

Supporting Statement
FERC-725N, Mandatory Reliability Standards: TPL¹ Reliability Standards,
in Final Rule in RM15-11-000

The reporting and recordkeeping requirements for Reliability Standard TPL-007-1 (Transmission System Planned Performance for Geomagnetic Disturbance Events) will be added to FERC-725N, as discussed in the Final Rule in Docket No. RM15-11² and this supporting statement³. The Federal Energy Regulatory Commission (FERC or Commission) is requesting that the Office of Management and Budget (OMB) approve the reporting and recordkeeping requirements in Reliability Standard TPL-007-1 in the Final Rule in RM15-11-000.

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.⁴ 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.

On March 16, 2007, in Order No. 693, pursuant to section 215(d) of the FPA, the Commission approved 83 of 107 proposed Reliability Standards, six of the eight proposed regional differences, and the North American Electric Reliability Corporation (NERC) *Glossary of Terms Used in Reliability Standards* (NERC Glossary), including Version 0 TPL Reliability Standards.⁵ Further, pursuant to FPA section 215(d)(5), the Commission directed NERC to develop modifications to TPL-001-0 through TPL-004-0 through the Reliability Standards development process. In Order No. 693 the Commission indicated that the planning-related Reliability Standard could be improved to better account for probable contingencies when conducting planning studies. Further in that Order, FERC said that much of its proposal was consistent with the potential improvements NERC had already recognized.⁶

In this Final Rule in Docket RM15-11, FERC approves Reliability Standard TPL-007-1. Reliability Standard TPL-007-1 establishes requirements for certain entities to assess the

1 TPL stands for Transmission Planning

2 FERC's Final Rule is posted in FERC's eLibrary at <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14360208>; the associated News Release is posted at <http://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=13875403>.

3 The information collection requirements in the Reliability Standards (TPL-001-0 through TPL-004-0) are approved by OMB under FERC-725A (OMB Control No.1902-0244), with TPL-001-4 contained in FERC-725N (from the final rule in Dockets RM12-1 and RM13-9).

4 The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2000).

5 *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at PP 1840, 1845, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007). The currently-effective versions of the TPL Reliability Standards are as follows: TPL-001-0.1, TPL-002-0b, TPL-003-0a, and TPL-004-0.

6 *Id.* at P 431

vulnerability of their transmission systems to geomagnetic disturbance events (GMDs), which occur when the sun ejects charged particles that interact and cause changes in the earth's magnetic fields. Entities that do not meet certain performance requirements, based on the results of their vulnerability assessments, must develop a plan to achieve the requirements. NERC submitted the Reliability Standard for Commission approval in response to a FERC directive in Order No. 779. In addition, the Commission directs that NERC develop modifications to the benchmark GMD event definition set forth in Attachment 1 of the approved Reliability Standard so that the definition is not based solely on spatially-averaged data.

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

In its Petition, NERC states that:

“Geomagnetic disturbances (“GMDs”) occur during solar storms when the sun ejects charged particles directed toward the earth, and the magnetic field associated with these charged particles interacts with the earth’s magnetic field. This interaction could cause geomagnetically induced currents (also known as “GICs”) to flow in an electric power system through transmission lines and grounded transformer windings. GMDs can be of varying intensity, and their impact on an electric power system is dependent on a number of factors, including where the geomagnetic storm is located, the magnitude and direction of the geomagnetic fields, the geomagnetic latitude of the electric power system, the local geology (i.e. electrical conductivity of the ground), and the characteristics of the electric power system.

During a GMD event, GIC flow in transformers can substantially increase absorption of reactive power and create harmonics, resulting in a risk of voltage instability or voltage collapse. In some cases, GIC flow in power transformers can cause increased transformer hot-spot heating, which can lead to equipment loss of life or damage. The science regarding the impacts of GMDs on electric power systems is still evolving, and much remains to be learned about the unique threat GMDs pose to the reliability of the Bulk-Power System. However, as the Commission noted in Order No. 779, “while there is an ongoing debate as to how a severe GMD event will most likely impact the Bulk-Power System, there is a general consensus that GMD events can cause wide-spread blackouts due to voltage instability and subsequent voltage collapse, thus disrupting the reliable operation of the Bulk-Power System.”

