

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

Supporting Statement for
**FERC-516H (Electric Rate Schedules and Tariff Filings,
in Final Rule in Docket Nos. RM16-23-000 and AD16-20-000)**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-516H¹ as implemented in the Final Rule (Order 841) in Docket Nos. RM16-23-000 and AD16-20-000. We are requesting OMB approval of FERC-516H.²

**1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF
INFORMATION NECESSARY**

The Commission issues this Final Rule³ in Docket Nos. RM16-23-000 and AD16-20-000 to amend its regulations under section 206 of the Federal Power Act (FPA) to remove barriers to the participation of electric storage resources and distributed energy resource aggregations in the capacity, energy, and ancillary service markets operated by regional transmission organizations (RTOs) and independent system operators (ISOs) (organized wholesale electric markets). Specifically, in the Final Rule, the Commission requires each RTO and ISO to revise its tariff to establish a participation model consisting of market rules that, recognizing the physical and operational characteristics of electric storage resources, facilitates their participation in the RTO/ISO markets. The

¹ The burden estimates for the Notice of Proposed Rulemaking (NOPR) in Docket No. RM16-23 were submitted to OMB under FERC-516 (OMB Control No. 1902-0096, in ICR 201611-1902-005). Currently there is another unrelated item affecting FERC-516 and pending OMB review. Because only one item per OMB Control No. can be pending OMB review at a time, the reporting requirements in this Final Rule in RM16-23 will be submitted to OMB under a new collection number, FERC-516H.

² In OMB's decision on the information collection requirements related to the NOPR in this docket (Docket No. RM16-23, and related ICR 201611-1902-005), OMB included the following in the Comment "FERC will include in the next OMB submission for this ICR a full description and accounting of the burden associated with the entire information collection whether new or existing." This supporting statement addresses only the requirements in the Final Rule in RM16-23, which are being included in the new information collection FERC-516H. An unrelated Final Rule in Docket RM16-6, which modifies FERC-516, is being submitted concurrently to OMB for review; it will address that comment in ICR 201611-1902-005 on FERC-516.

³ The Final Rule is posted in FERC's eLibrary at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14823755>. The Errata Notice (issued 2/28/2018) is posted at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14831701>.

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

participation model must (1) ensure that a resource using the participation model is eligible to provide all capacity, energy, and ancillary services that the resource is technically capable of providing in the RTO/ISO markets; (2) ensure that a resource using the participation model can be dispatched and can set the wholesale market clearing price as both a wholesale seller and wholesale buyer consistent with existing market rules that govern when a resource can set the wholesale price; (3) account for the physical and operational characteristics of electric storage resources through bidding parameters or other means; and (4) establish a minimum size requirement for participation in the RTO/ISO markets that does not exceed 100 kW. Additionally, each RTO/ISO must specify that the sale of electric energy from the RTO/ISO markets to an electric storage resource that the resource then resells back to those markets must be at the wholesale locational marginal price. Accordingly, the rule would require the RTOs and ISOs to change their tariffs to conform to the rule within 270 days of the effective date of the Final Rule.

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

The information collected in the FERC-516H, pursuant to the Final Rule, allows the Commission to ensure that each RTO/ISO revises its tariff to establish market rules that, recognizing the physical and operational characteristics of electric storage resources, facilitates their participation in the RTO/ISO markets. This information is collected pursuant to the Commission's legal authority under section 206 of the FPA⁴ to ensure that rates are just and reasonable.

The requirements in this information collection (tariff filings) are the minimum necessary to comply with the Final Rule. If this information was not collected or retained, there would be no data available to determine whether violations of the laws had occurred.

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

FERC implemented its eTariff system (fully implemented in 2010) for the electronic filing of tariffs. More information on eTariff is posted at <https://www.ferc.gov/docs-filing/etariff.asp>.

⁴ 16 U.S.C. 824e.

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 rules and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements to identify duplication. The information to be submitted, generated, retained, or posted, pursuant to this Final Rule is not readily available from other sources.

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

Under the Small Business Administration's classification⁵, the six RTOs/ISOs would be considered electric bulk power transmission and control, for which the small business size threshold is 500 or fewer employees. Because each RTO/ISO has more than 500 employees, none are considered small entities.

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

The Commission requires this information in order to perform its mandated oversight and review responsibilities with respect to electric market-based rates being just and reasonable. Without this information, the Commission would be unable to meet its statutory responsibility under Section 206 of the FPA to ensure that electric utility rates and tariffs are not unjust, unreasonable, or unduly discriminatory or preferential. Failing to meet this responsibility could result in public utilities charging rates that are not just and reasonable.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances relating to this information collection.

