Supporting Statement for
FERC-725A, 725G, and FERC-725Y,[1]
in the Final Rule in Docket No. RM16-22

The Federal Energy Regulatory Commission (Commission or FERC) requests OMB review and approval of the changes to reporting and recordkeeping requirements, as noted in the Final Rule (Coordination of Protection Systems for Performance during Faults and Specific Training for Personnel Reliability Standards) in Docket No. RM16-22.

This consolidated supporting statement for FERC-725A[2](Mandatory Reliability Standards for the Bulk-Power System), FERC-725G (Reliability Standards for the Bulk Power System: PRC Reliability Standards) and FERC-725Y (Mandatory Reliability Standards: Personnel Performance, Training, and Qualifications) is being submitted, to reflect the changes in the Final Rule in RM16-22 (Coordination of Protection Systems for

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[1] As noted in the supporting statement, Footnote 1, for the Notice of Proposed Rulemaking in Docket RM16-22:

> "On an administrative note, this consolidated supporting statement should be submitted in FERC-725A (OMB Control No. 1902-0244), FERC-725G (OMB Control No. 1902-0252), and FERC-725Y. However, there are other unrelated items pending at OMB in FERC-725A and FERC-725G, and only one item per OMB Control No. can be pending OMB review at a time. As a result, we are having to make two adjustments in order to submit timely, to OMB, the NOPR in Docket No. RM16-22 with the related Paperwork Reduction Act materials.
>
> a) The NOPR proposes to retire Reliability Standard PRC-001-1.1 and to reduce burden (in FERC-725A). FERC is *not* taking the reduction to FERC-725A at this time. Estimates for the burden reduction are included in the NOPR and this supporting statement in #12, in order to solicit public comments, although an ICR cannot be submitted at this time for FERC-725A.
> b) We are using FERC-725G6, a temporary 'placeholder' information collection number (rather than FERC-725G) for the NOPR."

Due to those necessary administrative adjustments in ROCIS at the NOPR stage, the meta-data in OMB's ROCIS system for those associated ICRs for the Final Rule in RM16-22 will have the NOPR data for the 60-day notice fields and the Final Rule data for the 30-day notice fields. FERC is taking the reduction to FERC-725A at this Final Rule stage.

[2] FERC-725A (OMB Control No. 1902-0244) currently includes the information collection requirements associated with Reliability Standard PRC-001-1.1(ii), which is retiring. The Commission is reducing the burden estimates associated with FERC-725A in this final rule.

Performance during Faults and Specific Training for Personnel Reliability Standards)[3]. The changes include:

- implementation of Reliability Standards PRC-027-1 (to be included in FERC-725G) and PER-006-1 (to be included in FERC-725Y)
- retirement of Reliability Standard PRC-001-1.1(ii) (currently included in FERC-725A).

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[4]. 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.

Section 215 of the FPA requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.[5] Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.[6] In 2006, the Commission certified NERC (North American Electric Reliability Corporation) as the ERO[7] pursuant to section 215 of the FPA.[8]

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[3] These standards are included in two 'families' of NERC Reliability standards: a) Personnel Performance, Training, and Qualifications (PER), and b) Protection and Control (PRC). The standards are available on NERC's website at https://www.nerc.com/pa/Stand/Reliability%20Standards/PRC-027-1.pdf (Reliability Standard PRC-027-1 and https://www.nerc.com/pa/Stand/Reliability%20Standards/PER-006-1.pdf (Reliability Standard PER-006-1). The NERC Petition for these standards is available here.

[4] The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2006).

[5] *Id.* 824o(c), (d).

[6] *Id.* 824o(e).

[7] "Electric Reliability Organization" or "ERO" means the organization certified by the Commission the purpose of which is to establish and enforce Reliability Standards for the Bulk-Power System, subject to Commission review.

[8] *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,190, *order on reh'g*, 119 FERC ¶ 61,046 (2007), *aff'd sub nom. Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

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. Order 693 addressed several PER and PRC Reliability Standards. Some of them were approved but others were approved with a Commission directive for NERC to make modifications. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards

Background on 725A. On March 16, 2007, the Commission issued Order No. 693, approving 83 of the 107 Reliability Standards filed by NERC, including Reliability Standard PRC-001-1.[9] In addition, the Commission directed NERC to develop modifications to Reliability Standard PRC-001-1 that:

