

Supporting Statement for  
**FERC-516 (Electric Rate Schedules and Tariff Filings)**  
**as modified by the Final Rule in Docket RM17-8-000**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-516 (Electric Rate Schedules and Tariff Filings) as modified by the Final Rule in RM17-8-000<sup>1</sup>.

The Notice of Proposed Rulemaking in Docket No. RM17-8-000 was submitted to OMB under the FERC-516F information collection (OMB Control No. 1902-0297)<sup>2</sup>. FERC-516F was a temporary information collection number that Commission staff used due to FERC-516 being under review by OMB for an unrelated project at the time and, thus, unavailable for submission purposes.

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

In Order Nos. 2003 and 2006 and pursuant to its responsibility under Sections 205 and 206 of the Federal Power Act (FPA), the Commission adopted standard procedures for the interconnection of large and small generating facilities, including the development of standardized *pro forma* generator interconnection procedures and agreements. Prior to Order No. 2003, the addressed interconnection issues on a case-by-case basis through filings under Section 205 of the FPA. The Commission required public utility transmission providers to file revised Open Access Transmission Tariffs (OATT) containing these standardized provisions, and use the *pro forma* Large Generator Interconnection Procedures (LGIP) and *pro forma* Large Generator Interconnection Agreements (LGIA) to provide non-discriminatory interconnection service to Large Generators (i.e., generating facilities having a capacity of more than 20 MW), and the *pro forma* Small Generator Interconnection Procedures (SGIP) and *pro forma* Small Generator Interconnection Agreement (SGIA) to provide non-discriminatory interconnection service to Small Generators (i.e., generators having a capacity of no more than 20 MW). The *pro forma* LGIP, *pro forma* LGIA, *pro forma* SGIP, and the *pro forma* SGIA have since been revised through various subsequent proceedings.

The Commission has identified proposed reforms that could remedy potential shortcomings in the existing interconnection processes. The Commission believes the adopted reforms will benefit interconnection customers through more timely and cost-effective interconnection and will benefit transmission providers by mitigating the potential for serial re-studies associated with late-stage interconnection request withdrawals. Specifically, the Commission believes that the provision of more timely and accurate information could increase certainty for

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1 The Final Rule (issued 4/19/2018) is available in FERC's eLibrary system at <https://elibrary-backup.ferc.gov/idmws/common/OpenNat.asp?fileID=14893809>.

2 ICR No. 201612-1902-003, submitted on 2/15/2017.

interconnection customers and assist them in earlier evaluation and quicker development, as well as assist in earlier, fewer disruptive withdrawals from the interconnection queue. The Commission also believes that more thorough and transparent information presented for the interconnection customer could enable more informed decisions earlier in the interconnection process, which, in turn, could reduce late-stage interconnection request withdrawals and result in fewer restudies and delays. More timely and accurate information regarding an interconnection request, as well as greater transparency, will also reduce the incentive for interconnection customers to submit multiple interconnection requests when they only intend to see one to commercial operation. The Commission has also identified a set of reforms that enhance the interconnection process by, for example, addressing interconnection issues experienced most acutely by new technologies. The Commission believes there are ways to allow flexibility in the interconnection process to accommodate innovation.

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

In the Final Rule in Docket No. RM17-8-000, the Commission is approving ten reforms that focus on improving aspects of the *pro forma* LGIA and LGIP. The approved reforms fall into three broad categories and are intended to:

- improve certainty in the interconnection process;
- improve transparency by providing more information to interconnection customers; and
- enhance interconnection processes.

First, the Commission approves two reforms to improve certainty by affording interconnection customers more predictability in the interconnection process. To accomplish this goal, the Commission adopts reforms to:

- remove from the *pro forma* LGIA the limitation that interconnection customers may only exercise the option to build transmission provider's interconnection facilities and standalone network upgrades if the transmission owner cannot meet the dates proposed by the interconnection customer; and
- require that transmission providers modify their LGIPs to establish dispute resolution procedures that disputing parties may initiate unilaterally.