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

a. FERC's Request for Comments

⁵ 13 CFR 121.201 (Sector 22, Utilities)

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

The Notice of Proposed Rulemaking (NOPR)⁶ proposing FERC-516H gave the public the opportunity to review FERC's proposals and to comment on them. It was published in the Federal Register on 11/30/2016 (81 FR 86522). In the NOPR, the Commission proposed to require each RTO/ISO to submit a compliance filing to demonstrate that it satisfies the proposed requirements set forth in the Final Rule within six months of the date the Final Rule in this proceeding is published in the Federal Register. The Commission stated that, while it believed that six months would be sufficient for each RTO/ISO to develop and submit its compliance filing, it recognized that implementation of the reforms proposed therein could take more time due to the changes that may be necessary to each RTO's/ISO's modeling and dispatch software. Therefore, the Commission proposed to allow 12 months from the date of the compliance filing for implementation of the proposed reforms to become effective.

In the NOPR, the Commission sought comment from the RTOs/ISOs on the changes that would be required to implement the proposed participation model for electric storage resources and the associated costs as well as how those costs could be minimized. The Commission sought comment on the time and resources that would be necessary for the RTOs/ISOs to incorporate the proposed bidding parameters for resources using the participation model for electric storage resources into their modeling and dispatch software.

The Commission sought comment on the proposed deadline for each RTO/ISO to submit its compliance filing, as well as the proposed deadline for each RTO's/ISO's implementation of the proposed reforms to become effective. Specifically, the Commission sought comment on whether the proposed compliance and implementation timeline would allow sufficient time for each RTO/ISO to implement changes to its technological systems and business processes in response to a Final Rule. The Commission also sought comment on whether the RTOs/ISOs would require more or less time to implement certain reforms versus others. The Commission stated that, to the extent that any RTO/ISO believes that it already complies with any of the requirements adopted in a Final Rule in this proceeding, the RTO/ISO would be required to demonstrate how it complies in the filing due within six months of the date any Final Rule in this proceeding is published in the Federal Register. The Commission also stated that the proposed implementation deadline would apply only to the extent that an RTO/ISO does not already comply with the reforms proposed in this NOPR.

b. Comments

⁶ The NOPR is posted at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14401103>.

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

A few commenters, such as NRG Energy Inc., Energy Storage Association, and Public Interest Organizations support the timeline proposed in the NOPR. For example, NRG and Energy Storage Association support the Commission's proposed implementation timeline. Public Interest Organizations also supports finalizing the proposed rules as scheduled but adds that, if more time is needed, the Commission should allow the RTOs/ISOs more time to develop their compliance filings.

Other commenters, such as the RTOs/ISOs, generally express concerns about the feasibility of the Commission's proposed timelines. NYISO argues that the proposed filing deadline of six months after a final rule and another six months for implementation do not appear to be feasible. Based on the comprehensive review of electric storage resource participation that NYISO is conducting in its own region, it asserts that the compliance deadline should not be before the end of 2018 and implementation should not be required until the end of 2021. MISO requests that the Commission give it time to understand the system impacts of various integration options, noting, for example, that changing the minimum size to 100 kW could tax systems beyond current capabilities. SPP points out that the proposed participation model for electric storage resources will require extensive changes to software, the tariff, and market protocols.

PJM and ISO-NE state that the timeline depends upon the magnitude of the required changes. PJM states that it can implement the necessary system changes in approximately 12 months at a cost of under \$1 million if (1) the final rule is limited to changes in PJM's real-time energy market and to offers to sell energy and (2) if PJM does not need to manage electric storage resources' state of charge. However, PJM asserts that, if more extensive system changes are necessary to comply, the cost could be significantly higher and will likely take more time to implement. PJM also states that, given the timing of PJM's upcoming implementations of 5-minute settlements and hourly offers, it could not realistically begin working on the necessary system changes until at least early 2018. ISO-NE states that the changes contemplated in the NOPR are substantial but that the time and resources needed to comply with the final rule depend on the specific final provisions. ISO-NE argues that, if the Commission accepts ISO-NE's suggestions to (1) only require implementation of state of charge in real time as an information communication requirement (for example, via telemetered information), (2) not require implementation of the proposed voluntary bidding parameters, and (3) require participants to manage their own bidding parameters (except when reliability needs dictate otherwise), then the implementation effort will be substantially shorter and easier.

Some commenters also point out that, in order to comply with the rule, the RTOs/ISOs will need to change more than just their market rules. For example, AES Companies,

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

Energy Storage Association, and Electric Power Research Institute note that the RTOs/ISOs will need to make changes to their software. AES Companies also note that RTOs/ISOs will have to adjust their business practice manuals to comply.

