

Supporting Statement for
FERC-715, Annual Transmission Planning and Evaluation Report

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve **FERC-715, Annual Transmission Planning and Evaluation Report**, for a three year period. FERC-715 (OMB Control No. 1902-0171) is an existing Commission data collection, as stated by 18 Code of Federal Regulations (CFR) 141.300.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Energy Policy Act of 1992 provided the Commission authority with which it may mandate bulk power transmission owners to provide access to their transmission grids to third parties when requested. This allowed transmission systems to be more accessible to outside customers. In spite of the added accessibility, transmission owners retained a flexibility of service that transmission customers did not also receive. Moreover, timely permission to use the transmission grid did not occur since the Commission had to review requests on a case-by-case basis. To remedy these problems, the Commission issued Order No. 888¹. Order No. 888 required utilities owning bulk power transmission facilities to treat any of their own wholesale and purchases of energy over their own transmission facilities under the same transmission tariffs they apply to others.

The Energy Policy Act of 2005 further granted significant new responsibilities and authority to discharge these responsibilities by modifying the Federal Power Act (FPA), the Natural Gas Act, and the Public Utility Regulatory Policies Act of 1978 (PURPA). These new responsibilities included (but not limited to):

- Overseeing the reliability of the nation's electricity transmission grid;
- Implementing new tolls (including penalty authority) to prevent market manipulation;
- Providing rate incentives to promote electric transmission investment;
- Supplementing state transmission siting efforts in national interest electric transmission corridors and;
- Reviewing certain holding company mergers and acquisitions involving electric utility facilities as well as certain public utility acquisitions of generating facilities.

FPA Section 213² requires each transmitting utility that operates non-radial integrated transmission system facilities rated above 100 kilovolts (kV) to submit annually:

- Contact information for the FERC-715;
- Base case power flow data (if it does not participate in the development and use of regional power flow data);
- Transmission system maps and diagrams used by the respondent for transmission planning;

¹ 75 FR 61080

² 16 USC 842l (Chapter 12)

- A detailed description of the transmission planning reliability criteria used to evaluate system performance for time frames and planning horizons used in regional and corporate planning;
- A detailed description of the respondent's transmission planning assessment practices (including, but not limited to, how reliability criteria are applied and the steps taken in performing transmission planning studies); and
- A detailed evaluation of the respondent's anticipated system performance as measured against its stated reliability criteria using its stated assessment practices.³

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

The FERC-715 enables the Commission to use the information as part of their regulatory oversight functions which includes:

- The review of rates and charges;
- The disposition of jurisdictional facilities;
- The consolidation and mergers;
- The adequacy of supply and;
- Reliability of the nation's transmission grid.

The FERC-715 enables the Commission to facilitate and resolve transmission disputes. Additionally, the Office of Electric Reliability (OER) uses the FERC-715 data to help protect and improve the reliability and security of the nation's bulk power system. OER oversees the development and review of mandatory reliability and security standards and ensures compliance with the approved standards by the users, owners, and operators of the bulk power system. OER also monitors and addresses issues concerning the nation's bulk power system, including assessments of resource adequacy and reliability.

Without the FERC-715 data, the Commission would be unable to evaluate planned projects or requests related to transmission.

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

The Commission allows the FERC-715 application to be eFiled.

For current information on the FERC-715, submission guidelines, and instructions, see <http://www.ferc.gov/docs-filing/forms/form-715/overview.asp> .

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY

³ <http://www.ferc.gov/docs-filing/forms/form-715/overview.asp>

AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2.

The Commission published a notice in the Federal Register⁴ to help identify any duplication of the information in FERC-715. The Commission received one comment, which is summarized and addressed in Question 8, below. No similar information can be used or modified. There are no other Federal agencies responsible for the collection of power flow simulation data, transmission line diagrams, or detailed transmission planning reports.

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

The Commission uses eFiling for the FERC-715 as a means of reducing burden for respondents including small entities.

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

The Commission continually uses the information collected to review reliability issues and market structure relationships. The Commission also uses the data to review merger analysis. The United States Department of Justice (DOJ) uses the data for merger analysis and transmission line relief (TLR) calculation. The Energy Information Administration (EIA) uses the data to model various electricity markets. Finally, state regulatory authorities and potential transmission customers use the data to assess whether transmission capacity is available.

