

Supporting Statement
**FERC Form No. 725E (Mandatory Reliability Standards for Western Electric
Coordinating Council), as modified
in Docket Numbers RD16-10-000 and RD17-5-000 and IC17-6-000**

The Federal Energy Regulatory Commission (Commission or FERC) requests the Office of Management and Budget (OMB) review and approve the information collection requirements in FERC Form No. 725E (OMB Control No. 1902-0246), as modified for three years. FERC-725E is an existing collection whose filing requirements are contained in 18 Code of Federal Regulations (CFR) Part 40.

The Commission submits the changes due to the Dockets No. RD17-5-000, IC17-6-00 and RD16-10-000 under the FERC-725E information collection.

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.

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 currently-effective TOP/IRO Reliability Standards approved in Order No. 817¹.

RD16-10-000: On March 23, 2016 (and supplemented on November 16, 2016), the North American Electric Reliability Corporation (NERC) and Western Electricity Coordinating Council (WECC) filed a joint petition to retire regional Reliability Standard TOP-007-WECC-1a - System Operating Limits¹³⁰⁴ (“SOL”). The purpose of the proposed retirement is to shift away from the path-centric model and allow entities in the Western Interconnection to align their operating practices with the framework established in the continent-wide TOP/IRO Reliability Standards approved in Order No. 817, which,

¹ The burdens related to Order No. 817 are included in FERC-725Z (Mandatory Reliability Standards: IRO Reliability Standards, OMB Control No. 1902-0276), and FERC-725A Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0244).

according to NERC and WECC, achieve the objective of operating within acceptable pre- and post-contingency reliability criteria (i.e., within SOLs and Interconnection Reliability Operating Limits (“IROL”). On March 10, 2017, the Commission approved the retirement of regional Reliability Standard TOP-007-WECC-1a.²

RD17-5 and IC17-6: On March 10, 2017, NERC and WECC filed a joint petition in Docket No. RD17-5-000³ requesting Commission approval of: (a) regional Reliability Standard VAR-501-WECC-3 (Power System Stabilizers), and (b) the retirement of then-existing regional Reliability Standard VAR-501-WECC-2. The petition states: “Regional Reliability Standard VAR-501-WECC-3 establishes the performance criteria for power system stabilizers to help ensure the Western Interconnection is operated in a coordinated manner under normal and abnormal conditions.” VAR-501-WECC-3 was approved by order in Docket No. RD17-5-000 on April 28, 2017.

FERC-725E, In General: The information collected by the FERC-725E is required to implement the statutory provisions of section 215 of the Federal Power Act (FPA) (16 U.S.C. 824o). Section 215 of the FPA buttresses the Commission’s efforts to strengthen the reliability of the interstate grid through the grant of new authority by providing for a system of mandatory Reliability Standards developed by the Electric Reliability Organization (ERO). Reliability Standards that the ERO proposes to the Commission may include Reliability Standards that are proposed to the ERO by a Regional Entity.⁴ A Regional Entity is an entity that has been approved by the Commission to enforce Reliability Standards under delegated authority from the ERO.⁵ On June 8, 2008, the Commission approved eight regional Reliability Standards submitted by the ERO that were proposed by the Western Electricity Coordinating Council (WECC).⁶

WECC promotes bulk electric system reliability in the Western Interconnection. WECC is the Regional Entity responsible for compliance monitoring and enforcement. In addition, WECC provides an environment for the development of Reliability Standards and the coordination of the operating and planning activities of its members as set forth in the WECC Bylaws.

There are several regional Reliability Standards in the WECC region. These regional Reliability Standards generally require entities to document compliance with substantive requirements, retain documentation, and submit reports to WECC. The following standards will be continuing without change.

² The Delegated Letter Order is posted in FERC’s eLibrary at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14515285>.

³ The joint petition and exhibits are posted in the Commission’s eLibrary system in Docket No. RD17-5-000.

⁴ 16 U.S.C. 824o(e)(4).

⁵ 16 U.S.C. 824o(a)(7) and (e)(4).

