

Supporting Statement for  
**Modifications to 10 Information Collections, Due to NOPR in Docket No. RM19-12**

The Federal Energy Regulatory Commission (Commission or FERC) requests the Office of Management and Budget (OMB) approve the modifications proposed in the Notice of Proposed Rulemaking (NOPR) issued 1/17/2019 in Docket No. RM19-12<sup>1</sup>.

The Revisions to the Filing Process for Commission Forms (Forms Refresh) NOPR affects the following 10 information collections (covered by nine OMB Control Nos.), addressed by this consolidated supporting statement:

- 1) FERC Form No. 1 (also called FERC-1) (Annual Report of Major Electric Utilities, Licensees and Others and Supplemental; OMB Control No. 1902-0021)
- 2) FERC Form No. 1F (also called FERC-1F) (Annual Report for Nonmajor Public Utilities and Licensees; OMB Control No. 1902-0029)
- 3) FERC Form No. 2 (also called FERC-2) (Major Natural Gas Pipeline Annual Report; OMB Control No. 1902-0028)
- 4) FERC Form No. 2A (also called FERC-2A) (Non- Major Natural Gas Pipeline Annual Report; OMB Control No. 1902-0030)
- 5) FERC Form No. 3-Q (also called FERC-3Q, Quarterly Financial Report-Electric and Gas; OMB Control No. 1902-0205)
  - a. Form No. 3-Q for natural gas entities
  - b. Form No. 3-Q for electric entities
- 6) FERC Form No. 6 (also called FERC-6) (Annual Report of Oil Pipeline Companies; OMB Control No. 1902-0022)
- 7) FERC Form No. 6Q (also called FERC-6Q) (Quarterly Report of Oil Pipeline Companies; OMB Control No. 1902-0206)
- 8) FERC Form No. 60A (also called FERC-60A) (Annual Report of Centralized Service Cos.), OMB Control No. TBD) *Note that the NOPR discusses the FERC Form No. 60 (also called FERC-60) (Annual Reports of Centralized Service Cos., OMB Control No. 1902-0215)<sup>2</sup> for which the OMB expiration date is 5/31/2019. Due to separate activity to renew the FERC-60 before the expiration date, we are using a temporary information*

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<sup>1</sup> The Forms Refresh effort was announced on 4/16/2015 in Docket No. AD15-11 (“Order Instituting Proceeding To Develop Electronic Filing Protocols For Commission Forms,” posted in FERC’s eLibrary at <https://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=13841811>). The NOPR is posted at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15142191>.

<sup>2</sup> Note that OMB Control No.1902-0215 also includes FERC-61 (Narrative Description Of Service Co. Functions) and FERC-555A (Preservation of Records for Holding Cos. and Service Cos. Subject to Public Utility Holding Company Act of 2005), but they are not affected by the Forms Refresh NOPR and not addressed here. In addition, the regular renewal of the FERC Form No. 60, FERC-61, and FERC-555A (all included in OMB Control No. 1902-0215) is a separate activity from the Forms Refresh effort and not addressed here.

*collection number (FERC-60A) for this supporting statement for the related components in the NOPR in Docket RM19-12.*<sup>3</sup>

- 9) FERC Form No. 714A (also called FERC-714A) (Annual Electric Balancing Authority Area and Planning Area Report, for RM19-12; OMB Control No. TBD)--*Note that the NOPR discusses the FERC Form No. 714 (Annual Electric Balancing Authority Area and Planning Area Report, OMB Control No. 1902-0140) for which the OMB expiration date is 5/31/2019. Due to activity in a separate pending docket (Docket No. IC19-4) to renew the FERC Form No. 714 before the expiration date, we are using a temporary information collection number (FERC Form No. 714A) for this supporting statement for the related components in the NOPR in Docket RM19-12.*<sup>4</sup>

When the 10 information collections are being discussed as a group here, we will refer to them as the ‘VFP Forms.’

Currently, these information collections use a Commission-distributed software application called Visual FoxPro (VFP). Each entity is required to gather its relevant financial and other data and enter the data into VFP, which the entity maintains on its own computer system. The entity then uses the VFP software to transmit the information to the Commission. However, Microsoft Corporation, the developer of Visual FoxPro, no longer supports this product.

In moving to a long-term solution for the VFP Forms, the Commission has held conferences and discussions with industry members, other federal agencies, and other stakeholders. Based on these discussions, the Commission believes a standard built on Extensible Markup Language (XML) called eXtensible Business Reporting Language (XBRL) would be a superior method for both the Commission and filing entities to use. XBRL was developed specifically for reporting financial data and is used widely for reporting business and financial information. Under the NOPR, the Commission is not proposing to change the information currently collected in the VFP Forms, but rather to change the format of the information that is being collected from VFP to XBRL.

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

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<sup>3</sup> There can only be one pending item per OMB Control No. pending OMB review at a time. We plan to transfer any burden (related to the FERC Form No. 60A) from the proceeding in Docket No. RM19-12 to the FERC Form No. 60 when possible. Some information on the FERC Form No. 60 is included throughout for background. The FERC-60A only relates to the conversion to XBRL of the FERC Form No. 60, as proposed in RM19-12.

<sup>4</sup> There can only be one pending item per OMB Control No. pending OMB review at a time. We plan to transfer any burden (related to the FERC Form No. 714A) from the proceeding in Docket No. RM19-12 to the FERC Form No. 714 when possible. Some information on the FERC Form No. 714 is included throughout for background. The FERC Form No. 714A only relates to the conversion to XBRL of the FERC Form No. 714, as proposed in RM19-12.

**FERC Form Nos. 1, 1F, and 3Q.**<sup>5</sup> In accordance with sections 304 and 309 of the Federal Power Act and section 10(a) of the Natural Gas Act, FERC is authorized to collect and record data to the extent it considers necessary, and to prescribe rules and regulations concerning accounts, records and memoranda.

