

Supporting Statement  
**FERC-725E, Mandatory Reliability Standards for the Western Electric  
Coordinating Council,  
as modified by Docket No. RM19-20**

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the information collection requirements in FERC-725E under OMB Control No. 1902-0246 as modified by Docket No. RM19-20 for three years. FERC-725E is an existing collection whose filing requirements are contained in 18 Code of Federal Regulations (CFR) Part 40.

**Background**

On September 6, 2019, NERC and WECC submitted a joint petition seeking approval of proposed regional Reliability Standard BAL-002-WECC-3, the associated violation risk factors and violation severity levels, effective date, and implementation plan. The joint petition also requests retirement of the currently-effective WECC regional Reliability Standard BAL-002-WECC-2a.<sup>1</sup>

In the joint petition, NERC and WECC explain that principal modification in the proposed regional Reliability Standard is the retirement of Requirement R2 in currently-effective regional Reliability Standard BAL-002-WECC-2a. NERC and WECC contend that continent-wide Reliability Standard BAL-003-1.1 “helps ensure that sufficient Frequency Response is provided to maintain Interconnection frequency in support of the reliable operation of the Interconnection,” and therefore renders regional Reliability Standard BAL-002-WECC-2a, Requirement R2 “redundant and no longer needed for reliability in the Western Interconnection.”<sup>2</sup>

Proposed regional Reliability Standard BAL-002-WECC-3 applies to balancing authorities and reserve sharing groups in the WECC Region, and it specifies the quantity and types of contingency reserve required to ensure reliability under normal and

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<sup>1</sup> BAL-002-WECC-2 is included in the OMB-approved inventory for FERC-725E. On November 9, 2016, NERC and WECC submitted a joint petition for approval of an interpretation of BAL-002-WECC-2, to be designated BAL-002-WECC-2a. BAL-002-WECC-2a was approved by order in Docket No. RD17-3-000 on January 24, 2017. The Order determined: “The proposed interpretation provides clarification regarding the types of resources that may be used to satisfy Contingency Reserve requirements in regional Reliability Standard BAL-002-WECC-2.” BAL-002-WECC-2a did not trigger the Paperwork Reduction Act and did not affect the burden estimate.

<sup>2</sup> Joint Petition at 4.

abnormal conditions. Aside from eliminating Requirement R2, NERC and WECC assert that proposed regional Reliability Standard BAL-002-WECC-3 retains the other existing requirements because they are needed to maintain reliability.<sup>3</sup>

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

On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law. EPAAct 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, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight. In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO pursuant to FPA section 215.<sup>4</sup> The reporting requirements in the FERC-725E are contained in FERC's regulations in 18 Code of Federal Regulations (CFR) Part 40.

On March 16, 2007, in Order No. 693, pursuant to section 215(d) of the FPA, the Commission approved 83 of 107 proposed Reliability Standards, six of the eight proposed regional differences, and the North American Electric Reliability Corporation (NERC) Glossary of Terms used in Reliability Standards (NERC Glossary).

**FERC-725E (General):** The information collected by the FERC-725E is required to implement the statutory provisions of section 215 of the Federal Power Act (FPA).<sup>5</sup> Section 215 of the FPA buttresses the Commission's efforts to strengthen the reliability of the interstate grid through the grant of new authority by providing for a system of mandatory Reliability Standards developed by the Electric Reliability Organization (ERO). Reliability Standards that the ERO proposes to the Commission may include Reliability Standards that are proposed to the ERO by a Regional Entity.<sup>6</sup> A Regional Entity is an entity that has been approved by the Commission to enforce Reliability Standards under delegated authority from the ERO.<sup>7</sup> On June 8, 2008, the Commission

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<sup>3</sup> *Id.* at 10.

<sup>4</sup> *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh'g & compliance*, 117 FERC ¶ 61,126 (2006), *aff'd sub nom. Alcoa, Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

<sup>5</sup> 16 U.S.C. 824o.

