

FERC-725A, FERC-725D, and FERC-725R (OMB Control Nos. 1902-0244, 1902-0247, and 1902-0268 respectively)
Final Rule (Order 836, issued 9/20/2017) in Docket RM16-13-000
RIN: 1902-AF30
(Updated 12/7/2017)

Supporting Statement for
**FERC-725A (Mandatory Reliability Standards for the Bulk-Power System),
FERC-725D (Mandatory Reliability Standards: FAC Reliability Standards), and
FERC-725R (Mandatory Reliability Standards: BAL Reliability Standards),
as modified by the Final Rule in Docket RM16-13**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-725A (Mandatory Reliability Standards for the Bulk-Power System), FERC-725D (Mandatory Reliability Standards: FAC Reliability Standards), and FERC-725R (Mandatory Reliability Standards: BAL Reliability Standards), as modified by the Final Rule (Order 836) in RM16-13¹ for a three-year period.²

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Background. On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAct 2005), was enacted into law. EPAct 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, subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.

Section 215 of the FPA requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently. In 2006, the Commission certified NERC (now called the North American Electric Reliability Corporation) as the ERO pursuant to section 215 of the FPA.

On March 16, 2007 (pursuant to section 215(d) of the FPA), the Commission issued Order No. 693, approving 83 of the 107 initial Reliability Standards filed by NERC. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards.

1 The Final Rule (Order 836, issued 9/20/2017) is available in FERC's eLibrary system at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14684897>.

2 Please note that in the Final Rule in Docket No. RM16-13, the FERC-725R1 (a 'placeholder' information collection number) was discussed because the FERC-725R (the appropriate OMB Control No) was pending OMB review in an unrelated item (ICR 201705-1902-003). (Only one item per OMB Control No. may be pending OMB review at a time.) In the interim, OMB issued its decision on the other unrelated FERC-725R package, so this submittal for the Final Rule in RM16-13 can now be made under FERC-725R.

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Docket No. RM16-13. NERC's Petition (at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14211431>) dated 4/20/2016 (footnotes omitted) includes the following information.

“ NERC's Proposal reflects revisions developed under Project 2010-14.2.1 Phase 2 of Balancing Authority Reliability-based Controls (“Project”) to clarify, consolidate, streamline, and enhance the Reliability Standards addressing frequency control.

...

Reliable Operation of the Bulk Power System (“BPS”) depends on maintaining frequency within predefined boundaries approximating 60 Hertz (“Hz”). Frequency is the speed of rotation of an Interconnection, measured in cycles per second (or Hz). As a result, multiple NERC Reliability Standards, such as currently effective Reliability Standard BAL-005-0.2b, operate together to maintain reliable frequency control. The Project standard drafting team (“SDT”) proposed revisions to currently effective Reliability Standards BAL-005-0.2b and FAC-001-2, modifications to several NERC definitions, and the retirement of Reliability Standard BAL-006- 2, to clarify, consolidate, streamline, and enhance the manner in which NERC Reliability Standards address certain issues related to frequency control. The SDT developed the proposed modifications after review of Commission directives, Paragraph 81 Criteria,⁶ and recommendations by the periodic review team that examined Reliability Standards BAL-005- 0.2b and BAL-006- 2 in 2013 (“PRT”).

Currently effective Reliability Standard BAL-005-0.2b facilitates efforts to maintain frequency at 60 Hz by supporting the accurate and consistent calculation of a key frequency control and reliability indicator – Reporting Area Control Error (“Reporting ACE”). Reporting ACE represents a Balancing Authority Area's (“BAA”) Area Control Error (“ACE”) measured in megawatts (“MW”) as the difference between the BAAs Actual and Scheduled Net Interchange, plus its Frequency Bias Setting obligation and meter error corrections. Reporting ACE helps Responsible Entities provide reliable frequency control by indicating the current state of the entity's contribution to Reliability. As such, Reporting ACE is a key input to other frequency related Reliability Standards, such as BAL-001 and BAL-002.

