

FERC-545 (OMB Control No. 1902-0154)
Docket No. RM96-1-041 Final Rule (issued 11/15/2018)
RIN: 1902-AF54
Updated: 2/12/2019

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**SUPPORTING STATEMENT FOR
FERC-545¹ [(Gas Pipeline Rates: Rate Change (Non-Formal))
as modified by Final Rule in Docket No. RM96-1-041²**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review/approve changes to and the extension of the FERC-545 information collection [(Gas Pipeline Rates: Rate Change (Non-Formal))], as stated in the Final Rule in Docket No. RM96-1-041.

The Commission is submitting this consolidated supporting statement to OMB with one ICR for each of the two separate OMB Control Numbers (1902-0154 for FERC-545 and 1902-0174 for FERC-549C). Additionally, each ICR will contain information regarding the extension of each collection (the majority of each collections' requirements remain unchanged) and additional requirements due to the modifications of the Final Rule in Docket. No. RM96-1-041 (Final Rule).

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Final Rule in Docket RM96-1-041

The Final Rule says in part (footnotes omitted):

“On September 29, 2017, NAESB filed a report informing the Commission that it had adopted and ratified WGQ Version 3.1 of its business practice standards applicable to natural gas pipelines. The NAESB report identifies all the changes made to the Version 3.0 Standards and summarizes the deliberations that led to the changes. It also identifies changes to the existing standards that were considered but not adopted due to a lack of consensus or other reasons.

On August 21, 2018, the Commission issued a Notice of Proposed Rulemaking (NOPR) proposing to incorporate by reference NAESB WGQ Version 3.1 business

¹ The submittal to OMB for the NOPR in RM96-1-041 was made under a temporary collection number (and temporary placeholder), FERC-545B (OMB Control No. TBD) to enable FERC to submit this package timely to OMB for review under the Paperwork Reduction Act. This was done because another unrelated item was pending OMB review under FERC-545, and only one item per OMB Control Number can be pending OMB review at a time.

² This supporting statement will also contain information concerning the extension of the FERC-545 information collection.

practice standards applicable to natural gas pipelines, with certain enumerated exceptions into its regulations.³

Following issuance of the NOPR regarding NAESB's WGQ Version 3.1 business practice standards, the Tennessee Valley Authority (TVA) and the Interstate Natural Gas Association of America (INGAA) filed comments. TVA expresses support for the Commission's proposal to incorporate by reference NAESB's WGQ Version 3.1 business practice standards. INGAA also supports the Commission's proposal in the Version 3.1 NOPR, but urges the Commission to ensure that implementation of a Final Rule in this proceeding does not occur prior to April 1, 2019, which will be after the winter heating season. INGAA states that implementation of a Final Rule in this proceeding will require substantial time and effort from both the pipelines and their customers to alter business systems, scheduling, and coordination processes, and thus it would be best to schedule implementation to not occur during the winter heating season."

In the Final Rule, the Commission amends its regulations in 18 CFR 284.12 to incorporate by reference, with certain enumerated exceptions, the latest version (Version 3.1) of business practice standards applicable to interstate natural gas pipelines (adopted by the Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board (NAESB)), replacing Version 3.0. Under this Final Rule, interstate natural gas pipelines are required to file compliance filings with the Commission by April 1, 2019, and are required to comply with the standards incorporated by reference in this rule on and after August 1, 2019. Adoption of the Version 3.1 business practice standards will allow NAESB and its members to continue their efforts to update and improve the wholesale natural gas industry's business practice standards, which will benefit all participants in the wholesale natural gas market as shown by the consensus support for the revised standards from all segments of the industry.

FERC-545 (renewal)

FERC-545 is required to implement Sections 4, 5, and 16 of the Natural Gas Act (NGA), (15 USC 717c-717o, PL 75 688, 52 Stat. 822 and 830). NGA Sections 4, 5, and 16 authorize the Commission to inquire into rate structures and methodologies and to set rates at a just and reasonable level. Specifically, a natural gas company must obtain Commission authorization for all rates and charges made, demanded, or received in connection with the transportation or sale of natural gas in interstate commerce.