<sup>6</sup> 16 U.S.C. 824o(e)(4).

<sup>7</sup> 16 U.S.C. 824o(a)(7) and (e)(4).

approved eight regional Reliability Standards submitted by the ERO that were proposed by the Western Electricity Coordinating Council (WECC).<sup>8</sup>

WECC promotes bulk electric system reliability in the Western Interconnection. WECC is the Regional Entity responsible for compliance monitoring and enforcement. In addition, WECC provides an environment for the development of regional Reliability Standards and the coordination of the operating and planning activities of its members as set forth in the WECC Bylaws.

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

There are several regional Reliability Standards in the WECC region. These regional Reliability Standards generally require entities to document compliance with substantive requirements, retain documentation, and submit reports to WECC. The following standards will be continuing without change:

- BAL-004-WECC-03 (Automatic Time Error Correction) requires balancing authorities to document that time error corrections and primary inadvertent interchange payback were conducted according to the requirements in the standard.
- FAC-501-WECC-2 (Transmission Maintenance) requires transmission owners with certain transmission paths to have a transmission maintenance and inspection plan and to document maintenance and inspection activities according to the plan.
- VAR-501-WECC-3.1 (Power System Stabilizer [PSS])<sup>9</sup> requires generator owners and operators to ensure the Western Interconnection is operated in a

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<sup>8</sup> *North American Electric Reliability Corp.*, 119 FERC ¶ 61,260 (2007).

<sup>9</sup> VAR-501-WECC-3.1 was approved by order in Docket No. RD17-7-000 on September 26, 2017. The August 18, 2017 petition requested Commission approval of errata to mandatory and enforceable regional Reliability VAR-501-WECC-3 (Power System Stabilizer). Because the reporting burden for VAR-501-WECC-3.1 did not increase for entities that operate within the Western Interconnection, FERC submitted the order to OMB for information only. The burden related to VAR-501-WECC-3.1 does not differ from the burden of VAR-501-WECC-3, which is included in the OMB-approved inventory. VAR-501-WECC-3.1 is being included in this Notice and the Commission's submittal to OMB as part of FERC-725E.

coordinated manner by establishing the performance criteria for WECC power system stabilizers.

The Commission is submitting this request to OMB to extend those requirements with no change for three years. The Commission's request to OMB also reflects the following:

- Implement the regional Reliability Standard BAL-002-WECC-3 (addressed in Docket No. RM19-20), and
- Adjustments to the burden estimates due to changes in the NERC Compliance Registry for regional Reliability Standards BAL-002-WECC-3 (Contingency Reserve) and IRO-006-WECC-3 (Qualified Path Unscheduled Flow (USF) Relief).<sup>10</sup>

In this document, we provide estimates of the burden and cost related to the aforementioned revisions to FERC-725E.

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

This collection does not require industry to file the information with the Commission. However, FERC-725E does contain information collection and record retention requirements for which using current technology is an option.

The information technology to meet the information collection requirements is not specifically covered in the Reliability Standard.

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<sup>10</sup> IRO-006-WECC-3 was approved by order in Docket No. RD19-4-000 on May 10, 2019. The March 6, 2019 petition states that WECC revised the regional Reliability Standard to clarify the purpose statement, replace certain defined terms, account for multiple reliability coordinators in the Western Interconnection, and conform the regional Reliability Standard to the current drafting conventions and template. Because the reporting burden for IRO-006-WECC-3 did not increase for entities that operate within the Western Interconnection, FERC submitted the order to OMB for information only. The burden related to IRO-006-WECC-3 does not differ from the burden of IRO-006-WECC-2, which is included in the OMB-approved inventory. IRO-006-WECC-3 is being included in this Notice and the Commission's submittal to OMB as part of FERC-725E.

**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. The Commission is unaware of any other source of information related to WECC regional Reliability Standards.

