FERC-516 (OMB Control No. 1902-0096)
FERC-516A (OMB Control No. 1902-0203)
Docket No. RM22-14-000
RIN # 1902-AG00

Supporting Statement for RM22-14-000

FERC-516 (Electric Rate Schedules and Tariff Filings) and FERC-516A (Standardization of Small Generator Interconnection Agreements and Procedures)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve the information collection requirements in FERC-516 "Electric Rate Schedules and Tariff Filings" and FERC-516A "Standardization of Small Generator Interconnection Agreements and Procedures" (Expires 1/31/2023), for a three-year period. Both collections have an existing information collection.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

Section 206 of the Federal Power Act (FPA) obligates the Commission to remedy unjust, unreasonable, and unduly discriminatory or preferential rates, terms, and conditions of transmission service. Generator interconnection is a critical component of open access transmission service.

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

- 18 CFR 35.28 ("Non-Discriminatory Open Access Transmission Tariff");
- The *pro forma* Large Generator Interconnection Procedures (LGIP);
- The *pro forma* Large Generator Interconnection Agreement (LGIA);
- The *pro forma* Small Generator Interconnection Procedures (SGIP); and
- The *pro forma* Small Generator Interconnection Agreement (SGIA).

The Commission's regulations at 18 CFR 35.28 require certain types of entities to have on file an Open Access Transmission Tariff (OATT) that contains minimum terms and conditions of non-discriminatory transmission service. This requirement applies to all public utilities[1] that own, control, or operate facilities used for transmitting electric energy in interstate commerce. Public utilities that are required to have an OATT on file with the Commission must include the *pro forma* LGIP, *pro forma* LGIA, *pro forma* SGIP, and *pro forma* SGIA in their OATT. Other provisions 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.

[1] 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.

The Commission originally developed the *pro forma* LGIP and *pro forma* LGIA in Order No. 2003, 68 FR 49846 (Aug. 19, 2003). In Order No. 2003, the Commission determined that standard interconnection procedures are needed in order to: (1) limit opportunities for transmission providers to favor their own generation; (2) facilitate market entry for generation competitors by reducing interconnection costs and time; and (3) encourage needed investment in generation and transmission infrastructure. The final rule in Order No. 2003 required 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 standard agreement came to be known as the *pro forma* LGIA. Similarly, the Commission developed standard procedures and a standard agreement for interconnecting generators with a capacity of 20 MW or less in Order No. 2006, 70 FR 34189 (June 13, 2005). The standard procedures for small generators came to be known as the *pro forma* SGIP. The standard agreement came to be known as the *pro forma* SGIA.

Since the issuance of Order Nos. 2003 and 2006 and other Commission orders modifying the standard generator interconnection procedures and agreements, the electricity sector has transformed significantly. The growth of new resources seeking to interconnect to the transmission system and the differing characteristics of those resources have created new challenges for the generator interconnection process. These new challenges are creating large backlogs in the queues of interconnection customers awaiting service (interconnection queues), and uncertainty regarding the cost and timing of interconnecting to the transmission system, potentially increasing costs for consumers. Backlogs in the generator interconnection process, in turn, can create reliability issues as needed new generating facilities are unable to come online in an efficient and timely manner. Therefore, the Commission believes that it may be appropriate to reform the Commission's standard generator interconnection procedures and agreements to ensure that interconnection customers are able to interconnect to the transmission system in a reliable, efficient, transparent, and timely manner, thereby ensuring that rates, terms, and conditions for Commission-jurisdictional services remain just and reasonable and not unduly discriminatory or preferential.

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

Overview of Reforms in Proposed Rule

Pursuant to section 206 of the FPA, the proposed rule in Docket No. RM22-14-000 would reform the Commission's standard generator interconnection procedures and agreements to ensure that interconnection customers are able to interconnect to the electric transmission system in a reliable, efficient, transparent, and timely manner. The proposed rule would require all public utilities that own, control, or operate facilities used for transmitting electric energy in interstate commerce to modify their tariffs and jurisdictional agreements to comply with the Commission's revised standard generator interconnection procedures and agreements. The

Commission will use the information collected in compliance filings after any final rule in this docket to determine whether each transmission provider complies with the final rule such that the rates, terms, and conditions for Commission-jurisdictional services are just and reasonable and not unduly discriminatory or preferential.

