

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

## **FEDERAL ENERGY REGULATORY COMMISSION**

Supporting Statement A for  
**FERC-516F (OMB Control No. 1902-0297) and  
FERC-917 (OMB Control No. 1902-0233)  
Modifications Proposed in the NOPR in RM21-17-000**

**“Reform of Generator Interconnection Procedures and Agreements” (FERC-516F)  
and “Electric Transmission Filings” (FERC-917)**

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**Terms of Clearance:** None.

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review the revisions to FERC-516F and FERC-917, as proposed in the Notice of Proposed Rulemaking (NOPR) in Docket No. RM21-17-000).

*Please note: (1) The NOPR identified FERC-516 as one of the information collections proposed to be revised, but that collection is currently pending approval at OMB. Because agencies are only allowed to seek one clearance for an information collection at a time, we are designating FERC-516F as a relevant collection for purposes of this supporting statement. The information collection previously designated as FERC-516F was subsequently added to FERC-516. (2) The information collection at OMB Control No. 1902-0233 includes both FERC-917 and FERC-918, but the information collection activities proposed in Docket No. RM21-17-000 to not include any activities in FERC-918.*

### **Justification**

- 1. Explain the circumstances that make the collection of information necessary.  
Identify any legal or administrative requirements that necessitate the collection.**

The Federal Energy Regulatory Commission (Commission or FERC) has a statutory obligation under the Federal Power Act (FPA) to prevent unduly discriminatory practices in transmission access. Specifically, section 206 of the FPA obligates the Commission to

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remedy unjust and unreasonable, or unduly discriminatory or preferential, rates, terms, and conditions of transmission service.<sup>1</sup>

This information collection request involves Commission implementation of section 206 via:

- 18 CFR 35.28 (“Non-Discriminatory Open Access Transmission Tariff”);
- The *pro forma* Open Access Transmission Tariff (OATT); and
- The *pro forma* Large Generator Interconnection Procedures (LGIP).

The regulation at 18 CFR 35.28 requires certain types of entities to have on file an Open Access Transmission Tariff (OATT) that contains minimum terms and conditions of non-discriminatory service. This requirement applies to all public utilities<sup>2</sup> that own, control, or operate facilities used for transmitting electric energy in interstate commerce. Other requirements in section 35.28 apply to non-public utilities, but only if they seek voluntary compliance with jurisdictional transmission tariff reciprocity conditions. Non-public utilities are not affected by this information collection request.

The *pro forma* OATT, as originally developed by the Commission, is included in the final rule designated as Order No. 888, 61 FR 21540, at 21706 through 21724 (May 10, 1996). As the term “*pro forma*” implies, the tariff contains standardized terms and conditions that public utilities must adopt in their own tariffs, unless they demonstrate that unique practices in a geographic region require modifications. The currently effective *pro forma* OATT<sup>3</sup> has been modified several times and is proposed to be modified in RM21-17-000.

The *pro forma* LGIP, as originally developed by the Commission, is included in the final rule designated as Order No. 2003, 68 FR 49846, at 49933 through 49972 (Aug. 19, 2003). In Order No. 003, the Commission determined that standard interconnection procedures are needed in OATTs in order to:

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<sup>1</sup> 16 U.S.C. 824e

<sup>2</sup> As defined at 16 U.S.C. 824(e), a “public utility” is any person who owns or operates facilities subject to the jurisdiction of the Commission under Subchapters II and III of the FPA.

<sup>3</sup> <https://www.ferc.gov/media/pro-forma-oatt-effective-march-14-2022>

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- Limit opportunities for Transmission Providers to favor their own generation;
- Facilitate market entry for generation competitors by reducing interconnection costs and time; and
- Encourage needed investment in generation and transmission infrastructure.

The final rule in Order No. 2003 requires all public utilities that own, control, or operate facilities used for transmitting electric energy in interstate commerce to file revised OATTs that include standard procedures and a standard agreement for interconnecting generators larger than 20 megawatts (MW). The standard procedures came to be known as the *pro forma* LGIP. The currently effective LGIP<sup>4</sup> has been modified several times and is proposed to be further modified in RM21-17-000.

**2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection. Be specific. If this collection is a form or a questionnaire, every question needs to be justified.**

Pursuant to section 206 of the FPA, the proposed rule in RM21-17-000 would require public utility transmission providers<sup>5</sup> to comply with revised electric regional transmission planning and cost allocation requirements.