Under the NGA, a natural gas company's rates must be just and reasonable and not unduly discriminatory or preferential. The Commission may act under different sections of the NGA to

³ *Standards for Business Practices of Interstate Natural Gas Pipelines*, Notice of Proposed Rulemaking, 83 FR 44521 (Aug. 31, 2018), FERC Stats. & Regs. ¶ 32,728 (Aug. 21, 2018) (Version 3.1 NOPR).

effect a change in a natural gas company's rates. When the Commission reviews changes in rates that a natural gas company has proposed, it is subject to the requirement of Section 4(e) of the NGA. Under Section 4(e), the natural gas company bears the burden of proving that its proposed rates are just and reasonable. For example, when a pipeline files to increase its rates, it makes a filing with the Commission under Section 4 of the NGA. These types of filings are referred to as general section 4 rate cases. In the proceedings, the Commission reviews all of a pipeline's rates and services. A pipeline can file a general Section 4 rate case anytime it wishes, provided the pipeline did not agree otherwise in a settlement. A pipeline must demonstrate that the new rates it proposes to charge are just and reasonable. When a rate increase filing is made pursuant to Section 4, the application is typically suspended and set for hearing by a Commission Order. On the other hand, when the Commission seeks to impose its own rate determination, it must do so in compliance with Section 5(a) of the NGA. Under Section 5, the Commission must first establish that its alternative rate proposal is both just and reasonable.

Section 16 of the NGA states that the Commission "shall have the power to perform any and all acts, and to prescribe, issue, make, amend, and rescind such orders, rules, and regulations as it may find necessary or appropriate to carry out provisions of [the NGA]." In other words, Section 16 of the NGA grants the Commission the power to define accounting, technical and trade terms, prescribe forms, statements, declarations or reports and to prescribe rules and regulations.

Pipelines adjust their tariffs to meet market and customer needs. Commission review of these proposed changes is required to ensure rates remain just and reasonable and that services are not provided in an unduly or preferential manner. The Commission's regulation in 18 C.F.R. Part 154 specifies what changes are allowed and the procedures for requesting Commission approval.

The following filing categories are subject to FERC-545:

- Tariff Filings – filings regarding proposed changes to a pipeline's tariff (including Cost Recovery Mechanisms for Modernization of Natural Gas Facilities filings in Docket No. PL15-1) and any related compliance filings;
- Rate Filings – rate-related filings under NGA sections 4 and 5 and any related compliance filings and settlements;
- Informational Reports;
- Negotiated Rate and Non-Conforming Agreement Filings; and
- Market-Based Rates for Storage Filings (18 CFR 284.501-505).

One-time compliance filings mandated in Order No. 587-W (Docket Nos. RM96-1-038 and RM14-2-003) and Order No. 801 (Docket No. RM14-21-000) are excluded from this data collection renewal. The Commission uses the FERC-545 information to:

- ensure there are adequate customer protections under section 4 of the NGA;
- review rates and terms and conditions of service changes by natural gas companies for

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- the transportation and storage of natural gas;
- provide general industry oversight; and
- supplement documentation during FERC's audits process.

In summary, the Commission reviews the FERC-545 materials to determine whether proposed transportation and sales rates and terms and conditions of service are just and reasonable. The Commission uses the information to monitor rates and terms and conditions of service related to jurisdictional transportation, natural gas storage, and unbundled sales activities of jurisdictional companies. In addition to fulfilling the Commission's obligations under the NGA, the information enables the Commission to monitor the activities and evaluate transactions of the natural gas industry to ensure competitiveness and improved efficiency of the industry's operations. The business practice standards the Commission is incorporating by reference in this final rule aid the Commission in ensuring that the terms and conditions of pipeline tariffs are just and reasonable. The standards ensure that business transactions use a common process and terminology for processing transactions and these standards have been vetted for reasonableness by both the Commission and the industry itself.

NAESB is a consensus standards organization composed of representatives of all segments of the natural gas industry and the electric power industry. Since 1996, NAESB's business practice standards have established standardized procedures and protocols for conducting their business transactions that both the industry and the Commission have deemed necessary for a more efficient and integrated pipeline system.