⁶ *North American Electric Reliability Corp.*, 119 FERC ¶ 61,260 (2007).

- BAL-002-WECC-2a (Contingency Reserve)⁷ requires balancing authorities and reserve sharing groups to document compliance with the contingency reserve requirements described in the standard.
- BAL-004-WECC-02 (Automatic Time Error Correction) requires balancing authorities to document that time error corrections and primary inadvertent interchange payback were conducted according to the requirements in the standard.
- FAC-501-WECC-1 (Transmission Maintenance) requires transmission owners with certain transmission paths to have a transmission maintenance and inspection plan and to document maintenance and inspection activities according to the plan.
- IRO-006-WECC-2 (Qualified Transfer Path Unscheduled Flow (USF) Relief)⁸ requires balancing authorities and reliability coordinators to document actions taken to mitigate unscheduled flow.
- PRC-004-WECC-2 (Protection System and Remedial Action Scheme Misoperation)⁹ requires transmission owners, generator owners and

⁷ BAL-002-WECC-2 is included in the OMB-approved inventory for FERC-725E. On November 9, 2016, NERC and WECC submitted a joint petition for approval of an interpretation of BAL-002-WECC-2, to be designated BAL-002-WECC-2a. BAL-002-WECC-2a was approved by order in Docket No. RD17-3-000 on January 24, 2017. The Order determined: “The proposed interpretation provides clarification regarding the types of resources that may be used to satisfy Contingency Reserve requirements in regional Reliability Standard BAL-002-WECC-2.” BAL-002-WECC-2a did not trigger the Paperwork Reduction Act and did not affect the burden estimate. BAL-002-WECC-2a is being included in this Notice and the Commission’s submittal to OMB as part of the FERC-725E.

⁸ On December 20, 2013, NERC and WECC submitted a joint petition for approval of IRO-006-WECC-2 and retirement of IRO-006-WECC-1. IRO-006-WECC-2 was approved by order in Docket No. RD14-9-000 on May 13, 2014. Because the reporting burden for IRO-006-WECC-2 did not increase for entities that operate within the Western Interconnection, FERC submitted the order to OMB for information only. The burden related to IRO-006-WECC-2 does not differ from the burden of IRO-006-WECC-1, which is included in the OMB-approved inventory. IRO-006-WECC-2 is being included in this Notice and the Commission’s submittal to OMB as part of FERC-725E.

⁹ Order No. 818, issued on November 19, 2015 in Docket Nos. RM15-7, RM15-12, and RM15-13, stated in part: “NERC requested approval of the following Reliability Standards to incorporate the proposed definition of Remedial Action Scheme and eliminate use of the term Special Protection System: . . . PRC-004-WECC-2, . . . NERC did not propose any changes to the Violation Risk Factors or Violation Severity Levels for the modified standards.” *Revisions to Emergency Operations Reliability Standards; Revisions to Undervoltage Load Shedding Reliability Standards; Revisions to the Definition of “Remedial Action Scheme” and Related Reliability Standards*, Order No.

transmission operators to document their analysis and/or mitigation due to certain misoperations on major transfer paths. This standard requires that documentation be kept for six years.

The Commission will be submitting a request to OMB to extend those requirements with no change for three years. The Commission's request to OMB will also reflect the following:

- eliminating the burden associated with regional Reliability Standard TOP-007-WECC-1a, which is being retired (addressed in Docket No. RD16-10);¹⁰ and
- implementing the regional Reliability Standard VAR-501-WECC-3 and retiring regional Reliability Standard VAR-501-WECC-2 (addressed in Docket No. RD17-5 and discussed below).

In this document, we provide estimates of the burden and cost related to those revisions to FERC-725E. Details follow on the changes due to Docket Nos. RD16-10, RD17-5, and IC17-6 and on the continuing burdens which are being submitted to OMB for approval in a consolidated package under FERC-725E.