(1) correct the references for Requirements, and (2) include a requirement that upon the detection of failures in relays or protection system elements on the Bulk-Power System that threaten reliable operation, relevant transmission operators must be informed promptly, but within a specified period of time that is developed in the Reliability Standards development process, whereas generator operators must also promptly inform their transmission operators; and (3) clarifies that, after being informed of failures in relays or protection system elements that threaten reliability of the Bulk-Power System, transmission operators must carry out corrective control actions, i.e., return a system to a stable state that respects system requirements as soon as possible and no longer than 30 minutes after they receive notice of the failure.[10]

Background on FERC-725Y. Order No. 693 included approval of four PER Reliability Standards governing certain areas of personnel staffing and training. In addition, under section 215(d)(5) of the FPA, the Commission directed NERC to develop several modifications to the approved PER standards. NERC addressed a portion of the Order No. 693 directives in a September 30, 2009 filing; FERC approved those Reliability Standards in Order No. 742. However, the Commission noted that the standards did not fully satisfy the directives issued in Order No. 693, and issued additional directives to NERC.

On March 7, 2014, NERC filed a Petition seeking approval of PER-005-2, explaining that the purpose of the revisions is to "improve upon PER-005-1 by expanding the scope of the Reliability Standard" consistent with the Commission's directives in Order Nos. 693 and 742. The FERC Order in Docket No. RD14-7 addressed the NERC Petition and

[9] *Mandatory Reliability Standards for the Bulk-Power System*, Order No. 693, FERC Stats. & Regs. ¶ 31,242 at PP 1433-1449, *order on reh'g*, Order No. 693-A, 120 FERC ¶ 61,053 (2007).
[10] Order No. 693, FERC Stats. & Regs. ¶ 31,242 at P 1449.

approved Reliability Standard PER-005-2; the related reporting and recordkeeping requirements were approved by OMB under FERC-725Y on 4/23/2015.

Background on FERC-725G. On March 18, 2010, in Order No. 733, the Commission approved Reliability Standard PRC-023-1 (Transmission Relay Loadability)[11] and directed NERC to develop a new Reliability Standard that requires the use of protective relay systems that can differentiate between faults and stable power swings and, when necessary, retirement of protective relay systems that cannot meet this requirement.[12] In Order No. 733, the Commission cited the findings of both NERC and the U.S.-Canada Power System Outage Task Force on the causes of the 2003 Northeast Blackout, explaining that the cascade during this event was accelerated by zone 2 and zone 3 relays that continued to operate because these devices could not distinguish between a dynamic, but stable, power swing and an actual fault.[13] The Commission recognized that addressing stable power swings is a complex issue which impacted the 2003 Blackout, and yet there was no Reliability Standard that addresses the issue; therefore, the Commission directed NERC to develop a Reliability Standard to address undesirable relay operation due to stable power swings.[14]

FERC-725A, FERC-725Y and FERC-725G, as affected by Final Rule in Docket RM16-22.

On September 2, 2016, NERC submitted a petition seeking Commission approval of Reliability Standards PRC-027-1 and PER-006-1.[15] NERC states that the Reliability Standards, new and revised NERC Glossary terms, and the retirement of Reliability Standard PRC-001-1.1(ii) satisfy the Commission's criteria in Order No. 672 and are just, reasonable, not unduly discriminatory or preferential, and in the public interest.[16] NERC explains that the intent of the Reliability Standards and changes to the NERC Glossary are to maintain the coordination of protection systems installed to detect and isolate faults on bulk electric system elements and require registered entities to provide training to their

[11] The reporting and recordkeeping requirements of Reliability Standard PRC-023-1 are included under FERC-725G and were approved by OMB in ICR 201004-1902-003.
[12] Order No. 733, 130 FERC ¶ 61,221 at P 150.
[13] *Id.* PP 3-4, 130 (*citing* U.S.-Canada Power System Outage Task Force, Final Report on the August 14, 2003 Blackout in the United States and Canada: Causes and Recommendations, at 80 (2004); and August 14, 2003 Blackout: NERC Actions to Prevent and Mitigate the Impacts of Future Cascading Blackouts, at 13 (2004)).
[14] *Id.* P 153.
[15] The Reliability Standards are available on the Commission's eLibrary document retrieval system in Docket No. RM16-22-000 and are posted on the NERC website, http://www.nerc.com .
[16] NERC Petition at 10.

relevant personnel on protection systems and remedial action schemes. NERC asserts that the Reliability Standards are an improvement over currently-effective Reliability Standard PRC-001-1.1(ii)[17] and will ensure that appropriate personnel are trained on protection systems and that protection systems are appropriately studied, coordinated, and monitored.