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

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden. Detailed information regarding these options is available in NERC's Rules of Procedure at Sections 507 and 508.<sup>11</sup>

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

The Reliability Standard requires balancing authorities and reserve sharing groups to document compliance with contingency reserve requirements. The standard specifies the quantity and types of contingency reserve required to ensure reliability under normal and abnormal conditions. As stated above, aside from eliminating Requirement R2, NERC and WECC assert that proposed regional Reliability Standard BAL-002-WECC-3 retains the other existing requirements because they are needed to maintain reliability. And as stated earlier, all of this would be hindered if this collection of information were discontinued or conducted less frequently.

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

There are no special circumstances related to the FERC-725E information collection.

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

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<sup>11</sup> See [https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC%20ROP%20\(With%20Appendicies\).pdf](https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC%20ROP%20(With%20Appendicies).pdf)

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders developing and reviewing drafts and providing comments.<sup>12</sup> The NERC-approved Reliability Standards were then submitted by NERC to the FERC for review and approval.

In accordance with OMB requirements, the Commission published the Notice of Proposed Rulemaking (NOPR) in the Federal Register in Docket No. RM19-20-000, (85 FR 68809, on October 30, 2020).<sup>13</sup> Comments from the public were due on December 29, 2020 in response to the NOPR regarding the FERC-725E information collection. No comments were received in response to the proposed FERC-725E information collection.

The Final Rule was published in the Federal Register on April 29, 2021 (86 FR 22588).

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

There are no payments or gifts to respondents associated with this collection.

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

According to the NERC Rules of Procedure<sup>14</sup>, "...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 under these Reliability Standards to FERC. Rather, they maintain it internally and provide information collected to applicable Regional Entities. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

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<sup>12</sup> Details of the ERO standards development process are available on the NERC website at:  
[https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/SPM\\_Clean\\_Mar2019.pdf](https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/SPM_Clean_Mar2019.pdf).

<sup>13</sup> *WECC Regional Reliability Standard BAL-002-WECC-3 (Contingency Reserve)*, Notice of Proposed Rulemaking, 173 FERC ¶ 61,032 (2020).

<sup>14</sup> Section 1502, Paragraph 2, available at NERCs website.

**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.**

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

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

The FERC-725E information collection requirements contained in this Final Rule are subject to review by the OMB under section 3507(d) of the Paperwork Reduction Act of 1995 (PRA).<sup>15</sup> OMB's regulations require approval of certain information collection requirements imposed by agency rules.<sup>16</sup> Upon approval of a collection(s) of information, OMB will assign an OMB control number and an expiration date. Respondents subject to the filing requirements of a rule will not be penalized for failing to respond to these collections of information unless the collections of information display a valid OMB control number.

In addition to the changes identified in this Final Rule, the Commission is adjusting burden estimates for the other WECC regional Reliability Standards in the FERC-725E information collection. These adjustments are warranted based on updates to the number of applicable registered entities that have changed due to normal industry fluctuations (e.g., companies merging or splitting, going into or leaving the industry, or filling more or fewer roles in the NERC Compliance Registry).

There are several regional Reliability Standards in the WECC region. These regional Reliability Standards generally require entities to document compliance with substantive requirements, retain documentation, and submit reports to WECC. The following standards will be continuing without change.

- BAL-004-WECC-3 (Automatic Time Error Correction) requires balancing authorities to document that time error corrections and primary inadvertent interchange payback were conducted according to the requirements in the standard.
- FAC-501-WECC-2 (Transmission Maintenance) requires transmission owners with certain transmission paths to have a transmission maintenance and inspection plan and to document maintenance and inspection activities according to the plan.

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<sup>15</sup> 44 U.S.C. 3507(d).

<sup>16</sup> 5 C.F.R. 1320.11.

- VAR-501-WECC-3.1 (Power System Stabilizer [PSS]) requires generator owners and operators to ensure the Western Interconnection is operated in a coordinated manner by establishing the performance criteria for WECC power system stabilizers.

