

SUPPORTING STATEMENT FOR FERC Forms 1, 1-F, and 3-Q (Electric and Gas)

The Federal Energy Regulatory Commission (FERC or Commission) is requesting the Office of Management and Budget review and approve for three years the following existing information collection requirements:

- FERC Form 1, Annual Report of Major Electric Utilities, Licensees, and Others (OMB Control No. 1902-0021)
- FERC Form 1-F, Annual Report for Nonmajor Public Utilities And Licensees (OMB Control No. 1902-0029)
- FERC Form 3-Q, Quarterly Financial Report of Electric Utilities, Licensees, and Natural Gas Companies (OMB Control No. 1902-0205). Both the electric and natural gas versions of the Form 3-Q are included in this OMB Control Number and discussed in this supporting statement.¹

This consolidated supporting statement and renewal request for the FERC Forms 1, 1-F, and 3-Q (both electric and gas) are for the current forms, with no changes to the reporting requirements. *Note that these forms are also part of the Forms Refresh effort (started in Docket No. AD15-11), which is a separate activity and not addressed here.*²

JUSTIFICATION

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Forms 1, 1-F, and 3-Q. In accordance with sections 304 and 309 of the Federal Power Act and section 10(a) of the Natural Gas Act, FERC is authorized to collect and record data to the extent it considers necessary, and to prescribe rules and regulations concerning accounts, records and memoranda.

Under the existing regulations, FERC jurisdictional entities subject to its Uniform System of Accounts must annually file with the Commission a complete set of

¹ In ROCIS and reginfo.gov, the electric and gas versions of the Form 3-Q are separate ICs.

² When FERC makes changes to the forms, instructions, and/or reporting platform system, that information will be submitted to OMB, as appropriate, for review under the Paperwork Reduction Act (PRA). More information on the Forms Refresh project is posted at <http://www.ferc.gov/docs-filing/forms/eforms-refresh.asp>.

FERC Form Nos. 1 (OMB Control No. 1902-0021), 1-F (1902-0029), and 3-Q [both electric and gas] (1902-0205) (10/3/2016)

financial statements, along with other selected financial and non-financial data through the submission of FERC Annual Report Forms 1 and 1-F. The Form 1 is a comprehensive financial and operating report submitted for electric rate regulation, market oversight analysis, and financial audits. Major pertains to utilities and licensees that have, in each of the three previous calendar years, sales or transmission services that exceed one of the following: (1) one million megawatt hours of total annual sales; (2) 100 megawatt hours of annual sales for resale; (3) 500 megawatt hours of annual power exchanges delivered; or (4) 500 megawatt hours of annual wheeling for others (deliveries plus losses).³ Form 1-F is designed to collect financial and operational information from Nonmajor public utilities and licensees. Nonmajor pertains to utilities and licensees that have total annual sales of 10,000 megawatt-hours or more in the previous calendar year and that are not classified as Major.⁴

The FERC Form 3-Q is a quarterly financial and operating report for rate regulation, market oversight analysis, and financial audits which supplements the (a) Forms 1 and 1-F for the electric industry, or the (b) Form 2 (Major Natural Gas Pipeline Annual Report; OMB Control No. 1902-0028) and Form 2-A (Nonmajor Natural Gas Pipeline Annual Report; OMB Control No. 1902-0030) for the natural gas industry. The FERC-3-Q is submitted for electric utilities and licensees reporting Forms 1 or 1-F; and natural gas companies reporting Forms 2 or 2A.⁵

The Commission collects Forms 1, 1-F, and 3-Q as prescribed in Title 18 CFR (Code of Federal Regulations) Parts 141.1, 141.2, and 141.400 and 260.300. The FERC Forms 1, 1-F, and 3-Q provide an informative picture of the jurisdictional entities' financial conditions and other relevant data that are used by FERC and others, in making economic judgments about the entity or its industry.

³ 18 CFR § 101. Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provision of the Federal Power Act, General Instructions. Nonoperating entities formerly designated as Major and new entities that expect to be in the Major category should file as detailed in 18 CFR § 101.

⁴ 18 CFR § 101. Uniform System of Accounts Prescribed for Public Utilities and Licensees Subject to the Provision of the Federal Power Act, General Instructions. Nonoperating entities formerly designated as Nonmajor and new entities that expect to be in the Nonmajor category should file as detailed in 18 CFR § 101.