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

Final Rule in Docket RM96-1-041

The Final Rule in RM96-1-041 requires interstate gas pipelines to make a one-time tariff filing to reflect the changes in the updated NAESB standards. Interstate natural gas pipelines are required to conduct their transactions in accordance with the stated terms of their tariffs. The compliance tariff filings made in accordance with the final rule ensure that the pipelines acknowledge their obligation to conduct their business transactions in accordance with Commission requirements, which now include a requirement to comply with the business practice standards incorporated by reference into the Commission's regulations as enforceable, mandatory requirements. The tariff filing also provides transparency for customers, as the business practice standards to be followed by the pipeline are specifically identified in the pipeline's tariff.

In the Final Rule, the Commission amends its regulations at 18 CFR 284.12(a) to incorporate by reference the latest version (Version 3.1) of certain business practice standards adopted by the Wholesale Gas Quadrant (WGQ) of the North American Energy Standards Board (NAESB)

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applicable to natural gas pipelines. To implement these standards, natural gas pipelines will be required to file tariff sheets to reflect the changed standards. The FERC-545 accounts for the preparation and filing of tariff sheets. Information collection requirements contained within the standards are under FERC-549C (OMB Control No. 1902-0174), which the Commission is submitting concurrently with this package in a separate ICR.

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

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

In previous rulemakings,⁴ the Commission implemented the capability and requirement for electronic filing of all tariff submissions. FERC also improved the security of submitting those electronic filings and the pipelines' on-line process of appointing and modifying agents with the authority to make a filing on the pipeline's behalf (providing filing companies with greater control over the agents eligible to make specific types of filings on their behalf).

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.

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

Commission filings and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements to identify duplication. No duplication of the information collection requirements has been found.

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

Final Rule in Docket RM96-1-041

The Small Business Administration's (SBA) Office of Size Standards develops the numerical definition of a small business as matched to North American Industry Classification System Codes (NAICS). The SBA (in 13 CFR 121.101) has established a size standard for pipelines

⁴ More information is available on FERC's eTariff page at <http://www.ferc.gov/docs-filing/etariff.asp>.

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transporting natural gas, stating that a firm is a small entity if its annual receipts (including those of its affiliates) are \$27.5 million or less.⁵

FERC-545 (renewal)

The FERC-545 is a filing requirement related to pipeline rate filing obligations for the transportation and storage of natural gas. The filing collects data from both large and small respondent companies. The data required were designed to impose the least possible burden for companies, while collecting the information required for processing the filings. Use of the Internet to file documents electronically is the primary method the Commission uses to minimize the FERC-545A filing burden.

The one-time compliance filings mandated in the Final Rule must be filed electronically.

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

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

FERC-545 is a one-time compliance filing. Failure to collect the information would prohibit the Commission from properly monitoring and evaluating pipeline transactions and meeting statutory obligations under the NGPA and NGA.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

The FERC-545 presents no special circumstances.

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

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

⁵ U.S. Small Business Administration, Table of Small Business Size Standards for Pipeline Transportation of Natural Gas, NAICS Code 486210, available at https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf, Subsector 486. Matched to North American Industry Classification System Codes, Natural Gas Pipeline Transportation, NAICS Code 486210, page 27, July 14, 2014, available at https://www.sba.gov/sites/default/files/files/Size_Standards_Table.pdf, Subsector 486.

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The Commission's outside consultation was in the form of a Notice of Proposed Rulemaking⁶ that included the Commission's best estimate of the hourly burden imposed by companies' compliance with the NOPR's requirements, as well as the availability of a request for waivers, where deemed appropriate. Interested persons were notified through publication in the Federal Register that they could file comments on the proposals in the NOPR, including the burden estimates. In addition, potential commenters were specifically informed that they could file comments on the proposed collection of information and the associated burden directly with OMB. There were a total of two comments filed with the Commission in response to the NOPR. Both were generally supportive of the Commission's proposals and raised no concerns about the burden estimates in the NOPR. Accordingly, the Commission used the same estimates in The RM96-1-041 Final Rule⁷.

The Commission also issued a 60-day public notice⁸ and a 30-day public notice⁹ concerning the renewal of currently approved burden for the FERC-545 information collection. No comments were received from the public in response to either of those notices.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

There are no payments or gifts made or given to respondents associated with collections FERC-545 and the Final Rule.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

The FERC-545 data is public. In general, for all submittals to the Commission, filers may submit specific requests for confidential treatment to the extent permitted by law; details are available in 18 C.F.R. 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.

