

Supporting Statement for
**FERC-516G,¹ Electric Rates Schedules and Tariff Filings,
Implemented in the Final Rule in RM17-2-000**

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve for three years the FERC-516G as implemented in the Final Rule² (Order No. 844) in Docket No. RM17-2.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

In June 2014, the Commission initiated a proceeding in Docket No. AD14-14-000, Price Formation in Energy and Ancillary Services Markets in Regional Transmission Organizations and Independent System Operators, to evaluate issues regarding price formation in the energy and ancillary services markets operated by Regional Transmission Organizations/Independent System Operators (RTOs/ISOs). In the notice initiating that proceeding, the Commission stated that there may be opportunities for the RTOs/ISOs to improve the price formation process in the energy and ancillary services markets. As set forth in the notice, prices used in energy and ancillary services markets ideally “would reflect the true marginal cost of production, taking into account all physical system constraints, and these prices would fully compensate all resources for the variable cost of providing service.”³ Pursuant to the notice, staff conducted outreach and

¹ These requirements would normally be submitted under the FERC-516 information collection (OMB Control No. 1902-0096). However, the Notice of Proposed Rulemaking (NOPR) for Docket No. RM17-2 was submitted to OMB under the FERC-516G (which was a temporary information collection number intended only to allow the timely submission of the requirements in the NOPR to OMB). When the NOPR was submitted, there was another unrelated item under FERC-516 pending OMB review, and only one item per OMB Control No. can be pending OMB review at a time. Therefore we used FERC-516G as a ‘placeholder’ for the NOPR submittal. At this time, there is another unrelated item pending OMB review under FERC-516, so we are also using FERC-516G for the Final Rule in RM17-2.

² The Final Rule is posted in FERC’s eLibrary at <https://elibrary-backup.ferc.gov/idmws/common/OpenNat.asp?fileID=14893587>. The FERC News Release and Staff Presentation are posted at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14893194> and <https://www.ferc.gov/industries/electric/indus-act/rto/04-19-18-E-1-presentation.pdf>.

³ Price Formation Notice, Docket No. AD14-14-000, at 2 (June 19, 2014).

convened technical workshops on the following four general issues: (1) use of uplift payments; (2) offer price mitigation and offer price caps; (3) scarcity and shortage pricing; and (4) operator actions that affect prices.⁴

In January 2015, the Commission requested comments on questions that arose from the price formation technical workshops.⁵ As a result of these comments, the Commission identified five topics with potential for reform to improve price formation, but for which further information was needed. In November 2015, the Commission issued an order that directed each RTO/ISO to report on those five price formation topics: fast-start pricing; managing multiple contingencies; look-ahead modeling; uplift cost allocation; and transparency.⁶ Specifically, the order directed each RTO/ISO to file a report with the Commission providing an update on its current practices in the five topic areas, outlining the status of its efforts (if any) to address issues in each of the five topic areas, and responding to specific questions contained in the order. In the reports filed and in subsequent comments, RTOs/ISOs and other commenters addressed the issues of uplift cost allocation and transparency.

On February 7, 2017, the Commission published in the Federal Register a Notice of Proposed Rulemaking in Docket No. RM17-2 proposing requirements related to uplift cost allocation and transparency.⁷ Based on the record in this proceeding, the Commission in this Final Rule adopts the preliminary findings related to transparency in the NOPR and concludes that the existing RTO/ISO practices of reporting uplift and operator-initiated commitments are insufficiently transparent, thus resulting in rates that are unjust and unreasonable. The current reporting on uplift is insufficient because no RTO/ISO currently reports uplift on a resource-specific basis. Some RTOs/ISOs do not report uplift by zone, and some do not report in a machine-readable format. Additionally, reporting on operator-initiated commitments is insufficient because some RTOs/ISOs do not report the reasons for these commitments, the zones in which the commitments are made, or information about the size of the system needs for which resources are

⁴ *Id.* at 1, 3-4.

⁵ Notice Inviting Comments, Docket No. AD14-14-000 (Jan. 16, 2015).

⁶ Price Formation in Energy and Ancillary Services Markets Operated by Regional Transmission Organizations and Independent System Operators, 153 FERC ¶ 61,221 (2015) (Order Directing Reports).

⁷ Uplift Cost Allocation and Transparency in Markets Operated by Regional Transmission Organizations and Independent System Operators, 82 Fed. Reg. 9539 (Feb. 7, 2017), FERC Stats. & Regs. ¶ 32,721, at P 82 (2017) (NOPR).

committed.

