

FERC-725E (OMB Control No. 1902-0246)
Orders (issued 5/30/2018) in Docket Nos. RD18-2-000 and RD18-5-000 and
Changes due to Docket Nos. RD18-1-000 and RD18-3-000
Supporting Statement

**FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating
Council,
as modified by Docket Nos. RD18-1-000, RD18-2-000, RD18-3-000, and RD18-5-000**

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the information collection requirements in FERC-725E under OMB Control No. 1902-0246 as modified by Docket Nos. RD18-1-000, RD18-2-000, RD18-3-000, and RD18-5-000.

The Commission submits changes due to:

- Order (issued on 5/30/2018) in Docket No. RD18-2-000; and
- Order (issued on 5/30/2018) in Docket No. RD18-5-000

The Commission also submits proposed changes to the FERC-725E information collection in:

- Docket No. RD18-1-000; and
- Docket No. RD18-3-000

The reporting requirements in the FERC-725E are contained in FERC's regulations in 18 Code of Federal Regulations (CFR) Part 40.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law. EPAAct 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, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight. In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO pursuant to FPA section 215.¹

On March 16, 2007, in Order No. 693, pursuant to section 215(d) of the FPA, the Commission approved 83 of 107 proposed Reliability Standards, six of the eight proposed regional differences, and the North American Electric Reliability Corporation (NERC) Glossary of Terms used in Reliability Standards (NERC Glossary).

¹ *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

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FERC-725E (General): The information collected by the FERC-725E is required to implement the statutory provisions of section 215 of the Federal Power Act (FPA).² Section 215 of the FPA buttresses the Commission’s efforts to strengthen the reliability of the interstate grid through the grant of new authority by providing for a system of mandatory Reliability Standards developed by the Electric Reliability Organization (ERO). Reliability Standards that the ERO proposes to the Commission may include Reliability Standards that are proposed to the ERO by a Regional Entity.³ A Regional Entity is an entity that has been approved by the Commission to enforce Reliability Standards under delegated authority from the ERO.⁴ On June 8, 2008, the Commission approved eight regional Reliability Standards submitted by the ERO that were proposed by the Western Electricity Coordinating Council (WECC).⁵

WECC promotes bulk electric system reliability in the Western Interconnection. WECC is the Regional Entity responsible for compliance monitoring and enforcement. In addition, WECC provides an environment for the development of Reliability Standards and the coordination of the operating and planning activities of its members as set forth in the WECC Bylaws.

There are several regional Reliability Standards in the WECC region. These regional Reliability Standards generally require entities to document compliance with substantive requirements, retain documentation, and submit reports to WECC. The following standards will be continuing without change:

- BAL-002-WECC-2a (Contingency Reserve)⁶ requires balancing authorities and reserve sharing groups to document compliance with the contingency reserve requirements described in the standard.
- BAL-004-WECC-02 (Automatic Time Error Correction) requires balancing authorities to document that time error corrections and primary inadvertent interchange payback were conducted according to the requirements in the standard.
- FAC-501-WECC-1 (Transmission Maintenance) requires transmission owners with certain transmission paths to have a transmission maintenance and inspection plan and to document maintenance and inspection activities according to the plan.

² 16 U.S.C. 824o

³ 16 U.S.C. 824o(e)(4).

⁴ 16 U.S.C. 824o(a)(7) and (e)(4).

⁵ *North American Electric Reliability Corp.*, 119 FERC ¶ 61,260 (2007).

⁶ BAL-002-WECC-2 is included in the OMB-approved inventory for FERC-725E. On November 9, 2016, NERC and WECC submitted a joint petition for approval of an interpretation of BAL-002-WECC-2, to be designated BAL-002-WECC-2a. BAL-002-WECC-2a was approved by order in Docket No. RD17-3-000 on January 24, 2017. The Order determined: “The proposed interpretation provides clarification regarding the types of resources that may be used to satisfy Contingency Reserve requirements in regional Reliability Standard BAL-002-WECC-2.” BAL-002-WECC-2a did not trigger the Paperwork Reduction Act and did not affect the burden estimate. BAL-002-WECC-2a is being included in this Notice and the Commission’s submittal to OMB as part of the FERC-725E.

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- IRO-006-WECC-2 (Qualified Transfer Path Unscheduled Flow (USF) Relief) requires balancing authorities and reliability coordinators to document actions taken to mitigate unscheduled flow.
- VAR-501-WECC-3.1 (Power System Stabilizer [PSS]) requires generator owners and operators to ensure the Western Interconnection is operated in a coordinated manner by establishing the performance criteria for WECC power system stabilizers.