Reliability Standard TPL-007-1, together with Commission-approved Reliability Standard EOP-010-1, addresses the unique risks posed by a high-impact, low frequency GMD event on the reliable operation of the Bulk-Power System and is responsive to the Commission’s concerns articulated in Order No. 779. As the Commission established in Order No. 779, the Reliability Standard “should include Requirements whose goal is to prevent instability, uncontrolled separation, or cascading failures of the Bulk-Power system when confronted with a benchmark GMD event.” The standard is responsive to this directive by requiring owners and operators of the Bulk-

Power System to conduct initial and ongoing assessments of the potential impact of a defined GMD event (referred to herein as the “Benchmark GMD Event”) on Bulk-Power System equipment and the Bulk-Power System as a whole. The Benchmark GMD Event used to develop the standard is based on a 1-in-100 year frequency of occurrence, and is supported by rigorous technical analysis of modern measurement data and publicly-available models. The Benchmark GMD Event sets a high benchmark for reliability, as it represents the most severe GMD event expected in a 100- year period as determined by a statistical analysis of recorded geomagnetic data. Additionally, the approved standard specifies parameters for assessments that will identify impacts from this Benchmark GMD Event and requires corrective action to protect against instability, uncontrolled separation, and cascading failures of the Bulk-Power System.

The Reliability Standard represents a significant milestone in NERC's ongoing efforts to understand and address the unique reliability risks that high-impact, low-frequency GMD events pose to the Bulk-Power System. The assessments and other actions required by the approved standard complement the Operating Plans, Processes, and Procedures required in the Commission-approved EOP-010-1 Reliability Standard to address GMD impacts to the Bulk-Power System. Additionally, implementation of the approved Reliability Standard will provide opportunities to further mature the tools, models, and techniques for assessing potential impacts of GMDs.”

As described in the Background section of the approved standard, “[d]uring a GMD event, geomagnetically-induced currents (GIC) may cause transformer hot-spot heating or damage, loss of Reactive Power sources, increased Reactive Power demand, and Misoperation(s), the combination of which may result in voltage collapse and blackout.” GMD events could cause widespread blackouts and cause damage to equipment that could result in sustained system outages.⁷ The GIC flow information will be used by the transmission owners and generation owners so that they can conduct thermal impact assessments on their equipment. This will allow the equipment owners to take action to protect their equipment.

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

The use of current or improved technology is not covered in Reliability Standards, and is therefore left to the discretion of each reporting entity. We think that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the eight Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional

⁷ *Id.* PP 3, 16 (citing NERC 2012 Special Reliability Assessment Interim Report: Effects of Geomagnetic Disturbances on the Bulk Power System at 69 (February 2012) (GMD Interim Report); Oak Ridge National Laboratory, Electromagnetic Pulse: Effects on the U.S. Power Grid: Meta-R-319 at page 1-14, Tables 4-1, 4-2, 4-3 (discussing at-risk transformers) (January 2010)).

Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

The submittals are not made to FERC.

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 information collection requirements are unique to this reliability standard and to this information collection. The Commission does not know of any duplication in the requirements. In addition, the standard-developing group (the ERO and various stakeholders) and the scientific community think it needs to be addressed and documented, as indicated in the NERC petition.

5. METHODS USED TO MINIMIZE THE BURDEN IN COLLECTION OF INFORMATION INVOLVING SMALL ENTITIES⁸

Small entities generally can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity the ability to share its compliance burden with other similar entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508⁹.

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

If this standard and the associated information collection requirements did not exist or were performed less frequently, the reduction or elimination of transmission system planning would likely lead to lower system reliability and higher vulnerability and risk, such as transmission system outages and loss of load.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are some special circumstances as described in 5 CFR 1320.5(d)(2) related to this information collection.