Because Reporting ACE is key measure to maintaining frequency at 60 Hz, Responsible Entities must accurately calculate Reporting ACE using complete and correct data. NERC's Proposal clarifies and refines Requirements for accurate, consistent, and complete Reporting ACE calculations. The proposed revisions include relocating Requirements to confirm that interconnecting Facilities are within a BAA's metered boundary, and thereby captured in the Reporting ACE calculation, into Reliability Standard FAC-001-3. Similarly, NERC's Proposal includes moving Requirement R3 of currently effective Reliability Standard BAL-006-2 into proposed Reliability Standard BAL-005-1, as this Requirement helps ensure that BAs will use consistent data sources to calculate Reporting ACE. To support these improvements to Reporting ACE calculations, NERC's Proposal would also revise the following definitions: Actual Frequency, Actual Net Interchange, Scheduled Net Interchange,

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Interchange Meter Error, Automatic Time Error Correction, Reporting ACE, Automatic Generation Control (“AGC”), Pseudo-Tie, and Balancing Authority.

NERC’s Proposal would also retire ineffective or duplicative Requirements that do not affect reliability (such as commercial calculations). For example, NERC proposes retiring the remaining Requirements in Reliability Standard BAL-006-2, as they pertain to administrative or commercial obligations such as the calculation of Inadvertent Interchange. The SDT prepared a White Paper regarding Inadvertent Interchange accumulations and their associated paybacks to explain inadvertent interchange calculations. Based on this White Paper, the SDT developed an Inadvertent Interchange Guideline to help ensure a seamless transition to the proposed integrated Reliability Standards. The Operating Committee (“OC”) is currently reviewing the draft Inadvertent Interchange Guideline.

Together, these revisions and enhancements will improve reliability by supporting efforts to maintain Interconnection frequency at 60 Hz in a manner consistent with Commission directives, technological developments, and NERC’s current framework of integrated Reliability Standards.”

Pursuant to section 215 of the Federal Power Act (FPA),³ in Order 836,⁴ the Commission approves Reliability Standards BAL-005-1 (Balancing Authority Control) and FAC-001-3 (Facility Interconnection Requirements), submitted by the North American Electric Reliability Corporation (NERC), as well as the retirement of Reliability Standards BAL-005-0.2b (Automatic Generation Control), FAC-001-2 (Facility Interconnection Requirements), and BAL-006-2 (Inadvertent Interchange). The Commission also approves the associated implementation plans, violation risk factors, and violation severity levels for Reliability Standards BAL-005-1 and FAC-001-3. Finally, the Commission approves three revised definitions for the NERC Glossary of Terms used in NERC’s Reliability Standards.

The revised Reliability Standards will enhance the reliability of the Bulk-Power System, as further described below, and the record-keeping and reporting requirements associated with those standards allow for oversight and enforcement of the revised Reliability Standards.

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

FERC-725R and FERC-725D. Reliability Standards BAL-005-1 (FERC-725R) and FAC-001-3 (FERC-725D) will enhance the reliability of the Bulk-Power System, as compared to currently-effective Reliability Standards BAL-005-0.2b and FAC-001-2, by clarifying and consolidating existing requirements related to frequency control. The Reliability Standards support more accurate and comprehensive calculation of Reporting Area Control Error (ACE) by requiring

³ 16 U.S.C. 824(o).

⁴ Order 836 in Docket No. RM16-13 was issued on 9/20/2017 and is posted at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14684897>.

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timely reporting of an inability to calculate Reporting ACE and by requiring balancing authorities to maintain minimum levels of annual availability of 99.5% for each balancing authority system for calculating Reporting ACE.⁵

FERC-725A: The BAL-005-0.2b Reliability Standard being retired is being removed.

3. DESCRIBE ANY CONSIDERATION OF THE USE OF IMPROVED TECHNOLOGY TO REDUCE 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, and are therefore left to the discretion of each respondent. 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

FERC-725D and FERC-725R. 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.

FERC-725A. The BAL-005-0.2b Reliability Standard being retired is being removed.

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

FERC-725D. The Commission estimates a very limited, one-time⁶ increase in record-keeping and reporting burden on balancing authorities due to the changes in the revised Reliability

5 NERC states that Reporting ACE "represents a Balancing Authority Area's [BAA] Area Control Error [ACE] measured in megawatts [MW] as the difference between the [Balancing Authority Area's] Actual and Scheduled Net Interchange, plus its Frequency Bias Setting obligation and meter error corrections. Reporting ACE helps Responsible Entities provide reliable frequency control by indicating the current state of the entity's contribution to Reliability." NERC Petition at 3.