The Commission is submitting a request to OMB in order to:

- Eliminate the burden associated with regional Reliability Standards BAL-004-WECC-2 and FAC-501-WECC-1 which are being retired (addressed in Docket Nos. RD18-2-000 and RD18-5-000 respectively); and
- Implement the regional Reliability Standards BAL-004-WECC-3 and FAC-501-WECC-2 (addressed in Docket Nos. RD18-2-000 and RD18-5-000 respectively).
- Eliminate the burden associated with regional Reliability Standards PRC-004-WECC-2 and VAR-002-WECC-2 which are proposed for retirement (addressed in Docket Nos. RD18-3-000 and RD18-1-000 respectively).

In this document, we provide estimates of the burden and cost related to the aforementioned revisions to FERC-725E.

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

In March 2018, NERC issued four joint petitions to retire and modify WECC regional Reliability Standards.

RD18-2. On March 8 2018, NERC and WECC filed a joint petition in Docket No. RD18-2-000⁷ requesting Commission approval of:

- regional Reliability Standard BAL-004-WECC-3 (Automatic Time Error Correction), and
- the retirement of existing regional Reliability Standard BAL-004-WECC-2.

The joint petition in Docket No. RD18-2-000 states:

“Regional Reliability Standard BAL-004-WECC-3 seeks to maintain Interconnection frequency and to ensure that Time Error Corrections and Primary Inadvertent

⁷ The joint petition and exhibits are posted in the Commission’s eLibrary system in Docket No. RD18-2-000 ([BAL-004-WECC-3 Petition](#)).

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Interchange (“PII”) payback are effectively conducted in a manner that does not adversely affect the reliability of the [Western] Interconnection.”⁸

The proposed modifications to the standard focus on the entities using a common tool. All other proposed changes are for clarification. The Commission is not changing the reporting requirements, nor is it modifying the burden, cost or respondents with this collection, and sees this as a non-material or non-substantive change to the FERC-725E information collection.

RM18-5. On March 16, 2018, NERC and WECC filed a joint petition in Docket No. RD18-5-000⁹ requesting Commission approval of:

- regional Reliability Standard FAC-501-WECC-2 (Transmission Maintenance), and
- the retirement of existing regional Reliability Standard FAC-501-WECC-1.

The joint petition in Docket No. RD18-5-000 states:

“The purpose of FAC-501-WECC-2 is to ensure the Transmission Owner of a transmission path identified in the table titled “Major WECC Transfer Paths in the Bulk Electric System” (“WECC Transfer Path Table” or “Table”), including associated facilities, has a Transmission Maintenance and Inspection Plan (“TMIP”) and performs and documents maintenance and inspection activities in accordance with the TMIP.”

The modifications to the existing standard are for clarification of the transmission owner’s obligations and to directly incorporate the list of applicable transmission paths. This list is currently posted on the WECC website and has not changed. The Commission is not changing reporting requirements nor is it modifying the burden, cost or respondents with this collection, and sees this as a non-material or non-substantive change to the FERC-725E information collection.

RD18-1. On March 7, 2018, NERC (and WECC) filed a joint petition in Docket No. RD18-1-000 requesting Commission approval to retire the WECC regional Reliability Standard VAR-002-WECC-2 (Automatic Voltage Regulators). According to the petition, the purpose of the proposed retirement is based on WECC’s experience with regional Reliability Standard VAR-002-WECC-2 which has shown that the reliability-related issues addressed in the regional standard are adequately addressed by the continent-wide voltage and reactive (“VAR”)

⁸ [BAL-004-WECC-3 Petition](#), page 1.

⁹ The joint petition and exhibits are posted in the Commission’s eLibrary system in Docket No. RD18-5-000 ([FAC-501-WECC-2 Petition](#)).

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Reliability Standards¹⁰ and that retention of the regional standard would not provide additional
benefits for reliability.

RD18-3. Also, on March 9, 2018, NERC (and WECC) filed a joint petition in Docket No. RD18-3-000 requesting Commission approval to retire the WECC regional Reliability Standard PRC-004-WECC-2 (Protection System and Remedial Action Scheme Misoperation). The purpose of the proposed retirement is based on NERC and WECC's belief that since the initial development of this regional standard, other continent-wide Reliability Standards¹¹ have been developed that have made the requirements of this regional Reliability Standard redundant and no longer necessary for reliability in the Western Interconnection.

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

This collection does not require industry to file the information with the Commission. However, FERC-725E does contain information collection and record retention requirements for which using current technology is an option.

The information technology to meet the information collection requirements is not specifically covered in the Reliability Standard.

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.

¹⁰ The burdens related to continent-wide Reliability Standards VAR-001-4.2 (Voltage and Reactive Control) and VAR-002-4.1 (Generator Operation for Maintenance Network Voltage Schedules) are included in FERC-725A (Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0244).