The associated reporting and recordkeeping requirements included in the regional Reliability Standards above are not being revised, and the Commission will be submitting a request to OMB to extend these requirements for three years. The Commission’s request to OMB will also reflect the following:

- Implement the regional Reliability Standard BAL-002-WECC-3 (addressed in this Final Rule, Docket No. RM19-20), and
- Adjustments to the burden estimates due to changes in the NERC Compliance Registry for regional Reliability Standards BAL-002-WECC-3 (Contingency Reserve) and IRO-006-WECC-3 (Qualified Path Unscheduled Flow (USF) Relief).

*Changes Due to Docket No. RM19-20.* The Commission estimates the reduction in the annual public reporting burden for the FERC-725E (due to the retirement of BAL-002-WECC-2a, Requirement R2) as follows:

<b>FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Reductions Due to FERC Docket No. RM19-20</b>					
<b>Information Collection Requirements and Entity</b>	<b>Number of Respondents (1)</b>	<b>Annual Number of Responses per Respondent (2)</b>	<b>Total Number of Responses (1)*(2)=(3)</b>	<b>Average Burden Hours &amp; Cost<sup>17</sup> Per Response (4)</b>	<b>Total Annual Burden Hours &amp; Total Annual Cost (3)*(4)=(5)</b>
Balancing Authorities	0 (no change)	0 (no change)	0 (no change)	0 hrs.; \$0	0 hrs.; \$0

<sup>17</sup> The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics (BLS) for three positions involved in the reporting and recordkeeping requirements. These figures include salary (based on BLS data for May 2019, [http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm)) and benefits (based on BLS data for December 2019; issued March 19, 2020, <http://www.bls.gov/news.release/ecec.nr0.htm>) and are Manager (Code 11-0000 \$97.15/hour), Electrical Engineer (Code 17-2071 \$70.19/hour), and File Clerk (Code 43-4071 \$34.79/hour). The hourly cost for the reporting requirements (\$83.67) is an average of the cost of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.



Years 1 and 2 <sup>18</sup>				(no change)	(no change)
Balancing Authorities Year 3 and Ongoing	34	1	34	1 hr.; \$83.67 (reduction)	34 hrs.; \$2,844.78 (reduction)
<b>SUB-TOTAL, REDUCTION (Due to Docket No. RM19-20) in Year 3 and Ongoing</b>					34 hrs.; \$2,844.78 (reduction)

*Adjustments due to normal industry fluctuations.* The Commission estimates the changes in the annual public reporting burden for the FERC-725E (due to the number of applicable registered entities) as follows:<sup>19</sup>

<b>FERC-725E, Mandatory Reliability Standards for the Western Electric Coordinating Council, Adjustments Due to Normal Industry Fluctuations</b>					
<b>Information Collection Requirements and Entity</b>	<b>Number of Respondents (1)</b>	<b>Annual Number of Responses per Respondent (2)</b>	<b>Total Number of Responses (1)*(2)=(3)</b>	<b>Average Burden Hours &amp; Cost<sup>17</sup> Per Response (4)</b>	<b>Total Annual Burden Hours &amp; Total Annual Cost (3)*(4)=(5)</b>
Reliability Coordinators (IRO-006-WECC-3) Reporting Requirement	1 (increase)	1	1	1 hr.; \$83.67 (increase)	1 hr.; \$83.67 (increase)
Reliability Coordinators	1 (increase)	1	1	1 hr.; \$34.79	1 hr.; \$34.79

<sup>18</sup> The reduction in burden is zero for the first two years due to the directive in the Final Rule to continue to report hourly contingency reserve data for 24 months.

<sup>19</sup> The number of applicable entities is based on the NERC Compliance Registry as of September 3, 2020.