The Commission declined to adopt the proposals related to requiring periodic restudies and the transmission owner's right to initially fund network upgrades. Additionally, the Commission did not take any action in response to comments on whether the Commission should revise the *pro*

*forma* LGIP and *pro forma* LGIA to provide for a cost cap that would limit an interconnection customer's network upgrade costs following a certain stage in the interconnection study process.

Second, the Commission adopts four reforms to improve transparency by providing improved information for the benefit of all participants in the interconnection process. These reforms would provide a fuller picture of the considerations involved in interconnecting a new large generating facility. The Commission adopts reforms to:

- require transmission providers to outline and make public a method for determining contingent facilities in their LGIPs and LGIAs based upon guiding principles in the Final Rule;
- require transmission providers to list either on their websites or on their Open Access Same-Time Information System (OASIS) sites the specific study processes and assumptions for forming the networking models used for interconnection studies;
- revise the definition of "Generating Facility" in the *pro forma* LGIP and LGIA to explicitly include electric storage resources; and
- create a system of reporting requirements for aggregate interconnection study performance.

The Commission declined to adopt a proposal related to congestion and curtailment information, and created a new proceeding in order to gather more information on affected systems coordination.

Third, the Commission approves four reforms to enhance interconnection processes by making use of underutilized existing interconnections, providing interconnection service earlier, or accommodating changes in the development process. In this area, the Commission adopts reforms to:

- allow interconnection customers to limit their requested level of interconnection service below their generating facility capacity;
- require transmission providers to allow for provisional agreements so that interconnection customers can operate on a limited basis prior to completion of the full interconnection process;
- require transmission providers to create a process for interconnection customers to use surplus interconnection service at existing interconnection points; and
- require transmission providers to set forth a separate procedure to allow transmission providers to assess and, if necessary, study an interconnection customer's technology changes (e.g., incorporation of a newer turbine model) without a change to the interconnection customer's queue position.

The Commission declined to take action in response to comments regarding the modeling methods transmission providers use to study electric storage resources.

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

Commission staff expects to receive all filings via eTariff. In 2010, the Commission fully implemented its eTariff system for the electronic filing of tariffs. Further, Commission staff believes that there is minimal burden associated with the proposed postings to OASIS websites .

**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 approved actions here relate to a Commission jurisdictional tariff and the company posting information on its website or on its OASIS site. Therefore, the Commission would be the only entity requiring this information. The Commission is unaware of any other source of information related to bulk-electric system physical security.

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

The Commission estimates that the total number of transmission providers, both public and non-public, affected by this Final Rule is 132. Of these, the Commission estimates that approximately 43 percent (approximately 57 entities) are small entities. The Commission estimates the average total cost to each of these entities will be between \$20,562 and \$21,158 in the first year of compliance and approximately \$4,768 in subsequent years (i.e., Years 2 and 3). The Commission makes no specific concession with regard to entity size and requisite reporting requirements.

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

To conduct these filings less frequently (i.e., not conducting them at all), the Commission would be unable to ensure that rates are just and reasonable and not unduly discriminatory or preferential. The requirements within this Final Rule have several beneficial effects on the generator interconnection process benefiting both interconnection customers and transmission

providers. The provision of more timely and accurate information should facilitate interconnection customer decision making, improve interconnection queue operations, and help with generation project development.

**7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION**

FERC-516 information collection has no special circumstances.

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

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.

The Commission solicited comments at the NOPR stage<sup>3</sup>. None of the comments received pertained to the Commission's paperwork burden or cost estimates.

The Final Rule was published<sup>4</sup> in the Federal Register on 5/9/2018.

**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**

The data involved and affected by the revisions approved in this Final Rule 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 contain any questions of a sensitive nature.

**12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION**

The Commission believes that the burden estimates below are representative of the average

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<sup>3</sup> NOPR was issued on 12/15/2016, and published in the Federal Register at 81 FR 4464 on 1/13/2017.  
<sup>4</sup> 83 FR 21342

burden on respondents.

