

Supporting Statement
**FERC-717, Open Access Same-Time Information System and Standards for
Business Practices and Communication Protocols**
(Three year approval for extension requested)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve the FERC-717 (Open Access Same-Time Information System and Standards for Business Practices and Communication Protocols) information collection for a three-year period under OMB Control No. 1902-0173.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Federal Power Act Section 205¹ requires the Federal Energy Regulatory Commission to ensure that the rates and charges for the wholesale sale of electric energy are just and reasonable. Section 205 also requires that the rules and regulations affecting or pertaining to the rates and charges for the wholesale sale of electric energy be just and reasonable.

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

The Commission required public utilities to establish Open Access Same-Time Information System (OASIS) sites to provide transmission customers with equal and timely access to information about transmission and ancillary services provided in the tariffs. This requirement was established because the Commission believes that transmission customers must have simultaneous access to the same information available to the Transmission Provider in order to achieve nondiscriminatory transmission services.

The Commission determined that standardization of business practices and communication processes benefits the electric industry by providing uniform methods for public utilities to conduct business with different transmission providers. Many participants in electric markets conduct business transactions involving a number of different transmission providers. Establishing a uniform set of procedures and communication protocols increases the efficiency of such transactions.

Public utilities currently collect and post information on various systems such as OASIS currently in use by the industry. The revisions within these revised NAESB standards may adjust some of the business practices around this information, but does not

¹ 16 U.S.C. 824d(a)

substantially affect the amount or content of the information. Without these standards, the same transactions would occur. However, the details regarding each transaction would vary from utility to utility hindering standardization.

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

FERC has made no significant changes in information technology use for complying with the FERC-717 collection. Applicable entities continue to use OASIS (under the FERC-717 collection) providing the public online access to transmission service information.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements as OMB review dates arise, expiration dates approach, or as the Commission may deem necessary in carrying out its responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized. No other forms collect data similar to that collected/filed within FERC-717.

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

The reporting requirements of this renewal are unchanged. Thus, the impact of this renewal remains very minimal. The Commission does consider waivers for small entities, which serves as an option for small entities to reduce their burden. The Commission grants these waivers on a case-by-case basis. Overall, the impact of the FERC-717 upon small entities is minimal.

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

Applicants submit the FERC-717 in response of the Commission directive for all public utilities that own, control, or operate facilities for transmitting energy in interstate commerce to provide certain types of information regarding their transmission operations on OASIS. If the FERC-717 information collection standard was conducted less frequently, then the standard would not fully achieve its purpose. Regarding filing frequency, filing less frequently is not possible since mandated responsibilities would be unfulfilled.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances relating to the FERC-717 information collection.

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

In accordance with OMB requirements, the Commission published a 60-day notice² and a 30-day notice³ to the public regarding this information collection on 08/11/2017 and 10/17/2017 respectively. Within the public notices, the Commission noted that it would be requesting a three-year extension of the public reporting burden. The Commission received no comments from the public in response to either published notice regarding this information collection.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts to respondents related to the FERC-717 information collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

All data are public information and, therefore, not confidential. A filer may request (as allowed under the Commission's regulations at 18 CFR 388.112) confidential treatment of some or all of the FERC-717. Each request for confidential treatment will be reviewed on a case-by-case basis.

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 associated with the FERC-717 reporting requirements.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission estimates the Public Reporting burden for the FERC-717 information collection as follows:

² 82 FR 37580

³ 82 FR 48226

FERC-717 (Open Access Same-Time Information System and Standards for Business Practices and Communication Protocols)						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Average Cost per Respondent (\$) (5)÷(1)
FERC-717	170	1	170	30 hrs.; \$2,295	5,100 hrs.; \$390,150	30 hrs.; \$2,295

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no capital or start-up costs associated with this collection. All of the costs are associated with the burden hours and accounted for in Question #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimated annualized cost to the Federal Government for FERC-717, is as follows:

	Number of Employees (FTE)	Estimated Annual Federal Cost
FERC-717 Analysis	0.5	\$79,377
PRA ⁶ Administrative Cost (for FERC-717)		\$5,723
FERC Total		\$85,100

Based on the above table, the total Federal Cost for FERC-717 is \$85,100.