⁶ Issued on 8/21/2018; published on 8/31/2018 (83 FR 44521)

⁷ Issued on 11/15/2018; published on 12/3/2018 (83 FR 62242)

⁸ Publication in the Federal Register occurred on 8/16/2018 (83 FR 40759)

⁹ Publication in the Federal Register occurred on 10/31/2018 (83 FR 54737)

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

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

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Final Rule in Docket RM96-1-041

The following estimates of reporting burden are related only to this Final Rule in RM96-1-041 and anticipate the costs to pipelines for compliance. The burden estimates are primarily related to start-up to implement these standards and regulations and will not result in ongoing costs.

RM96-1-041 Final Rule (Standards for Business Practices of Interstate Natural Gas Pipelines)						
	Number of Respondents¹⁰ (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)= (3)	Average Burden Hr. Per Response (4)	Total Annual Burden Hours & Total Annual Cost¹¹ (3)*(4)=(5)	Annual Costs Per Respondent (\$) (5) * (1) = (6)
FERC-545 (one-time)	165	1	165	10 hrs.; \$1,020	1,650 hrs.; \$168,000	\$1,020
FERC-549C (one-time)	165	1	165	22 hrs.; \$2,244	3,630 hrs.; \$370,260	\$2,244
TOTAL			330		5,280 hrs.; \$538,560	

The one-time burden (for both the FERC-545 and FERC-549C) will be averaged over three years:

FERC-545: $1,650 \text{ hours} \div 3 = 550 \text{ hours/year}$ over three years

¹⁰ The number of respondents is the number of entities in which a change in burden from the current standards to the proposed exists, not the total number of entities from the current or proposed standards that are applicable.

¹¹ The estimated hourly cost (salary plus benefits) provided in this section is based on the salary figures for May 2017 posted by the Bureau of Labor Statistics for the Utilities sector (available at https://www.bls.gov/oes/current/naics3_221000.htm) and scaled to reflect benefits using the relative importance of employer costs in employee compensation from May 2017 (available at <https://www.bls.gov/news.release/ecec.nr0.htm>). The hourly estimates for salary plus benefits are:
Computer and Information Systems Manager (Occupation Code: 11-3021), \$96.51
Electrical Engineer (Occupation Code: 17-2071), \$66.90
Legal (Occupation Code: 23-0000), \$143.68
The average hourly cost (salary plus benefits), weighting all of these skill sets evenly, is \$102.36. The Commission rounds it to \$102/hour.

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 FERC-549C: $3,630 \text{ hours} \div 3 = 1,210 \text{ hours/year}$ over three years

The number of responses is also averaged over three years (for both the FERC-545 and FERC-549C):
 FERC-545: $165 \text{ responses} \div 3 = 55 \text{ responses/year}$
 FERC-549C: $165 \text{ responses} \div 3 = 55 \text{ responses/year}$

The responses and burden for Years 1-3 will total respectively as follows:
 Year 1: 55 responses; 550 hours (FERC-545); 1,210 hours (FERC-549C)
 Year 2: 55 responses; 550 hours (FERC-545); 1,210 hours (FERC-549C)
 Year 3: 55 responses; 550 hours (FERC-545); 1,210 hours (FERC-549C)

FERC-545(renewal)

FERC-545: Gas Pipeline Rates: Rate Change (Non-Formal)						
	Number of Respondents (1)	Average Number of Responses per Respondent (2)=(3)÷(1)¹²	Total Number of Responses (3)	Average Burden Hrs. & Cost (\$) (rounded) Per Response¹³,¹⁴ (4)	Total Annual Burden Hours & Total Annual Cost (\$) (rounded) (3)*(4)=(5)	Cost per Respondent (\$) (rounded) (5)÷(1)¹⁵
Tariff Filings	124	2.597	322	211 hrs.; \$24,054	67,942 hrs.; \$7,745,388	\$62,463

¹² The average number of responses per respondent was calculated by dividing the total number of responses (Column 3) in each category by the number of respondents (Column 1).