The following table contains the estimated reporting burden and cost<sup>5</sup> related to revisions in the Final Rule in Docket RM17-8-000:

FERC 516					
	Number of Applicable Registered Entities (Respondents) (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Costs per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)
Issue A1 – Scheduled periodic restudies <sup>6</sup>	N/A <sup>7</sup>	N/A	N/A	N/A	N/A
Issue A2 – Interconnection customer’s option to build (Non-RTO/ISO)	126	1 (Year 1); 0 (Ongoing) <sup>8</sup>	126 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	504 hrs. (Year 1); \$38,808; 0 hrs. (Ongoing); \$0
Issue A2 – Interconnection customer’s option to build (RTO/ISO)	6	1 (Year 1); 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	24 hrs. (Year 1); \$1,848; 0 (Ongoing) \$0

<sup>5</sup> The estimated hourly cost (salary plus benefits) provided in this section is 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#13-0000](http://www.bls.gov/oes/current/naics2_22.htm#13-0000)) and scaled to reflect benefits using the relative importance of employer costs in employee compensation from June 2016 (available at [https://www.bls.gov/oes/current/naics2\\_22.htm](https://www.bls.gov/oes/current/naics2_22.htm)). The hourly estimates for salary plus benefits are:

- Auditing and accounting (code 13-2011), \$53.00
- Computer and Information Systems Manager (code 11-3021), \$100.68
- Computer and mathematical (code 15-0000), \$60.70
- Economist (code 19-3011), \$77.96
- Electrical Engineer (code 17-2071), \$68.12
- Information and record clerk (code 43-4199), \$39.14
- Information Security Analyst (code 15-1122), \$66.34
- Legal (code 23-0000), \$143.68
- 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.

<sup>6</sup> There are no estimates for this section, because the Commission has withdrawn the NOPR proposal.

<sup>7</sup> N/A = Not applicable. In reference to this Final Rule, proposals listed as “N/A” means that they were proposed in the NOPR and not accepted for the Final Rule.

<sup>8</sup> Ongoing refers to Year 2 and ongoing.

FERC-516 (OMB Control No. 1902-0096)  
Final Rule (issued 4/19/2018) in Docket RM17-8-000  
RIN: 1902-AF33

FERC 516					
	Number of Applicable Registered Entities (Respondents) (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Costs per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)
Issue A3 – Self-funding by the transmission owner <sup>9</sup> (Non-RTO/ISO)	126	N/A	N/A	N/A	N/A
Issue A3 – Self-funding by the transmission owner (RTO/ISO)	6	N/A	N/A	N/A	N/A
Issue A4 – RTO/ISO dispute resolution (Non-RTO/ISO)	126	1 (Year 1); 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	504 hrs. (Year 1); \$38,808; 0 hrs. (Ongoing); \$0
Issue A4 - RTO/ISO dispute resolution (RTO/ISO)	6	1 (Year 1); 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	24 hrs. (Year 1); \$1,848; 0 (Ongoing) \$0
Issue A5 – Capping costs for network upgrades <sup>10</sup> (Non-RTO/ISO)	126	N/A	N/A	N/A	N/A
Issue A5 – Capping costs for network upgrades (RTO/ISO)	6	N/A	N/A	N/A	N/A
Issue B1 – Identification and definition of contingent facilities (Non-RTO/ISO)	126	1 (Year 1); 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue B1 – Identification and definition of contingent facilities (RTO/ISO)	6	1 (Year 1); 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160 ; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960; 0 hrs. (Ongoing); \$0
Issue B2 – Transparency in the interconnection process (Non-RTO/ISO)	126	1 (Year 1); 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue B2 – Transparency in the interconnection process (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960; 0 hrs. (Ongoing); \$0

9 There are no estimates for this section, because the Commission has withdrawn the NOPR proposal.

10 There are no estimates for this issue, because the NOPR did not propose, and the Final Rule did not adopt, any requirements for this issue.