Multiple commenters argue that the Commission should take a phased approach to its proposed compliance and implementation timelines. For example, NextEra Energy Resources, LLC suggests that the Commission finalize proposed reforms related to both the electric storage resource and distributed energy resource aggregation resources, while extending the distributed energy resource aggregation requirements to allow further time to work through issues. NextEra states that the Commission could stage compliance deadlines with electric storage resource tariff revisions being submitted within six months of a final rule and aggregation tariff revisions being due 12 months after a final rule. NextEra asserts that, if the Commission determines additional consideration needs to be given to the aggregation-related issues, the Commission should finalize the storage related revisions now.

MISO suggests that the Commission allow RTOs/ISOS to integrate electric storage resources using a phased approach. MISO explains that electric storage resources can be accommodated in the short term through the RTO's/ISO's existing system or with relatively manageable modifications but argues that, in the long-term, the further integration of electric storage resources should be pursued through joint study of an RTO's/ISO's market design and system enhancements. FirstLight Power Resources, Inc. also argues that, because the proposal includes changes to RTO/ISO bidding, dispatch, pricing and settlement software, the Commission should allow each RTO/ISO to address the phasing of market development and implementation efforts related to any final rule.

Several other commenters argue that the Commission should allow the RTOs/ISOs to develop their own implementation schedules. CAISO, PJM, IRC, and NYISO Indicated Transmission Owners argue that the Commission should permit each affected RTO/ISO to propose an implementation schedule for various aspects of the final rule. CAISO states that it does not oppose the Commission setting a compliance and implementation timeframe but suggests that a better approach would be to direct the RTO/ISOs to establish independent timelines in their compliance filings. PJM states that allowing RTOs/ISOS to propose implementation schedules is preferable to the Commission setting firm deadlines that may lead to requests for waivers. IRC recommends that the final rule should require each RTO/ISO to file an implementation plan and schedule with the Commission within 180 days. IRC states that the implementation plan and schedule should be subject to notice and comment and not necessarily limited to 12 months.

NYISO Indicated Transmission Owners state that the Commission should not set

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

unrealistic goals for the participation of distributed energy resource aggregations in wholesale markets before the grid has the needed technological capabilities. Therefore, NYISO Indicated Transmission Owners oppose the Commission's proposal to make the compliance filing due in six months with full implementation 12 months thereafter. Instead, NYISO Indicated Transmission Owners request that each RTO/ISO be allowed to utilize the stakeholder process to establish a timeline for implementation.

Xcel Energy Services also expresses concerns that the implementation timeline is too aggressive, stating that that Commission should further evaluate whether the technological capability exists to fully implement the NOPR requirements and, if not, what timeline is needed to ensure that such functionality can be developed. Xcel Energy Services contends that the requirements of the NOPR and the implementation timeline must be tailored to fit within achievable technological capabilities. Xcel Energy Services states that the RTOs/ISOs and their stakeholders should be permitted to propose alternate implementation timelines that allow higher priority regional projects to move forward before the software updates needed under the NOPR.

In contrast to other commenters, Advanced Microgrid Solutions argues that the proposed compliance and implementation timeline will take 18 months and therefore not promptly end unduly discriminatory rules and practices and will impose on-going burdens on the storage industry. Advanced Microgrid Solutions argues that compliance plans should be filed within 90 days and specify the earliest possible implementation date for each compliance action.

Multiple entities discuss the proposed bidding parameters, including state of charge, in relation to the proposed timeline for compliance. MISO states that managing state of charge would require costly investments and upgrades, noting that in some cases it may not be technically feasible for large volumes of electric storage resources. CAISO states that it will require at least 24 months to design and incorporate bidding parameters that account for all physical operating parameters (such as state of charge) into its modeling and dispatch software, which would require stakeholder discussions, market design work, and implementation testing. CAISO further explains that this directive would be inconsistent with how the CAISO models other resources in its markets and asks that the Commission direct RTOs/ISOs to account for the physical operating constraints of resources in their market modeling and dispatch software and require them to explain how they do so.

AES Companies similarly explain that time, resources, and capital costs can be minimized if all energy storage resources managed their own state of charge. EPRI notes that, assuming that the Commission does not require the RTOs/ISOs to manage state-of-

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

charge of electric storage resources (which some already do), there would only be minimal changes to the bidding interface, market clearing, or settlement software. EPRI states that the large change absent RTOs/ISOs having to manage state of charge will be allowing electric storage resources to offer as an injector and withdrawer of energy in the same market interval but for the market clearing software to only allow acceptance of one or the other. Tesla/SolarCity state that bidding parameters should reflect storage resources state of charge and be included in the unit commitment and economic dispatch optimization algorithms of each RTO/ISO. Tesla/SolarCity believe that storage resources should manage their own state of charge or have the choice between relying on RTO/ISO estimates or self-managing. In contrast to other commenters, Tesla/SolarCity assert that the time and resources necessary to incorporate these bidding parameters into the dispatch software should be minimal and are justified given the increased efficiency of markets and operations.