Under the existing regulations, FERC jurisdictional entities subject to its Uniform System of Accounts (USofA) must annually file with the Commission a complete set of financial statements, along with other selected financial and non-financial data through the submission of FERC Annual Report Forms Nos. 1 and 1-F. The Form No. 1 is a comprehensive financial and operating report submitted for electric rate regulation, market oversight analysis, and financial audits. Major pertains to utilities and licensees that have, in each of the three previous calendar years, sales or transmission services that exceed one of the following: (1) one million megawatt hours of total annual sales; (2) 100 megawatt hours of annual sales for resale; (3) 500 megawatt hours of annual power exchanges delivered; or (4) 500 megawatt hours of annual wheeling for others (deliveries plus losses).<sup>6</sup> Form No. 1-F is designed to collect financial and operational information from Nonmajor public utilities and licensees. Nonmajor pertains to utilities and licensees that have total annual sales of 10,000 megawatt-hours or more in the previous calendar year and that are not classified as Major.<sup>7</sup>

The FERC Form No. 3-Q is a quarterly financial and operating report for rate regulation, market oversight analysis, and financial audits which supplements the (a) Forms Nos. 1 and 1-F for the electric industry, or the (b) Form Nos. 2 and 2-A for the natural gas industry. The FERC Form No. 3-Q is submitted for electric utilities and licensees reporting Forms No. 1 or 1-F and natural gas companies reporting Forms No. 2 or 2A.<sup>8</sup>

The Commission collects Forms Nos. 1, 1-F, and 3-Q as prescribed in Title 18 CFR (Code of Federal Regulations) Parts 141.1, 141.2, and 141.400 and 260.300. The FERC Forms Nos. 1, 1-F, and 3-Q provide an informative picture of the jurisdictional entities’ financial conditions and other relevant data that are used by FERC and others in making economic judgments about the entity or its industry.

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<sup>5</sup> Unless otherwise specified, the FERC-3Q refers to both the electric and gas versions, which are separate ICs in ROCIS and reginfo.gov.

<sup>6</sup> 18 CFR § 141.1. Nonoperating entities formerly designated as Major and new entities that expect to be in the Major category should file as detailed in 18 CFR § 101, General Instructions (1)(A)(3).

<sup>7</sup> 18 CFR § 141.2. Nonoperating entities formerly designated as Nonmajor and new entities that expect to be in the Nonmajor category should file as detailed in 18 CFR § 101, General Instructions (1)(A)(2).

<sup>8</sup> 18 CFR 260.1(b). For natural gas, “Major” pertains to a company whose combined gas transported or stored for a fee exceed 50 million Dth in each of the three previous calendar years. 18 CFR 260.2(b). “Nonmajor” pertains to a company not meeting the filing threshold for Major, but having total gas sales or volume transactions exceeding 200,000 Dth in each of the three previous calendar years.

**FERC Form No. 2 and FERC Form No. 2A.** Pursuant to sections 8, 10 and 14 of the National Gas Act (NGA), (15 U.S.C. 717g-717m), the Commission is authorized to conduct investigations and collect and record data, and to prescribe rules and regulations concerning accounts, records and memoranda as necessary or appropriate for purposes of administering the NGA. The Commission may prescribe a system of accounts for jurisdictional companies and, after notice and opportunity for hearing, may determine the accounts in which particular outlays and receipts will be entered, charged or credited. The Commission collects Form Nos. 2 and 2A information as prescribed in 18 CFR 260.1 and 18 CFR 260.2.

**FERC Form No. 6 and FERC Form No. 6Q.** Sections 13 and 15 of the Interstate Commerce Act (ICA) authorize the Commission to conduct investigations, collect, and record data in order to carry out certain necessary and useful provisions. The information collected from oil pipeline companies under the requirements of the FERC Form Nos. 6 and 6-Q provide the Commission the ability to implement the statutory provisions of the ICA including the authority to prescribe rules, regulations concerning accounts, records, and memoranda as necessary. The ICA also allows the Commission to prescribe a system of accounts for jurisdictional companies and (after notice) an opportunity for hearing can determine the accounts in which particular outlays and receipts can be entered, charged, or credited.

In 1994, the Commission addressed additional revisions to the Form No. 6 in Order Nos. 571 and 571-A, including a new Page 700 (Annual Cost of Service).<sup>9</sup> Data collected on page 700 is the basis for determining a pipeline’s cost of service and rate base, which are used in tariff filings and the 5-year index.<sup>10</sup>

**FERC Form No. 60A.** In accordance with the Energy Policy Act of 2005 (EPAAct 2005), the Commission implemented the repeal of the Public Utility Holding Company Act of 1935 (PUHCA 1935) and implemented the provisions of a newly enacted Public Utility Holding Company Act 2005 (PUHCA 2005). Pursuant to PUHCA 2005, the Commission requires centralized service companies to file the Form No. 60. The information collected in Form No. 60 enables better monitoring for cross-subsidization, and aids the Commission in carrying out its statutory responsibilities.

**FERC Form No. 714A.** The Federal Power Act authorizes the Commission to collect information from electric utility balancing authorities and planning areas in the United States for the purpose of analyzing power system operations. These analyses estimate the effect of changes in power system operations resulting from the installation of a new generating unit, plant, or transmission facilities, as well as the effects of energy transfers between systems and/or new points of interconnection. Also, these analyses assist with evaluating rates and charges, assessing reliability and other operating attributes in regulatory proceedings, monitoring market

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<sup>9</sup> *Cost of Service Requirements and Filing Requirements for Oil Pipelines*, Order No. 571, FERC Stats. & Regs., Regulation Preambles Jan. 1991- June 1996 ¶ 31,006, at p. 31,169 (1995).

<sup>10</sup> The Commission established an indexing methodology that allows oil pipelines to change their rates subject to certain ceiling levels instead of making cost-of-service filings. The Commission reviews the index level every five years to ensure it adequately reflects changes to industry costs.

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

trends and behaviors, and determining the competitive impacts of proposed mergers, acquisitions, and dispositions. The Commission collects the Form No. 714A information as prescribed in 18 CFR 141.51.

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

Under the NOPR, the Commission is not proposing to change the information currently collected in the VFP Forms, but rather to change the format of the information that is being collected from VFP to XBRL.

A description of how, by whom, and for what purpose the information collected in the VFP Forms is used and the consequences of not collecting the information is provided below.

**FERC Form Nos. 1, 1-F, and 3-Q.** These forms provide information concerning a company’s current performance, compiled using the Commission’s USofA.<sup>11</sup> The forms include a basic set of financial statements: Comparative Balance Sheet, Statement of Income and Statement of Retained Earnings, Statement of Cash Flows, and the Statement of Comprehensive Income and Hedging Activities and supporting schedules containing supplementary information. Electric respondents report revenues and the related quantities of electric sales and electricity transmitted; account balances for all electric operation and maintenance expenses; selected plant cost data; and other statistical information.