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

In general, information collection and record retention requirements related to Reliability Standards are not submitted to, or retained for audit by, the Commission. Rather they are

818, 153 FERC ¶ 61,228, at P 23 n.31 (2015). In addition, Order No. 818 stated: "The Commission approved the definition of Special Protection System (Remedial Action Scheme) in Order No. 693. We approve a revision to the previously approved definition. The revisions to the Remedial Action Scheme definition and related Reliability Standards are not expected to result in changes to the scope of systems covered by the Reliability Standards and other Reliability Standards that include the term Remedial Action Scheme. Therefore, the Commission does not expect the revisions to affect applicable entities' current reporting burden." *Id.* P 67. The change to the definition did not affect the burden of PRC-004-WECC-1 (which is included in the current OMB-approved inventory). PRC-004-WECC-2 (the current version of the standard) is being included in this Notice and the Commission's submittal to OMB as part of the FERC-725E.

¹⁰ The Commission approved the retirement of regional Reliability Standard TOP-007-WECC-1a (System Operating Limits ("SOL")) by order in Docket No. RD16-10-000 on March 10, 2017. On March 31, 2017, the Commission issued a 60-day Notice requesting public comment on the effect on burden. The 60-day Notice is available at 82 FR 16823 (April 6, 2017). Comments on the 60-day Notice were due in Docket No. RD16-10-000 by June 5, 2017; no comments were received. See Docket No. RD16-10-000 for additional information (including the estimated annual burden reduction of 1,188 hours).

submitted to, or retained for audit by, NERC (the Commission-approved ERO) or the Compliance Enforcement Authority, as specified in each individual Reliability Standard.

The information collected by the FERC-725E is required to implement the statutory provisions of section 215 of the Federal Power Act (FPA) (16 U.S.C. 824o). Section 215 of the FPA buttresses the Commission's efforts to strengthen the reliability of the interstate grid through the grant of new authority by providing for a system of mandatory Reliability Standards developed by the Electric Reliability Organization (ERO). Reliability Standards that the ERO proposes to the Commission may include Reliability Standards that are proposed to the ERO by a Regional Entity.¹¹

The information generated by these standards generally serves to ensure entities are complying with applicable Reliability Standards, which help to ensure the reliability of the Nation's Bulk Power System.

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 and the medium are not covered in Reliability Standards.

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 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.

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

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its regulatory responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized. There are no similar sources for information available that can be used or modified for these reporting purposes.

¹¹ 16 U.S.C. 824o(e)(4).

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

Small entities by the nature of their size have a smaller (or lower) incidence of overlap with their applicable assets and standard requirement obligations imposed on those assets. Also in several instances, NERC has closely examined registered entity's' impact on the bulk electric system and eliminated particular registered entities from applicability or even eliminated entire registered entity classifications in an effort to minimize the burden of compliance for those not having a significant impact on the bulk power system.

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

Any reduction in frequency of the information collection may diminish the ability of NERC, or Regional Entities, to ensure that applicable entities achieve the objective of operating within acceptable pre- and post-contingency reliability criteria. Failure to follow reporting requirements could directly affect the ability to effectively monitor, control and ensure reliability of the bulk electric system.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

PRC-004-WECC-1 requires transmission owners, generator owners and transmission operators to maintain documentation for six years related to their analysis and/or mitigation due to certain misoperations on major transfer paths. This six year retention period is necessary because tracking and correcting system protection misoperations are critical to reliability. NERC in its Misoperations Report (April 1, 2013) says it formed a task force to analyze one of its “top priority reliability issues – protection system misoperations.” The data collected allows for study of events, how to properly categorize the type of misoperations and develop recommendations “to potentially reduce the amount of future misoperations.”¹² The task force has not posted an updated version of this Misoperations Report on the NERC website since 2013.

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

¹² NERC Misoperations Report at 3, available at [http://www.nerc.com/comm/PC/Pages/Protection-System-Misoperations-Task-Force-\(PSMTF\)-2013.aspx](http://www.nerc.com/comm/PC/Pages/Protection-System-Misoperations-Task-Force-(PSMTF)-2013.aspx).