Based on its analysis of the record in this proceeding, the Commission is withdrawing its proposal in the NOPR to require that each RTO/ISO that currently allocates the costs of real-time uplift to deviations allocate such costs only to those market participants whose transactions are reasonably expected to have caused those costs.

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

In this Final Rule in RM17-2, the Commission adopts, with some minor adjustments, the proposed requirements of the NOPR, and seeks to remedy unjust and unreasonable rates by requiring that, pursuant to section 206 of the Federal Power Act, each RTO/ISO establish in its tariff:

- (1) requirements to report, on a monthly basis, total uplift payments for each transmission zone, broken out by day and uplift category;
- (2) requirements to report, on a monthly basis, total uplift payments for each resource;
- (3) requirements to report, on a monthly basis, for each operator-initiated commitment, the size of the commitment, transmission zone, commitment reason, and commitment start time; and
- (4) the transmission constraint penalty factors used in its market software, as well as the circumstances under which those factors can set locational marginal prices, and any process by which they can be changed.

A more detailed explanation of the three reports and the transmission constraint penalty factor requirement follows below. All three reports must be posted in machine-readable format on a publicly accessible portion of the RTO's/ISO's website.

Zonal Uplift Report

Each Commission-approved RTO/ISO must post uplift, paid in dollars, and categorized by transmission zone, day, and uplift category. Transmission zone shall be defined as the geographic area that is used for the local allocation of charges.⁸ Transmission zones with

⁸Transmission zones are included in both the Zonal Uplift Report and the Operator-Initiated Commitment Report. Prior to the Final Rule, many commenters argued that understanding the location of resources that receive uplift payments and operator-initiated commitments would improve market participants' ability to reduce the need for uplift. All RTOs/ISOs have several types of zones within their footprints, each with different terminology and definitions. "Transmission zone" is not a universal term among RTOs/ISOs; for the purposes of reporting uplift the Commission defines a "transmission

fewer than four resources may be aggregated with one or more neighboring transmission zones, until each aggregated zone contains at least four resources, and reported collectively. This report shall be posted within 20 calendar days of the end of each month.

As noted in the Final Rule, the current lack of the information contained in the two uplift reports hinders market participants' ability to plan and efficiently respond to system needs. Requiring the RTOs/ISOs to report this information will facilitate market participants' ability to evaluate possible solutions to reduce the incurrence of uplift, thereby leading to more just and reasonable rates. For example, with more granular information on the location, amounts, and types of uplift, market participants can better evaluate the benefits of additional transmission upgrades that could reduce the need for unit commitments. Market participants can also use the information to raise issues of concern in the relevant stakeholder process.

Resource-Specific Uplift Report

Each Commission-approved RTO/ISO must post the resource name and the total amount of uplift paid in dollars aggregated across the month to each resource that received uplift payments within the calendar month. This report shall be posted within 90 calendar days of the end of each month.

The Commission finds in the Final Rule that the Resource-Specific Uplift Report will improve transparency into the causes of uplift. The Resource-Specific Uplift Report will complement the Zonal Uplift Report by providing more granular technology-type and geographic information, allowing market participants to identify potential system needs at specific locations that may not otherwise be revealed through price signals. The locational granularity of the required uplift report also mirrors the locational granularity of energy prices. The two uplift reports in combination will improve market efficiency by providing information to market participants considering, for example, where to site new resources, transmission facilities, or demand response.

While all of the six jurisdictional RTOs/ISOs currently provide monthly uplift reports on their websites, each does so on a different timeline. Most RTOs/ISOs provide these

zone" as a geographic area that is used for the local allocation of charges. In the Final Rule, the Commission finds that on balance, this definition will provide the transparency benefits of geographically granular information while minimizing the risk of harm to the market from the potential release of commercially-sensitive information. With this definition, the Commission aims to ease the reporting burden on RTOs/ISOs by allowing them to use existing zones rather than requiring them to adjust data and the geographic level of their reporting to fit a newly prescribed level of geographic granularity.

reports within the month following the reporting period. Some commenters stated that having this information earlier would improve the transparency of uplift payments and charges. As explained in the Final Rule, such transparency supports the efficient functioning of RTO/ISO markets by improving market participants' understanding of how uplift is calculated, how uplift relates to system needs, and the predictability of uplift payments and charges going forward.

In the Final Rule, the Commission recognizes that the timing of uplift reporting is driven, in part, by each individual RTO's/ISO's market settlement process, which needs to be completed before an uplift report can be compiled. Each RTO/ISO produces a variety of public reports daily, monthly, and over longer time intervals. Each RTO/ISO has the flexibility to align the production of the uplift reports with any other public report it generates within the relevant reporting timeline (i.e., 20 days after the end of the month for the Zonal Uplift Report and 90 days after the end of the month for the Resource-Specific Uplift Report) in order to reduce the reporting burden.

