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Supporting Statement for

**FERC-725G (Mandatory Reliability Standards for the Bulk-Power System: PRC Reliability Standards), FERC-725G1 ((Order in RD14-14) Reliability Standards for the Bulk Power System: Reliability Standard PRC-004-5(i)), and FERC-725G4 ((Final Rule in RM15-7, RM15-12, & RM15-13) Mandatory Reliability Standards: Reliability Standard PRC-010-1 (Undervoltage Load Shedding))**  
(Three-year extension requested)

NOTE:

This consolidated supporting statement covers reporting and recordkeeping requirements currently in:

1. FERC-725G (Mandatory Reliability Standards for the Bulk-Power System (BPS): PRC Reliability Standards),
2. FERC-725G1 ((Order in RD14-14) Reliability Standards for the Bulk Power System: Reliability Standard PRC-004-5(i)) and
3. FERC-725G4 ((Final Rule in RM15-7, RM15-12, & RM15-13) Mandatory Reliability Standards: Reliability Standard PRC-010-1 (Undervoltage Load Shedding)).

We are making the following changes<sup>1</sup>:

- transferring the reporting and record-keeping requirements currently in FERC-725G1 (from Reliability Standard PRC-004-5(i)) and in FERC-725G4 (Rel. Std. PRC-010-2) into the FERC-725G information collection, which is being renewed for 3 years
- temporarily renewing the FERC-725G1 and FERC-725G4 information collections, only to avoid a lapse in approval for these requirements until OMB issues its decision on the consolidated FERC-725G. After OMB approval of the consolidated FERC-725G information collection, Commission staff plans to submit a request to discontinue the independent FERC-725G1 and FERC-725G4 information collection to do away with the intentional temporary duplication of burden.

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<sup>1</sup> FERC-725G1 and FERC-725G4 are both “temporary” information collection numbers. They are “temporary” in the sense that they allowed Commission staff to obtain clearance on requirements intended for FERC-725G while that collection was already under OMB review for other unrelated Commission activities. We are now transferring those requirements to the correct place in the Commission’s burden inventory, namely the FERC-725G.

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The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and renew the information collection requirements in FERC-725G under OMB Control No. 1902-0252, and include the requirements currently approved in FERC-725G1 and FERC-725G4. This supporting statement covers the requirements of the FERC-725G, FERC-725G1, and FERC-725G4 information collections. The reporting requirements in the FERC-725G, FERC-725G1, and FERC-725G4 are all contained in FERC's regulations in 18 Code of Federal Regulations (CFR) Part 40.

## **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<sup>2</sup>. 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.<sup>3</sup> Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.<sup>4</sup> In 2006, the Commission certified NERC (North American Electric Reliability Corporation) as the ERO<sup>5</sup> pursuant to section 215 of the FPA.<sup>6</sup>

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

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<sup>2</sup> 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).

<sup>3</sup> *Id.* 824o(c), (d).

<sup>4</sup> *Id.* 824o(e).

<sup>5</sup> “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.

<sup>6</sup> *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).

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modifications. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards

**Background on FERC-725G.** On March 18, 2010, in Order No. 733, the Commission approved Reliability Standard PRC-023-1 (Transmission Relay Loadability) 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.<sup>7</sup> 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.<sup>8</sup> 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.<sup>9</sup>

The FERC-725G information collection currently contains the reporting and recordkeeping requirements for the following Reliability Standards:

- PRC-002-2 (Disturbance Monitoring and Reporting Requirements)
- PRC-006-2 (Automatic Underfrequency Load Shedding)
- PRC-012-2 (Remedial Action Schemes)
- PRC-019-1 (Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection)
- PRC-023-4 (Transmission Relay Loadability)
- PRC-024-1 (Generator Frequency and Voltage Protective Relay Settings)
- PRC-025-1 (Generator Relay Loadability)
- PRC-026-1 (Relay Performance During Stable Power Swings)
- PRC-027-1 (Coordination of Protection Systems for Performance During Faults)

**Background on FERC-725G1.** FERC-725G1 is a temporary collection containing only Reliability Standard PRC-004-5(i).

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<sup>7</sup> Order No. 733, 130 FERC ¶ 61,221 at P 150.

<sup>8</sup> *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)).

<sup>9</sup> *Id.* P 153.

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On 5/13/2015, the Commission issued an Order in Docket No. RD14-14-000. In that Order, the Commission approved Reliability Standard PRC-004-3 to replace Reliability Standards PRC-004-2.1a and PRC-003-1 and require transmission owners, generator owners, and distribution providers to identify and correct causes of misoperations of certain protection systems. Reliability Standard PRC-004-3 has since been revised into a subsequent version, PRC-004-5(i) which updated the violation risk factors (VRFs) and violation severity levels (VSLs) from “medium” to “high” for Requirements R1 through R6.