¹³ The estimated hourly cost (salary plus benefits) provided in this section is based on the salary figures (http://www.bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) for May 2017 posted by the Bureau of Labor Statistics for the Utilities sector. The hourly estimates for salary plus benefits are:

- Computer and Mathematical (Occupation Code: 15-0000), \$63.25
- Economist (Occupation Code: 19-3011), \$71.98
- Legal (Occupation Code: 23-0000), \$143.68
- Accountants and Auditors: 13-2011), \$56.59

The average hourly cost (salary plus benefits) is calculated weighting each of the aforementioned wage categories as follows: $\$63.25 (0.05) + \$71.98 (0.3) + \$143.68 (0.6) + \$56.59 (0.05) = \$113.79$. The Commission rounds it to \$114/hour.

¹⁴ The average costs are rounded to the nearest dollar.

¹⁵ The average costs per respondent are rounded to the nearest dollar.

Rate Filings	17	1.412	24	354 hrs.; \$40,356	8,496 hrs.; \$968,544	\$56,973
Informational Reports	101	2.347	237	235 hrs.; \$26,790	55,695 hrs.; \$6,349,230	\$62,864
Negotiated Rates & Non-Conforming Agreement Filings	65	9.923	645	233 hrs.; \$26,562	150,285 hrs.; \$17,132,490	\$263,577
Market-Base Rates for Storage Filings	4	1	4	230 hrs.; \$26,220	920 hrs.; \$104,880	\$26,220
TOTAL			1,232		283,338 hrs.; \$32,300,532	

Total requested responses and burden for FERC-545:¹⁶

Annual response: 55 response/year (due to Final Rule in RM96-1-041) + 1,232 responses/year (FERC-545 renewal) = 1,287 responses/year.

Annual hourly burden 550 hours (due to Final Rule in RM96-1-041) + 283,338 hours (FERC-545 renewal) = 283,888 hours/year.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

There are no capital or start-up costs for the requirements in the Final Rule in RM96-1-041 that are not associated with the burden hours. All of the costs are related to burden hours and are detailed in Questions #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The following federal costs relate only to the new requirements in the Final Rule.

	Number of Hours or FTE's	Estimated Annual Federal Cost (\$)¹⁷
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¹⁶Note that there are other program changes not related to RM96-1-041, which are described in Question 15. FERC staff is removing three one-time requirements that are outside of their respective implementation periods, have been completed, and should no longer apply to FERC-545 reporting burden:

¹⁷ Based on FERC's Fiscal Year 2018 average cost per FTE (salary plus benefits) of \$164,820 per year (or 2,080 work hours), rounded to \$79.00 per hour.

PRA ¹⁸ Administration Cost ¹⁹	-	\$ 4,193 ²⁰
Data Processing and Analysis, Sub-Total ²¹	1 ²²	\$164,820
<i>FERC-545</i>	0.75	\$123,615
<i>FERC-549C</i>	0.25	\$41,205
FERC Total	1	\$164,820

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

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

FERC-545 (as affected by the Final Rule in RM96-1-041). The Final Rule in RM96-1-041 amends the Commission’s regulations at 18 CFR 284.12(a) to incorporate by reference the latest version (Version 3.1) of seven business practice standards applicable to interstate natural gas pipelines adopted by NAESB’s WGQ. By incorporating these standards by reference into the Commission’s regulations the Commission has made compliance mandatory and enforceable. Non-compliance, absent a specific waiver, violates the Commission’s regulations as well as the terms of each pipeline’s tariff. The final rule revises and replaces the existing incorporated business practices standards (the Version 3.0 standards) to make two substantive revisions to its Nominations Related Standards, one to establish a standard rounding process for elapsed-prorated-scheduled quantity calculations, and a second to revise the specifications for the information to be included in a nomination request.

NAESB also adopted three revisions to the Quadrant Electronic Delivery Mechanism Related Standards. First, it has increased the allowable field length in ASCII Comma Separated Value Files to 3000 characters. Second, it has adopted new Standard 4.3.106 to allow checkboxes and radio buttons in the Transmission Service Providers’ Electronic Bulletin Boards. Third, NAESB

¹⁸ Paperwork Reduction Act of 1995 (PRA)

¹⁹ The PRA Administration Cost is \$ 4,931, and includes preparing supporting statements, notices, and other activities associated with Paperwork Reduction Act compliance.