Specifically, as explained in detail in the NOPR, the Commission proposed reforms to the *pro forma* LGIP and *pro forma* LGIA that would require public utilities to: (1) implement a first-ready, first-served cluster study process; (2) increase the speed of generator interconnection queue processing; and (3) incorporate technological advancements into the generator interconnection process.

The Commission also proposed reforms to the *pro forma* SGIP and *pro forma* SGIA that would require public utilities to incorporate alternative transmission technologies into the generator interconnection process and to provide modeling and performance requirements for non-synchronous generators.

These proposed requirements are presented below in three categories, according to (1) which existing information collection the proposed requirement relates and (2) whether the requirement will lead to one-time and ongoing information collection activities, or merely one-time information collection activities.

FERC-516 Information Collection

One-Time and Ongoing Activities due to Revisions Proposed to Standard Generator Interconnection Procedures and Agreements

The NOPR proposes provisions that would be required in public utilities' tariffs and jurisdictional agreements. The proposed revisions below would result in both one-time and ongoing information collection activities.

Requirement to Offer Public Interconnection Information

The proposed rule would set minimum requirements for transmission providers to publicly post available information pertaining to generator interconnection, including providing an interactive visual representation of available interconnection capacity and a table of relevant interconnection metrics that allow prospective interconnection customers to see certain estimates of a potential generating facility's effect on the transmission provider's transmission system.

A prospective interconnection customer would use the interactive visual to obtain preliminary information about the potential addition of a proposed project (a user-specified amount of megawatts (MWs), voltage level, and point of interconnection), which would be used by the interconnection customer to facilitate a high-level comparison between various points of interconnection, without requiring the submission of an interconnection request. Without this information, interconnection customers will have greater incentive to submit multiple interconnection requests with different configurations of the same project in order to determine

the configuration and point of interconnection that meets their desired interconnection, which clogs the interconnection queue, triggers restudies when the requests that may not be desirable for the interconnection customer due to associated costs are ultimately withdrawn, and therefore impairs the ability of transmission providers to process interconnection requests in a timely and efficient manner.

The information collection activity associated with this reform during Year 1 includes the one-time compliance filing and information collection to set up the interactive visual during Year 1. This reform would also require transmission providers to collect information to update the interactive visual representation after the completion of each generator interconnection study periodduring subsequent years.

First-Ready, First-Served Cluster Study Process
The proposed rule would require transmission providers to eliminate the use of serial first-come, first-served study processes and instead use first-ready, first-served cluster study processes for the study of generator interconnection requests.

As part of this reform, transmission providers would be required to publicly post metrics for cluster study processing time in a manner similar to the currently-required posting requirements for serial study processing time pursuant to Order No. 845 (which received OMB approval). This revised information would be used by the Commission and the public to determine the status of interconnection queue processing to determine if the queue is being processed in an efficient and timely manner.

The information collection activity associated with this reform during Year 1 includes the one-time compliance filing. This reform would also require transmission providers to collect information to post metrics on a quarterly basis during subsequent years similar to the current requirement to post metrics on a quarterly basis.

Elimination of Reasonable Efforts Standard
The proposed rule would revise the *pro forma* LGIP to eliminate the reasonable efforts standard for transmission providers completing interconnection studies, and instead impose firm study deadlines and establish penalties that would apply when transmission providers fail to meet these deadlines.

As part of this reform, the proposed rule would require a transmission provider to post to its Open Access Same-Time Information System (OASIS) or a public website on a quarterly basis (1) the total amount of such penalties assessed in the previous quarter and (2) the highest amount of such penalties assessed to a single interconnection request from the previous quarter. These metrics will be used by the Commission and the public to assess the impact and efficacy of the reform.

The information collection activity associated with this reform during Year 1 includes the one-time compliance filing. This reform would also require transmission providers to collect information to post metrics on a quarterly basis during subsequent years.