FERC-516 (OMB Control No. 1902-0096)  
Final Rule (issued 4/19/2018) in Docket RM17-8-000  
RIN: 1902-AF33

FERC 516					
	<b>Number of Applicable Registered Entities (Respondents) (1)</b>	<b>Annual Number of Responses per Respondent (2)</b>	<b>Total Number of Responses (1)*(2)=(3)</b>	<b>Average Burden (Hours) &amp; Costs per Response (4)</b>	<b>Total Annual Burden Hours &amp; Total Annual Cost (3)*(4)=(5)</b>
Issue B3 – Curtailment concerns (Non-RTO/ISO)	126	N/A	N/A	N/A	N/A
Issue B3 – Curtailment concerns (RTO/ISO)	6	N/A	N/A	N/A	N/A
Issue B4 – Definition of generating facility (non-RTO/ISO)	126	1 (Year 1) 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue B4 – Definition of generating facility (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960; 0 hrs. (Ongoing); \$0
Issue B5 – Interconnection study deadlines (non-RTO/ISO)	126	1 (Year 1) 4 (Ongoing)	126 (Year 1); 504 (Ongoing)	4 hrs. (Year 1); \$308; 4 hrs. (Ongoing) \$308	504 hrs. (Year 1); \$38,808; 2,016 hrs. (Ongoing); \$155,232
Issue B5 – Interconnection study deadlines (RTO/ISO)	6	1 (Year 1) 4 (Ongoing)	6 (Year 1); 24 (Ongoing)	4 hrs. (Year 1); \$308; 4 hrs. (Ongoing) \$308	24 hrs. (Year 1); \$1,848; 96 hrs. (Ongoing); \$7,392



FERC-516 (OMB Control No. 1902-0096)  
Final Rule (issued 4/19/2018) in Docket RM17-8-000  
RIN: 1902-AF33

FERC 516					
	Number of Applicable Registered Entities (Respondents) (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Costs per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)
Issue B6 – Improving Coordination of Affected Systems <sup>11</sup> (non-RTO/ISO)	126	N/A	N/A	N/A	N/A
Issue B6 – Improving Coordination of Affected Systems (RTO/ISO)	6	N/A	N/A	N/A	N/A
Issue C1 – Requesting interconnection service below generating facility capacity (Non-RTO/ISO)	126	1 (Year 1) 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue C1 – Requesting interconnection service below generating facility capacity (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960; 0 hrs. (Ongoing); \$0
Issue C2 – Provisional agreements (non-RTO/ISO)	126	1 (Year 1) 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160 ; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue C2 – Provisional agreements (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960 ; 0 hrs. (Ongoing); \$0
Issue C3 – Utilization of surplus interconnection service (non-RTO/ISO)	126	1 (Year 1) 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	504 hrs. (Year 1); \$38,808; 0 hrs. (Ongoing); \$0
Issue C3 – Utilization of surplus interconnection service (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	4 hrs. (Year 1); \$308; 0 hrs. (Ongoing) \$0	24 hrs. (Year 1); \$1,848; 0 (Ongoing) \$0

<sup>11</sup> There are no estimates for this issue, because the NOPR did not propose, and the Final Rule did not adopt, any requirements for this issue.

FERC 516					
	Number of Applicable Registered Entities (Respondents) (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden (Hours) & Costs per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)
Issue C4 – Material modification and incorporation of advanced technologies (non-RTO/ISO)	126	1 (Year 1) 0 (Ongoing)	126 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	10,080 hrs. (Year 1); \$776,160; 0 hrs. (Ongoing); \$0
Issue C4 – Material modification and incorporation of advanced technologies (RTO/ISO)	6	1 (Year 1) 0 (Ongoing)	6 (Year 1); 0 (Ongoing)	80 hrs. (Year 1); \$6,160; 0 hrs.; (Ongoing); \$0	480 hrs. (Year 1); \$36,960; 0 hrs. (Ongoing); \$0
Issue C5 – Modeling of electric storage resources <sup>12</sup> (non-RTO/ISO)	126	N/A	N/A	N/A	N/A
Issue C5 – Modeling of electric storage resources (RTO/ISO)	6	N/A	N/A	N/A	N/A
<b>Total</b>	Non-RTO/ISO, Year 1		1,260	62,244 hrs.; \$4,792,788	
	Non-RTO/ISO, Ongoing		504	2,016 hrs.; \$155,232	
	RTO/ISO, Year 1		60	2,976 hrs.; \$229,152	
	RTO/ISO, Ongoing		24	96 hrs.; \$7,392	

The one-time burden of 65,220 hours (62,244 (non-RTO/ISO) + 2,976 (RTO/ISO)) will be averaged over three years (65,220 ÷ 3 = 21,740 hours/year over three years).