⁵ 18 CFR 260.1(b) For natural gas, Major, as defined by the Natural Gas Act, pertains to a company whose combined gas transported or stored for a fee exceed 50 million Dth in each of the three previous calendar years; 18 CFR 260.2(b) For natural gas, Nonmajor as defined by the Natural Gas Act, pertains to a company not meeting the filing threshold for Major, but having total gas sales or volume transactions exceeding 200,000 Dth in each of the three previous calendar years.

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

Forms 1, 1-F, and 3-Q. These forms provide information concerning a company's current performance, compiled using the Commission's Uniform Systems of Accounts (USofA).⁶ The forms include a basic set of financial statements: Comparative Balance Sheet, Statement of Income and Statement of Retained Earnings, Statement of Cash Flows, and the Statement of Comprehensive Income and Hedging Activities and supporting schedules containing supplementary information. Electric respondents report revenues and the related quantities of electric sales and electricity transmitted; account balances for all electric operation and maintenance expenses; selected plant cost data; and other statistical information. Natural gas respondents include monthly and quarterly quantities of gas transported and associated revenues; storage, terminaling, and processing services; natural gas customer accounts and details of service; and operational expenses, depreciation, depletion and amortization of gas plant.

Information in the forms is used by FERC, state regulatory agencies and others in the review of the financial condition of regulated companies. The information is also used in various rate proceedings, market oversight, FERC's audit programs, and the computation of annual charges based on certain schedules contained on the forms.

In summary, without this information the Commission will not be able to respond and make decisions in a timely manner to rapidly changing financial conditions of entities subject to its jurisdiction.

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

FERC-1, 1-F, and 3-Q. There is an ongoing effort to determine the potential and value of improved information technology to reduce the burden.

⁶ See 18 CFR Part 101 (Uniform System Of Accounts Prescribed For Public Utilities And Licensees Subject To The Provisions Of The Federal Power Act) and Part 201 (Uniform System Of Accounts Prescribed For Natural Gas Companies Subject To The Provisions Of The Natural Gas Act).

The FERC Forms 1 and 3-Q are submitted electronically (as described at <http://www.ferc.gov/docs-filing/forms/form-1/elec-subm-soft.asp> for electric entities, and at <http://www.ferc.gov/docs-filing/eforms/form-2/elec-subm-soft.asp> for gas entities submitting the 3-Q). Companies filing the FERC Form 1-F may file electronically or in hard copy.

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's 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 any duplication. The Commission's staff is continuously reviewing its various filings in an effort to alleviate duplication.

Forms 1, 1-F, and 3-Q. While some jurisdictional entities may file similar information with the Securities and Exchange Commission (SEC), the level of detail concerning assets, liabilities, stockholders' equity along with the revenues, expenses, gains, and losses is different for the Commission and the SEC. The financial statements filed with the SEC are on a consolidated, or parent company basis. The Commission notes that a majority of the jurisdictional entities that it regulates files financial information with the SEC that consolidates their assets, liabilities and profits with their parent company, or combine the regulated and unregulated operations in the reports to the SEC. While consolidation is appropriate for SEC reporting, the Commission requires more detailed information concerning the results of operations, and the financial position of each jurisdictional entity in order to meet its regulatory needs. Therefore, the Commission has required jurisdictional entities to file financial information on a jurisdictional entity level basis using a uniform system of accounts.

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

Forms 1, 1-F, and 3-Q. As noted previously, the Form 1 is filed by major utilities or licensees and as such does not apply to small entities. The Form 1-F is filed by public utilities with total sales of 10,000 megawatt-hours or more that are not major utilities. The Form 3-Q is filed only by electric or gas companies that file Forms 1, 1-F, 2, or 2-A and therefore excludes companies that do not qualify as Major or Nonmajor. If the reporting requirements represent an undue burden on small businesses, the affected entity may seek a waiver of the disclosure

requirements from the Commission. However, the Commission believes that the information collected on these forms is the minimum necessary to provide a meaningful review of financial conditions and would impose the least possible burden on entities.