Revisions to Affected Systems Study Process
The proposed rule would revise the *pro forma* LGIP to include an affected systems study process, including initial notification, affected system scoping meeting, study process, cost allocation, study results and assessment, and a financial penalties assessment.

The proposed rule would require that the transmission provider provide data monthly, or more frequently as needed, to affected system operators during the affected system study process. Such data would include the amount and location of generation in the transmission provider's interconnection queue as well as updated information about the transmission provider's transmission system. This information will be used by affected system operators in conducting affected system studies. Without such information, affected system operators may be less able to process affected system studies in an accurate and timely manner.

The information collection activity associated with this reform during Year 1 includes the one-time compliance filing. This reform would also require information collection and disclosure on a monthy basis (or more frequently as needed) during the affected system study process.

Annual Informational Report on Consideration of Alternative Technologies
The proposed rule would revise the *pro forma* LGIP and *pro forma* SGIP to require transmission providers to submit an annual informational report to the Commission that details whether, and if so how, advanced power flow control, transmission switching, dynamic line ratings, static synchronous compensators, and static VAR compensators were considered in interconnection requests over the last year. The submission of these reports would add transparency to the evaluation process and deployment of alternative transmission technologies in generator interconnection processes.

The information collection activity associated with this reform during Year 1 includes the one-time compliance filing. This reform would also require an ongoing information collection in connection with the annual informational report.

<u>One-Time Activities Due to Revisions Proposed to Standard Generator Interconnection Procedures and Agreements</u>
The NOPR proposes provisions that would be required in public utilities' tariffs and jurisdictional agreements. The proposed revisions below would result in one-time information collection activities related to changing public utilities' tariffs and jurisdictional agreements in Year 1. For the following proposed reforms, the Commission estimates no ongoing information collection burden.

These proposed reforms include:

- **Informational Interconnection Study** – requiring transmission providers to offer an informational interconnection study to serve as additional information for prospective interconnection customers in deciding whether to submit an interconnection request;
- **Allocation of Cluster Study Costs** – requiring transmission providers to allocate the shared costs of cluster studies as follows: 90% of the applicable study costs to interconnection customers on a *pro rata* basis based on requested MWs included in the applicable cluster, and 10% of the applicable study costs to interconnection customers on a per capita basis based on the number of interconnection requests included in the applicable cluster;
- **Allocation of Cluster Network Upgrades** – requiring transmission providers to allocate network upgrade costs to interconnection customers within a cluster using a proportional impact method;
- **Allocation of Shared Network Upgrades Costs** – requiring transmission providers to allocate the costs for network upgrade costs between interconnection customers in an earlier cluster study and interconnection customers in a subsequent cluster study that benefit from the same network upgrade in a manner that is roughly commensurate with the benefits received;
- **Increased Study Deposits and LGIA Deposit** – requiring transmission providers to increase the total study deposit amounts and requiring require interconnection customers to submit a deposit equal to nine times the amount of its study deposit when executing the LGIA or requesting the filing of an unexecuted LGIA, to be refunded once the generating facility achieves commercial operation;
- **Demonstration of Site Control** – requiring interconnection customers to demonstrate 100% site control for their proposed generating facilities when they submit their interconnection request or submit a deposit in lieu of site control when regulatory limitations prohibit the interconnection customer from obtaining site control;
- **Demonstration of Commercial Readiness** – requiring interconnection customers to make certain commercial readiness demonstrations to enter a cluster study, cluster re-study, and facilities study, or submit a deposit in lieu of demonstrating commercial readiness;
- **Imposition of Withdrawal Penalties** – requiring transmission providers to assess withdrawal penalties to interconnection customers in certain circumstances;
- **Implementation of Transition Process** – requiring transmission providers to establish a transition process for moving to a first-ready, first-served cluster study process, by offering existing, eligible interconnection customers several options;
- **Affected Systems *Pro Forma* Agreements** – requiring transmission providers to adopt a *pro forma* affected system study agreement and *pro forma* affected systems facilities construction agreement;
- **Affected Systems Modeling and Study Assumptions** – requiring a transmission provider acting as the affected system to study interconnection requests using Energy