With respect to regional transmission planning, the NOPR, at Appendix B, includes proposed revisions of Attachment K of the *pro forma* OATT that would require public utility transmission providers to conduct Long-Term Regional Transmission Planning on a sufficiently forward-looking basis to meet transmission needs driven by changes in the resource mix and demand. Specifically, the reforms proposed in the NOPR would require that public utility transmission providers in each transmission planning region:<sup>6</sup>

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<sup>4</sup> <https://www.ferc.gov/sites/default/files/2020-04/LGIP-procedures.pdf>

<sup>5</sup> As defined at 18 CFR 37.3(a) a “Transmission Provider” is any public utility that owns, operates, or controls facilities for the transmission of electric energy in interstate commerce.

<sup>6</sup> Public utility transmission providers, in consultation with stakeholders and affected states, establish transmission planning regions in which they participate for purposes of regional transmission planning and the development of a single regional plan.

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(1) identify transmission needs driven by changes in the resource mix and demand through the development of Long-Term Scenarios;<sup>7</sup> (2) evaluate the benefits of regional transmission facilities to meet these needs over a time horizon that covers, at a minimum, 20 years starting from the estimated in-service date of the transmission facilities; (3) establish transparent and not unduly discriminatory criteria to select transmission facilities in the regional transmission plan for purposes of cost allocation that more efficiently or cost-effectively address these transmission needs in collaboration with states and other stakeholders; and (4) seek the agreement of relevant state entities within the transmission planning region regarding the cost allocation method or methods that will apply to transmission facilities.

Information Collection: Revisions Proposed in Attachment K of the *pro forma* OATT

The NOPR describes, in Attachment K of the *pro forma* OATT, proposed provisions that would be required in transmission providers’ OATTs.

*Requirement to Participate in Long-Term Regional Transmission Planning*

The transmission providers’ participation in Long-Term Regional Transmission Planning includes a requirement to develop Long-Term Scenarios. The proposed rule explains that each scenario would comprise a hypothetical sequence of events that incorporates assumptions used to forecast transmission needs driven by changes in the resource mix and demand.

In order to determine the relevant assumptions, transmission providers would be required to collect information such as:

- Forecasts of the level and pattern (i.e., hourly and seasonal variability) of future electricity demand;
- The quantity, location, and type of resource additions and retirements; and

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<sup>7</sup> As used in the NOPR, the term “Long-Term Scenarios” describes a tool to identify transmission needs driven by changes in the resource mix and demand, and to enable the evaluation of transmission facilities to meet such needs, across multiple scenarios that incorporate different assumptions about the future electric power system over a sufficiently long-term, forward-looking transmission planning horizon.

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- Forecasts about the electric power system that are used as inputs to the transmission model and determine the need for new transmission facilities over the transmission planning horizon.
- Forecasts for natural gas prices, increasing outage trends due to extreme weather and climatic trends, and other future events.

The Transmission Providers’ participation in Long-Term Regional Transmission Planning would also include evaluating the benefits of regional transmission facilities over a 20-year time horizon, and establishing criteria in consultation with states to select transmission facilities for purposes of cost allocation. The proposed revisions of the *pro forma* OATT, at Appendix B of the proposed rule, list many benefits that “may be useful” for transmission providers to consider in Long-Term Regional Transmission Planning and cost allocation processes. However, the Commission has declined to propose to require use of any specific benefits. Instead, the Commission proposes to consider such matters on review of compliance filings.

Participation in Long-Term Regional Transmission Planning would be required during both Year 1 and during the updating of data inputs and factors at least every three years. Thus, the proposed requirement to participate in Long-Term Regional Transmission Planning would involve both a Year 1 information collection and subsequent information collections.

#### *Revision of the Regional Transmission Planning Process*

The reforms proposed in the NOPR would require transmission providers to add at least three stakeholder meetings to their regional transmission planning process:

- (1) A stakeholder meeting to review the criteria, assumptions, and models related to each Transmission Provider’s local transmission planning (Assumptions Meeting);
- (2) No fewer than 25 calendar days after the Assumptions Meeting, a stakeholder meeting to review identified reliability criteria violations and other transmission needs that drive the need for local transmission facilities (Needs Meeting); and
- (3) No fewer than 25 calendar days after the Needs Meeting, a stakeholder meeting to review potential solutions to those reliability criteria violations and other transmission needs (Solutions Meeting).

The meetings would be required before including each transmission provider’s local

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transmission planning information into the transmission planning region’s planning models. The reforms proposed in the NOPR would require transmission providers to post publicly all materials for stakeholder review before and after each stakeholder meeting and provide opportunities for comments by stakeholders.