**Background on FERC-725G4.** FERC-725G4 is a temporary collection containing only Reliability Standard PRC-010-2.

On February 6, 2015, NERC filed a petition seeking approval of Reliability Standard PRC-010-1 (Undervoltage Load Shedding), a revised definition of Undervoltage Load Shedding Program (UVLS Program) for inclusion in the NERC Glossary, and the associated violation risk factors, violation severity levels, effective date and implementation plan. NERC also proposed the retirement of four PRC Reliability Standards.<sup>10</sup> NERC stated that the purpose of Reliability Standard PRC-010-1 is to “establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs” as directed by the Commission in Order No. 693.<sup>11</sup>

On 11/19/2015, the Commission issued a Final Rule in Docket Nos. RM15-7-000, RM15-12-000, and RM15-13-000 which approved the revision of Reliability Standard PRC-010-1 into Reliability Standard PRC-010-2.

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

### **FERC-725G**

The stated purpose of each Reliability Standard and its respective reporting and (if applicable) record-keeping requirements follow (each of the Reliability Standards can be viewed in entirety within the ICR’s “Supplementary Documents” section):

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<sup>10</sup> Reliability Standards PRC-010-0 (Assessment of the Design and Effectiveness of UVLS Program); PRC-020-1 (Under-Voltage Load Shedding Program Database); PRC-021-1 (Under-Voltage Load Shedding Program Data); and PRC-022-1 (Under-Voltage Load Shedding Program Performance).

<sup>11</sup> NERC PRC Petition at 14 (citing Order No. 693, FERC Stats & Regs ¶ 31,242 at P 1509).

FERC-725G, FERC-725G1, and FERC-725G4 (OMB Control Nos. 1902-0252, 1902-0284 and 1902-0282)

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PRC-002-2 (Disturbance Monitoring and Reporting Requirements): To have adequate data available to facilitate analysis of Bulk Electric System (BES) disturbances.

PRC-006-2 (Automatic Underfrequency Load Shedding): To establish design and documentation requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures.

PRC-012-2 (Remedial Action Schemes): To ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the BES.

PRC-019-2 (Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection): To verify coordination of generating unit Facility or synchronous condenser voltage regulating controls, limit functions, equipment capabilities and Protection System settings.

PRC-023-4 (Transmission Relay Loadability): To ensure that protective relay settings shall not limit transmission loadability; not interfere with system operators' ability to take remedial action to protect system reliability and; to ensure they are set to reliably detect all fault conditions and protect the electrical network from these faults.

PRC-024-2 (Generator Frequency and Voltage Protective Relay Settings): To ensure Generator Owners set their generator protective relays such that generating units remain connected during defined frequency and voltage excursions.

PRC-025-2 (Generator Relay Loadability): To set load-responsive protective relays associated with generation Facilities at a level to prevent unnecessary tripping of generators during a system disturbance for conditions that do not pose a risk of damage to the associated equipment.

PRC-026-1 (Relay Performance During Stable Power Swings): To ensure that load-responsive protective relays are expected to not trip in response to stable power swings during non-Fault conditions.

PRC-027-1 (Coordination of Protection Systems for Performance During Faults): To maintain the coordination of Protection Systems installed to detect and isolate Faults on BES Elements, such that those Protection Systems operate in the intended sequence during Faults.

**FERC-725G1**

FERC-725G, FERC-725G1, and FERC-725G4 (OMB Control Nos. 1902-0252, 1902-0284 and 1902-0282)

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The purpose of Reliability Standard PRC-004-5(i) is to identify and correct the causes of Misoperations of Protection Systems for BES Elements.

#### **FERC-725G4**

The purpose of Reliability Standard PRC-010-2 is to ensure that personnel are trained on specific topics essential to reliability to perform or support real-time operations of the BES.

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.

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## **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.<sup>12</sup>

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

These requirements are necessary for the reliable operation of the bulk electric system. Any reduction in frequency may diminish the ability of NERC, Regional Entities, or FERC in maintaining reliability on the bulk electric system.

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

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**

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.<sup>13</sup> The

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<sup>12</sup> 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](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf).

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FERC-725G, FERC-725G1, and FERC-725G4 (OMB Control Nos. 1902-0252, 1902-0284 and 1902-0282)

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Commission issued a 60-day<sup>14</sup> comment request on 10/12/2018 and a 30-day<sup>15</sup> comment request on 12/21/2018. Also, an errata was issued for the 30-day notice (on 12/21/2018) that remedied errant cost figures.

## **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**

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.**

These collections do not contain any questions of a sensitive nature.