Information in the forms is used by the Commission, state regulatory agencies, and others in the review of the financial condition of regulated companies. The information is also used in various rate proceedings, market oversight, the Commission’s audit programs, and the computation of annual charges based on certain schedules contained on the forms.

**FERC Form Nos. 2, 2A, and 3Q (gas).** These forms provide information concerning a company’s current performance, compiled using the Commission’s USofA.<sup>12</sup> Form No. 2 is filed by "Major" natural gas companies that have combined gas transported or stored for a fee that exceeds 50 million Dekatherms in each of the three previous calendar years. Form No. 2-A is filed by "Non-Major" natural gas companies that have total gas sales or volume transactions that exceeds 200,000 Dekatherms, but does not qualify as Major. 3-Q natural gas quarterly respondents include monthly and quarterly quantities of gas transported and associated revenues; storage, terminaling, and processing services; natural gas customer accounts and details of service; and operational expenses, depreciation, depletion and amortization of gas plant.

The forms provide information concerning a company’s past performance and its future prospects and is based on the companies’ financial and other information. The forms contain schedules which include a basic set of financial statements: Comparative Balance Sheet,

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<sup>11</sup> See 18 CFR Part 101 (Uniform System Of Accounts Prescribed For Public Utilities And Licensees Subject To The Provisions Of The Federal Power Act).

<sup>12</sup> See 18 CFR Part 201 (Uniform System Of Accounts Prescribed For Natural Gas Companies Subject To The Provisions Of The Natural Gas Act).

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

Statement of Income and Retained Earnings, Statement of Cash Flows, and the Statement of Comprehensive Income and Hedging Activities. Supporting schedules containing supplementary information are filed, including revenues and the related quantities of products sold or transported; account balances for various operating and maintenance expenses; selected plant cost data; and other information.

The information collected assists the Commission in the administration of its jurisdictional responsibilities and is used by Commission staff, state regulatory agencies, customers, financial analysts and others in the review of the financial condition of regulated companies. The information is also used in various rate proceedings, industry analyses and in the Commission's audit programs and as appropriate, for the computation of annual charges based on Page No. 520 of the Form No. 2. The Commission provides the information to the public, interveners and all interested parties to assist in the proceedings before the Commission.

In addition, the forms provide the Commission, as well as others, with an informative picture of the jurisdictional entities' financial condition along with other relevant data that is used by the Commission in making economic judgments about the entity or its industry. For financial information to be useful to the Commission, it must be understandable, relevant, reliable and timely. The Form Nos. 2 and 2-A financial statements are prepared in accordance with the Commission's USofA and related regulations, and provide data that enables the Commission to develop and monitor cost-based rates, analyze costs of different services and classes of assets, and compare costs across lines of business. The use of a uniform system of accounts permits natural gas companies to account for similar transactions and events in a consistent manner, and communicate those results to the Commission on a periodic basis.

Additionally, the uniformity helps to present accurately the entity's financial condition and produces comprehensive data related to the entity's financial history helping to act as a guide for future action. The uniformity provided by the Commission's USofA and related accounting instructions permits comparability and financial statement analysis of data provided by jurisdictional entities. Comparability of data and financial statement analysis for a particular entity from one period to the next, or between entities, within the same industry, would be difficult to achieve if each company maintained its own accounting records using dissimilar accounting methods and classifications to record similar transactions and events.

In summary, without the information collected in the forms, it would be difficult for the Commission to ensure, as required by the NGA, that a pipeline's rates remain just and reasonable, respond to Congressional and outside inquires and make decisions in a timely manner, particularly to rapidly changing financial conditions of entities subject to its jurisdiction.

**FERC Form Nos. 6 and 6Q.** In order to reduce burden while obtaining the data the Commission needs, there are three thresholds related to the material respondents must file.

1. Each oil pipeline carrier whose annual jurisdictional operating revenues has been \$500,000 or more for each of the three previous calendar years must file the Form No. 6 (18 C.F.R. § 357.2 (a)). Newly established entities must use projected data to determine whether FERC Form No. 6 must be filed. Oil pipeline companies subject to the

provisions of section 20 of the ICA must submit the Form No. 6-Q. 18 C.F.R. § 357.4(b).

2. Oil pipeline carriers exempt from filing the Form No. 6 whose annual jurisdictional operating revenues have been more than \$350,000 but less than \$500,000 for each of the three previous calendar years must prepare and file page 301, “Operating Revenue Accounts (Account 600), and page 700, “Annual Cost of Service Based Analysis Schedule,” of the Form No. 6. When submitting pages 301 and 700, each exempt oil pipeline carrier must include page 1 of the Form No. 6, the Identification and Attestation schedules (18 C.F.R. § 357.2 (a)(2)).
3. Oil pipeline carriers exempt from filing the Form No. 6 and page 301 and whose annual jurisdictional operating revenues were \$350,000 or less for each of the three previous calendar years must prepare and file page 700, “Annual Cost of Service Based Analysis Schedule,” of the Form No. 6.

When submitting page 700, each exempt oil pipeline carrier must include page 1 of the Form No. 6, the Identification and Attestation schedule (18 C.F.R. § 357.2 (a)(3)).

The Commission’s Office of Enforcement (OE) uses the Form Nos. 6 and 6Q data to assist in the implementation of its financial audits and programs, in the continuous review of the financial condition of regulated companies and in the assessment of energy markets. The Office of Energy Markets Regulation (OEMR) uses the data collected for various rate proceedings and economic analyses. The Office of Administrative Litigation (OAL) uses the data collected for background research for use in litigation. The Office of the General Counsel (OGC) uses the data in its programs relating to the administration of the ICA.

The Office of the Executive Director (OED) uses data on Page 301 of the Form No. 6 to compute annual charges which are then assessed against oil pipeline companies to recover the Commission's annual costs as mandated by Commission Order No. 472. The annual charges are required by Section 3401 of the Omnibus Budget Reconciliation Act of 1986.

The majority of state regulatory commissions use the Form Nos. 6 and 6Q and the FERC USofA<sup>13</sup> to satisfy their reporting requirements for those companies under their jurisdiction. In addition, the public uses the data to assist in monitoring rates, the financial condition of the oil pipeline industry, and in the assessing energy markets.