In accordance with OMB requirements, the Commission published 60-day notices and a 30-day notice providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collection of data. Within the public notices, the Commission noted that it would be requesting a three-year extension of the public reporting burden, as revised in Docket Nos. RD16-10, RD17-5, and IC17-6. The Commission published Notices in the Federal Register in Docket No. RD16-10-000, (82 FR 16823, 4/6/2017), and in Docket Nos. RD17-5-000 and IC17-6-000 (82 FR 21538, 5/9/2017) requesting public comments. The Commission received no comments from the public regarding this information collection.

The consolidated 30-day notice was published in Federal Register on 8/21/2017. An Errata Notice was issued by FERC on 8/22/2017.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents of information collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Responding entities do not submit the information collection to FERC. Rather, they submit the information to NERC, the regions, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

According to the NERC Rule of Procedure section 1502,¹³ "...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 or retained for NERC or Regional Entities.

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

There are no questions of a sensitive nature that are considered private in this collection.

¹³ Section 1502, Paragraph 2, available at NERC's website ([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)).

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

We provide three tables below with burden estimates which show: (1) reductions due to Docket No. RD16-10, (2) reductions, increases, and net changes, due to Docket No. RD17-5, and (3) resulting net ongoing burden for FERC-725E overall, being submitted to OMB for approval¹⁴.

Changes Due to Docket No. RD16-10. The Commission estimates the reduction in the annual public reporting burden for the FERC-725E (due to the retirement of regional Reliability Standard TOP-007-WECC-1a) as follows:¹⁵

FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Reductions Due to Docket No. RD16-10					
Information Collection Requirements and Entity	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden Hours & Cost¹⁶ Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)

¹⁴ In the tables, an entity could serve one or more roles, be subject to multiple requirements, and be double counted in the number of entities.

¹⁵ The reductions in burden and cost shown in the table are the same figures as those in the current OMB-approved inventory for the reporting and recordkeeping requirements, now being retired.

¹⁶ The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics for three positions involved in the reporting and recordkeeping requirements. These figures include salary (http://bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) and are: Manager: \$89.07/hour, Engineer: \$64.91/hour, and File Clerk: \$31.19/hour.

The hourly cost for the reporting requirements (\$76.99) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

Reporting Requirement-Transmission Operators that operate qualified transfer paths ¹⁷	9	3	27	40 hrs.; \$2,908	1,080 hrs.; \$78,516
Recordkeeping Requirement-Transmission Operators that operate qualified transfer paths	9	1	9	12 hrs.; \$347	108 hrs.; \$3,124
SUB-TOTAL, REDUCTION (Due to Docket No. RD16-10)					1,188 hrs.; \$81,640.

Changes Due to Docket No. RD17-5.: The Commission estimates the changes in the annual public reporting burden for the FERC-725E (due to Docket No. RD17-5) as follows.

FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Changes Due to Docket No. RD17-5-000

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Entity	No. of Respondents¹⁸ (1)	Annual No. of Responses per Respondent (2)	Annual No. of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost¹⁹ Per Response (\$) (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3)*(4)=(5))	Cost per Respondent (\$) (5)÷(1)=(6)
Retirement Of Former Standard VAR-501-WECC-2 and Associated Reductions						
<i>Reporting Requirements</i>						
Generator Operators	249	4	996	1 hr.; \$76.22	996 hrs.; \$75,915.12 (reduction)	\$304.88 (reduction)
<i>Recordkeeping Requirements</i>						
Generator Operators	249	4	996	0.5 hrs.; \$31.19	498 hrs.; \$15,532.62 (reduction)	\$62.38 (reduction)
Subtotal Reductions (Discontinued in yr. 1)					1,494 hrs.; \$91,447.74 (reduction)	

¹⁸ The number of respondents is derived from the NERC Compliance Registry as of March 10, 2017.