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

The following table provides the estimated annual burden and cost related to FERC-725G information collection requirements:

<b>FERC-725G: Mandatory Reliability Standards: PRC Reliability Standards</b>
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<sup>14</sup> Published 10/17/2018 (83 FR 52442)

<sup>15</sup> Published 12/31/2018 (83 FR 67717)

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Reliability Standards	Number of Respondents <sup>16</sup> (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost (\$) (rounded) Per Response (4) <sup>17</sup>	Total Annual Burden Hours & Total Annual Cost (\$) (rounded) (3)*(4)=(5)	Cost per Respondent (rounded) (\$) (5)÷(1)
<b>Reporting Requirements</b>						
PRC-023-4	741 (TO, GO, DP, PC)	1	741	42.445 hrs.; \$2,840	31,452 hrs.; \$2,104,139	\$2,840
PRC-002-2	521 (TO, GO)	1	521	73.729 hrs.; \$4,932	38,413 hrs.; \$2,569,830	\$4,932
PRC-006-2	80 (TO, DP)	1	80	47 hrs.; \$3,144	3,760 hrs.; \$251,544	\$3,144
PRC-012-2	3,291 (RC, PC, TO, GO, DP)	1	3,291	23.746 hrs.; \$1,589	78,147 hrs.; \$5,228,034	\$1,589
PRC-019-1	738 (GO, TO)	1	738	17 hrs.; \$1,137	12,546 hrs.; \$839,327	\$1,137
PRC-024-1	738 (GO)	1	738	17 hrs.; \$1,137	12,546 hrs.; \$839,327	\$1,137
PRC-025-1	1,019 (GO, TO, DP)	1	1,019	6.622 hrs.; \$443	6,748 hrs.; \$451,441	\$443
PRC-026-1	1,092 (GO, PC, TO)	1	1,092	7.868 hrs.; \$526	8,592 hrs.; \$574,805	\$526
PRC-027-1	1,727 (TO, GO, DP)	1	1,727	19.757 hrs.; \$1,322	34,120 hrs.; \$2,282,628	\$1,322
PRC-004-5(i) <sup>18</sup> (formerly in FERC-725G1)	648 (TO, GO, DP)	1	648	8 hrs. <sup>19</sup> ; \$535	5,184 hrs.; \$346,810	\$535
PRC-010-2 (formerly in FERC-725G4)	26 (PC, TP, DP)	1	26	36 hrs.; \$2,408	936 hrs.; \$62,618	\$2,408
<b>Record-Keeping (Evidence Retention) Requirements</b>						
PRC-023-4	741 (TO, GO, DP, PC)	1	741	513.858 hrs.; \$20,390	380,769 hrs.; \$15,108,914	\$20,390

<sup>16</sup> GO = generator owner, TO=transmission owner, DP = distribution planner; PC = planning coordinator, TP = transmission planners, RC = Reliability Coordinator

<sup>17</sup> The average costs are rounded to the nearest dollar.

<sup>18</sup> Reliability Standard PRC-004-5(i) is an updated standard that neither added nor removed reporting and record keeping requirements (and corresponding burden) as compared to Reliability Standards PRC-004-3 and PRC-004-4.

<sup>19</sup> The reporting requirements for Reliability Standard PRC-004-5(i) are being reduced by 2 hours/response (annually, to 8 hrs. rather than 10) due to completion of a one-time requirement imposed by the Order in Docket No. RD14-14-000.

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PRC-002-2	521 (TO, GO)	1	521	31.599 hrs.; \$1,254	16,463 hrs.; \$653,252	\$1,254
PRC-006-2	80 (TO, DP)	1	80	5 hrs.; \$198	400 hrs.; \$15,872	\$198
PRC-012-2	3,291 (RC, PC, TO, GO, DP)	1	3,291	11.754 hrs.; \$466	38,684 hrs.; \$1,534,981	\$466
PRC-019-2	738 (GO, TO)	1	738	1 hr. <sup>20</sup> ; \$40	738 hrs.; \$29,284	\$40
PRC-024-1	738 (GO)	1	738	1 hr. <sup>21</sup> ; \$40	738 hrs.; \$29,284	\$40
PRC-025-1	1,019 (GO, TO, DP)	1	1,019	2.044 hrs.; \$81	2,083 hrs.; \$82,653	\$81
PRC-026-1	1,092 (GO, PC, TO)	1	1,092	12 hrs.; \$476	13,104 hrs.; \$519,967	\$476
PRC-027-1	1,727 (TO, GO, DP)	1	1,727	15.854 hrs.; \$629	27,380 hrs.; \$1,086,438	\$629
PRC-004-5(i) (formerly in FERC-725G1)	648 (TO, GO, DP)	1	648	12 hrs.; \$476	7,776 hrs.; \$308,552	\$476
PRC-010-2 (formerly in FERC-725G4)	26 (PC, TP, DP)	1	26	12 hrs.; \$476	312 hrs.; \$12,380	\$476
<b>Subtotal for Reporting Requirements</b>					<b>232,444 hrs.; \$15,550,503</b>	
<b>Subtotal for Record-keeping Requirements</b>					<b>488,420 hrs.; \$19,381,57 7<sup>22</sup></b>	
<b>TOTAL</b>					<b>720,864 hrs.; \$34,932,080<sup>1</sup> <sub>3</sub></b>	