The reforms proposed in the NOPR also would require, at a specified point early in each Long-Term Regional Transmission Planning cycle, that each transmission provider submit a list of transmission facilities that it owns that operate at or above 230 kilovolts (kV), and that may need to be replaced over the next 10 years. Upon collecting that information, the transmission provider would be required to evaluate whether the listed facilities can be “right-sized” to address a transmission need identified in Long-Term Regional Transmission Planning. Right-sizing could include, for example, increasing the facility’s voltage level, adding circuits to the towers, or incorporating advanced technologies.

This information collection activity would be required during both Year 1 and during the updating of data inputs and factors at least every three years. Thus, it would involve both a Year 1 information collection and subsequent information collections.

*Seek Agreement from the States to Establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process*

The reforms proposed in Appendix B of the NOPR would include revisions described in the *pro forma* OATT that would require the transmission providers in each transmission planning region to include in their tariffs: (1) a Long-Term Regional Transmission Cost Allocation Method to allocate the costs of Long-Term Regional Transmission Facilities, (2) a State Agreement Process by which one or more relevant state entities may voluntarily agree to a cost allocation method, or (3) a combination thereof.

The reforms proposed in the NOPR would define the term “Long-Term Regional Transmission Cost Allocation Method” as an *ex ante* (i.e., based on forecasts rather than on actual results) regional cost allocation method that would be included in each public utility transmission provider’s OATT as part of Long-Term Regional Transmission Planning. The required collection of information for this method would be forecasts to support the method.

The reforms proposed in the NOPR would define the term “State Agreement Process” as

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an *ex post* (i.e., based on actual results instead of forecasts) cost allocation process that would be included in each public utility transmission provider’s OATT as part of Long-Term Regional Transmission Planning, which may apply to an individual Long-Term Regional Transmission Facility or a portfolio of such Facilities grouped together for purposes of cost allocation. The required collection of information for this method would be results in support of this method.

The NOPR explains that a “combination” approach may entail, for example:

- Providing a Long-Term Regional Transmission Cost Allocation Method for certain types of Long-Term Regional Transmission Facilities and providing a State Agreement Process for others; or
- Providing for cost allocation for a Long-Term Regional Transmission Facility, portfolio, or type of such facilities partially based on a Long-Term Regional Transmission Cost Allocation Method and partially based on funding contributions in accordance with a State Agreement Process.

The information collection for a combination approach would include both forecasts and actual results.

This information collection activity would be required during both Year 1 and during the updating of data inputs and factors at least every three years. Thus, it would involve both a Year 1 information collection and subsequent information collections.

*Consider in the Regional Transmission Planning Processes Regional Transmission Facilities that Address Interconnection-related Needs*

In the NOPR, the Commission states that, at present, transmission needs seem to be determined outside regional transmission planning and cost allocation processes, and instead are being constructed as a result of incremental generator interconnection requests. The generator interconnection process is not designed to consider how to more efficiently or cost-effectively address transmission needs beyond the interconnection request(s) being studied. In contrast, Long-Term Regional Transmission Planning can facilitate development of more efficient or cost-effective transmission facilities to solve transmission needs driven by changes in the resource mix and demand, as well as provide for system-wide benefits that may not be achieved through piecemeal, one-off transmission upgrades.

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The information collection activity associated with this provision consists of including in Long-Term Regional Transmission Planning all of the criteria required in connection with a finding of a need for one or more regional transmission facilities to serve an interconnection-related need.

This information collection activity would be required in Year 1 only.

*Revise Interregional Transmission Coordination Procedures to Reflect Long-Term Regional Transmission Planning*

The reforms proposed in this NOPR would require transmission providers, through their regional transmission planning process, to coordinate with the transmission providers in each neighboring transmission planning region within its interconnection to address transmission planning coordination issues related to interregional transmission facilities. The reforms proposed in this NOPR would require transmission providers to (i) share information with the transmission providers in each neighboring transmission planning region about the region’s transmission needs identified through Long-Term Regional Transmission Planning and each interregional transmission facility that is proposed to be located in both transmission planning regions and (ii) to identify and jointly evaluate possible interregional transmission facilities that could address each region’s transmission needs identified through Long-Term Regional Transmission Planning more efficiently or cost-effectively than separate regional transmission facilities. The interregional transmission coordination procedures shall be described in an attachment to the transmission provider’s tariff.

This information collection activity would be required during both Year 1 and during the sharing of information and evaluation of possible interregional transmission facilities at least every three years. Thus, it would involve both a Year 1 information collection and subsequent information collections.