⁸In the OMB approval for FERC-725N dated 1/10/2014, OMB's Terms of Clearance said "[w]hen FERC considers approval of the next version of Reliability Standard TPL-001-0 through TPL-PRC-005, they should consider small entity impacts and potential options for reducing their recordkeeping and reporting burden." The Final Rule in RM15-11 and this corresponding supporting statement address Standard TPL-007-1 and do not affect TPL-001-0 through TPL-PRC-005.

⁹Details of the current ERO Reliability Standard processes are available on the NERC website at <http://www.nerc.com/pa/Stand/Resources/Documents/Appendix3AStandardsProcessesManual.pdf>.

Some of the evidence must be retained for five years or until actions in the Corrective Action Plan are completed, as described below, in the Evidence Retention section of the approved standard.

“1.2. Evidence Retention

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Planning Coordinator, Transmission Planner, Transmission Owner, and Generator Owner shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

For Requirements R1, R2, R3, R5, and R6, each responsible entity shall retain documentation as evidence for five years.

For Requirement R4, each responsible entity shall retain documentation of the current GMD Vulnerability Assessment and the preceding GMD Vulnerability Assessment.

For Requirement R7, each responsible entity shall retain documentation as evidence for five years or until all actions in the Corrective Action Plan are completed, whichever is later.

If a Planning Coordinator, Transmission Planner, Transmission Owner, or Generator Owner is found non-compliant it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.”

These special circumstances are necessary for reliability purposes. The schedule for revisiting the GMD vulnerability assessments and corrective action plans is every 60 months (see Requirement R4). The retention periods essentially require evidence to be retained until updated assessments are performed. The updates would incorporate such things as better scientific or engineering tools, changes to the electric grid topology and resources, and better mitigation measures.

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

The Commission published the NOPR in Docket RM15-11-000 on 5/26/2016¹⁰ giving interested members of the public, industry, and government an opportunity to comment. The Commission published the Final Rule in the same docket in the Federal Register (81 FR 67120, 9/30/2016).

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, with the final standard submitted to the FERC for review and approval.¹¹ 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 collection of data.

The Commission received initial and supplemental comments from 28 entities in response to the Notice of Proposed Rulemaking. Commenters generally supported the Commission's proposal to approve Reliability Standard TPL-007-1, although some commenters did not support approval of the Reliability Standard as filed by NERC. With respect to the directives proposed by the Commission (i.e., for NERC to develop revisions to Reliability Standard TPL-007-1 and conduct additional research), the comments variously supported the Commission's proposals, stated that the proposals were unnecessary, or that proposals did not go far enough to address alleged weaknesses with Reliability Standard TPL-007-1. The comments did not raise concerns with the Commission's estimates in the section of the Notice of Proposed Rulemaking addressing the Paperwork Reduction Act.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rule of Procedure 1502, "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 approved Reliability Standards 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 unless and until any such information is submitted to FERC as part of an enforcement action or other compliance review.

10 80 FR 29990

11 Details of the current ERO Reliability Standard processes are available on the NERC website at <http://www.nerc.com>.

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.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

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

FERC-725N, as modified by the Final Rule in Docket No. RM15-11-000 (TPL-007-1 Reliability Standard for Transmission System Planned Performance for Geomagnetic Disturbance Events)¹²						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden Hours & Cost Per Response¹³ (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
(One-time) Requirement 1	121 (PC & TP)	1	121	Eng. 5 hrs. (\$331.75); RK 4 hrs. (\$149.80)	1,089 hrs. (605 Eng., 484 RK); \$58,267.55 (\$40,141.75 Eng., \$18,125.80 RK)	\$481.55
(On-going) Requirement 1	121 (PC & TP)	1	121	Eng. 3 hrs. (\$199.05); RK 2 hrs. (\$74.90)	605 hrs. (363 Eng., 242 RK); \$33,147.95 (\$24,085.05 Eng., \$9,062.90 RK)	\$273.95

¹² Eng.= engineer; RK = recordkeeping (record clerk); PC = planning coordinator; TP = transmission planner; TO = transmission owner; and GO = generator owner.