6 This one-time burden increase is annualized over three years. The burden will be removed at a later time.

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Standards, with no other increase in the cost of compliance (when compared with the current standards). Approximately 24 of the 99 balancing authorities are expected to meet the SBA's definition for a small entity. In addition, approximately 161 entities will be subject to new record-keeping and reporting requirements under revised Reliability Standard FAC-001-3, with no other increase in the cost of compliance. Even assuming that the one-time cost of compliance for administering the change from Reliability Standard BAL-005-0.2b to BAL-005-1 is an annual cost, and assuming that all of the entities affected by the revisions to both BAL-005 and FAC-001 qualify as small entities, the estimated total annual cost to the industry as a whole is minimal (\$19,055.90), and the average cost per affected entity is \$118.36 (P53 of the final rule).

FERC-725R. The total one-time cost to the industry as a whole is minimal (\$6,364.71). According to SBA guidance, the determination of significance of impact "should be seen as relative to the size of the business, the size of the competitor's business, and the impact the regulation has on larger competitors."⁷ The Commission does not consider the estimated burden to be a significant economic impact. As a result, the reforms in this Final Rule will not have a significant economic impact on a substantial number of small entities.

FERC-725A. The burden is being reduced to reflect retirement of the associated standard.

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

FERC-725D and FERC-725R. The collections focus on enhancing the reliability of the Bulk-Power System clarifying and consolidating existing requirements related to frequency control. The Reliability Standards support more accurate and comprehensive calculation of Reporting Area Control Error (ACE) by requiring timely reporting of an inability to calculate Reporting ACE and by requiring balancing authorities to maintain minimum levels of annual availability of 99.5% for each balancing authority's system for calculating Reporting ACE. Any reduction in frequency of the information collection may diminish the ability of NERC, or Regional Entities, to ensure that applicable entities maintain frequency control.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

FERC-725D and FERC-725R have no special circumstances.
FERC-725A is a reduction due to retirement of a standard.

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

⁷ U. S. Small Business Administration, *A Guide for Government Agencies: How to comply with the Regulatory Flexibility Act*, at 18 (May 2012), https://www.sba.gov/sites/default/files/advocacy/rfaguide_0512_0.pdf.

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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 proposed collections of data.
None of the comments received in response to the RM16-13 NOPR pertained to paperwork burden.

The Final Rule was published in the Federal Register on 9/26/2017.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

No payments or gifts have been made to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rules of Procedure⁸, "...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 due to the Reliability Standards to FERC. Rather, they submit the information to NERC, the regional entities, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

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

These collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

FERC-725D and FERC-725R. NERC's revisions to Reliability Standards BAL-005 (FERC-725R) and FAC-001 (FERC-725D) will not result in an ongoing increase in the record-keeping and reporting requirements imposed on balancing authorities, other than the one-time cost of administering the change to the revised standard (in FERC-725R). All other recordkeeping and reporting obligations imposed on balancing authorities under the revised requirements essentially track those that already exist under currently-effective Reliability Standards BAL-005-0.2b and FAC-001-2.

⁸ Section 1502, Paragraph 2, available at NERCs website

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FERC-725D. The revisions in FAC-001-3 will result in a limited increase in the record-keeping and reporting requirements imposed on those transmission owners and generator owners that are not also transmission operators and generator operators (about 161 entities in the United States), as shown in the chart below.⁹

The estimated changes to the burden and cost for FERC-725A, -725R, and -725D due to the modifications in the Final Rule in RM16-13 follow:

⁹ Reliability Standard FAC-001-3 (in FERC-725D) replaces and strengthens currently effective Reliability Standard FAC-001-2 by moving currently effective Requirement R1 of Reliability Standard BAL-005-0.2b (FERC-725R) to Reliability Standard FAC-001-3, requiring that transmission owner and generator owner interconnection requirements include procedures for confirming that new or materially modified facilities connecting to the bulk electric system are within a balancing authority's metered boundaries. NERC explains that these interconnection requirements should be relocated to Reliability Standard FAC-001-3, as FAC-001-3 establishes facility interconnection requirements.