The Commission would be unable to perform its mandated review in a timely and accurate manner if they collected this information less frequently.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances related to this collection.

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

In accordance with OMB requirements, the Commission published a 60-day notice^{Error: Reference source not found} providing an opportunity for public comment. The Commission received one comment.

Summary of Public Comment: In response to the Notice of Information Collection and Request for Comments published in the Federal Register on December 27, 2018, the

⁴ 83 FR 66697, December 27, 2018

Commission received one comment from the American Public Power Association (APPA). The comment recommended enhancing the current FERC Form No. 715 collection process to have each of the six submission parts better segregated from each other to allow for more granular responses to data requests and limit the release of components of the report which are Critical Energy/Electric Infrastructure Information (CEII).

FERC Response: These recommendations will be taken under consideration in the event of potential future revisions of the FERC Form No. 715 process.

The Commission is also publishing a 30-day notice requesting public comment.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to FERC-715 respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission considers the information collected in FERC-715 filings to be Critical Energy Infrastructure Information (CEII). The Commission releases this information only to requestors that file a request for CEII under the appropriate regulations and are approved for access.⁵

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

The Commission does not consider any of the questions in the FERC-715 of a sensitive nature that would be considered private.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

⁵ 18 CFR 388.113

The Commission estimates the total annual burden and cost⁶ for this information collection as follows.

FERC-715, Annual Transmission Planning and Evaluation Report						
	Number of Respondents (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Average Burden & Cost Per Response (4)	Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)	Cost per Respondent (\$) (5)÷(1)
Annual Transmission Planning and Evaluation Report ⁷	111	1	111	160 hrs.; \$11,897.60	17,760 hrs.; \$1,320,633.60	\$11,897.60

13. ESTIMATE OF TOTAL ANNUAL COST OF BURDEN TO RESPONDENTS

There are no non-labor start-up costs. All costs are related to burden hours and are addressed in Questions #12 and #15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

⁶ The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics, May 2017. These figures include salary (https://www.bls.gov/oes/current/naics2_22.htm) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>) and are:

- Management (Code 11-0000), \$94.28/hr.
- Computer and mathematical (Code 15-0000), \$63.25/hr.
- Electrical Engineers (Code 17-2071), \$66.90/hr.
- Economist (Code 19-3011), \$71.98/hr.
- Computer and Information Systems Managers (Code 11-3021), \$96.51/hr.
- Accountants and Auditors (Code 13-2011), \$56.59/hr.
- Transportation, Storage, and Distribution Managers (Code 11-3071), \$88.61/hr.
- Power Distributors and Dispatchers (Code 51-8012), \$56.74/hr.

We are using the average hourly cost (for wages plus benefits, for these categories) of \$74.36/hour.

⁷ In 2018, FERC had 111 direct filings (responses) from entities. However there were 239 total respondents if Transmitting Utilities that have their filing submitted by a designated reporting agent, such as a regional entity, are counted independently.

The estimate of the cost for ‘analysis and processing of filings’⁸ 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 Cost⁹ 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.

FERC-715 Information Collection	Full-Time FERC Staff Equivalents (FTEs) for 'Analysis & Processing of Filings'	FERC Staff Cost of Analysis & Processing of Filings (FTEs * \$164,820/year) (rounded)	PRA Administrative Cost (\$4,931 per collection)	Estimated Annual Federal Cost (rounded)
	0.048	\$7,911	\$4,931	\$12,842

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

The requirements in FERC-715 did not change. However the number of respondents varies from year to year due to normal changes in the industry such as company mergers, entry of new entities, and changes to the ownership or operating authority for applicable assets.

The following table shows the total burden of this collection of information. The format, labels, and definitions of the table follow the ROCIS submission system’s “Information Collection Request Summary of Burden” for the metadata.

FERC-715	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion

⁸ 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.)

⁹ This estimate was updated May 2018.

Annual Number of Responses	111	115	-4	0
Annual Time Burden (Hr.)	17,760	18,400	-640	0
Annual Cost Burden (\$)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no tabulating, statistical or tabulating analysis or publication plans for the collection of information. The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

The Commission provides a summary and instructions regarding the FERC-715 on the FERC website (<http://www.ferc.gov/docs-filing/forms.asp#715>) which includes the expiration date for OMB approval.

The OMB expiration dates are also posted on <http://www.ferc.gov/docs-filing/info-collections.asp>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.