¹⁹ For VAR-501-WECC-3, the hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics for three positions involved in the reporting and recordkeeping requirements. These figures include salary (http://bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) and are: Manager: \$89.07/hour, Engineer: \$64.91/hour, and File Clerk: \$31.19/hour. The hourly cost for the reporting requirements (\$76.99) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

New Standard VAR-501-WECC-3						
<i>Reporting Requirements</i>						
Generator Owners and/or Operators, in Year 1	291	3	873	1 hr.; \$76.99	873 hrs.; \$67,212.27	\$230.97
Generator Owners and/or Operators, in Year 2 and Ongoing	291	2	582	1 hr.; \$76.99	582 hrs.; \$44,808.18	\$153.98
<i>Recordkeeping Requirements</i>						
Generator Owners and/or Operators, in Year 1	291	3	873	1 hr.; \$31.19	873 hrs.; \$27,228.87	\$93.57
Generator Owners and/or Operators, in Year 2 and Ongoing	291	2	582	0.5 hrs.; \$15.595	291 hrs.; \$9,076.29	\$31.19
New					1,746 hrs.;	

Burden, in Year 1					\$94,441.14	
New Burden, in Year 2 & Ongoing					873 hrs.; \$53,884.47	
Net Burden Change in Year 1 (Due to Docket RD17-5)					+252 hrs.; \$2,993.40 (increase)	
Net Burden Change in Year 2 and Ongoing (Due to Docket RD17-5)					+873 hrs.; \$53,884.47 (increase)	

Net Burden for FERC-725E, for Submittal to OMB²⁰. The table below describes the new and continuing information collection requirements and the associated burden for FERC-725E. (The burdens and costs related to TOP-007-WECC-1a and VAR-501-WECC-2 [the standards being retired] are omitted.)

FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council [New and Continuing Information Collection Requirements]						
Entity	No. of Respondents²¹ (1)	Annual No. of Responses per Respondent (2)	Annual No. of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost²² Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)= (6)
Reporting Requirements						
Balancing Authorities	34	1	34	21 hrs., \$1,616.79	714 hrs., \$54,970.86	\$1,616.79
Generator Operators	228	1	228	10 hrs., \$769.90	2,280 hrs., \$175,537.20	\$769.90
Transmission Operators applicable to standard VAR-002	86	4	344	10 hrs., \$769.90	3,440 hrs., \$264,845.60	\$769.90

²⁰ The Commission is also removing 36 one-time burden hours associated with the requirements in Docket No. RM13-13. The one-time burden has been completed and will now be administratively removed on submittal to OMB. Those hours are not included in the table.

²¹ The number of respondents is derived from the NERC Compliance Registry as of March 10, 2017.

²² The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics for three positions involved in the reporting and recordkeeping requirements. These figures include salary (http://bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) and are: Manager: \$89.07/hour, Engineer: \$64.91/hour, File Clerk: \$31.19/hour.

The hourly cost for the reporting requirements (\$76.99) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

Transmission Owners that operate qualified transfer paths	5	3	15	40 hrs., \$3,079.60	600 hrs., \$46,194.00	\$3,079.60
Reliability Coordinators	1	1	1	1 hr., \$76.99	1 hr., \$76.99	\$76.99
Reserve Sharing Group	3	1	3	1 hr., \$76.99	3 hrs., \$230.97	\$76.99
Generator Owners and/or Operators , in Year 1, per RD17-5 for VAR-501-WECC-3	291	3	873	1 hr.; \$76.99	873 hrs.; \$67,212.27	\$230.97
Generator Owners and/or Operators, in Year 2 and Ongoing, per RD17-5 for VAR-501-WECC-3	291	2	582	1 hr.; \$76.99	582 hrs.; \$44,808.18	\$153.98
Sub-Total for Reporting Requirements in Year 1			1498		7,911 hrs.; \$609,067.89	
Sub-Total for Reporting Requirements in Year 2 & ongoing			1207		7,620 hrs.; \$586,663.80	
Recordkeeping Requirements						
Balancing Authorities	34	1	34	2.1 hrs., \$65.50	71.4 hrs., \$2,226.97	\$65.50
Balancing Authorities (IRO-006)	34	1	34	1 hr., \$31.19	34 hrs., \$1,060.46	\$31.19
Generator Operators	228	1	228	1 hr., \$31.19	228 hrs., \$7,111.32	\$31.19
Transmission Operator (VAR-002)	86	1	86	4 hrs., \$124.76	344 hrs., \$10,729.36	\$124.76
Transmission Owner that operate	5	1	5	12 hrs., \$374.28	60 hrs., \$1,871.40	\$374.28