¹³ The estimates for cost per response are derived using the following formula: Burden Hours per Response * \$/hour = Cost per Response. The \$66.35/hour figure for an engineer and the \$37.45/hour figure for a record clerk are based on data on the average salary plus benefits from the Bureau of Labor Statistics obtainable at http://www.bls.gov/oes/current/naics2_22.htm and <http://www.bls.gov/news.release/ecec.nr0.htm>.

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(One-time) Requirement 2	121 (PC & TP)	1	121	Eng. 22 hrs. (\$1,459.70); RK 18 hrs. (\$674.10)	4840 hrs. (2,662 Eng., 2,178 RK); \$258,189.80 (\$176,623.70 Eng., \$81,566.10 RK)	\$2,133.80
(On-going) Requirement 2	121 (PC & TP)	1	121	Eng. 5 hrs. (\$331.75); RK 3 hrs. (\$112.35)	968 hrs. (605 Eng., 363 RK); \$53,736.10 (\$40,141.75 Eng., \$13,594.35 RK)	\$444.10
(One-time) Requirement 3	121 (PC & TP)	1	121	Eng. 5 hrs. (\$331.75); RK 3 hrs. (\$112.35)	968 hrs. (605 Eng., 363 RK); \$53,736.10 (\$40,141.75 Eng., \$13,594.35 RK)	\$444.10
(On-going) Requirement 3	121 (PC & TP)	1	121	Eng. 1 hrs. (\$66.35); RK 1 hrs. (\$37.45)	242 hrs. (121 Eng., 121 RK); \$12,559.80 (\$8,028.35 Eng., \$4,531.45 RK)	\$103.80
(On-going) Requirement 4	121 (PC & TP)	1	121	Eng. 27 hrs. (\$1,791.45); RK 21 hrs. (\$786.45)	5,808 hrs. (3,267 Eng., 2,541 RK); \$311,919.85 (\$216,765.45 Eng., \$95,154.40 RK)	\$2,277.85
(On-going) Requirement 5	121 (PC & TP)	1	121	Eng. 9 hrs. (\$597.15); RK 7 hrs. (\$262.15)	1936 hrs. (1,089 Eng., 847 RK); \$103,975.30 (\$72,255.15 Eng., \$31,720.15 RK)	\$859.30

(One-time) Requirement 6	881 (TO & GO)	1	881	Eng. 22 hrs. (\$1,459.70); RK 18 hrs. (\$674.19)	35,240 hrs. (19,382 Eng., 15,858 RK); \$1,879,957.09 (\$1,285,995.70 Eng., \$593,961.39 RK)	\$2,133.89
(On-going) Requirement 6	881 (TO & GO)	1	881	Eng. 2 hrs. (\$132.70); RK 2 hrs. (\$74.90)	3,524 hrs. (1,762 Eng., 1762 RK); \$182,895.60 (\$116,908.70 Eng., \$65,986.90 RK)	\$207.60
(On-going) Requirement 7	121 (PC & TP)	1	121	Eng. 11 hrs. (\$729.85); RK 9 hrs. (\$337.05)	2,420 hrs. (1,331 Eng., 1,089 RK); \$129,094.90 (\$88,311.85 Eng., \$40,783.05 RK)	\$1,066.90
TOTAL			2,851		57,640¹⁴ hrs. (31,792 Eng., 25,848 RK); \$3,077,480.04 (\$2,109,399.20 Eng., \$968,080.84 RK)	

Averaging One-Time Burden and Responses (due to the Final Rule in RM15-11-000) over Years 1-3. Of the 57,640 total burden hours, 42,137 hours are one-time burden hours, and 15,503 hours are on-going annual burden hours. For purposes of this OMB clearance, the 42,137 one-time burden hrs. (some of which will not be completed for 5 years) will be averaged over Years 1-3. After Year 3, the one-time burden hours will then be removed from the inventory. The estimated additional burden due to this Final Rule is 29,548.67 (rounded to 29,549) hours [consisting of (42,137/3) +15,503].