¹¹ The burdens related to continent-wide Reliability Standards mentioned in the petition: FAC-003-4 (Transmission Vegetation Management) are included in FERC-725M (Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0263); PRC-001-1.1(ii) (System Protection Coordination) are included in FERC-725A (Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0244); PRC-004-5(i) (Protection System Misoperation Identification and Correction), PRC-005-6 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance), PRC-012-2 (Remedial Action Schemes) are included in FERC-725G (Mandatory Reliability Standards for the Bulk-Power System: PRC Standards, OMB Control No. 1902-0252); PRC-016-1 (Remedial Action Scheme Misoperations), PRC-017-1 (Remedial Action Scheme Maintenance and Testing), TOP-001-3 (Transmission Operations) and TOP-003-3 (Operational Reliability Data) are included in FERC-725A (Mandatory Reliability Standards for the Bulk-Power System, OMB Control No. 1902-0244).

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The Commission is unaware of any other source of information related to WECC regional Reliability Standards.

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

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden. Detailed information regarding these options is available in NERC's Rule of Procedure at Sections 507 and 508¹².

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

The Reliability Standard provides consistent documentation and information sharing practices for demand and energy data while promoting efficient planning practices across industry and supporting identification of necessary system reinforcements. As stated earlier, all of this would be hindered if this collection of information were discontinued or conducted less frequently.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to the FERC-725E information collection.

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

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders developing and reviewing drafts and providing comments.¹³ The NERC-approved Reliability Standards were then submitted by NERC to the FERC for review and approval.

In accordance with OMB requirements, the Commission published a 60-day notice¹⁴ and a 30-day notice¹⁵ to the public regarding this information collection on 5/11/2018 and 7/19/2018

12 http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20161031.pdf

13 Details of the ERO standards development process are available on the NERC website at http://www.nerc.com/pa/Stand/Documents/Appendix_3A_StandardsProcessesManual.pdf.

14 83 FR 22051

15 83 FR 33925

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respectively. The Commission received no comments from the public in response to the 60-day
notice regarding the FERC-725E information collection.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents associated with this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rule of Procedure¹⁶, "...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 under these Reliability Standards to FERC. Rather, they maintain it internally and provide information collected to applicable Regional Entities. 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.

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

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Non-Substantive Changes: Due to the Order in Docket No. RD18-2-000, the Commission approved the retirement of Reliability Standard BAL-004-WECC-2 and the adoption of Reliability Standard BAL-004-WECC-3. The proposed modifications to the standard focus on the entities using a common tool. All other proposed changes are for clarification. The Commission is not changing the reporting requirements, nor is it modifying the burden, cost or respondents with this collection, and sees this as a non-material or non-substantive change to a currently approved collection.

Similarly, due to the Order in Docket No. RD18-5-000, the Commission approved the retirement of Reliability Standard FAC-501-WECC-2 and the adoption of Reliability Standard FAC-501-

¹⁶ Section 1502, Paragraph 2, available at NERCs website.

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WECC-3. The modifications to the existing standard are for clarification of the transmission owner's obligations and to directly incorporate the list of applicable transmission paths. This list is currently posted on the WECC website and has not changed. The Commission is not changing reporting requirements nor is it modifying the burden, cost or respondents with this collection, and sees this as a non-material or non-substantive change to a currently approved collection.

Estimate of Changes to Burden Due to Docket No. RD18-1: The Commission estimates the reduction in the annual public reporting burden for the FERC-725E (due to the retirement of regional Reliability Standard VAR-002-WECC-2) as follows:^{17, 18}

FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Reductions Due to Docket No. RD18-1-000						
Entity	No. of Respondents (1)	Annual No. of Responses per Respondent (2)	Annual No. of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost Per Response (\$) (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3)*(4)=(5)	Cost per Respondent (rounded) (\$) (5)÷(1)=(6)
Retirement of Regional Reliability Standard VAR-002-WECC-2 and Associated Reductions						
<i>Reporting Requirements (Annually)</i>						
Generator Operators	228	1	228	10 hr.; \$769.90	2,280 hr.; \$175,537 (reduction)	\$770 (reduction)
Transmission Operators applicable to standard VAR-002	86	4	344	10 hr.; \$769.90	3,440 hr.; \$264,846 (reduction)	\$3,080 (reduction)

¹⁷ The reductions in burden and cost shown in the table are the same figures as those in the current OMB-approved inventory for the reporting and recordkeeping requirements that are now being retired.

¹⁸ The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics for three positions involved in the reporting and recordkeeping requirements. These figures include salary (http://bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) and are: Manager: \$89.07/hour, Engineer: \$64.91/hour, and File Clerk: \$31.19/hour.