FERC-725G1 estimated burden (currently):

Responses: 659

Total annual burden hours: 14,498

FERC-725G4 estimated burden (currently):

<sup>20</sup> This hourly figure was revised from the 60-day public notice from 0 hours/response to 1 hour/response. This results in a total annual burden of 738 hours for Reliability Standard PRC-019-2.

<sup>21</sup> This hourly figure was revised from the 60-day public notice from 0 hours/response to 1 hour/response. This results in a total annual burden of 738 hours for Reliability Standard PRC-024-1.

<sup>22</sup> These hour and cost figures were updated from cost posited in the 60-day notice based due to updated hour and cost figures related to Reliability Standards PRC-019-2 and PRC-024-1.

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Responses: 26

Total annual burden hours: 1,248

### **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 the FERC-725G, FERC-725G1, or FERC-725G4. 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 information collection (OMB Control No. 1902-0225) and is not part of this request/ICR package.

The PRA Administrative Cost (estimate of \$4,931 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.

	<b>Number of Employees (FTE)</b>	<b>Estimated Annual Federal Cost</b>
Analysis and Processing of filings <sup>23</sup>	0	0
PRA Administrative Cost (\$4,931 each for FERC-725G, FERC-725G1, and FERC-725G4)		\$14,793 <sup>24</sup>
<b>FERC Total</b>		<b>\$14,793</b>

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

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<sup>23</sup> Based upon FERC's 2018 FTE average salary plus benefits (\$164,520)

<sup>24</sup> \$4,931 \* 3 FTEs (one for each information collection) = \$14,793

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### **FERC-725G**

The changes in burden due to agency discretion for the FERC-725G information collection are due to:

- The elimination of one-time burdens related to implementation activities that are completed (the one-time burdens related to Reliability Standards PRC-019-1 and PRC-024-1) resulting in annual decreases of 1,476 responses and 11,808 hours respectively;
- The inclusion of Reliability Standards PRC-004-5(i)<sup>25</sup> and PRC-010-2<sup>26</sup> that result in total annual increases of 674 responses and 14,208 hours.

The changes in burden due to adjustment in estimate are due to:

- a more accurate analysis of the number of distinct entities that serve multiple NERC-registered roles (e.g. Generator Owners that also serve as Planning Coordinators previously erroneously being counted as two separate entities rather than the same entity complying with the requirements once) resulted in an annual decrease of responses of 1,074;
- a more accurate analysis of the nature of reporting burden associated with Reliability Standards PRC-019-1 and PRC-024-1 resulted in the average burden per response (reporting and record-keeping) to increase from 9 hours to 18 hours. This resulted in an annual burden increase of 13,284 hours.
- A minor increase to the burden estimate for Reliability Standard PRC-012-2 of 61 hours related to a slight adjustment in the average burden per response.

### **FERC-725G1**

There is no change in either reporting or record-keeping burden for the FERC-725G1 information collection.

### **FERC-725G4**

There is no change in either reporting or record-keeping burden for the FERC-725G4 information collection.

The following tables summarize the changes in burden and responses to FERC-725G, FERC-725G1, and FERC-725G4:

<b>FERC-725G</b>	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment</b>	<b>Change Due to Agency</b>
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<sup>25</sup> Formerly included in the FERC-725G1 information collection (OMB Collection No. 1902-0284)

<sup>26</sup> Formerly included in the FERC-725G4 information collection (OMB Collection No. 1902-0282)

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			<b>in Estimate</b>	<b>Discretion</b>
Annual Number of Responses	10,621	12,497	-1,074	-802
Annual Time Burden (Hr.)	720,864	705,147	13,317	2,400
Annual Cost Burden (\$)	0	0	0	0

<b>FERC-725G1</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	659	659	0	0
Annual Time Burden (Hr.)	14,498	14,498	0	0
Annual Cost Burden (\$)	0	0	0	0

<b>FERC-725G4</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	26	26	0	0
Annual Time Burden (Hr.)	1,248	1,248	0	0
Annual Cost Burden (\$)	0	0	0	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>.

FERC-725G, FERC-725G1, and FERC-725G4 (OMB Control Nos. 1902-0252, 1902-0284 and 1902-0282)

Updated on 2/6/2019

## **18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

The Commission does not use statistical methods for these collections.