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|---|--|---|--|---|---|
| | Number and Type of Respondents¹⁰ | Number of Responses per Respondent | Total Number of Responses | Average Burden Hours & Cost per Response | Annual Burden Hours & Total Annual Cost¹¹ |
| | (1) | (2) | (1)×(2)=(3) | (4) | (3)×(4)=(5) |
| BAL-005-1 (FERC-725R) ¹² | BA 99 | 1 | 99 | 1 hr.; \$64.29 ¹³ | 99 hrs.; \$6,364.71 |
| FAC-001-3, R3 (FERC-725D) | GO/TO 161 ¹⁴ | 1 | 161 | 2 hr. ^{15,16} ; \$102.04 ¹⁷ | 322 hrs. ¹⁴ ; \$16,428.44 |

10 The estimated number of respondents is based on the NERC compliance registry as of August 12, 2016. According to the NERC compliance registry, there are 70 U.S. balancing authorities (BA) in the Eastern Interconnection, 34 balancing authorities in the Western Interconnection and one balancing authority in the Electric Reliability Council of Texas (ERCOT).

11 For purposes of determining the overall annual cost of the record-keeping and reporting changes reflected in this NOPR, the one-time cost associated with administering the change to BAL-005-1 is being treated as an annual cost. The total annual cost is derived from salary figures from the Bureau of Labor Statistics for two positions involved in the reporting and record-keeping associated with this collection. These figures include salary (http://bls.gov/oes/current/naics2_22.htm) and other associated benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>).

12 Responses related to BAL-005-1 as imposed by the RM16-13-000 Final Rule are one-time.

13 This is the hourly wage figure (plus benefits) associated with electrical engineers (Occupation Code: 17-2071) from the Bureau of Labor Statistics website (http://www.bls.gov/oes/current/naics2_22.htm).

14 Per the NERC compliance registry, there are 56 generator owners (GO) that are not also generator operators and 142 transmission owners (TO) that are not also transmission operators, for a total of 161 new entities in the United States subject to FAC-001-3 Requirement R3.

15 This hourly figure was incorrectly stated as 1 hour per response in the Final Rule. The correct figure is 2 hours per response which will result in a total annual burden of 322 hours imposed by Reliability Standard FAC-001-3.

16 The average burden hours per response related to FAC-001-3 was listed as 1 hour in the RM16-13 Final Rule (issued 9/20/2017 <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14684897>). The figure is corrected here to 2 hours. The resulting annual burden related to FAC-003-1 is corrected to 322 hours (from 161 hours in the issued Final Rule).

17 This is the hourly wage figure (plus benefits) is the sum of two figures: the \$64.29/hour wage associated with electrical engineers (Occupation Code: 17-2071) and the \$37.75/hour wage associated with record and information clerks (Occupation Code: 34-4199). Both figures are from the Bureau of Labor Statistics website (http://www.bls.gov/oes/current/naics2_22.htm).

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|---|---------------------------------------|---|----------------------------------|---|--|
| | Number and Type of Respondents | Number of Responses per Respondent | Total Number of Responses | Average Burden Hours & Cost per Response | Annual Burden Hours & Total Annual Cost |
| | (1) | (2) | (1)×(2)=(3) | (4) | (3)×(4)=(5) |
| Retirement of current standard BAL-006-02 (burden reduction from FERC-725A) ¹⁸ | BA 99 | -1 | -99 | -1 hr.; -\$37.75 ¹⁹ | -99 hrs.; -\$3,737.25 |
| NET TOTAL CHANGES | | | | | 322 hrs. ²⁰ \$19,055.90 |

FERC-725D and FERC-725R. Many of the revisions to the Reliability Standards reflected in this Final Rule were developed to help clarify and streamline existing requirements related to calculation of Reporting ACE, and are expected to simplify these entities’ overall burden with respect to recordkeeping, reporting, and compliance.

FERC-725A. The Final Rule approves the retirement of the requirements in Reliability Standard BAL-006-2 (which are currently in FERC-725A) further reducing the overall record-keeping and reporting requirements for balancing authorities. Accordingly, the Commission estimates that the overall change in the record-keeping and reporting requirements as a result of this rulemaking will be *de minimis* on a per-entity basis.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

¹⁸ The NOPR indicated there would be 99 responses reduced from FERC-725A to reflect the retirement of the standard. FERC-725A continues to include multiple other standards (with reporting and recordkeeping requirements) applying to multiple types of entities (including Balancing Authorities), with an average of 1 response per entity. Because BAs continue to have other responsibilities under FERC-725A, we will not reduce the number of responses by 99 for the purposes of reginfo.gov and ROCIS. We will reduce the number of total hours under FERC-725A by 99 to reflect the retirement of the standard.

¹⁹ This is the hourly wage figure (plus benefits) associated with information and record clerks (Occupation Code: 43-4199) from the Bureau of Labor Statistics website (http://www.bls.gov/oes/current/naics2_22.htm).