The hourly cost for the reporting requirements (\$76.99) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

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<i>Recordkeeping Requirements (Annually)</i>						
Generator Operators	228	1	228	1 hr.; \$31.19	228 hr.; \$7,111 (reduction)	\$31 (reduction)
Transmission Operators applicable to standard VAR-002	86	1	86	4 hr.; \$124.76	344 hr.; \$10,729 (reduction)	\$125 (reduction)
Total Reduction			886		6,292 hr.; \$458,223 (reduction)	

Estimate of Changes to Burden Due to Docket No. RD18-3: The Commission estimates the reduction in the annual public reporting burden for the FERC-725E (due to the retirement of regional Reliability Standard PRC-004-WECC-2) as follows:^{19, 20}

FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Reductions Due to Docket No. RD18-3-000						
Entity	No. of Respondents (1)	Annual No. of Responses per Respondent (2)	Annual No. of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost Per Response (\$) (4)	Total Annual Burden Hours & Total Annual Cost (\$) (rounded) (3)*(4)=(5)	Cost per Respondent (\$) (rounded) (5)÷(1)=(6)
Retirement Of regional Reliability Standard PRC-004-WECC-2 and Associated Reductions						
<i>Reporting Requirements (Annually)</i>						
Transmission Owners that operate qualified transfer paths	5	2	10	40 hr.; \$3,079.60	400 hr.; \$30,796 (reduction)	\$6,159 (reduction)
<i>Recordkeeping Requirements (Annually)</i>						
Transmission Owners that operate qualified transfer paths	5	1	5	6 hr.; \$187.14	30 hr.; \$936 (reduction)	\$187 (reduction)
Total Reduction			15		430 hr.; \$31,732 (reduction)	

¹⁹ The reductions in burden and cost shown in the table are the same figures as those in the current OMB-approved inventory for the reporting and recordkeeping requirements, now being retired.

²⁰ The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics for three positions involved in the reporting and recordkeeping requirements. These 2015 figures include salary (https://www.bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/eccec.nr0.htm>) and are: Manager: \$89.07/hour, Engineer: \$64.91/hour, and File Clerk: \$31.19/hour. Commission staff used the original 2015 BLS figures for these reductions in order to mirror the currently approved OMB burden inventory and to better represent the reductions being made.

The hourly cost for the reporting requirements (\$76.99) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

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Total Reduction in Burden for FERC-725E (resulting from Dockets RD18-3 and RD18-1), for Submittal to OMB. The total reduction in burden due to the proposed retirements of regional Reliability Standards VAR-002-WECC-2 and PRC-004-WECC-2 is detailed below:

- Total Reduction of Annual Responses: 638
- Total Reduction of Burden Hours: 6,722
- Total Reduction of Burden Cost: \$489,955

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor costs currently associated with the FERC-725E. All of the costs are associated with burden hours (labor) and described in #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; the burden and cost are included under the FERC-725 collection (OMB Control No. 1902-0225) and are not part of this request or package. 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 estimated annualized cost to the Federal Government for FERC-725E follows:

	Number of Employees (FTE)	Estimated Annual Federal Cost
FERC-725E Analysis and Processing of filings	0	\$0
PRA ²¹ Administrative Cost		\$4,931
FERC Total		\$4,931

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 made in response to the information collection.

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

²¹ Paperwork Reduction Act of 1995 (PRA)

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 rulemakings, and other changes to the collection, as well as necessary publications in the Federal
 Register.

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

There are changes to reporting requirements for the FERC-725E information collection. The changes are the proposed retirement of the following regional Reliability Standards:

- VAR-002-WECC-2 (reduction of 6,292 hours)²²
- PRC-004-WECC-2 (reduction of 430 hours)²³

The proposed retirements of Reliability Standards VAR-002-WECC-2 and PRC-004-WECC-2 are not approved by any FERC orders yet.

The Order in Docket No. RD18-2-000 (retiring Reliability Standard BAL-004-WECC-2 and approving Reliability Standard BAL-004-WECC-3) results in no net burden change. Similarly, the Order in Docket No. RD18-5-000 (retiring Reliability Standard FAC-501-WECC-1 and approving FAC-501-WECC-2) also results in no net burden change.

FERC-725E	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	1,733	2,371	0	-638
Annual Time Burden (Hr.)	2,218	8,940	0	-6,722
Annual Cost Burden (\$)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

FERC does not publish any data associated with this collection.

17. DISPLAY OF EXPIRATION DATE

The expiration date is displayed at <http://www.ferc.gov/docs-filing/info-collections.asp>.

²² Due to Order in Docket RD18-1-000

²³ Due to Order in Docket RD18-3-000

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18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.