Information Collection: Revision Proposed in the *Pro Forma* LGIP

*Revise LGIP to Indicate the Consideration in the Regional Transmission Planning Processes of Regional Transmission Facilities that Address Certain Interconnection-Related Needs*



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Transmission providers in each transmission planning region would be required to evaluate for possible selection in the regional transmission plan, and under the relevant cost allocation method(s), transmission facilities to address interconnection-related needs that have been identified in at least two interconnection queue cycles during the preceding five years, have a voltage of at least 200kV and/or an estimated cost of at least \$30 million, and have not been developed due to the withdrawal of interconnection customers. This proposal would involve collecting information on interconnection requests and their withdrawal and considering whether those requests should be included in Long-Term Regional Transmission Planning.

This information collection activity would be required only during Year 1.

**3. Describe any consideration of the use of improved information technology to reduce the burden and technical or legal obstacles to reducing burden.**

The Commission requires public utility transmission providers to provide transmission customers with equal and timely access to transmission and ancillary service tariff information through Open Access Same-Time Information System (OASIS) website postings. OASIS website posting is ongoing and used by the public utility transmission providers and stakeholders to improve the processes of (1) planning transmission projects; (2) considering transmission needs; (3) determining possible alternatives that would be more efficient or cost effective; and (4) allocating costs of transmission projects among the beneficiaries of the projects.

**4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.**

The Commission is the only federal agency to regulate interstate electric power transmission; therefore, other agencies would not be expected to collect this tariff-specific information. There is no other known source for the information.

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.

**5. If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.**

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The collection of this data imposes the least possible burden for small and large entities while collecting the information required of FERC by statute.

**6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.**

Frequency of reporting for IC titled “Consider in the Regional Transmission Planning Processes Regional Transmission Facilities that Address Certain Interconnection-related Needs”: One time during Year 1 only.

Frequency of reporting for all other ICs: One time during Year 1. Occasionally during subsequent years, at least once every three years.

If the collection is not conducted or conducted less frequently, the Commission would not be able to fulfill its statutory obligation to remedy unjust and unreasonable, or unduly discriminatory or preferential, rates, terms, and conditions of transmission service.

**7. Explain any special circumstances that would cause an information collection to be conducted in a manner:**

- \* **requiring respondents to report information to the agency more often than quarterly;**
- \* **requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;**
- \* **requiring respondents to submit more than an original and two copies of any document;**
- \* **requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;**
- \* **in connection with a statistical survey that is not designed to produce valid and reliable results that can be generalized to the universe of study;**
- \* **requiring the use of a statistical data classification that has not been reviewed and approved by OMB;**

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- \* **that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or**
- \* **requiring respondents to submit proprietary trade secrets, or other confidential information, unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.**

There are no special circumstances.

#### **8. Describe efforts to consult outside the agency: Summarize public comments and the agency’s response**

FERC proposed and final rules are published in the Federal Register, thereby providing the public, including public utilities and licensees, state commissions, and Federal agencies, an opportunity to submit data, views, comments or suggestions concerning the proposed collections of data.

On July 15, 2021, the Commission published an Advance Notice of Proposed Rulemaking<sup>8</sup> (ANOPR) seeking public comments on a broad range of transmission-related issues, including some that are addressed in the NOPR. The Commission has also held a technical video conference on November 15, 2021, and issued a transcript of that conference.<sup>9</sup>

On May 4, 2022, the NOPR was published in the *Federal Register* at 87 FR 26502. The NOPR includes a summary of relevant comments received in response to the ANOPR.

#### **9. Explain any decision to provide any payment or gift to respondents, other than**

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<sup>8</sup> 86 FR 40266.

<sup>9</sup> [file:///C:/Users/jnsed34/Downloads/20220420-4001\\_Final%20Transcript%20-%2011-15-21%20\(1\).pdf](file:///C:/Users/jnsed34/Downloads/20220420-4001_Final%20Transcript%20-%2011-15-21%20(1).pdf)

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**remuneration of contractors or grantees.**

There are no payments or gifts to respondents.

**10. Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.**

The Commission does not consider the information collected to be confidential.

If an entity chooses to seek confidential treatment of the information, it must submit a request for the Commission to treat this information as confidential and non-public, consistent with 18 CFR 388.112.

**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. This justification should include the reasons why the agency considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.**

There are no questions of a sensitive nature associated with these information collections.