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

Forms 1, 1-F, and 3-Q. The existing Forms 1 and 1-F are required by the Commission to be submitted annually. The Form 3-Q filings provide quarterly updates to supplement the Forms 1, 1-F, 2, and 2A. Reporting is consistent with the reporting to the companies' own management, the Internal Revenue Service, state and other Federal agencies' (including Office of Management and Budget) requirements. Further, Section 304(a) of the Federal Power Act (16 U.S.C. 825(c)) states the following:

“Every licensee and every public utility shall file with the Commission such annual and other periodic or special reports as the Commission may by rules and regulations or order prescribe as necessary or appropriate to assist the Commission in the proper administration of this Act. The Commission may prescribe the manner and form in which such reports shall be made, and require from such persons specific answers to all questions upon which the Commission may need information. The Commission may require that such reports shall include, among other things, full information as to assets and liabilities, capitalization, net investment, and reduction thereof, gross receipts, interest due and paid, depreciation, and other reserves, cost of project and other facilities, cost of maintenance and operation of the project and other facilities, cost of renewals and replacement of the project works and other facilities, depreciation, generation, transmission, distribution delivery, use, and sale of electric energy. The Commission may require any such person to make adequate provision for currently determining such costs and other facts. Such reports shall be made under oath unless the Commission otherwise specifies.”

Therefore, the Commission is meeting its statutory obligations as well as implementing a reporting frequency that coincides with industry business practices and OMB guidelines as noted above.

It is not possible to collect this data less frequently. If the collections were conducted less frequently, the Commission would be unable to perform its mandated oversight and review responsibilities with respect to electric market based rates being just and reasonable.

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

Forms 1, 1-F, and 3-Q. These collections meet OMB's section 1320.5 requirements.

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

Forms 1, 1-F, and 3-Q. The 60-day notice⁷ in Docket No. IC16-11 was published in the Federal Register on June 7, 2016, 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 collection of data. The 30-day notice is also being published in the Federal Register for public review and comment.⁸

The Commission received a total of three comments (from two parties) for Forms 1, 1-F, and 3-Q in response to the 60-day Notice. A summary of the comments and the Commission's responses follow.

- The Bureau of Economic Analysis (BEA) submitted comments on 7/28/2016 on Forms 1 and 1-F.⁹

BEA Comments: BEA uses data from Forms 1 and 1-F in estimating the national income and product account (NIPA) structures investment estimate. BEA states: "While BEA uses this information indirectly through the [U.S. Census Bureau's Construction Value Put-In Place] program, it is considered an indispensable data source to the NIPA estimates."¹⁰ BEA would like to explore receiving data directly from the Commission with

⁷ The Notice was published at 81 FR 38169, 6/13/2016 (<https://www.gpo.gov/fdsys/pkg/FR-2016-06-13/pdf/2016-13922.pdf>).

⁸ 81FR 67343, 9/30/2016.

⁹ The submittals are posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14318233> and <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14318200>.

¹⁰ Comment of BEA under IC16-11 (2 Letters of Support) ID 158/159 (OMB Numbers 1902-0021; 1902;0029) ID 437 (OMB Number 1902-0205, Dockets IC16-11-000 07/28/2016.

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aggregated industry totals of particular line items from Forms 1 and 1-F. BEA also suggests that the Commission expand the Form 1 and 1-F collection to include additional information regarding details on capital expenditures.

FERC Response: BEA may access Form 1 and 1-F data directly: (1) using the Form 1 viewer and historical data that is accessible via the Commission's website at www.ferc.gov/docs-filing/forms.asp; or (2) by searching for individual filings in eLibrary at <http://www.ferc.gov/docs-filing/elibrary.asp>.

The Commission is not presently considering modifications to collect additional information on the Forms 1 and 1-F. Separately, the Commission is looking at modernizing data collection in Docket No. AD15-11, but that is an activity not addressed here.¹¹

- BEA also submitted comments on 7/28/2016 on Form 3-Q.¹²

BEA Comments: BEA relies heavily on data from Forms 3-Q to calculate components of both the industry and national economic accounts to estimate gross output, intermediate input, and value added to the U.S. economy from the utilities industry. Similar to BEA's comments on Forms 1 and 1-F, BEA is interested in the inclusion of additional information in Form 3-Q regarding details related to capital expenditures. BEA suggests expansions to the Form 3-Q such as adding "new versus replacement capital expenditures for certain line items"; including "annual payments for equipment, software, and structures leased under operating leases from others"; and improving "questions to help identify plants producing services in the current period (in service) versus plant not in service or off-line".