Data from FERC Form No. 6 facilitates the calculation of the actual rate of return on equity. The actual rate of return on equity is particularly useful information when evaluating a pipeline’s rates.

The ICA mandates the collection of information needed by the Commission to perform its regulatory responsibilities in the setting of just and reasonable rates. The Commission could be held in violation of the ICA if the information was not collected.

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<sup>13</sup> See 18 CFR Part 352, Uniform Systems Of Accounts Prescribed For Oil Pipeline Companies Subject To The Provisions Of The Interstate Commerce Act.

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

**FERC Form No. 60A.** The proposed temporary information collection no., FERC Form No. 60A, covers the proposed industry burden to convert to filing the Form No. 60 using XBRL, as discussed in the NOPR in RM19-12. The following information provides some background on the FERC Form No. 60 collection.

Form No. 60 is an annual reporting requirement under 18 CFR 366.23 for centralized service companies. The report’s function is to collect financial information (including balance sheet, assets, liabilities, billing and charges for associated and non-associated companies) from centralized service companies subject to the jurisdiction of the FERC. Unless Commission rule exempts or grants a waiver pursuant to 18 CFR 366.3 and 366.4 to the holding company system, every centralized service company in a holding company system must prepare and file electronically with the Form No. 60, pursuant to the General Instructions in the form.

**FERC Form No. 714A.** The proposed temporary information collection no. FERC Form No. 714A covers the proposed industry burden to convert to filing FERC-714 using XBRL, as discussed in the NOPR in RM19-12. The following information provides some background on the Form No. 714 collection.

The Commission uses the Form No. 714 data to analyze power system operations. The result of these analyses estimate the effect of changes in power system operations resulting from the installation of a new generating unit or plant, transmission facilities, energy transfers between systems, and/or new points of interconnections. The Form No. 714 data assists in providing a broad picture of interconnected balancing authority area operations including comprehensive information of balancing authority area generation, actual and scheduled inter-balancing authority area power transfers, and net energy for load, summer and winter generation peaks and system lambda. The Commission also uses the data to prepare status reports on the electric utility industry including a review of inter-balancing authority area bulk power trade information.

The Commission uses the collected data from planning areas to monitor forecasted demands by electric utilities with fundamental demand responsibilities and to develop hourly demand characteristics.

The consequence of not collecting the information contained within the Form No. 714 would be impeded support for the Commission’s regulatory functions associated with the processing of rate applications and cases, proposed mergers and dispositions of jurisdictional facilities, and understanding of the planning and operational needs of the grid. The Commission, other federal and state regulatory agencies, transmission users, and the public may lose a capability of monitoring the operations of the wholesale electric market for possible abuses of market power and the environment, and the efforts of electric utility entities in ensuring that resource capabilities could sufficiently and reliably meet system peak and forecast loads.

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

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

The purpose of the Forms Refresh effort and this NOPR is to transition from a software platform which is no longer supported by the vendor to a more modern and efficient approach. The use of XBRL should make the information in these forms easier for filers and data users to analyze and assist in automating regulatory filings and business information processing. In addition, the Commission believes that transitioning from the current Visual FoxPro system to XBRL will decrease the costs, over time, of preparing the necessary data for submission and complying with future changes to filing requirements set forth by the Commission.

**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**

Under the NOPR, the Commission is not proposing to change the information currently collected in the VFP Forms, but rather to change the format of the information that is being collected from VFP to XBRL.

A description of the Commission’s efforts to periodically review filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden is provided below.

**FERC Form Nos. 1, 1-F, 3-Q, 2, 2-A, 6 and 6-Q.** While some jurisdictional entities may file similar information with the Securities and Exchange Commission (SEC), the level of detail concerning assets, liabilities, stockholders' equity along with the revenues, expenses, gains, and losses is different for the Commission and the SEC. The financial statements filed with the SEC are on a consolidated, or parent company basis. The Commission notes that a majority of the jurisdictional entities that it regulates files financial information with the SEC that consolidates their assets, liabilities and profits with their parent company, or combine the regulated and unregulated operations in the reports to the SEC. While consolidation is appropriate for SEC reporting, the Commission requires more detailed information concerning the results of operations, and the financial position of each jurisdictional entity in order to meet its regulatory needs. Therefore, the Commission has required jurisdictional entities to file financial information on a jurisdictional entity level basis using a uniform system of accounts.

**FERC Form No. 714A.** As relates to the Form No.714, the U.S. Energy Information Administration (EIA) implemented a data collection of hourly electric power data from all entities in the contiguous United States that are listed in the NERC Compliance Registry as a balancing authority. The EIA-930: Hourly and Daily Balancing Authority Operations Report, requires the filing of hourly balancing authority operating data including day-ahead demand forecast, actual demand, net generation, and net metered tie line flow to EIA. The data is posted onto a publicly available Internet website and can be used to monitor the near-real time status

and trends of the electric power industry and to support the enhancement of electric system operations.

However, the EIA-930 does not include more granular data on generating plant capabilities, identification of adjacent interconnections, or system lambda. Also, there are no other Federal agencies responsible for obtaining planning area-level data consisting of forecasted demands and hourly demand characteristics from electric utility entities with fundamental demand responsibilities.

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

**FERC Form Nos. 1, 1-F, 3-Q, 2, and 2-A.** As noted previously, the Form No. 1 is filed by major utilities or licensees and as such does not apply to small entities. The Form No. 1-F is filed by public utilities with total sales of 10,000 megawatt-hours or more that are not major utilities. The Form No. 3-Q is filed only by electric or gas companies that file Forms Nos. 1, 1-F, 2, or 2-A, and therefore excludes companies that do not qualify as Major or Nonmajor. If the reporting requirements represent an undue burden on small businesses, the affected entity may seek a waiver of the disclosure requirements from the Commission. However, the Commission believes that the information collected on these forms is the minimum necessary to provide a meaningful review of financial conditions and would impose the least possible burden on entities.

**FERC Form Nos. 6 and 6-Q.** The filing threshold for the Form No. 6 is divided into three categories, based on the annual jurisdictional operating revenues of the respondent company. (See #2 above.) Smaller companies are required to file only certain components of the Form No. 6. The Commission concluded that exempting a certain percentage of oil companies from filing the full FERC Form No. 6 in its entirety will not compromise its ability to gather meaningful data upon which to base its regulation of the oil pipeline industry.