Operator-Initiated Commitment Report

Each Commission-approved RTO/ISO must post a report of each operator-initiated commitment listing the size of the commitment, transmission zone, commitment reason, and commitment start time on a publicly accessible portion of its website within 30 calendar days of the end of each month. As previously noted, transmission zone shall be defined as a geographic area that is used for the local allocation of charges.⁹ Commitment reasons shall include, but are not limited to, system-wide capacity, constraint management, and voltage support. Based on comments received, the Commission adopts a modified definition of an operator-initiated commitment. For the purposes of this Final Rule, an operator-initiated commitment is a commitment after the day-ahead market, whether manual or automated, for a reason other than minimizing the total production costs of serving load.

Transparency into operator-initiated commitments is important because such commitments can affect energy and ancillary service prices and can result in uplift. Greater transparency will allow stakeholders to better understand the drivers of uplift costs, assess an RTO's/ISO's operator-initiated commitment practices, and raise any issues of concern through the stakeholder process. The Operator-Initiated Commitment Report will provide granular information about the location, timing, causes and size of operator-initiated commitments. Such information will allow stakeholders to better understand the connections between system needs and operator actions and to make investments in facilities and equipment where most needed by the system, thus potentially improving market efficiency.

⁹ See *supra* note 8 (discussing the definition of the term "transmission zone" for the purposes of this Final Rule).

Transmission Constraint Penalty Factors

The Commission adopts the NOPR proposal, and requires that each RTO/ISO include in its tariff: (1) the transmission constraint penalty factor values currently used in its market software; (2) the circumstances, if any, under which the transmission constraint penalty factors can currently set Locational Marginal Prices; and (3) the current procedures, if any, for temporarily changing the transmission constraint penalty factor values. The Commission also requires in the Final Rule that any procedures for temporarily changing transmission constraint penalty factor values must provide for notice of the change to market participants as soon as practicable.

The Commission finds that transmission constraint penalty factors have the potential to materially affect energy and ancillary services prices, so they should be included in the tariff. Further, greater transparency into transmission constraint penalty factors will allow market participants to understand how an RTO's/ISO's actions and practices affect clearing prices. Without transparency into transmission constraint penalty factors, market participants cannot understand the impact of these factors on Locational Marginal Prices or effectively engage in dialogue or transactions to improve market efficiencies.

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

Commission staff expects to receive all tariff filings via eTariff. In 2010, the Commission fully implemented its eTariff system for the electronic filing of tariffs. (For more information on eTariff, see <https://www.ferc.gov/docs-filing/etariff.asp>.)

In addition, three reports will be posted monthly on each individual respondent's website. With respect to the required reports, all RTOs/ISOs already provide some information regarding the locations and causes of uplift and operator-initiated commitments. However, the information is often highly aggregated or lacks detail. Thus, these requirements improve the usability of information that, in many cases, is either already reported or exists within current reporting systems. The requirements aim to strike a balance between ensuring transparency for stakeholders in the form of clear, easy-to-use data in machine-readable format, reported at regular intervals, and minimizing the burden on RTOs/ISOs.

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 concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. The actions in this Final Rule relate to a Commission jurisdictional tariff and the company posting information on its website. Therefore, the Commission would be the only entity requiring and collecting this information.

All RTOs/ISOs provide some information regarding the locations and causes of uplift and operator-initiated commitments. However, the information is often highly aggregated or lacks detail, and is not consistently reported across markets. Current reporting practices do not provide adequate transparency for stakeholders to understand the needs of the system and recognize the resource attributes that are required to meet these needs. Improving the availability of information about the location and causes of uplift and operator-initiated commitments would enhance market participants' ability to evaluate the need for, and the value of investment in, transmission and generation. Increased transparency could also facilitate more informed stakeholder discussions that support capacity or transmission planning to address future reliability and resilience issues.

Some uplift information is also reported in Electronic Quarterly Reports (EQR).¹⁰ However, the Commission has not required uplift to be reported in EQR at the level of granularity necessary to meet the price formation objectives of this proceeding. For example, EQR uplift information does not differentiate between different categories of uplift.

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

The Small Business Administration (SBA) classifies an entity as an electric utility if it is primarily engaged in the transmission, generation, and/or distribution of electric energy for sale. Under this definition, the six RTOs/ISOs are considered electric utilities, specifically focused on electric bulk power and control. The size criterion for a small electric utility is 500 or fewer employees.¹¹ Since every RTO/ISO has more than 500 employees, none are considered small entities.