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

FERC-725A, FERC-725Y and FERC-725G, as affected by Final Rule in RM16-22. As stated in NERC's Petition[18] [footnotes omitted]:

> "[t]he purpose of the Reliability Standards and the NERC Glossary definitions is to: (1) maintain the coordination of Protection Systems installed to detect and isolate Faults on Bulk Electric System ("BES") Elements, such that those Protection Systems operate in the intended sequence during Faults; and (2) require registered entities to provide training to their relevant personnel on Protection Systems and Remedial Action Schemes ("RAS") to help ensure that the BES is reliably operated. The reliable and coordinated operation of Protection Systems is essential to Bulk Power System ("BPS") reliability for the following reasons. Protection Systems help maintain reliability by isolating faulted equipment, thereby reducing the risk of instability or Cascading, and leaving the remainder of the BPS operational and more capable of withstanding a future Contingency. In the event of a Fault, properly coordinated Protection Systems minimize the number of BES Elements that are removed from service and protect equipment from damage. System reliability is reduced or threatened if a Protection System can no longer perform as designed because of a failure of its relays. Further, the functions, settings, and limitations of Protection Systems are recognized and integrated in deriving System Operating Limits ("SOLs") and Interconnection Reliability Operating Limits ("IROLs")."

FERC-725A. Currently-effective Reliability Standard PRC-001-1.1(ii) System Protection Coordination) is being retired and all associated burden and cost will be removed. FERC-725Y (rather than FERC-725A) will contain the burden required by PER-006-1.

[17] Reliability Standard PRC-001-1.1(ii) will be retired as a result of the RM16-22 Final Rule.

[18] https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=14345793

FERC-725G. The purpose of Reliability Standard PRC-027-1 is to maintain the coordination of protection systems installed to detect and isolate faults on bulk electric system elements, such that those protection systems operate in the intended sequence during faults. Reliability Standard PRC 027-1 improves on currently-effective Reliability Standard PRC 001-1.1(ii) by: (1) modifying the applicability section to include the appropriate functional entity types with the responsibilities, resources, and skill sets to conduct the studies required to coordinate protection systems, and (2) listing the protection system functions on all bulk electric system elements that require coordination.

FERC-725Y. The purpose of Reliability Standard PER-006-1 is to ensure that personnel are trained on specific topics essential to reliability to perform or support Real-time operations of the Bulk Electric System. Reliability Standard PER-006-1, along with existing formal training requirements in the Personnel Performance, Training, and Qualifications (PER) group of Reliability Standards, also improves upon Reliability Standard PRC 001 1.1(ii), Requirement R1 by ensuring that the necessary personnel are familiar with and understand the purpose and limitations of protection systems schemes while providing more precise and auditable requirements.

The consequences of failing to collect information would have an adverse impact as Protection Systems help maintain reliability by isolating faulted equipment, thereby reducing the risk of instability or Cascading, and leaving the remainder of the BPS operational and more capable of withstanding a future Contingency. If those relay protection systems are not properly coordinated can result in an increase to the cascading risk of the BPS. Also, not providing training to appropriate generator operator personnel who should be familiar with protection systems and remedial actions schemes could lead to failure to act properly during system events.

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

The use of current or improved technology is not covered in Reliability Standards, and is therefore left to the discretion of each reporting entity. Commission staff estimates 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

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. This information is not available elsewhere. The standard-developing group (the ERO and various stakeholders) think these areas need to be addressed and documented as indicated in the NERC Petition.

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

Small entities generally can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity the ability to share its compliance burden with other similar entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.[19]

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

FERC-725A. FERC-725Y (rather than FERC-725A) will contain the burden required by PER-006-1.

FERC-725Y. The purpose of Reliability Standard PER-006-1 is to ensure that personnel are trained on specific topics essential to reliability to perform or support Real-time operations of the BPS. There would be greater risk and vulnerability to the safe and reliable operation of the Nation's BPS if suitably trained and qualified personnel were not retained and their training not provided, refreshed, and updated, and documented.

FERC-725G. The purpose of Reliability Standard PRC-027-1 is to maintain the coordination of protection systems installed to detect and isolate faults on bulk electric system elements, such that those protection systems operate in the intended sequence during faults. If protection systems are not coordinated then it cannot operate in the

[19] Details of the current ERO Reliability Standard processes are available on the NERC website at http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf.

intended sequence during Faults. Without updating the Protection and Control (PRC) standards, the reliability and security of the Nation's BPS would be at greater risk. Additionally, failure to adequately update/review the PRC standards may cause a simple fault condition to expand or cascade outside of a zone of protection affecting more equipment and greater impact on load (customers).