New England Power Pool (NEPOOL) raises regional issues. NEPOOL encourages the Commission to ensure that any final rule includes sufficient flexibility to allow the region to implement the requirements while also achieving the other regional priorities in ISO-NE's Work Plan for 2017-2018. Specifically, NEPOOL urges that the final rule take into account market rules that are currently being implemented in the region to eliminate barriers to the entry of electric storage resources into wholesale markets.

c. FERC's Response

Upon consideration of the comments, we find that it is reasonable to provide the RTOs/ISOs additional time to submit their proposed tariff revisions in response to the Final Rule, given that the changes could require significant work on the part of the RTOs/ISOs. We find that shorter timeframes proposed by commenters such as Advanced Microgrid Solutions would not provide the RTO/ISOs with sufficient time to implement the required reforms. Taking into account that the Commission is not implementing the distributed energy resource aggregation reforms at this time, we require each RTO/ISO to file the tariff changes needed to implement the requirements of this Final Rule within 270 days of the publication date of this Final Rule in the Federal Register. We will continue to allow each RTO/ISO a further 365 days from that date to implement the tariff provisions.

We find that, given the modifications and clarifications to the NOPR we make in this Final Rule and the record in this proceeding in support of the reforms we finalize here, our implementation schedule is reasonable. Commenters highlight that managing state of charge will complicate or delay implementation, and we note that we are not requiring the RTOs/ISOs to manage state of charge. Further, some commenters also provide

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

feedback on the implementation of the entire NOPR and indicate that implementing only the storage components would expedite compliance and implementation. We are not establishing any requirements for distributed energy resource aggregations as part of this Final Rule. Instead, a Notice of Technical Conference is being issued under Docket No. RM18-9-000 so that the Commission can continue to explore the proposed distributed energy resource aggregation reforms.

Given the additional time we are providing for each RTO/ISO to file proposed tariff revisions to comply with this Final Rule, we believe that the compliance and implementation schedule that we establish in this Final Rule is appropriate. As a consequence, we are not persuaded that more than 365 days after the RTO/ISOs are required to submit their proposed tariff revisions will be necessary to implement the reforms in this Final Rule; therefore, we decline to adopt commenters' other proposed recommendations, such as allowing the RTO/ISOs to develop their own implementation schedules. We disagree with Xcel Energy Services' argument that the Commission needs to further evaluate whether the technological capability exists to fully implement the NOPR requirements, especially as we are not finalizing in this Final Rule the distributed energy resource aggregation reforms proposed in the NOPR.

Additionally, we note that many of the RTO/ISOs already have rules in place to enable the participation of electric storage resources in their markets. To the extent that an RTO/ISO proposes to comply with certain requirements of this Final Rule using existing market rules, it must demonstrate on compliance how its existing market rules meet the requirements of this Final Rule. We expect that the additional time that we are providing for the RTO/ISOs to make their compliance filings, along with the ability of the RTO/ISOs to use existing tariff provisions to demonstrate compliance with aspects of the Final Rule, will mean that the RTO/ISOs can meet the deadlines that we are establishing here. Finally, we also note that, throughout this Final Rule, we are allowing regional flexibility to the extent possible. We believe that this flexibility will assist the RTO/ISOs in meeting the compliance and implementation deadlines.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents of this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission does not consider the information collected in FERC-516H filings to be confidential.

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

Generally, the Commission does not consider this information to be confidential. If an entity chooses to seek confidential treatment of the information, they must submit a request for the Commission to treat this information as confidential and non-public, consistent with 18 CFR 388.112.

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

There are no questions of a sensitive nature associated with the reporting requirements.

12. ESTIMATED BURDEN COLLECTION OF INFORMATION

As mentioned earlier, in this Final Rule, we are not adopting any of the proposed reforms in the NOPR related to distributed energy resource aggregations and are modifying some of the requirements related to the participation model for electric storage resources.