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

¹⁰ EQR serves as a reporting mechanism for public utilities to fulfill their responsibility under section 205(c) of the Federal Power Act to have their rates and charges on file in a convenient form and place.

¹¹ 13 CFR 121.201 (Sector 22, Utilities).

To conduct these filings less frequently (i.e., not conducting them at all, or less frequently than prescribed by the Final Rule), the Commission would be unable to provide the necessary level of transparency to ensure that rates are just and reasonable and not unduly discriminatory or preferential.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances.

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

Each FERC activity that results in the revision of an information collection is published in the Federal Register thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the approved collections of data. As mentioned above in response to question one, the Commission initiated the price formation proceeding in 2014 and has since developed a substantial record. Comments relevant to this final rule on improving transparency in the RTO/ISO markets were received in response to the January 2015 Notice Inviting Comments, the November 2015 Order Directing Reports, and, most recently, the February 2017 NOPR.

The NOPR in Docket No. RM17-2-000¹² was issued on January 19, 2017 and published in the Federal Register on February 7, 2017.¹³ The comments are available in FERC's eLibrary under Docket No. RM17-2-000. The Commission received a number of comments agreeing with the Commission's preliminary finding that the proposed reporting requirements are necessary to improve transparency. Only one commenter, the California Independent System Operator Corporation (CAISO), argued that the proposed transparency reforms are an unnecessary burden. CAISO specifically argued that the timing of the uplift and operator initiated commitment reports proposed in the Notice of Proposed Rulemaking (NOPR) would not provide CAISO with sufficient time to produce and verify the reports. In the Final Rule, the Commission makes two modifications to reduce the burden on RTOs/ISOs of meeting the transparency requirements. With

¹² Uplift Cost Allocation and Transparency in Markets Operated by Regional Transmission Organizations and Independent System Operators, 82 Fed. Reg. 9539 (Feb. 7, 2017), FERC Stats. & Regs. ¶ 32,721, at P 82 (2017) (NOPR) (also available at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14469253>).

¹³ 82 FR 9539.

respect to uplift reporting, the Commission notes that it will consider arguments on compliance that a longer reporting timeline than 20 days after the end of the reporting month is necessary for an RTO/ISO to compile the report given its existing uplift settlement timeline. With respect to reporting operator-initiated commitments, the Commission modifies the reporting deadline from four hours after the commitment to 30 days after the end of the month.

Several RTOs/ISOs argued that the proposed uplift cost allocation reforms would be difficult to implement. As noted above, the Commission is withdrawing the proposed uplift cost allocation reforms.

The Final Rule will also be published in the Federal Register.

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 FERC-516G data are public.

In general, for all submittals to the Commission, filers may submit specific requests for confidential treatment to the extent permitted by law, as set forth in 18 CFR section 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

This collection does not include any questions of a sensitive nature.

12. ESTIMATED BURDEN COLLECTION OF INFORMATION

The FERC-516G information collection is new.¹⁴

¹⁴ A Paperwork Reduction Act (PRA) package under FERC-516G for the NOPR in RM17-2 was submitted to OMB. On August 8, 2017, OMB issued its decision (“comment filed on proposed rule”) which included assignment of OMB Control No. 1902-0295.

The reporting and posting requirements of the FERC-516G have the following due dates:

- a) Establishing a process for posting/reporting on company website, and submitting tariff filing to FERC (one-time in Year 1)—due within 60 days of the effective date of this Final Rule. Each RTO/ISO must submit a compliance filing that establishes in its tariff the three reporting requirements and one requirement related to transmission constraint penalty factors.
- b) Preparing and posting, monthly (starting in Year 1), reports on company website. Each RTO/ISO must begin posting reports no more than 120 days after compliance filings are due. At that point, each of the three reports would be posted on a monthly basis.
- c) Implementing—tariff changes must become effective no more than 120 days after compliance filings are due.

The estimated burden and cost¹⁵ for the requirements contained in this Final Rule follow.¹⁶

Note: The Commission's NOPR in Docket RM17-2 proposed reforms to improve uplift cost allocation and to enhance transparency. As stated above, in section 2, this Final Rule only addresses the transparency reforms.