**FERC Form No. 60A.** The information requirements under Form No. 60 apply to jurisdictional entities. Companies that do not qualify to file Form No. 60 use the FERC-61 to reduce burden on those small entities. In general, holding companies to which the rules apply are not small entities.

**FERC Form No. 714A.** For the Form No. 714, the Commission requires each balancing authority area and each electric utility with its planning area annual peak demand greater than 200 megawatts (MW) to provide the Form No. 714 filing as a means of reducing burden for small entities. This 200 MW threshold can result in a slight variation year to year in the number of balancing authorities and planning areas that are required to file the FERC-714. Small entities may have personnel constraints, and a significant increase in burden may be caused by requiring these entities to submit the Form No. 714 filing. Thus, setting a 200 MW threshold exempts many of these small entities from having to respond to this collection.

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

**FERC Form Nos. 1, 1-F, and 3-Q.** The existing Form Nos. 1 and 1-F are required by the Commission to be submitted annually. Annual reporting is consistent with the reporting to the companies' own management, the Internal Revenue Service, state and other Federal agencies' (including Office of Management and Budget) requirements.

The Form No. 3-Q filings provide quarterly updates to supplement the Form Nos 1, 1-F, 2, and 2A. This quarterly information provides the Commission and the public with updated and timely information regarding a company's financial and operational status. If the collections were conducted less frequently, the Commission would have difficulty performing its mandated review responsibilities with respect to the assessment of the financial condition of public utilities and licensees.

**FERC Form Nos. 2 and 2A.** Annual reporting is consistent with the reporting companies do to their own management, the Internal Revenue Service, state and other Federal agencies. If the form were filed less frequently, the Commission and third parties would have difficulty responding to and making fully informed decisions in a timely manner particularly to rapidly changing financial conditions of entities subject to its jurisdiction.

**FERC Form Nos. 6 and 6Q.** The Commission is authorized by statute to collect this information on an annual and quarterly basis. If the collections were conducted less frequently, the Commission would have difficulty performing its mandated review responsibilities with respect to the assessment of the financial conditions of oil pipeline companies. The continued use of the information collections ensures that the Commission has the financial, operational, and ratemaking information needed to carry out its regulatory responsibilities to monitor the oil pipeline industry.

**FERC Form No. 60A.** The Form No. 60 is required for statutory purposes and cannot be discontinued or collected less frequently.

**FERC Form No. 714A.** The FERC-714 information collected is used on a continual basis by: (1) the Commission staff to review rates and charges, reliability issues and market structure relationships; (2) the U.S. Environmental Protection Agency to monitor the environmental impacts of electric generation as the power industry has become more competitive; (3) the U.S. Energy Information Administration to model various electricity markets; and (4) other federal and state regulatory authorities, market participants and the public to access and monitor the wholesale electric market and to determine the competitive impacts of proposed mergers and acquisitions.

Some of the information in particular filings may change markedly from one year to the next. If the information were collected less frequently, the Commission would have difficulty performing its mandated review and oversight in a timely and accurate manner.

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

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

There are no special circumstances related to these information collections, other than those mentioned below.

**FERC Form No. 60A.** The Commission assumed responsibility for the Form No. 60 reporting requirements, formerly required by the U.S. Securities and Exchange Commission (SEC), and streamlined those requirements. These documents are necessary for the Commission to ensure that it is able to perform its oversight and review responsibilities. Rate cases are not generally scheduled, thus retention of data beyond three years is necessary for staff to adequately assess data submitted by entities including the holding and service companies. Similarly, complaints can occur randomly, and data must be available to adequately address any allegations that arise.

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

The Commission noted that the North American Energy Standards Board (NAESB) had helped facilitate meetings to develop the Commission’s eTariff system, and, in Docket No. AD15-11, the Commission directed Commission staff to seek NAESB’s assistance in the process of developing standards for the submission of the VFP Forms to the Commission in the new XML format. NAESB facilitated 18 meetings during which the transition of the forms was discussed.

Commission staff also discussed the filing of financial forms with other federal agencies.

Each FERC rulemaking (both proposed and final rules) is published in the Federal Register thereby providing public utilities and licensees, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments or suggestions concerning the proposed collections of data. The NOPR in Docket RM19-12 is posted in the Commission’s eLibrary system and was published by the Federal Register at 84 FR 1412 (2/4/2019).

#### **9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS**

There are no payments or gifts to respondents.

#### **10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

The Commission does not consider the information collected in filings to be confidential. However, the Commission will consider specific requests for confidential treatment (e.g. Critical Energy/Electric Infrastructure Information [CEII] or non-public) to the extent permitted by law.<sup>14</sup> The Commission will review each request for confidential treatment on a case-by-case basis.

#### **11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES,**

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<sup>14</sup> 18 C.F.R. § 388.112. More information on the CEII definition, program and requirements is posted at <http://www.ferc.gov/legal/ceii-foia/ceii.asp>.

**RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY  
CONSIDERED PRIVATE.**

There are no questions of a sensitive nature.

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

The estimated changes to the burden and cost of the information collections as proposed by the NOPR follow.

The compliance burden estimates for the proposed revisions to the filing process for the VFP Forms are based on several assumptions and unique assessments for each form. However, all regulated entities required to submit the VFP Forms would have to map the reporting information to the Commission’s standard XBRL taxonomy and create a final submission file(s). The following burden estimates associated with the proposal in this NOPR are based on the one-time implementation of an XBRL-based reporting system (Year 1), and an ongoing estimate for maintenance of the XBRL-based reporting system (Years 2 and 3). The original information collection burden for each individual form referenced in the NOPR remains unchanged.