(IRO-006-WECC-3) Record Keeping Requirement				(increase)	(increase)
Reserve Sharing Groups (BAL-002-WECC-3) Reporting Requirement	1 (reduction)	1	1	1 hr.; \$83.67 (reduction)	1 hr.; \$83.67 (reduction)
<b>SUB-TOTAL, (Net Due to Adjustments)</b>					1 hr.; \$34.79 (net change)

*Estimate of Continuing Annual Burden for Renewal:*<sup>20</sup> The Commission estimates the annual public reporting burden and cost as follows for FERC-725E. (This information will be submitted to OMB for approval.) These estimates reflect:

- Reliability Standards in FERC-725E which continue and remain unchanged (BAL-004-WECC-3, FAC-501-WECC-2, and VAR-002-WECC-3.1);
- Implement the regional Reliability Standard BAL-002-WECC-3 (addressed in this Final Rule, Docket No. RM19-20-000); and
- Adjustments to the burden estimates for regional Reliability Standards BAL-002-WECC-3 (Contingency Reserve) and IRO-006-WECC-3 (Qualified Path Unscheduled Flow (USF) Relief).

**FERC-725E, Mandatory Reliability Standards for the  
 Western Electric Coordinating Council  
 [New and Continuing Information Collection Requirements]**

<sup>20</sup> The Commission is also removing 1746 one-time burden hours associated with the requirements in Docket No. RD17-5 for regional Reliability Standard VAR-501-WECC-3 (Power System Stabilizer [PSS]). The one-time burden has been completed and will now be administratively removed on submittal to OMB. Those hours are not included in the table.

<b>Entity</b>	<b>No. of Respondents<sup>21</sup></b> <b>(1)</b>	<b>Annual No. of Responses per Respondent</b> <b>(2)</b>	<b>Annual No. of Responses</b> <b>(1)*(2)=(3)</b>	<b>Average Burden Hrs. &amp; Cost<sup>17</sup> Per Response</b> <b>(4)</b>	<b>Total Annual Burden Hours &amp; Total Annual Cost (\$)</b> <b>(3)*(4)=(5)</b>	<b>Cost per Respondent (\$)</b> <b>(5)÷(1)=(6)</b>
<b>Reporting Requirements</b>						
Balancing Authorities Years 1 and 2 (BAL-002-WECC-3; BAL-004-WECC-3; IRO-006-WECC-3)	34	1	34	21 hrs.; \$1,757.07	714 hrs.; \$59,740.38	\$1,757.07
Balancing Authorities Year 3 and Ongoing (BAL-002-WECC-3; BAL-004-WECC-3; IRO-006-WECC-3)	34	1	34	20 hrs.; \$1,673.40	680 hrs.; \$56,895.60	\$1,673.40
Reserve Sharing Groups (BAL-002-WECC-3)	2	1	2	1 hr.; \$83.67	2 hrs.; \$167.34	\$83.67
Reliability Coordinators (IRO-006-WECC-3)	2	1	2	1 hr.; \$83.67	2 hrs.; \$167.34	\$83.67

<sup>21</sup> The number of respondents is derived from the NERC Compliance Registry as of September 3, 2020.

Transmission Owners that Operate Qualified Transfer Paths (FAC-501-WECC-2)	5	1	5	40 hrs.; \$3,346.80	200 hrs.; \$16,734.00	\$3,346.80
Generator Owners and/or Operators (VAR-501-WECC-3.1)	291	2	582	1 hr.; \$83.67	582 hrs.; \$48,695.94	\$167.34
<b>Sub-Total for Reporting Requirements in Years 1 and 2</b>			625		<b>1,500 hrs.;</b> <b>\$125,505.00</b>	
<b>Sub-Total for Reporting Requirements in Year 3 &amp; ongoing</b>			625		<b>1,466 hrs.;</b> <b>\$122,660.22</b>	
<b>Recordkeeping Requirements</b>						
Balancing Authorities (BAL-002-WECC-3; BAL-004-WECC-3; IRO-006-WECC-3)	34	1	34	3.1 hrs.; \$107.85	105.4 hrs.; \$3,666.87	\$107.85
Reliability Coordinators (IRO-006-WECC-3)	2	1	2	1 hr.; \$34.79	2 hrs.; \$69.58	\$34.79
Transmission Owners that Operate Qualified Transfer Paths (FAC-501-WECC-2)	5	1	5	6 hrs.; \$208.74	30 hrs.; \$1043.70	\$208.74
Generator	291	2	582	0.5 hrs.;	291 hrs.;	\$34.79