FERC Response: The Commission is not presently considering modifications to collect additional information on the Form 3-Q but as

¹¹ When FERC makes changes to the forms, instructions, and/or reporting platform system, that information will be submitted to OMB, as appropriate, for review under the Paperwork Reduction Act (PRA). More information on the Forms Refresh project is posted at <http://www.ferc.gov/docs-filing/forms/eforms-refresh.asp>.

¹² The submittal is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14318234>.

noted above is looking at modernizing data collection, which is a separate activity not addressed here.

- EEI submitted comments on 8/12/2016 on the Form 3-Q.¹³

EEI Comments: In its comments, EEI proposes eliminating the Form 3-Q or reducing its frequency. EEI claims that the Form 3-Q has little to no value to the Commission's objective to achieve vigilant oversight of reporting entities. EEI states that it is unclear exactly how and to what extent the Commission uses the quarterly data and that no EEI member has ever been contacted about a Form 3-Q filing. EEI poses that Form 3-Q does not lend itself to identification of emerging trends or the economic effects of significant transactions and events and that Form 3-Q has no bearing on formula rate determination. As such EEI recommends that the Commission eliminate Form 3-Q or alternately adopt a mid-year frequency.

Regarding the accuracy of the Commission's burden and cost estimates, EEI comments that the Commission's estimates are reasonable, but that EEI does not believe the burden and costs are warranted.

FERC Response: The Commission currently uses the Form 3-Q report to perform oversight analysis and make timely evaluations of current financial information submitted to the Commission. Additionally, Form 3-Q is used to validate the debt and equity information of filings under Part 34 of the Commission's regulations when the most recent 12-month filing occurred more than 4 months prior to the application under Part 34. The Commission is not presently considering modifications to the collection or frequency of collection of the Form 3-Q, but may consider doing so in the future, at which time EEI will be able to submit comments on this issue.

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

Forms 1, 1-F, and 3-Q. The Commission does not provide compensation or remuneration to entities subject to its jurisdiction.

¹³ The submittal is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14328920>.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Forms 1, 1-F, and 3-Q. The data are considered public. Individual requests for confidentiality may be made pursuant to 18 CFR 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

Forms 1, 1-F, and 3-Q. The collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN ON COLLECTION OF INFORMATION

Forms 1 and 1-F . The one-time implementation burden (of 3 hours per respondent for the Forms 1 and 1-F) for the Final Rule in DocketNo. RM11-24 (issued 7/18/2013) was administratively averaged over Years 1-3 giving an additional 1 hour annually for Years 1-3. Because the implementation period and that 3-year period (of averaging the implementation burden) have been completed, the additional 1 hour of burden is removed here and will show as a program decrease in Question 15. These changes were inadvertently omitted from the 60-day Notice.

Forms 1, 1-F, and 3-Q. The estimated annual public reporting burdens and costs¹⁴ are as follows.

¹⁴ The cost estimate (wages plus benefits) is \$78.66/hour and is used for the Forms 1, 1-F, and 3-Q. The \$78.66/hour (wages plus benefits) is based on figures from the Bureau of Labor Statistics National Industry-Specific Occupational and Employment Wage Estimates (May 2015 estimates at http://www.bls.gov/oes/current/naics2_22.htm, and benefits information for December 2015 at <http://www.bls.gov/news.release/ecec.nr0.htm>) and is an average of the following: management (code 11-0000) of \$88.94/hour; business and financial operations occupations (code 13-0000) of \$56.86/hour; legal (code 23-0000) of \$128.94/hour; and office and administrative support (code 43-0000) of \$39.91/hour.

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Form	No. of Respondents (1)	Annual No. of Responses per Respondent (2)	Total No. 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)
Form 1	210	1	210	1,168 hrs.; \$91,874.88	245,280 hrs.; \$19,293,724.80	\$91,874.88?
Form 1-F	5	1	5	122 hrs.; \$9,596.52	610 hrs.; \$47,982.60	\$9,596.52
<i>Form 3-Q</i>						
Form 3-Q (electric)	213 ¹⁵	3	639	168 hrs.; \$13,214.88	107,352 hrs.; \$8,444,308	\$39,644.64
Form 3-Q (gas)	167	3	501	167 hrs.; \$13,136.22	83,667 hrs.; \$6,581,246	\$39,408.66
<i>Total for Form 3-Q</i>			1,140		191,019 hrs.; \$15,025,554	

Non-substantive updates to the instructions will be made as noted in Attachment A.