²⁰ This cost will be applied to both the FERC-545 and FERC-549C information collections as related their respective ICRs.

²¹ The estimate of federal FTE’s and the indicated split between FERC-545 and FERC-549C is based on staff’s experience and the fact that the FERC-545 filings are one-time filings, with the FERC-549C requirements both one-time and on-going.

²² The 1 FTE we are estimating here in connection with the issuance of the Final Rule in Docket No. RM96-1-041 does not represent an additional FTE. Rather, 1 FTE represents federal effort as applied to both FERC-545 and FERC-549C currently and after the Final Rule is effective.

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modified its standards to update the operating systems and web browsers that entities should support on behalf of users. Additionally, clarifying language was added to the Secure Sockets Layer/Transport Layer Security protocols.

Other changes adopted by NAESB to the business practice standards included changes to the NAESB WGQ data sets and other technical implementation documentation as well as revisions to the Flowing Gas Related data sets and technical implementation. Further, NAESB revised the Imbalance Trade data set and revised two Senders Option data elements. In addition, NAESB adopted revisions to the Capacity Release Related data sets and technical implementation. NAESB also revised Standard 6.3.1 (i.e., the NAESB Base Contract for Sale and Purchase of Natural Gas) to add language directing users to NAESB's copyright disclaimer posted on the NAESB website. Identical language was added to three additional NAESB WGQ Contracts. Lastly, NAESB added a self-identification provision that assists end users in determining whether counterparties are commercial market participants as defined by the United States Commodity Futures Trading Commission.

FERC-545, Other Program Changes Not Related to RM96-1-041. Also, FERC staff is removing three one-time requirements that are outside of their respective implementation periods, have been completed, and should no longer apply to FERC-545 reporting burden:

- One-time Tariff Filing for Pipeline Map URL²³: 165 responses and 1,320 hours annually (averaged over Years 1-3)
- Tariff Filing for New/Revised Nomination Cycles²⁴: 165 responses and 550 hours annually (averaged over Years 1-3)
- One-time Implementation Requiring Interstate Gas Pipelines to make one-time tariff filing²⁵: 165 responses and 1,650 hours annually (averaged over Years 1-3)

FERC-545 (changes due to Adjustment in Estimate). FERC subject-matter experts revised the organization and labelling for the reporting requirement based on their actual organization in FERC regulations. This more granular approach allowed a more thorough review of the FERC-545 information collection. The existing FERC-545 reporting burden experienced slight changes:1) a fluctuation in annual filers (921 less responses per year based on recent activity and projections on future activity) and 2) revised burden per response as related to each reporting requirement (which resulted in an additional 31 hours per year industry-wide).

²³ The RM14-21-000 Final Rule (Natural Gas Act Pipeline Maps) was issued on 11/20/2014; reporting requirements were completed after Year 1 of the three year approval.

²⁴ The RM14-2-000 Final Rule (Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities) was issued on 4/16/2015; reporting requirements were completed on 2/1/2016.

²⁵ The RM96-1-038 Final Rule (Standards for Business Practices of Interstate Natural Gas Pipelines; Coordination of the Scheduling Processes of Interstate Natural Gas Pipelines and Public Utilities) was issued on 10/16/2015; reporting requirements were completed on 2/1/2016.

Summary table of changes to burden hours, with current approved inventory, as listed in ROCIS and reginfo.gov follow. (The additional implementation burden due to the Final Rule in RM96-1-041 is being averaged over Years 1-3, as discussed in #12 above.)

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
FERC-545				
Annual Number of Responses	1,287	2,648	-921	-440
Annual Time Burden (Hr.)	283,888	286,827	31	-2,970
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

There are no publications of the information.

17. DISPLAY OF EXPIRATION DATE

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

The expiration dates are displayed on ferc.gov with links to the updated table from <http://www.ferc.gov/docs-filing/info-collections.asp>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

Final Rule in Docket RM96-1-041 and FERC-545 (renewal)

There are no exceptions.