Owners and/or Operators (VAR-501-WECC-3.1))				\$17.40	\$10,123.89
<b>Sub-Total for Recordkeeping Requirements</b>		623			<b>428.4 hrs.;</b> <b>\$14,904.04</b>
<b>TOTAL FOR FERC-725E, IN YR. 1 and YR. 2</b>		1248			<b>1,928.4 hrs.;</b> <b>\$140,409.04</b>
<b>TOTAL FOR FERC-725E, IN YR. 3 &amp; ONGOING</b>		1248			<b>1,894.4 hrs.;</b> <b>\$137,564.26</b>

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

There are no non-labor costs currently associated with the FERC-725E. All costs are associated with burden hours (labor) and are described in #12 and #15 of this document.

### 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; the burden and cost are included under the FERC-725 collection (OMB Control No. 1902-0225) and are not part of this request or package. Any involvement by the Commission is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

The estimated annualized cost to the Federal Government for FERC-725E follows:

	<b>Number of Employees (FTE)</b>	<b>Estimated Annual Federal Cost</b>
FERC-725E Analysis and Processing of filings	0	\$0
PRA <sup>22</sup> Administrative Cost		\$6,475
<b>FERC Total</b>		\$6,475

The Commission bases its estimate of the ‘Analysis and Processing of filings’ cost to the Federal Government on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision making, and review of any actual filings made in response to the information collection. The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other

<sup>22</sup> Paperwork Reduction Act of 1995 (PRA)

vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings, and other changes to the collection, as well as necessary publications in the Federal Register.

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

The changes in burden are due to the need for applicable entities to revise documentation, already required by the current WECC regional Reliability Standard BAL-002-WECC-2a, to reflect the retirement of Requirement R2 in the proposed WECC regional Reliability Standard BAL-002-WECC-3. Also, adjustments to the burden estimates are needed due to changes in the NERC Compliance Registry for regional Reliability Standards BAL-002-WECC-3 and IRO-006-WECC-3. The table below describes the new and continuing information collection requirements and the associated burden for FERC-725E.

The Commission is also removing 1746 one-time burden hours associated with the requirements in Docket No. RD17-5 for regional Reliability Standard VAR-501-WECC-3. The one-time burden has been completed and will now be administratively removed on submittal to OMB.

The annual responses and annual burden in the current OMB-approved inventory is 1,733 responses and 2,218 hours respectively. The estimates are the average total number of annual responses and corresponding burden hours for years 1, 2 and 3, divided by three, giving the average annual estimate for Years 1-3.

For reporting requirements, the numbers of responses are:

- o 625 responses for year one;
- o 625 for year two; and
- o 625 for year three.

The annual average for years 1-3 is one-third of 1,875, or 625 responses.

For recordkeeping requirements, the numbers of responses are:

- o 623 responses for year one;
- o 623 responses for year two; and
- o 623 responses for year three.

The annual average for years 1-3 is one-third of 1,869, or 623 responses.

The number of burden hours (including both reporting and recordkeeping requirements) is:

- o 1,928.4 hours for year 1;
- o 1,928.4 hours for year 2; and
- o 1,894.4 hours for year 3.

The annual average for years 1-3 is one-third of 5751.2 hour, or 1,917 responses.

<b>FERC-725E</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	1,248	1,733	0	-485
Annual Time Burden (Hr.)	1,917	2,218	0	-301
Annual Cost Burden (\$)	0	0	0	0

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

FERC does not publish any data associated with this collection.

**17. DISPLAY OF EXPIRATION DATE**

The expiration date is displayed at <http://www.ferc.gov/docs-filing/efiling.asp>

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

There are no exceptions.