¹⁵ The estimated hourly cost (salary plus benefits) provided in this section are based on the salary figures for May 2016 posted by the Bureau of Labor Statistics for the Utilities sector (*available at* http://www.bls.gov/oes/current/naics2_22.htm#00-0000) and benefits effective September 2017 (issued 12/15/2017, *available at* <http://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) Information Security Analyst (code 15-1122), \$66.34; (d) Accountant and Auditor (code 13-2011), \$53.00; (e) Information and Record Clerk (code 43-4199), \$39.14; (f) Electrical Engineer (code 17-2071), \$68.12; (g) Economist (code 19-3011), \$77.96; (h) Computer and Information Systems Manager (code 11-3021), \$100.68; (i) Management (code 11-0000), \$81.52. The average hourly cost (salary plus benefits), weighting all of these skill sets equally, is \$76.79. For these calculations, we round that figure to \$77 per hour.

¹⁶ Each FERC-jurisdictional RTO/ISO (California Independent System Operator Corporation (CAISO), Southwest Power Pool, Inc. (SPP), Midcontinent Independent System Operator, Inc. (MISO), PJM Interconnection, L.L.C. (PJM), New York Independent System Operator, Inc. (NYISO), and ISO New England, Inc. (ISO-NE)) is required to comply with the reforms in this Final Rule.

FERC-516G, as implemented by the Final Rule in Docket No. RM17-2-000						
	No. of Respondents¹⁷ (1)	Annual No. of Responses per Respondent (2)	Total No. of Responses (1)×(2)=(3)	Average Burden Hours & Cost Per Response (4)	Total Annual Burden Hours & Cost (3)×(4)=(5)	Cost per Respondent (\$) (5)÷(1)
One-Time Effort (in Year 1) to (a)establishing process for reporting on company website, ¹⁸ & (b)submitting tariff filing	6	1	6	500 hrs.; \$38,500	3,000 hrs.; \$231,000	\$38,500
Ongoing, Preparing and Posting of 3 reports on company website each month (starting in Year 1), as mentioned above	6	12	72	3 hrs.; \$231	216 hrs.; \$16,632	\$2,772

The total burden in Years 1-3 follows:

- Year 1 (one-time and ongoing), 3,216 hours for 78 responses; and
- Year 2 and Year 3, 216 hours each year for 72 responses.

¹⁷ Respondent entities are either RTOs or ISOs.

¹⁸ This includes monthly reporting/posting on the company website for: (1) Zonal Uplift Report (posting within 20 days of end of month), (2) Resource-Specific Uplift Report (posting within 90 days of end of month), and (3) Operator-Initiated Commitment Report (posting within 30 days of the end of month).

Therefore, the total burden for Years 1-3 is 3,648 hours (3,216 hours+216 hours+216 hours). *For submittal to OMB, we will use the annual averages of 1,216 hours (3,648 hours/3 years) and 74 responses [(78 responses+72 responses+72 responses)/3 years]for Years 1-3.* [The one-time burden will be removed from the OMB inventory after Year 3.]

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up or other non-labor costs.

Total Capital and Start-up cost: \$0

Total Operation, Maintenance, and Purchase of Services: \$0

All of the costs in the 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

	Number of Employees (FTE)	Estimated Annual Federal Cost (rounded)
Analysis and Processing of Filings ¹⁹	0.25	\$39,689
PRA ²⁰ Administrative Cost		\$5,723
FERC Total		\$45,412

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 any actual filings submitted in response to the information collection as well as monitoring of the website postings.

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, and other changes to the collection.

¹⁹ Based upon FERC’s 2017 FTE average annual salary plus benefits (\$158,754).

²⁰ Paperwork Reduction Act of 1995 (PRA).

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

The RM17-2-000 Final Rule is imposing a burden increase requiring that each RTO/ISO establish in its tariff:

- (1) requirements to report, on a monthly basis, total uplift payments for each transmission zone, broken out by day and uplift category;
- (2) requirements to report, on a monthly basis, total uplift payments for each resource;
- (3) requirements to report, on a monthly basis, for each operator-initiated commitment, the size of the commitment, transmission zone, commitment reason, and commitment start time; and
- (4) the transmission constraint penalty factors used in its market software, as well as the circumstances under which those factors can set locational marginal prices, and any process by which they can be changed.

For the purposes of submittal to OMB, we are averaging the number of responses and burden hours over Years 1-3 (as discussed in Question 12) in the table below; the one-time implementation burden will be removed after Year 3.

FERC-516G	Total Request	Previously Approved	Change due to Adjustment in Agency Estimate	Program Change Due to Agency Discretion
Annual Number of Responses	74	0	0	74
Annual Time Burden (Hours)	1,216	0	0	1,216
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

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

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

FERC-516G (OMB Control No.: 1902-0295)
as implemented in the Final Rule (issued 4/19/2018) in Docket No. RM17-2-000
RIN: 1902-AF37

There are no exceptions.