Based on discussions with other federal agencies, subject matter experts in XBRL data collection and the VFP Forms, and entities that have prepared their financial information in XBRL, we estimate that filers would incur the following average burden hours. We conservatively estimate that this average burden will be approximately 80 percent of the burden that the U.S. Securities and Exchange Commission (SEC) estimated that filers would incur when the SEC mandated reporting of financial information in XBRL in its final rule on Interactive Data to Improve Financial Reporting (issued on January 30, 2009):

- XBRL Form Nos. 1, 1-F, 3-Q electric, 2, 2-A, 3-Q natural gas, 6, and 6-Q<sup>15</sup>
  - Burden hours to tag in XBRL:
    - 100 hours to prepare and submit the first filing using XBRL; and
    - 14 hours for each subsequent filing in XBRL.
- Form No. 60A
  - Burden hours to tag in XBRL:
    - 20 hours to prepare and submit the first filing made in XBRL; and
    - 3 hours for each subsequent filing.
- Form No. 714A
  - Burden hours to tag in XBRL:
    - 15 hours to prepare and submit the first filing made in XBRL; and

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<sup>15</sup> The internal burden hours for tagging Form Nos. 1 and 3-Q electric are combined because the annual information reported in Form No. 1 is a compilation of the information reported in the prior three quarters in Form Nos. 3-Q electric in addition to the fourth quarter. Similarly, we have combined the number of internal burden hours for tagging the Form Nos. 2 and 3-Q natural gas and the Form Nos. 6 and 6-Q, respectively, because the annual Form Nos. 2 and 6 are based on a compilation of the information reported in the prior three quarters in Form Nos. 3-Q natural gas and 6-Q in addition to the fourth quarter.

- 2 hours for each subsequent filing.

RM19-12-000 NOPR One-Time Implementation Burden, in Year 1						
Requirement	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response <sup>16</sup> (4)	Total Annual Burden Hours & Cost <sup>17</sup> (3)*(4)=(5)	Annual Cost per Respondent (\$) (5)÷(1)
Form No. 1	207	1	207	100 hrs.; \$6,931	20,700 hrs.; \$1,434,717	\$6,931
Form No.1-F	5	1	5	100 hrs.; \$6,931	500 hrs.; \$34,655	\$6,931
Form No. 3-Q electric	212	3	636	No Change <sup>18</sup>	No Change	No Change
Form No. 2	92	1	92	100 hrs.; \$6,931	9,200 hrs.; \$637,652	\$6,931
Form No. 2-A	73	1	73	100 hrs.; \$6,931	7,300 hrs.; \$505,963	\$6,931
Form No. 3-Q natural gas	165	3	495	No Change	No Change	No Change
Form No. 6	244	1	244	100 hrs.; \$6,931	24,400 hrs.; \$1,691,164	\$6,931
Form No. 6-Q	244	3	732	No Change	No Change	No Change
Form No. 60A	39	1	39	20 hrs.; \$1,386.20	780 hrs.; \$54,062	\$1,386.20
Form No. 714A	176	1	176	15 hrs.; \$1,039.65	2,640 hrs.; \$182,977	\$1,039.65
<b>Total for Implementation Burden</b>			836 <sup>19</sup>		65,520 hrs.; \$4,541,190	

<sup>16</sup> The average burden and cost per response is calculated using the hourly wage figures described in detail below.

<sup>17</sup> Every figure in this column is rounded to the nearest dollar.

<sup>18</sup> There is no change to the internal burden hours for filing Form Nos. 3-Q electric, 3-Q natural gas, and 6-Q because the burden hours associated with these quarterly forms are included in the burden hours calculated for filing Form Nos. 1, 2, and 6.

<sup>19</sup> This total number of responses does not include the responses for Form Nos. 3-Q electric, 3-Q natural gas, or 6-Q because the burden hours for tagging Form Nos. 1, 2, and 6 include the number of hours required to tag the quarterly responses. The quarterly filings are generally a subset of the annual filings.

RM19-12-000 NOPR						
Annual Ongoing System Maintenance Burden, Starting in Year 2						
Requirement	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response <sup>20</sup> (4)	Total Annual Burden Hours & Cost <sup>21</sup> (3)*(4)=(5)	Annual Cost per Respondent (\$) (5)÷(1)
Form No. 1	207	1	207	14 hrs.; \$970.34	2,898 hrs.; \$200,860	\$970.34
Form No.1-F	5	1	5	14 hrs.; \$970.34	70 hrs.; \$4,852	\$970.34
Form No. 3-Q electric	212	3	636	No Change	No Change	No Change
Form No. 2	92	1	92	14 hrs.; \$970.34	1,288 hrs.; \$89,271	\$970.34
Form No. 2-A	73	1	73	14 hrs.; \$970.34	1,022 hrs.; \$70,835	\$970.34
Form No. 3-Q natural gas	165	3	495	No Change	No Change	No Change
Form No. 6	244	1	244	14 hrs.; \$970.34	3,416 hrs.; \$236,763	\$970.34
Form No. 6-Q	244	3	732	No Change	No Change	No Change
Form No. 60A	39	1	39	3 hrs.; \$207.93	117 hrs.; \$8,109	\$207.93
Form No. 714A	176	1	176	2 hrs.; \$138.62	352 hrs.; \$24,397	\$138.62
<b>Total for Ongoing Burden</b>			836 <sup>22</sup>		9,163 hrs.; \$635,087	

The Commission’s estimates for the hourly wage figure (as related to the implementation and ongoing burden estimate) are based on the Bureau of Labor Statistics data (for the Utilities sector, at [http://www.bls.gov/oes/current/naics2\\_22.htm](http://www.bls.gov/oes/current/naics2_22.htm), plus benefits information at <http://www.bls.gov/news.release/ceec.nr0.htm>). The salaries (plus benefits) for the eight occupational categories are:

- Management (Occupation Code: 11-0000): \$94.28/hour
- Information Security Analysts (Occupation Code: 15-1122): \$60.90/hour
- Legal (Occupation Code: 23-0000): \$143.68/hour
- Office and Administrative Support: \$41.34/hour
- Computer and Information Systems Manager (Occupation Code: 11-3021): \$96.51
- Management Analyst (Occupation Code: 13-1111): \$63.32/hour

20 The average burden and cost per response is calculated using the hourly wage figures described in detail below.

21 Every figure in this column is rounded to the nearest dollar.

22 This total number of responses does not include the responses for Form Nos. 3-Q electric, 3-Q natural gas, or 6-Q because the burden hours for tagging Form Nos. 1, 2, and 6 include the number of hours required to tag the quarterly responses. The quarterly filings are generally a subset of the annual filings.