qualified transfer paths						
Reliability Coordinator	1	1	1	1 hr.; \$31.19	1 hr.; \$31.19	\$31.19
Generator Owners and/or Operators, in Year 1, per RD17-5 for VAR-501-WECC-3	291	3	873	1 hr.; \$31.19	873 hrs.; \$27,228.87	\$93.57
Generator Owners and/or Operators, in Year 2 and Ongoing, per RD17-5 for VAR-501-WECC-3	291	2	582	0.5 hrs.; \$15.595	291 hrs.; \$9,076.29	\$31.19
Sub-Total for Recordkeeping Requirements in Yr. 1					1,611.4 hrs.; \$50,259.57	
Sub-Total for Recordkeeping Requirements in Yr. 2 & ongoing					1,029.4 hrs.; \$32,106.99	
TOTAL FOR FERC-725E, IN YR. 1			1261		9,522.4 hrs.; \$659,327.46	
TOTAL FOR FERC-725E, IN YR. 2 & ONGOING			970		8,649.4 hrs.; \$618,770.79	

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

All of the costs in this consolidation 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, auditing, and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0255) and is not part of this request or package.

The Commission does incur the costs associated with obtaining OMB clearance for this collection under the Paperwork Reduction Act of 1995 (PRA). The PRA Administrative

Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the 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 and orders, other changes to the collection, and associated publications in the Federal Register. The following table contains the annualized cost to the Federal Government for FERC-725E

	Number of Employees (FTE)	Estimated Annual Federal Cost
FERC-725E Analysis and Processing of Filings	0	0
PRA ²³ Administrative Cost ²⁴		\$5,723
FERC Total		\$5,723

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

The reason for the changes in burden are due to the retirement of regional Reliability Standard TOP-007-WECC-1a and the retirement of VAR-501-WECC-2 and the approval of VAR-501-WECC-3. The table below describes the new and continuing information collection requirements and the associated burden for FERC-725E. (The burdens and costs related to TOP-007-WECC-1a and VAR-501-WECC-2 [the standards being retired] are omitted.)

The Commission is also removing 36 one-time burden hours associated with the requirements in Docket No. RM13-13. The one-time burden has been completed and will now be administratively removed on submittal to OMB.

The annual responses and annual burden in the current OMB-approved inventory is 688 responses and 9,033 hours respectively. The estimates are the average total number of annual responses and corresponding burden hours for years 1, 2 and 3, divided by three, giving the average annual estimate for Years 1-3.

The number of responses is

for reporting requirements

- o 1,498 responses for year one,
- o 1,207 for year two
- o 1,207 for year three
- o giving an annual average for years 1-3 of 3,912/3, or 1,304 responses.

for record keeping requirements:

23 Paperwork Reduction Act of 1995 (PRA)

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- o 1,261 responses for year one,
- o 970 responses for year two
- o 970 responses for year three
- o giving an annual average for Years 1-3 of 3,201/3, or 1,067 responses

The number of burden hours (including both reporting and recordkeeping requirements) is:

- o 9,522.4 hours for year 1
- o 8,649.4 hours for year 2
- o 8,649.4 hours for year 3
- o giving an annual average for Years 1-3 of 26,821.2 hours/3 or 8,940.4.

FERC-725E	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,371	688	0	1,683
Annual Time Burden (Hr.)	8,940.4	9033	0	-92.60
Annual Cost Burden (\$)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no publication plans for this collection of information.

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>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The data collected for this reporting requirement is not used for statistical purposes.