**Justification For Non-Material Or Non-Substantive Change**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-725R (Mandatory Reliability Standards: BAL Reliability Standards), as discussed in Docket No. RD18-7.[[1]](#footnote-1) The communications (and related burden) are already covered under FERC-725R, and the additional information is de minimis. Therefore the Commission is not making a program change to the burden estimate.

The reporting and recordkeeping requirements (and corresponding burden per response) are not changing due to Docket No. RD18-7. However we are adjusting the number of respondents to reflect normal fluctuations in industry (e.g., companies merging or splitting, or entering or leaving the industry). The decrease of 6 respondents [to 99 (from 105) for BAL-002-3] reduces responses by 12 and burden hours by 72.

The Commission is submitting this to OMB as a non-material or non-substantive change to a currently approved collection.

1. The new version of the standard (BAL-002-3), approved on 9/25/2018 in Docket No. RD18-7 (posted at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15049739>) replaces the earlier version (Reliability Standard BAL-002-2, approved in Order 835, issued 1/19/2017, at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=14469204>).

The 60-day Notice was issued 9/28/2018 (at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15053916>) and published in the Federal Register (83 FR 50652, 10/9/2018). No public comments were received.

The 30-day Notice was issued on 3/5/2019 (at <https://elibrary.ferc.gov/idmws/common/OpenNat.asp?fileID=15175019>) and is being published in the Federal Register. [↑](#footnote-ref-1)