- Computer and Information Systems Analyst (Occupation Code: 15-1120): \$66.47/hour
- Accountants and Auditors (Occupation Code: 13-2011): \$56.59/hour

The average hourly cost for all eight of these categories is calculated assuming the following weights in correspondence to effort applied by each respective occupation:

- Management (Occupation Code: 11-0000): 5%
- Information Security Analysts (Occupation Code: 15-1122): 5%
- Legal (Occupation Code: 23-0000): 5%
- Office and Administrative Support: 10%
- Computer and Information Systems Manager (Occupation Code: 11-3021): 10%
- Management Analyst (Occupation Code: 13-1111): 5%
- Computer and Information Systems Analyst (Occupation Code: 15-1120): 35%
- Accountants and Auditors (Occupation Code: 13-2011): 25%

Overall, the average hourly cost uses the following calculation with all seven occupations and their respective weights included:

$$[(\$94.28/\text{hour} * 0.05) + (\$60.90/\text{hour} * 0.05) + (\$143.68/\text{hour} * 0.05) + (\$41.34/\text{hour} * 0.1) + (\$96.51/\text{hour} * 0.1) + (\$63.32/\text{hour} * 0.05) + (\$66.47/\text{hour} * 0.35) + (\$56.59/\text{hour} * 0.25)] \div 8 = \$69.31.$$

- The number of annual responses related to both the implementation and ongoing burden is 836 responses.<sup>23</sup>
- The implementation burden will be 65,520 hours for Year 1.
- The ongoing burden in Years 2 and 3 will be 9,163 hours per year.
- We are averaging the figures for Years 1-3. The responses and burden for Years 1-3 for both the implementation and ongoing burden are as follows:
  - o 836 responses/year;
  - o  $[(65,520 \text{ hours for Year 1}) + (9,163 \text{ hours for Year 2}) + (9,163 \text{ hours for Year 3})] \div 3 \text{ years} = 27,949 \text{ hours/year (annual average for Years 1-3).}$

### 13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

Based on the number of filers we expect to be subject to the proposed requirements, the number of filings that we expect those filers to make and the burden hours and out-of-pocket cost estimates described, we estimate that the average yearly burden of the proposed requirements over the first three years would be \$2,145,575 in out-of-pocket expenses per year. This would be incurred by an average of 836 filers for an average yearly burden per filer of \$2,566 in out-of-pocket expenses over Years 1-3. These numbers are derived as discussed below.

#### *Out-of-pocket expenses:*

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<sup>23</sup>This total number of responses does not include the responses for Form Nos. 3-Q electric, 3-Q natural gas, or 6-Q because the burden hours for tagging Form Nos. 1, 2, and 6 include the number of hours required to tag the quarterly responses. The quarterly filings are generally a subset of the annual filings.

Year 1: Due to the relatively recent development of the XBRL technology, its fairly limited implementation at other agencies, and the substantial differences in the data collected among agencies and corresponding final code to implement XBRL-based reporting systems, the Commission does not have sufficient data to specifically quantify the cost of implementing data tagging using XBRL in Year 1. Further, the complexity of each filer’s current reporting system and the individual methods chosen for tagging data may vary considerably by filer, making estimates for out of pocket costs difficult to calculate for implementing XBRL in Year 1. Thus, the estimates for the cost of implementation are reflected in the Year 1 burden hours estimate for each form.

In Years 2 and 3 (following the first year of implementation), we estimate that filers would incur the following out-of-pocket expenses for software, consulting, or filing agent services used:

- XBRL Form Nos. 1, 1-F, 3-Q electric, 2, 2-A, 3-Q natural gas, 6, and 6-Q:
  - Out-of-pocket cost for software and filing agent services: \$4,912 for each filing.<sup>24</sup>
  - Total out-of-pocket cost for software and filing agent services per year: (621 respondents) \* (\$4,912 for each filing) = \$3,050,352.
- Form No. 60A:
  - Out-of-pocket cost for software and filing agent services: \$982 for each filing.<sup>25</sup>
  - Total out-of-pocket cost for software and filing agent services per year: (39 respondents) \* (\$982 for each filing) = \$38,298.
- Form No. 714A
  - Out-of-pocket cost for software and filing agent services: \$737 for each filing.<sup>26</sup>

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24 This cost is estimated based on 16% of the out-of-pocket cost for software and filing agent services that the SEC estimated that filers would incur when the SEC mandated reporting of financial information in XBRL in its final rule on Interactive Data to Improve Financial Reporting (issued on January 30, 2009). (See page 117 of the SEC Final Rule).

25 This cost is estimated based on 16% of the out-of-pocket cost for software and filing agent services that the SEC estimated that filers would incur when the SEC mandated reporting of financial information in XBRL in its final rule on Interactive Data to Improve Financial Reporting (issued on January 30, 2009). (See page 117 of the SEC Final Rule). This is a considerably smaller collection than the others that are grouped together, yet this is still a conservatively high estimate based on the number of fields in the collection, its length, and its complexity.

26 This cost is estimated based on 12% of the of the out-of-pocket cost for software and filing agent services that the SEC estimated that filers would incur when the SEC mandated reporting of financial information in XBRL in its final rule on Interactive Data to Improve Financial Reporting (issued on January 30, 2009). (See page 117 of the Final Rule). This is an even smaller collection than the other forms, yet this is still a conservatively high estimate based on the number of fields in the collection, its length, and its complexity.

- o Total out-of-pocket cost for software and filing agent services per year: (176 respondents) \* (\$737 for each filing) = \$129,712.

In Question 15, below, the “annual cost burden” imposed annually in Years 2 and 3 is averaged over Years 1-3 and is provided for each collection.

#### 14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and processing of filings’<sup>27</sup> is based on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of any actual filings submitted in response to the information collections. The number of federal FTEs is not expected to change due to the NOPR in RM19-12. (The corresponding annual and hourly FERC costs use the figures for 2018, as noted.)

The Paperwork Reduction Act (PRA) Administrative Cost<sup>28</sup> is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

The estimated annualized cost to the Federal Government follows.<sup>29</sup>

<b>Information Collection</b>	<b>Full-Time FERC Staff Equivalents (FTEs) for 'Analysis &amp; Processing of Filings' --The Staff expects no change due to the NOPR in RM19-12.</b>	<b>FERC Staff Cost of Analysis &amp; Processing of Filings (FTEs * \$164,820/year)</b>	<b>PRA Administrative Cost (\$4,931 per collection)</b>	<b>Estimated Annual Federal Cost (rounded)</b>
<b>FERC-1, FERC-1F, &amp; FERC-3Q (electric and gas)</b>	4.0000	\$659,280.00	\$19,724.00	\$679,004.00
<b>FERC-2</b>	0.8400	\$138,448.80	\$4,931.00	\$143,379.80
<b>FERC-2A</b>	0.5800	\$95,595.60	\$4,931.00	\$100,526.60

27 The estimate uses the FERC’s FY 2018 average annual salary plus benefits of one FERC FTE (full-time equivalent [\$164,820 per year or \$79.00 per hour]). (These estimates were updated in May 2018.)