13. ESTIMATE OF THE TOTAL COST BURDEN TO RESPONDENTS

Forms 1, 1-F, and 3-Q: There are no capital or start-up costs; all costs are related to burden hours and are discussed in #12 and #15.

14. ESTIMATED ANNUALIZED COST TO THE FEDERAL GOVERNMENT

Forms 1, 1-F, and 3-Q. The estimated average annual costs to the Commission follow.

¹⁵The estimated number of electric filers of the Form 3-Q is 213 (rather than the 215 total for the number of filers of the Forms and 1-F) due to waivers granted by the Commission in Dockets No. AC04-105.

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	No. of FTE's	Estimated Annual Cost
Analysis and Processing of Filings ¹⁶	4	\$618,588
PRA ¹⁷ Administrative Cost		\$16,443 (\$5,481 for each collection)
Hardware and Software Costs ¹⁸		-
Total Estimated Annualized Federal Cost for Forms 1, 1-F, and 3-Q (electric and gas)		\$635,031

There is one interconnected IT system for the Forms 1, 1-F, and 3-Q, so the federal hardware and software costs cannot be separated. In addition, the staff time spent processing and analyzing the filings and postings (as well as performing the PRA clearance work) is difficult to separate between the information collections affected by the final rule.

Therefore, the estimated annual federal cost of \$635,031 will all be included in the Form 1 ICR in reginfo.gov and ROCIS.

Forms 1 and 3-Q must be submitted using electronic media.¹⁹ The current forms software is outmoded and unsustainable, so the Commission is working to discontinue its use of the software, as mentioned earlier. Error: Reference source not found Moreover, because of the software limitations, the new and revised form schedules which were required by the Final Rule in Docket RM11-24 were not available to utilities with energy storage assets and those that acquire the assets. Consequently, utilities with energy storage assets and those that acquire

¹⁶ The estimated average annual cost (salary plus benefits) for 2016 for an FERC Full-Time Equivalent (FTE) is \$154,647 (or \$74.50 per hour).

¹⁷ Paperwork Reduction Act of 1995 (PRA)

¹⁸ As discussed in the Final Rule (Order 784, issued 7/18/2013) in Docket RM11-24, the changes made to FERC Forms 1, 1-F, and 3-Q will be incorporated into a “refresh” of the IT system. (Order 784 is posted at <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13309336>.) Therefore the costs for hardware, filing platform system, and related human resource costs for the material required by Docket RM11-24 will be included as a part of the overall cost for the new system and submitted to OMB for review when appropriate.

Details on the cost of the Forms Refresh effort in Docket No. AD15-11 (affecting Forms 1, 1-F, 3-Q (gas and electric) and others) will be provided in the future when developed and as required by the PRA.

¹⁹ Form 1-F filers may also submit the reports electronically; however, the Commission’s regulations do not explicitly require these filers to submit the reports electronically.

the assets at a later date must continue or begin, as appropriate, using the existing form schedules to report energy storage assets pending availability of the new and revised schedules in the new filing platform. The Commission's Chief Accountant issued interim accounting and reporting guidance for utilities to report to the Commission the costs of energy storage operations (discussed in the Final Rule in Docket RM11-24) in the existing filing software system until the new and revised schedules are available in the new filing platform.²⁰

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

Forms 1 and 1-F. The one-time implementation burden (of 3 hours per respondent for the Forms 1 and 1-F) for the Final Rule in DocketNo. RM11-24 (issued 7/18/2013) was administratively averaged over Years 1-3 giving an additional 1 hour annually. Because the implementation period and that 3-year period of averaging have been completed, the additional 1 hour of burden is removed here and shows as a program decrease. This change was inadvertently omitted from the 60-day Notice.

Forms 1, 1-F, and 3-Q. Non-substantive updates [e.g., to estimated average number of burden hours and addresses for FERC and OMB] are being made to the instructions as noted in Attachment A.