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

FERC-725A, FERC-725G, and FERC-725Y. There are no special circumstances as described in 5 CFR 1320.5(d)(2).

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

Each FERC rulemaking 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 collections of data.

The ERO process to develop Reliability Standards is a collaborative process involving the ERO, Regional Entities and other stakeholders developing and reviewing drafts, and providing comments, vetting and voting (possibly multiple rounds) on the standards, with the final proposed standard submitted to the FERC for review and approval.[20]

The Final Rule is posted on FERC's eLibrary[21] and published on 6/13/2018 in the Federal Register to give the public and other entities an opportunity to comment.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to these collections.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

[20] Details of the current ERO Reliability Standard processes are available on the NERC website at http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf.

[21] https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14940363

According to the NERC Rules of Procedure , "…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 for 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.

FERC-725A, FERC-725G and FERC-725Y. These collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Final Rule in RM16-22. The number of respondents below is based on an examination of the NERC compliance registry on December 1, 2017, for transmission owners, generator owners, generator operators, and distribution providers within the United States and an estimate of how many entities from that registry will be affected by the Reliability Standards for adoption and implementation. At the time of Commission review of Reliability Standards PRC-027-1 and PER-006-1, 3374 transmission owners, 971 generator owners, 944 generator operators, and 419 distribution providers in the United States were registered in the NERC compliance registry. However, under NERC's compliance registration program, entities may be registered for multiple functions, so these numbers incorporate some double counting. We note that many generation sites share a common generator owner or generator operator.

The following table provides the estimated annual burden and cost related to information collection requirements in the Final Rule in Docket No. RM16-22.[22, 23]

[22] TO = transmission owner; TOP = transmission operator; GO = generator owner; GOP = generator operator; DP = distribution provider; and BA = balancing authority.
[23] Under NERC's compliance registration program, entities may be registered for multiple functions, so the numbers incorporate some double counting.

Changes due to the Final Rule in Docket No. RM16-22-000					
Respondent Category and Requirement[24]	**Number of Respondents** (1)	**Annual Number of Responses per Respondent** (2)	**Total Number of Annual Responses** (1)*(2)=(3)	**Average Burden Hours & Cost per Response**[25] (4)	**Annual Burden Hours & Total Annual Cost (rounded)**[26] (3)*(4)=(5)
FERC-725G (Reliability Standard PRC-027-1)[27]					
TO; Reporting Reqs. R1, R2, & R3	337	1	337	60 hrs.; $3,941.40	20,220 hrs.; $1,328,252
TO; Recordkeeping Reqs.	337	1	337	40 hrs.; $1,565.60	13,480 hrs.; $527,607

[24] For each Reliability Standard, the Measure shows the acceptable evidence for the associated Reporting Requirement, and the Compliance section details the related Recordkeeping Requirement.

[25] The estimates for cost per hour are based on May 2016 wage figures from the Bureau of Labor Statistics (BLS, at https://www.bls.gov/oes/current/naics2_22.htm) and BLS benefits information from March 20, 2018 (for December 2017, posted at https://www.bls.gov/news.release/ecec.nr0.htm). The estimated hourly cost, for wages plus benefits, are:

(a)$68.12/hour, for electrical engineer, Occupation Code 17-2071, and

(b) $39.14/hour, for information and record clerk, Occupation Code 43-4199.

The hourly cost for an electrical engineer is used for the reporting requirements; the hourly cost for a record clerk is used for the recordkeeping requirements.

[26] For display purposes, the cost figures in column 5 have been rounded.

[27] Some of the reporting requirements are required at least every six calendar years. In this table, the Commission assumes that respondents might work on some of their elements each year; the annual burden estimate shown is one sixth of the burden associated with one complete six-year cycle. For example, for each transmission owner: (a) the annual reporting burden associated with Requirements R1, R2, and R3 is shown as 60 hours per year, and (b) the burden for the six-year cycle would be six times that, or a total of 360 hours.