²⁰ The net total annual burden hour figure is updated (due to corrections noted in Footnote 14) from 260 hours to 322 hours.

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There are no start-up or other non-labor costs associated with the Final Rule in Docket No. RM16-13.²¹

Total Capital and Start-up cost: \$0
 Total Operation, Maintenance, and Purchase of Services: \$0

All of the costs in the final rule are associated with burden hours (labor) and described in Questions #12 and #15 in this supporting statement.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0255). The data are not submitted to FERC.

The Commission does incur the costs associated with obtaining OMB clearance for the three collections under the Paperwork Reduction Act (PRA). The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (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 (not just this Final Rule), and other changes to the collection. FERC estimates the annual cost for this effort to be \$5,723.00 for each of the three collections.

| FERC-725A | Number of Employees (FTEs) | Estimated Annual Federal Cost |
|---|----------------------------|-------------------------------|
| Analysis and Processing of filings | 0 | \$0 |
| Paperwork Reduction Act Administrative Cost | | \$5,723 |
| TOTAL | | \$5,723 |

| FERC-725D | Number of Employees (FTEs) | Estimated Annual Federal Cost |
|---|----------------------------|-------------------------------|
| Analysis and Processing of filings | 0 | \$0 |
| Paperwork Reduction Act Administrative Cost | | \$5,723 |
| TOTAL | | \$5,723 |

| FERC-725R | Number of Employees | Estimated Annual Federal |
|-----------|---------------------|--------------------------|
|-----------|---------------------|--------------------------|

²¹ The “cost burden” in the current OMB-approved inventory for FERC-725A does not change due to Docket RM16-13.

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| | (FTEs) | Cost |
|---|--------|---------|
| Analysis and Processing of filings | 0 | \$0 |
| Paperwork Reduction Act Administrative Cost | | \$5,723 |
| TOTAL | | \$5,723 |

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

Reliability Standards BAL-005-1 and FAC-001-3 and the retirement of Reliability Standard BAL-006-2 clarify, consolidate, streamline, and enhance the Reliability Standards addressing frequency control. These revisions streamline and clarify the current requirements related to the calculation of Reporting ACE (a key frequency control and reliability indicator factor) including consolidating the seventeen requirements of currently-effective BAL-005-0.2b, associated with FERC-725R, into seven requirements in BAL-005-1, relocation of certain requirements related to interconnection requirements for transmission owners and generation owners into FAC-001-3, associated with FERC-725D, relocation of Requirement R3 in currently-effective BAL-006-2 into BAL-005-1, and relocation of certain metrics and calculations required for calculating Reporting ACE into the NERC definition of Reporting ACE and its component definitions.

A summary of the current OMB-approved inventory and the changes due to the Final Rule in RM16-13 follows.

| FERC-725A | Total Request | Previously Approved | Change due to Adjustment in Estimate | Change Due to Agency Discretion |
|---------------------------------------|---------------|---------------------|--------------------------------------|---------------------------------|
| Annual Number of Responses | 3,966 | 3,966 | 0 | 0 |
| Annual Time Burden ²² | 1,642,296 | 1,642,395 | 0 | -99 |
| Annual Cost Burden (\$) ²¹ | \$126,725 | \$126,725 | \$0 | \$0 |

| FERC-725D | Total Request | Previously Approved | Change due to Adjustment in Estimate | Change Due to Agency Discretion |
|----------------------------------|---------------|---------------------|--------------------------------------|---------------------------------|
| Annual Number of Responses | 1,367 | 1,206 | 0 | 161 |
| Annual Time Burden ²⁰ | 154,742 | 154,420 | 0 | 322 |

²² The units of measurement applied to “annual time burden” are hours.

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| | | | | |
|-------------------------|-----|-----|-----|-----|
| Annual Cost Burden (\$) | \$0 | \$0 | \$0 | \$0 |
|-------------------------|-----|-----|-----|-----|

| FERC-725R | Total Request | Previously Approved | Change due to Adjustment in Estimate | Change Due to Agency Discretion |
|----------------------------------|----------------------|----------------------------|---|--|
| Annual Number of Responses | 4,001 | 3,902 | 0 | 99 |
| Annual Time Burden ²⁰ | 32,133 | 32,034 | 0 | 99 |
| Annual Cost Burden (\$) | \$0 | \$0 | \$0 | \$0 |

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information.

17. DISPLAY OF THE 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

There are no exceptions.