28 This estimate was updated May 2018.

29 The federal costs for the FERC-1, FERC-1F, and FERC-3Q (for both electric and gas) will be included under the ICR for FERC-1 in ROCIS and reginfo.gov.

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
 NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
 UPDATED 3/14/2019

<b>FERC-6</b>	0.2500	\$41,205.00	\$4,931.00	\$46,136.00
<b>FERC-6Q</b>	0.5000	\$82,410.00	\$4,931.00	\$87,341.00
<b>*FERC-60A</b>	0.0000	\$0.00	\$4,931.00	\$4,931.00
<b>*FERC-714A</b>	0.0000	\$0.00	\$4,931.00	\$4,931.00
<b>Total FERC Costs related to 'Analysis and Processing of Filings' and 'PRA Administration'</b>				\$1,066,249.40
<b>FERC IT development &amp; maintenance costs</b>				This information is Procurement sensitive and not available at this time.
<p>*Note that Federal FTE costs for the FERC-60A are included in the current Federal FTE costs for FERC-60 (0.5 FTE) and not included here. Similarly, the Federal FTE costs for the FERC-714A are included in the current Federal FTE costs for FERC-714 (0.1923 FTE) and not included here.</p>				

The FERC cost for IT development, implementation, and maintenance is procurement sensitive information that cannot be conveyed to the public at this time.

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

FERC is proposing to transition from the current use of the VFP software, which is no longer supported by its developer, to a type of Extensible Markup Language called eXtensible Business Reporting Language (XBRL). The XBRL standard would be used to file the Commission’s VFP Forms. The use of XBRL should make the information in these forms easier for filers and data users to analyze and assist in automating regulatory filings and business information processing. In addition, the Commission believes that transitioning from the current VFP system to XBRL will decrease the costs, over time, of preparing the necessary data for submission and complying with future changes to filing requirements set forth by the Commission. The Commission is also proposing to revise its regulations to require filers of Form No. 1-F to file their report in electronic media pursuant to 18 CFR 385.2011.

The following table shows the changes and is based on ROCIS (and reginfo.gov) metadata.

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
 NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
 UPDATED 3/14/2019

<b>Information Collection</b>		<b>Total Request</b>	<b>Previous y Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Average Annual Change Due to Agency Discretion (Burden changes [implementation and ongoing maintenance] are being averaged over Years 1-3)</b>
<b>FERC-1</b>	Annual Number of Responses	207	210	-3.000	
	Annual Time Burden (Hr.)	254,112	245,280		8,832.000
	Annual Cost Burden (\$)	\$677,856.00	\$0.00		\$677,856.00
<b>FERC-1F</b>	Annual Number of Responses	5	5	0.000	
	Annual Time Burden (Hr.)	823	610		213.333
	Annual Cost Burden (\$)	\$16,373.33	\$0.00		\$16,373.33
<b>FERC-3Q electric</b>	Annual Number of Responses	636	639	-3.000	
	Annual Time Burden (Hr.)	107,352	107,352		0.000
	Annual Cost Burden (\$)	\$694,229.33	\$0.00		\$694,229.33
<b>FERC-3Q gas</b>	Annual Number of Responses	495	501	-6.000	
	Annual Time Burden (Hr.)	83,667	83,667		0.000
	Annual Cost Burden (\$)	\$540,320.00	\$0.00		\$540,320.00
<b>FERC-2</b>	Annual Number of Responses	92	92	0.000	
	Annual Time Burden (Hr.)	153,793	149,868		3,925.330

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
 NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
 UPDATED 3/14/2019

	Annual Cost Burden (\$)	\$301,269.33	\$0.00		\$301,269.33
<b>FERC-2A</b>	Annual Number of Responses	73	66	7.000	
	Annual Time Burden (Hr.)	19,839	16,724		3,114.666
	Annual Cost Burden (\$)	\$239,050.67	\$0.00		\$239,050.67
<b>FERC-6</b>	Annual Number of Responses	244	198	46.000	
	Annual Time Burden (Hr.)	42,289	31,878		10,410.667
	Annual Cost Burden (\$)	\$799,018.67	\$0.00		\$799,018.67
<b>FERC-6Q</b>	Annual Number of Responses	732	525	207.000	
	Annual Time Burden (Hr.)	78,750	78,750		0.000
	Annual Cost Burden (\$)	\$799,018.67	\$0.00		\$799,018.67
<b>FERC-60A</b> [does not include figures for FERC-61 or FERC-555A, not affected by NOPR]	Annual Number of Responses	39	0	0.000	39.000
	Annual Time Burden (Hr.)	338	0		338.000
	Annual Cost Burden (\$)	\$25,532.00	\$0.00		\$25,532.00
<b>FERC-714A</b>	Annual Number of Responses	176	0		176.000
	Annual Time Burden (Hr.)	1,115	0		1,114.667
	Annual Cost Burden (\$)	\$86,474.67	\$0.00		\$86,474.67

*Note: "Annual Cost burden" is the out-of-pocket non-burden hour expenses which filers are estimated to incur in Years 2 & 3 and beyond. Those costs are being averaged over Years 1-3.*

Ten (10) FERC Information Collections (“VFP Forms”), as detailed on pages 1-2  
NOPR (issued 1/17/2019) in Docket No. RM19-12; RIN 1902-AF58  
UPDATED 3/14/2019

The total number of responses does not include the responses for Form Nos. 3-Q electric, 3-Q natural gas, or 6-Q because the burden hours for tagging Form Nos. 1, 1-F, 2, 2-A, and 6 include the number of hours required to tag the quarterly responses. The quarterly filings are generally a subset of the annual filings.

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

There is no publication of data.

#### **17. DISPLAY OF EXPIRATION DATE**

The expiration dates are posted on [ferc.gov](http://www.ferc.gov/docs-filing/info-collections.asp) at <http://www.ferc.gov/docs-filing/info-collections.asp> and on the forms where applicable.

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

There are no exceptions.