**12. Estimated burden of collection of information**

The burden estimates in this information collection request are based on data compiled by the Bureau of Labor Statistics (BLS) showing hourly salaries ([http://bls.gov/oes/current/naics2\\_22.htm](http://bls.gov/oes/current/naics2_22.htm)) and benefits (<http://www.bls.gov/news.release/ecec.nr0.htm>). In order to describe the burdens as precisely as possible, we have analyzed the costs of reporting requirements separately from the costs of records management.

For reporting requirements, we have determined the hourly cost (including both salaries and benefits) to be the average of the hourly cost for Managers (Occupation Code 11-0000, \$97.89/hour) and Electrical Engineers (Occupation Code 17-2071, \$72.15/hour). The rounded average for those occupations is \$85.00. For records management requirements, we have determined the hourly cost to be for File Clerks (Occupation Code 43-4071, \$35.83/hour).

The estimated burdens are itemized below in Tables 12-1 through 12-8. The content of

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each table is:

- FERC-917: Year 1 reporting burdens at Table 12-1;
- FERC-917: Subsequent Years reporting burdens at Table 12-2;
- FERC-917: Year 1 records management burdens at Table 12-3;
- FERC-917: Subsequent Years records management burdens at Table 12-4;
- FERC-516F: Year 1 reporting burdens at Table 12-5;
- FERC-516F: Year 1 records management burdens at Table 12-6. (There are no Subsequent Years burdens for FERC-516-F.);
- FERC-917: Summary of Year 1 burden hours at Table 12-7; and
- FERC-917: Summary of Subsequent Years burden hours at Table 12-8.

Please note: Every information collection activity in this request involves 1 response annually per respondent. Therefore, the number of responses equals the number of respondents, and the number of respondents and responses is reported in a single column of each of the following tables.

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Proposed Burden Estimates for FERC-917: Reporting Requirements in Year 1 and Subsequent Years

The Commission estimates that the NOPR would affect the burden<sup>10</sup> and cost of FERC-917 reporting requirements in Year 1 as shown in Table 12-1, and in Subsequent Years as shown in Table 12-2, below:

**Table 12-1**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Year 1 Reporting Requirements**

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<sup>10</sup> “Burden” is the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal agency. For further explanation of what is included in the information collection burden, refer to 5 CFR 1320.3.

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A. Area of Modification	B. Annual Number of Respondent s and Responses	C. Annual Average Burden Hours per Response for Reporting Requirement s	D. Annual Total Estimated Burden Hours for Reporting Requirement s (Column B x Column C)	E. Annual Cost per Response for Reporting Requirement s (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirement s (Column D x \$85 per hour)	G. Annual Cost per Responden t
Participate in Long-Term Regional Transmission Planning, which includes developing Long-Term Scenarios, evaluating the benefits of regional transmission facilities, and establishing criteria in consultation with states to select transmission facilities in the regional transmission plan for purposes of cost allocation (Year 1)	125	120 hours	15,000 hours	\$10,200	\$1,275,000	\$10,200

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A. Area of Modification	B. Annual Number of Respondent s and Responses	C. Annual Average Burden Hours per Response for Reporting Requirement s	D. Annual Total Estimated Burden Hours for Reporting Requirement s (Column B x Column C)	E. Annual Cost per Response for Reporting Requirement s (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirement s (Column D x \$85 per hour)	G. Annual Cost per Responden t
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities (Year 1)	125	10 hours	1,250 hours	\$850	\$106,250	\$850
In consultation with state entities, establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process. (Year 1)	125	120 hours	15,000 hours	\$10,200	\$1,275,000	\$10,200



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A. Area of Modification	B. Annual Number of Respondent s and Responses	C. Annual Average Burden Hours per Response for Reporting Requirement s	D. Annual Total Estimated Burden Hours for Reporting Requirement s (Column B x Column C)	E. Annual Cost per Response for Reporting Requirement s (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirement s (Column D x \$85 per hour)	G. Annual Cost per Responden t
Consider in the regional transmission planning processes regional transmission facilities that address certain interconnection-related needs (Year 1)	125	40 hours	5,000 hours	\$3,400	\$425,000	<u>\$3,400</u>
Revise interregional transmission coordination procedures to apply them to Long-Term Regional Transmission Planning (Year 1)	125	40 hours	5,000 hours	<u>\$3,400</u>	<u>\$425,000</u>	<u>\$3,400</u>
<b>Totals</b>	625	330 hours	41,250 hours	\$28,050	\$3,506,250	<u>\$28,050</u>