FERC-516H (OMB Control No. TBD)
 Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
 in Docket Nos. RM16-23-000 and AD16-20-000
 RIN 1902-AF18

FERC-516H, as implemented in the Final Rule in Docket No. RM16-23-000⁷						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)×(2)=(3)	Average Burden Hours & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)×(4)=(5)	Cost per Respondent (\$) (5)÷(1)
<u>One-Time Tariff Filing⁸</u>	6 ⁹	1	6	1,500 hrs; \$115,500	9,000 hrs; \$693,000	\$115,500

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor PRA-related costs. All costs are related to burden hours and are addressed in Questions #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

	Number of Employees	Estimated Annual
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⁷ The estimated hourly cost (salary plus benefits) is based on the salary figures for May 2016 posted by the Bureau of Labor Statistics (BLS) for the Utilities sector (at http://www.bls.gov/oes/current/naics2_22.htm) and benefits information for September 2017 (issued 12/15/2017, at <https://www.bls.gov/news.release/ecec.nr0.htm>). The hourly estimates for salary plus benefits are: (a) Legal (code 23-0000), \$143.68; (b) Computer and mathematical (code 15-0000), \$60.70; (c) Computer and information systems manager (code 11-3021), \$100.68; (d) Information security analyst (code 15-1122), \$66.34; (e) Auditing and accounting (code 13-2011), \$53.00; (f) Information and record clerk (code 43-4199), \$39.14; (g) Electrical Engineer (code 17-2071), \$68.12; (h) Economist (code 19-3011), \$77.96; and (i) Management (code 11-0000), \$81.52. The average hourly cost (salary plus benefits), weighting all of these skill sets evenly, is \$76.79. The Commission rounds it to \$77 per hour.

⁸ The one-time tariff filing is due within 270 days of the publication date of the Final Rule in the Federal Register.

⁹ Respondent entities are either RTOs or ISOs.

FERC-516H (OMB Control No. TBD)
 Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
 in Docket Nos. RM16-23-000 and AD16-20-000
 RIN 1902-AF18

	(FTE)	Federal Cost
Analysis and Processing of Filings ¹⁰	3.3	\$523,888
PRA ¹¹ Administrative Cost		\$5,723
FERC Total		\$529,611

FERC 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 any actual filings submitted in response to the information collection.

The PRA Administrative Cost (estimate of \$5,723 per collection annually) 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, and other changes to the collection.

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

Each RTO and ISO will now be required to revise its tariff to establish a participation model consisting of market rules that, recognizing the physical and operational characteristics of electric storage resources, facilitates their participation in the RTO/ISO markets. The participation model must (1) ensure that a resource using the participation model is eligible to provide all capacity, energy, and ancillary services that the resource is technically capable of providing in the RTO/ISO markets; (2) ensure that a resource using the participation model can be dispatched and can set the wholesale market clearing price as both a wholesale seller and wholesale buyer consistent with existing market rules that govern when a resource can set the wholesale price; (3) account for the physical and operational characteristics of electric storage resources through bidding parameters or other means; and (4) establish a minimum size requirement for participation in the RTO/ISO markets that does not exceed 100 kW.

Additionally, each RTO/ISO must specify that the sale of electric energy from the RTO/ISO markets to an electric storage resource that the resource then resells back to those markets must be at the wholesale locational marginal price.

¹⁰ Based upon 2017 FTE average annual salary plus benefits (\$158,754).

¹¹ Paperwork Reduction Act of 1995 (PRA).

The following table shows the one-time total burden of the collection of information. The RTOs and ISOs are required to file the tariff changes needed to implement the requirements of this Final Rule within 270 days of the publication date of this Final Rule in the Federal Register. The RTOs and ISOs will be granted a further 365 days from that date to implement the tariff provisions.¹² The format, labels, and definitions of the table follow the ROCIS submission system’s “Information Collection Request Summary of Burden” for the metadata.

FERC-516H	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Total Number of Responses	6	0	0	6
One-Time Burden (Hours)	9,000	0	0	9,000
One-Time Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information. The data are used for regulatory purposes only.

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

12 The estimated cost related to this Final Rule includes: (a) the cost (which is directly related to paperwork burden) of preparing and making a one-time tariff filing (\$115,500 [for the estimated 1,500 burden hours] per entity, as detailed in #12, and #15 in this supporting statement), and (b) the cost which is *non-PRA-related* (i.e. not related to paperwork), one-time cost of updating the economic dispatch software (mentioned above and described further in the Regulatory Flexibility Act section of the Final Rule). Revisions to the economic dispatch software are due to be implemented within 365 days after the due date of the tariff filing.

FERC-516H (OMB Control No. TBD)
Final Rule (issued 2/15/2018, with Errata Notice issued 2/28/2018),
in Docket Nos. RM16-23-000 and AD16-20-000
RIN 1902-AF18

There are no exceptions.