.gov/docs-filing/forms.asp#715>) which includes the expiration date for OMB approval.

The OMB expiration dates are also posted on <http://www.ferc.gov/docs-filing/info-collections.asp>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.