**Table 12-2**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Subsequent Years Reporting Requirements**

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<b>A. Area of Modification</b>	<b>B. Annual Number of Responses</b>	<b>C. Annual Average Burden Hours per Response for Reporting Requirements</b>	<b>D. Total Estimated Annual Burden Hours for Reporting Requirements (Column B x Column C)</b>	<b>E. Annual Cost per Response for Reporting Requirements (Column C x \$85 per hour)</b>	<b>F. Annual Total Estimated Cost for Reporting Requirements (Column D x \$85 per hour)</b>	<b>G. Annual Cost per Respondent</b>
Participate in Long-Term Regional Transmission Planning, which includes developing Long-Term Scenarios, evaluating the benefits of regional transmission facilities, and establishing criteria in consultation with states to select transmission facilities in the regional transmission plan for purposes of cost allocation (Subsequent Years)	125	40 hours	5,000 hours	\$3,400	\$425,000	\$3,400

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)

RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Respondents and Responses	C. Annual Average Burden Hours per Response for Reporting Requirements	D. Total Estimated Annual Burden Hours for Reporting Requirements (Column B x Column C)	E. Annual Cost per Response for Reporting Requirements (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirements (Column D x \$85 per hour)	G. Annual Cost per Respondent
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities (Subsequent Years)	125	40 hours	5,000 hours	\$3,400	\$425,000	\$3,400
In consultation with state entities, establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process (Subsequent Years)	125	40 hours	5,000 hours	\$3,400	\$425,000	\$3,400

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Responses	C. Annual Average Burden Hours per Response for Reporting Requirements	D. Total Estimated Annual Burden Hours for Reporting Requirements (Column B x Column C)	E. Annual Cost per Response for Reporting Requirements (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirements (Column D x \$85 per hour)	G. Annual Cost per Respondent
Consider in the regional transmission planning processes regional transmission facilities that address certain interconnection-related needs (Subsequent Years)	0	0 hours	0 hours	\$0	\$0	\$0
Revise interregional transmission coordination procedures to apply them to Long-Term Regional Transmission Planning (Subsequent Years)	125	20 hours	2,500 hours	\$1,700	\$212,500	\$1,700
<b>Totals</b>	500	140 hours	17,500 hours	\$11,900	\$1,487,500	\$11,900

Proposed Burden Estimates for FERC-917: Records Management Requirements in Year 1 and Subsequent Years

The Commission estimates that the NOPR would affect the burden and cost of FERC-917 records management requirements in Year 1 as shown in Table 12-3, and in Subsequent Years as shown in Table 12-4, below:

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

**Table 12-3**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Year 1 Records Management Requirements**

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Responses	C. Annual Average Burden Hours per Response for Records Management Requirements	D. Annual Total Estimated Burden Hours for Records Management Requirements (Column B x Column C)	E. Annual Estimated Cost per Response for Records Management Requirements (Column C x \$35.83 per hour)	F. Annual Total Estimated Cost for Records Management Requirements (Column D x \$35.83 per hour)	G. Annual Cost per Respondent
Participate in Long-Term Regional Transmission Planning, which includes developing Long-Term Scenarios, evaluating the benefits of regional transmission facilities, and establishing criteria in consultation with states to select transmission facilities in the regional transmission plan for purposes of cost allocation (Year 1)	125	30 hours	3,750 hours	\$1,075 (rounded)	\$134,363 (rounded)	\$1,075 (rounded)
Revise the regional transmission planning process to enhance transparency of local transmission planning and						

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

**Table 12-4**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Subsequent Years Records Management Requirements**

<b>A. Area of Modification</b>	<b>B. Annual Number of Respondents and Responses</b>	<b>C. Annual Average Burden Hours per Response for Records Management Requirements</b>	<b>D. Total Estimated Annual Burden Hours for Records Management Requirements (Column B x Column C)</b>	<b>E. Annual Cost per Response for Records Management Requirements (Column C x \$35.83 per hour)</b>	<b>F. Annual Total Estimated Cost for Records Management Requirements (Column D x \$35.83 per hour)</b>	<b>G. Annual Cost per Respondent</b>
Participate in Long-Term Regional Transmission Planning, which includes developing Long-Term Scenarios, evaluating the benefits of regional transmission facilities, and establishing criteria in consultation with states to select transmission facilities in the regional transmission plan for purposes of cost allocation (Subsequent Years)	125	10 hours	1,250 hours	\$358 (rounded)	\$44,788 (rounded)	\$358 (rounded)

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)

RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Responses	C. Annual Average Burden Hours per Response for Records Management Requirements	D. Total Estimated Annual Burden Hours for Records Management Requirements (Column B x Column C)	E. Annual Cost per Response for Records Management Requirements (Column C x \$35.83 per hour)	F. Annual Total Estimated Cost for Records Management Requirements (Column D x \$35.83 per hour)	G. Annual Cost per Respondent
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities (Subsequent Years)	125	10 hours	1,250 hours	\$358 (rounded)	\$44,788 (rounded)	\$358 (rounded)
In consultation with state entities, establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process (Subsequent Years)	125	10 hours	1,250 hours	\$358 (rounded)	\$44,788 (rounded)	\$358 (rounded)



Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Responses	C. Annual Average Burden Hours per Response for Records Management Requirements	D. Total Estimated Annual Burden Hours for Records Management Requirements (Column B x Column C)	E. Annual Cost per Response for Records Management Requirements (Column C x \$35.83 per hour)	F. Annual Total Estimated Cost for Records Management Requirements (Column D x \$35.83 per hour)	G. Annual Cost per Respondent
Consider in the regional transmission planning processes regional transmission facilities that address certain interconnection-related needs (Subsequent Years)	0	0 hours	0 hours	\$0	\$0	\$0
Revise interregional transmission coordination procedures to apply them to Long-Term Regional Transmission Planning (Subsequent Years)	125	5 hours	625 hours	\$179 (rounded)	\$22,394	\$179 (rounded)
<b>Totals</b>	500	20 hours	4,375 hours	\$1,253	\$156,758	\$1,253

Proposed Burden Estimates for FERC-516F: Reporting Requirements and Records Management Requirements in Year 1

The proposed estimated burden estimates for FERC-516F would be for Year 1 only. There are no proposed burden estimates for Subsequent Years.

The Commission estimates that the NOPR would affect the burden and cost of FERC-

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

516F reporting requirements in Year 1 as shown in Table 12-5, and the estimated burden and costs of FERC-516 records management requirements in Year 1 in Table 12-6, below:

**Table 12-5**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Year 1 Reporting Requirements**

A. Area of Modification	B. Annual Number of Respondents and Responses	C. Annual Average Burden Hours per Response for Reporting Requirements	D. Annual Total Estimated Burden Hours for Reporting Requirements (Column B x Column C)	E. Annual Cost per Response for Reporting Requirements (Column C x \$85 per hour)	F. Annual Total Estimated Cost for Reporting Requirements (Column D x \$85 per hour)	G. Annual Cost per Respondent
Revise LGIP to indicate the consideration in the regional transmission planning processes of regional transmission facilities that address certain interconnection-related needs	125	20	2,500 hours	\$1,700	\$212,500	\$1,700

**Table 12-6**  
**Proposed Revisions of FERC-516F in the NOPR at Docket No. RM21-17:**  
**Burden Hours and Costs**  
**Year 1 Records Management Requirements**

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

A. Area of Modification	B. Annual Number of Responses	C. Annual Average Burden Hours per Response for Records Management Requirements	D. Annual Total Estimated Burden Hours for Records Management Requirements (Column B x Column C)	E. Annual Estimated Cost per Response for Records Management Requirements (Column C x \$35.83 per hour)	F. Annual Total Estimated Cost for Records Management Requirements (Column D x \$35.83 per hour)	G. Annual Cost per Respondent
Revise LGIP to indicate the consideration in the regional transmission planning processes of regional transmission facilities that address certain interconnection-related needs	125	10 hours	1,250 hours	\$358 (rounded)	\$44,788 (rounded)	\$358 (rounded)

**Table 12-7  
 Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:  
 Summary of Year 1 Burden Hours**

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

<b>A. Area of Modification</b>	<b>B. Total Hours for Reporting Requirements</b>	<b>C. Total Hours for Records Management Requirements</b>	<b>D. Total Hours for All Requirements in Year 1 (Column B + Column C)</b>
Participate in Long-Term Regional Transmission Planning, which includes developing Long-Term Scenarios, evaluating the benefits of regional transmission facilities, and establishing criteria in consultation with states to select transmission facilities in the regional transmission plan for purposes of cost allocation (Year 1)	15,000 hours	3,750 hours	18,750 hours
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities (Year 1)	1,250 hours	1,250 hours	2,500 hours
In consultation with state entities, establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process (Year 1)	15,000 hours	3,750 hours	18,750 hours
Consider in the regional transmission planning processes regional transmission facilities that address certain interconnection-related needs (Year 1)	5,000 hours	1,250 hours	6,250 hours
Revise interregional transmission coordination procedures to apply them to Long-Term Regional Transmission Planning (Year 1)	5,000 hours	1,250 hours	6,250 hours
<b>Totals</b>	41,250 hours	11,250 hours	52,500 hours