GO; Reporting Reqs. R1, R2, & R3	971	1	971	10 hrs.; $656.90	9,710 hrs.; $637,830
GO; Recordkeeping Reqs.	971	1	971	10 hrs.; $391.40	9,710 hrs.; $380,049
DP; Reporting Reqs R1, R2, & R3	419	1	419	10 hrs.; $656.90	4,190 hrs.; $275,241
DP; Recordkeeping Reqs.	419	1	419	10 hrs.; $391.40	4,190 hrs.; $163,997
Sub-Total for Reporting Reqs. for FERC-725G					34,120 hrs.; $2,241,323
Sub-Total for Recordkeeping Reqs. for FERC-725G					27,380 hrs.; $1,072,653
Total Increase for FERC-725G					61,500 hrs.; $3,313,976
FERC-725Y (Reliability Standard PER-006-1)[28]					
GOP; Reporting Req. R1	944	1	944	5 hrs.; $328.45	4,720 hrs.; $310,057

[28] In order to provide improved information on the standard and associated burden, FERC-725Y (rather than FERC-725A) will cover the additional burden required by PER-006-1.

GOP; Recordkeeping Req.	944	1	944	10 hrs.; $391.40	9,440 hrs.; $369,482
Total Increase for FERC-725Y					14,160 hrs.; $679,539
Reductions to FERC-725A (retirement of Reliability Standard PRC-001-1.1(ii))[29]					
GOP; Reporting Req.	944	1	944	40 hrs.; $2,627.60	37,760 hrs.; $2,480,454
GOP; Recordkeeping Req.	944	1	944	50 hrs.; $1,957.00	47,200 hrs.; $1,847,408
TOP; Reporting Req.	176	1	176	60 hrs.; $3,941.40	10,560 hrs.; $693,686
TOP; Recordkeeping Req.	176	1	176	70 hrs.; $2,739.80	12,320 hrs.; $482,205
BA; Reporting Req.	99	1	99	32 hrs.; $2,102.08	3,168 hrs.; $208,106
BA; Recordkeeping Req.	99	1	99	20 hrs.; $782.80	1,980 hrs.; $77,497
Reduction Sub-Total Reporting Reqs. for FERC-725A					51,484 hrs.; $3,382,246

[29] The estimates for average annual burden hours per response are based on Order No. 693. The numbers of respondents and estimated hourly costs are based on current figures.

Reduction Sub-Total Recordkeeping Reqs. for FERC-725A					61,500 hrs.; $2,407,110
Reduction Sub-Total for FERC-725A					112,984 hrs.; $5,789,356 (reduction)
NET TOTAL REDUCTION FOR CHANGES IN RM16-22-000					**37,324 hrs.; $1,795,841 (reduction)**

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no start-up, capital, or other non-labor hour cost associated with the PRA aspects of this Final Rule in RM16-22. All costs are associated with burden hours and are addressed in Questions 12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

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 of 1995 (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 or orders, and other changes to the collection, as well as necessary publications in the Federal Register.

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of filings[30]	0	0
PRA Administrative Cost ($5,723 each for FERC-725G, FERC-725A, and FERC-725Y)		$17,169
FERC Total		$11,446

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

The purpose of Reliability Standard PRC-027-1 (contained within FERC-725G) is to maintain the coordination of protection systems installed to detect and isolate faults on bulk electric system elements, such that those protection systems operate in the intended sequence during faults. The purpose of Reliability Standard PER-006-1 (contained within FERC-725Y) is to ensure that personnel are trained on specific topics essential to reliability to perform or support real-time operations of the bulk electric system. The Commission also seeks to approve the associated violation risk factors, violation severity levels, implementation plans, and effective dates by NERC for Reliability Standards PRC-027-1 and PER-006-1. The Commission approved the retirement of currently-effective Reliability Standard PRC 001 1.1(ii) (System Protection Coordination) (currently covered by FERC-725A).

The following tables summarize the changes in burden and responses to FERC-725Y and FERC-725G and FERC-725A due to the Final Rule in RM16-22 (with each respondent having a recordkeeping and reporting requirement).

FERC-725G	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	12,497	10,770	0	1,727
Annual Time Burden (Hr.)	705,147	643,647	0	61,500

[30] Based upon FERC's 2017 FTE average salary plus benefits ($158,754)

Annual Cost Burden ($)	0	0	0	0

FERC-725Y	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	3,403	2,459		944
Annual Time Burden (Hr.)	33,494	20,334		14,160
Annual Cost Burden ($)	0	0	0	0

FERC-725A	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,566	2,566		0
Annual Time Burden (Hr.)	1,469,721	1,582,705		-112,984
Annual Cost Burden ($)	0	126,725	0	

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications.

17. DISPLAY OF EXPIRATION DATE

The PRA information (including expiration dates and OMB Control Nos.) is posted at http://www.ferc.gov/docs-filing/info-collections.asp.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for these collections.