Similarly, the 1,244 one-time responses will be averaged over years 1-3, giving an average of an additional 414.67 (rounded to 415) one-time responses each year. That 415 estimate will be added to the additional ongoing 1,607 annual responses, giving 2,022 additional responses per year.

¹⁴ Of the 57,640 total burden hours, 42,137 hours are one time burden hours, and 15,503 hours are on-going annual burden hours.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor costs currently associated with the FERC-725N.

All of the costs in the final rule in RM15-11 are associated with burden hours (labor) and described in #12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

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.

FERC-725N	Number of Employees (FTEs)	Estimated Annual Federal Cost
PRA ¹⁵ Administration Cost ¹⁶		\$5,481
Data Processing and Analysis ¹⁷	0	\$0
FERC Total		\$5,481

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

The Commission approves Reliability Standard TPL-007-1 and the associated implementation plan, violation severity levels, and violation risk factors, as discussed above. Reliability Standard TPL-007-1 will impose new requirements for transmission planners, planning coordinators, transmission owners, and generator owners.

1. Reliability Standard TPL-007-1, Requirement R1 requires planning coordinators, in conjunction with transmission planner, to identify the responsibilities of the planning coordinator and transmission planner in the planning coordinator’s planning area for maintaining models and performing the study or studies needed to complete GMD Vulnerability Assessments.
2. Requirements R2, R3, R4, R5, and R7 refer to the “responsible entity, as determined by Requirement R1,” when identifying which applicable planning coordinators or transmission planners are responsible for maintaining models and performing the necessary study or studies.

15 Paperwork Reduction Act of 1995 (PRA).

16 The PRA Administration Cost is \$5,481, and includes preparing supporting statements, notices, and other activities associated with Paperwork Reduction Act compliance.

17 The “Estimated Annual Federal Cost” uses the 2016 average annual cost (salary plus benefits) of one FERC FTE (Full Time Equivalent) which is \$154,647.

3. Requirement R2 requires that the responsible entities maintain models for performing the studies needed to complete GMD Vulnerability Assessments, as required in Requirement R4.
4. Requirement R3 requires responsible entities to have criteria for acceptable system steady state voltage performance during a benchmark GMD event.
5. Requirement R4 requires responsible entities to complete a GMD Vulnerability Assessment of the near-term transmission planning horizon once every 60 calendar months.
6. Requirement R5 requires responsible entities to provide GIC flow information to transmission owners and generator owners that own an applicable bulk electric system power transformer in the planning area. This information is necessary for applicable transmission owners and generator owners to conduct the thermal impact assessments required by Requirement R6.
7. Requirement R6 requires applicable transmission owners and generator owners to conduct thermal impact assessments where the maximum effective GIC value provided in Requirement R5, Part 5.1 is 75 A/phase or greater.
8. Requirement R7 requires responsible entities to develop a corrective action plan when its GMD Vulnerability Assessment indicates that its system does not meet the performance requirements of Table 1 – Steady State Planning Events. The corrective action plan must address how the performance requirements will be met, must list the specific deficiencies and associated actions that are necessary to achieve performance, and must set forth a timetable for completion.

The following table shows the total burden of the 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-725N	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,205	183	0	2,022
Annual Time Burden (Hr)	45,020	15,471	0	29,549
Annual Cost Burden (\$)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications as part of this collection

17. DISPLAY OF EXPIRATION DATE

The expiration date is displayed in a table posted on ferc.gov at <http://www.ferc.gov/docs-filing/info-collections.asp>.

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18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for this collection. Therefore the Commission does not certify that the collection uses statistical methods.