**Table 12-8**  
**Proposed Revisions of FERC-917 in the NOPR at Docket No. RM21-17:**  
**Summary of Subsequent Years Annual Burden Hours**

	<b>B. Total Annual Hours for Reporting Requirements</b>	<b>C. Total Annual Hours for Records Management Requirements</b>	<b>D. Total Annual Hours for All Requirements in Subsequent Years (Column B + Column C)</b>
	5,000 hours	1,250 hours	6,250 hours

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

	<b>B. Total Annual Hours for Reporting Requirements</b>	<b>C. Total Annual Hours for Records Management Requirements</b>	<b>D. Total Annual Hours for All Requirements in Subsequent Years (Column B + Column C)</b>
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities (Subsequent Years)	5,000 hours	1,250 hours	6,250 hours
In consultation with state entities, establish a Long-Term Regional Transmission Cost Allocation Method and/or a State Agreement Process (Subsequent Years)	5,000 hours	1,250 hours	6,250 hours
Consider in the regional transmission planning processes regional transmission facilities that address certain interconnection-related needs (Subsequent Years)	0 hours	0 hours	0 hours
Revise interregional transmission coordination procedures to apply them to Long-Term Regional Transmission Planning (Subsequent Years)	2,500 hours	625 hours	3,125 hours
<b>Totals</b>	17,500 hours	4,375 hours	21,875 hours

**13. Provide an estimate of the total annual non-hour cost burden to respondents or recordkeepers resulting from the collection of information. (Do not include the cost of any hour burden already reflected in item 12.)**

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

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
 RM21-17-000, Proposed Rule, “Building for the Future Through Electric Regional Transmission Planning and Cost Allocation and Generator Interconnection,” RIN 1902-AF87

Total Capital and Start-up cost: \$0  
 Total Operation, Maintenance, and Purchase of Services: \$0

**14. Provide estimates of annualized cost to the Federal government.**

The estimated annualized cost to the Federal Government for FERC-917 and FERC-516F is shown below:

<b>FERC-917</b>	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings <sup>11</sup>	7	\$1,264,921
Paperwork Reduction Act Administrative Cost <sup>12</sup>		\$8,279
<b>TOTAL for FERC-917</b>		<b>\$1,273,200</b>
<b>FERC-516F</b>	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings	0.25	\$45,176 (rounded)
Paperwork Reduction Act Administrative Cost		\$8,279
<b>TOTAL for FERC-516F</b>		<b>\$53,455</b>
<b>TOTAL for FERC-917 and FERC-516F</b>		<b>\$1,326,655</b>

**15. Explain the reasons for any program changes or adjustments in hour or cost burden.**

All of the PRA activities resulting from the reforms proposed in the NOPR would be

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<sup>11</sup> Based upon FERC’s 2021 FTE average annual salary plus benefits (\$180,703).

<sup>12</sup> 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 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.

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
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program changes that the Commission has determined will assist in fulfilling its statutory obligations under FPA section 206.

Some of the PRA activities in the NOPR would increase the total burden of FERC-917. At present, the estimated annual burdens for FERC-917 are not differentiated according to whether they are for Year One or for subsequent years. As shown in ROCIS for the currently active FERC-917 information collection, the approved burdens for FERC-917 are 162 responses and 83,927 hours. (These totals do not include the totals for FERC-918, which is included in currently active control number 1902-0233, but which is not included in Docket No, RM21-17-000).

The proposed rule would affect FERC-917 by adding the cumulative totals of first-year and subsequent-year burdens: an additional 1,125 responses and an additional 74,375 hours. The net effect for FERC-917 would be:

- 162 responses plus 1,125 responses = 1,287 responses; and
- 83,927 hours plus 74,375 hours = 158,302 hours.

The remaining PRA activity involved in this proposed rule, in FERC-516F, would replace the historical inactive burdens that have been combined with the burdens in FERC-516—and therefore are no longer included in FERC-516F. The burdens for the new, sole activity on FEERC-516F would be 125 responses and a total of 3,750 hours in Year 1. There would be no burdens after Year 1.

**16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.**

There is no publication of data.

**17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons that display would be inappropriate.**

The Commission expects to post the relevant expiration dates at <https://www.ferc.gov/media/information-collections>.

Proposed revisions of FERC-516F (OMB Control No. 1902-0297) and FERC-917 (OMB Control No. 1902-0233)  
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**18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."**

There are no exceptions.