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 responses to the information collection.

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

There are no changes to the FERC-717 reporting requirements or format.

There is a significant reduction in burden in FERC-717 because of program changes and adjustments related to the following.

Program Changes

- Removal of the one-time burden from Docket No. RM5-5-022. The one-time burden removal is a program decrease and is being removed because the requirements are complete. The supporting statement associated with

the Final Rule in Docket RM5-5-022 states “FERC assumes that burden associated with implementing the new standards is reduced to zero over time because of the increased efficiencies related to standardization”. (OMB originally approved RM05-5-022 Final Rule’s burden at 132 responses and 1,320 hours of burden.)

- Removal of one-time burden from Docket No. RM05-5-020 –(6 responses and 126 hours). The one-time burden removal is a program decrease and is being removed because the requirements are complete.
- Removal of one-time burden from Docket No. RM11-24 (of 176 responses and 176 hours). The one-time burden removal is a program decrease and is being removed because the requirements are complete.

The total resulting program decrease is 1,622 hours.

Adjustments

We are adjusting the burden by a decrease of 193,420 burden hours. The justification for the adjustment decrease is listed below.

- The Commission determined that standardization of business practices and communication processes benefits the electric industry by providing uniform methods for public utilities to conduct business with different transmission providers. Many participants in electric markets conduct business transactions involving a number of different transmission providers. Establishing a uniform set of procedures and communication protocols increases the efficiency of such transactions and, thus, reduces the burden involved.
- Industry is using more experienced personnel to submit filings. Transmission Owners are allowing Transmission Operators to include RTO/ISO’s to submit their filing.
- For those public utilities that want to incorporate the complete set of NAESB standards into their tariffs without modification, we will permit their initial compliance filing to specify that they are incorporating into their tariff all the standards as specified in Part 38 of the Commission’s Rules of Practice and Procedure as updated and revised.⁴ This will mean that those public utilities will not need to make compliance filings in future

⁴ [1] 148 FERC ¶ 61,205, UNITED STATES OF AMERICA, FEDERAL ENERGY REGULATORY COMMISSION, 18 CFR Parts 2 and 38, [Docket No. RM05-5-022; Order No. 676-H], Standards for Business Practices and Communication Protocols for Public Utilities, (Issued September 18, 2014), P87. Public utilities adopting this option should include the following language in their tariff: “The current versions of the NAESB WEQ Business Practice Standards incorporated by reference into the Commission’s regulations as specified in Part 38 of the Commission’s regulations (18 CFR Part 38) are incorporated by reference into this tariff.”

years to incorporate the standards so long as they continue to abide by all of the NAESB WEQ Business Practice Standards and Communication Protocols for Public Utilities that the Commission has incorporated by reference into its regulations.

In summary. As a result of the program decreases and adjustments discussed above, the FERC-717 existing inventory changes from 454 responses to 170 responses, and the burden hours change from 200,142 hours to 5,100 hours.

The tables provide a picture of the above statements:

	Responses	Burden Hours	Type of Change
Existing OMB-approved Burden Inventory	454	200,142	n/a
Burden from Docket RM05-020 (one-time)	-6	-126	Program Decrease due to completion
Burden from Docket RM11-24	-176	-176	Program Decrease due to completion
Burden from Docket RM05-05-022 (one-time)	-132	-1,320	Program Decrease due to completion
Renewal Request	+30	-193,420	Adjustment
Current Request:	170	5,100	

FERC-717	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	170	454	30	-314
Annual Time Burden (Hr.)	5,100	200,142	-193,420	-1622
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

FERC-717 (OMB Control Number: 1902-0173)

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. There are no exceptions.