There are no changes to the reporting requirements. However, total responses may vary in the future depending on the companies self-identifying as a required filer based on the classifications outlined in the CFR. A comparison of the current estimates with the OMB-approved inventory follows.

²⁰ See <http://www.ferc.gov/enforcement/acct-matts/docs/AI14-1-000.pdf>.

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	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
FERC-1				
Annual Number of Responses	210	210	0	0
Annual Time Burden (Hr.)	245,280	245,490	0	-210
Annual Cost Burden (\$)	0	0	0	0
FERC-1-F				
Annual Number of Responses	5	5	0	0
Annual Time Burden (Hr.)	610	615	0	-5
Annual Cost Burden (\$)	0	0	0	0
FERC-3-Q (combined electric and gas)				
Annual Number of Responses	1,140	1,101	39	0
Annual Time Burden (Hr.)	191,019	184,575	+6,444	0
Annual Cost Burden (\$)	0	0	0	0

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

Forms 1, 1-F, and 3-Q. The data are being collected or used for regulatory purposes, though the raw data can be accessed on FERC’s website.

17. DISPLAY OF EXPIRATION DATE

Forms 1, 1-F, and 3-Q. The expiration dates are displayed on the Forms 1, 1-F, and 3-Q, available at <http://www.ferc.gov/docs-filing/forms.asp>. In addition, all expiration dates are posted on ferc.gov at <http://www.ferc.gov/docs-filing/info-collections.asp>.

18. EXCEPTION TO THE CERTIFICATION STATEMENT

There are no exceptions.

ATTACHMENT A

The following part of the FERC Form 1 and 3-Q (electric) instructions will be updated as noted.

V. Where to Send Comments on Public Reporting Burden.

The public reporting burden for the FERC Form 1 collection of information is estimated to average 1,168 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data-needed, and completing and reviewing the collection of information. The public reporting burden for the FERC Form 3-Q (electric) collection of information is estimated to average 168 hours per response.

Send comments regarding these burden estimates or any aspect of these collections of information, including suggestions for reducing burden, to the Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426 (Attention: Information Clearance Officer), by e-mail at DataClearance@ferc.gov; and to the Office of Management and Budget, Washington, DC 20503 (Attention: Desk Officer for the Federal Energy Regulatory Commission), by e-mail at oir_submission@omb.eop.gov. No person shall be subject to any penalty if any collection of information does not display a valid OMB Control number (44 U.S.C. § 3512 (a)).

The following part of the FERC Form 1-F instructions will be updated as noted.

Where to Send Comments on Public Reporting Burden

The public reporting burden for this collection of information is estimated to average 122 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. Send comments regarding this burden estimate or any aspect of this collection of information, including suggestions for reducing this burden, to the Federal Energy Regulatory Commission, 888 First Street NE., Washington, DC 20426 (Attention: Information Clearance Officer), by e-mail at DataClearance@ferc.gov; and to the Office of Management and Budget, Washington, DC 20503 (Attention: Desk Officer for the Federal Energy Regulatory Commission) by e-mail at oir_submission@omb.eop.gov. No person shall be subject to any penalty

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if any collection of information does not display a valid OMB Ccontrol number (44 U.S.C. § 3512 (a)).

The following part of the FERC Form 3-Q (gas) instructions will be updated as noted.

V. Where to Send Comments on Public Reporting Burden.

The public reporting burden for the Form 2 collection of information is estimated to average 1,623 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data-needed, and completing and reviewing the collection of information. The public reporting burden for the Form 2A collection of information is estimated to average 250 hours per response. The public reporting burden for the Form 3-Q collection of information is estimated to average 167 hours per response.

Send comments regarding these burden estimates or any aspect of these collections of information, including suggestions for reducing burden, to the Federal Energy Regulatory Commission, 888 First Street NE, Washington, DC 20426 (Attention: Information Clearance Officer) by e-mail at DataClearance@ferc.gov; and to the Office of Management and Budget, Washington, DC 20503 (Attention: Desk Officer for the Federal Energy Regulatory Commission) by e-mail at oir_submission@omb.eop.gov. . No person shall be subject to any penalty if any collection of information does not display a valid control number (44 U.S.C. § 3512 (a)).