The ongoing burden of 2,112 hours (2,016 (non-RTO/ISO) + 96 (RTO/ISO)) applies to only Year 2 and beyond.

The number of responses is also averaged over three years (1,320 responses (one-time) + 528 responses (Year 2) + 528 responses (Year 3)) ÷ 3 = 792 responses/year.

The responses and burden for Years 1-3 will total respectively as follows:

Year 1: 792 responses; 21,740 hours.

Year 2: 792 responses; 21,740 hours + 2,112 hours = 23,852 hours.

Year 3: 792 responses; 21,740 hours + 2,112 hours = 23,852 hours.

For submission in ROCIS the averages over Years 1-3 are:

<sup>12</sup> There are no estimates for this section, because the Commission has withdrawn the NOPR proposal.

- Annual burden approved by the Final Rule in RM17-8-000 is 23,148 hours.  $[(21,740 \text{ hours} + ((21,740 \text{ hours} + 2,112 \text{ hours}) * 2)) \div 3] = 23,148 \text{ hours}$ .
  - Of the 23,148 hours, 1,408 hours will be submitted as ongoing and 21,740 hours will be submitted as one-time.
- Annual number of responses approved by the Final Rule in RM17-8 is 792.  $[(1,320 \text{ responses (one-time)} + (528 \text{ responses (Year 2)} + 528 \text{ (Year 3))}) \div 3 = 792]$ .
  - Of the 792 responses, 352 will be submitted as ongoing and 440 will be submitted as one-time.

### 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 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

The additional \$829,031 (detailed below) will be added to the previous federal cost of \$3,651,641 resulting in a new total of \$4,480,672.

The estimated annualized cost to the Federal Government for FERC-516 follows<sup>13</sup>:

<b>FERC-516</b>	<b>Number of Employees (FTEs)</b>	<b>Estimated Annual Federal Cost</b>
Analysis of Filings	2.5	\$412,050
Processing of Filings <sup>1</sup>	2.5	\$412,050
Paperwork Reduction Act Administrative Cost <sup>14</sup>		\$4,931 <sup>15</sup>
<b>TOTAL</b>		<b>\$829,031</b>

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

<sup>13</sup> Based upon FERC’s 2018 FTE average annual salary plus benefits (\$164,820)

<sup>14</sup> The Paperwork Reduction Act (PRA) Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings (not just this Final Rule), and other changes to the collection, as well as necessary publications in the Federal Register.

<sup>15</sup> The PRA Administrative Cost (revised May 2018) is for 2018.

The approved revisions in this docket would require filings of *pro forma* LGIAs and *pro forma* LGIPs with the Commission, as well as periodic postings to a transmission provider’s OASIS site or its websites. The increase in burden is due to the approved improvements to the interconnection process. Commission staff anticipates that the adopted reforms, once implemented, would not significantly change currently existing burdens on an ongoing basis. In regards to OASIS postings specifically, Commission staff anticipates that the majority of the burden associated with those requirements would be incurred in the first year developing the necessary processes and procedures to generate the data to be posted, and that in subsequent years there will be minimal burden to make those postings.

A summary of the current OMB-approved inventory and the changes to FERC-516 information collection due to the Final Rule in RM17-8 follows:

<b>FERC-516</b>	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Change Due to Agency Discretion</b>
Annual Number of Responses	6,673	5,881	0	792
Annual Time Burden <sup>16</sup>	523,795	500,647	0	23,148
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

#### **16. TIME SCHEDULE FOR THE PUBLICATION OF DATA**

There are no 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.

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<sup>16</sup> The units of measurement applied to “annual time burden” are hours.