Resource Interconnection Service modeling standards, regardless of the requested level of service on the host transmission provider's transmission system;

- **Optional Resource Solicitation Study** – requiring transmission providers to allow a resource planning entity to initiate an optional resource solicitation study, an informational study evaluating various combinations of interconnection requests associated with a qualifying resource solicitation;
- **Co-Located Generation Sites Behind One Point of Interconnection with Shared Interconnection Requests** – requiring transmission providers to allow more than one resource to co-locate on a shared site behind a single point of interconnection and share a single interconnection request;
- **Revisions to Material Modification to Require Consideration of Generating Facility Additions** – requiring transmission providers to evaluate the proposed addition of a generating facility to an interconnection request, and not automatically consider such a request to be a material modification of the interconnection request, as long as the interconnection customer does not request a change to the originally requested interconnection service level;
- **Availability of Surplus Interconnection Service** – requiring transmission providers to allow interconnection customers to access the surplus interconnection service process once the original interconnection customer has an executed LGIA or requests the filing of an unexecuted LGIA;
- **Operating Assumptions for Interconnection Studies** – requiring transmission providers, at the request of the interconnection customer, to use operating assumptions for interconnection studies that reflect the proposed operation of an electric storage resource or co-located resource containing an electric storage resource (including hybrid resources);
- **Consideration of Alternative Transmission Technologies in Interconnection Studies Upon Request of Interconnection Customer** – requiring transmission providers, upon request of the interconnection customer, to evaluate certain requested alternative transmission solution(s) during the LGIP cluster study within the generator interconnection process;
- **Modeling Requirements for Non-Synchronous Generating Facilities** – requiring interconnection customers requesting to interconnect a non-synchronous generating facility to submit to the transmission provider three models needed for accurate interconnection studies;
- **Ride Through Requirements for Non-Synchronous Generating Facilities** – requiring all newly interconnecting large generating facilities to ride through abnormal frequency and voltage conditions; and,
- **Applicability of Ride Through Requirements to Generating Facilities** – requiring that all newly interconnecting large generating facilities must provide ride-through capability consistent with any standards and guidelines that are applied to other generating facilities in the balancing authority area on a comparable basis.

FERC 516A Information Collection

One-Time Activities Due to Revisions Proposed to Standard Small Generator Interconnection Procedures and Agreements

The NOPR describes, in the *pro forma* SGIP and SGIA, proposed provisions that would be required in public utilities' tariffs and jurisdictional agreements. The proposed revisions below would result in only one-time information collection activities related to changing public utilities' tariffs and jurisdictional agreements. For the following proposed reforms, the Commission estimates no ongoing information collection burden because there is either no information collection aspect of the reform or the proposed requirements would merely supplant existing ones.

These proposed reforms include:

- **Consideration of Alternative Transmission Technologies in Interconnection Studies Upon Request of Interconnection Customer** – requiring transmission providers, upon request of the interconnection customer, to evaluate certain requested alternative transmission solution(s) during the SGIP system impact study and facilities study within the generator interconnection process; and
- **Modeling Requirements: Transmission Providers** – requiring interconnection customers requesting to interconnect a non-synchronous generating facility under the *pro forma* SGIP to submit to the transmission provider three models needed for accurate interconnection studies.

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

Commission staff expects that public utilities will revise their tariffs in accordance with any final rule in this docket by filing electronically using eTariff (eTariff is described at https://www.ferc.gov/ferc-online/etariff.). The tariffs are available to the public on the internet through FERC's eTariff viewer. The compliance filings and agency action on the filings are also publicly available on ferc.gov in eLibrary.

Additionally, public utilities are required to maintain Open Access Same-Time Information System (OASIS) websites to provide transmission customers with equal and timely access to transmission and ancillary service tariff information.[2] This NOPR proposes to require public utilities to post certain data to their OASIS site on an ongoing basis, in a manner similar to other existing reporting requirements.

[2] *See* 18 CFR 37.6 (2021) (Information to be posted on the OASIS).

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 filings and to minimize the filing burden. The Commission is unaware of any other source of this information that is readily available. Therefore, no duplicate information is available that would serve as a substitute for this information and for performing oversight and review responsibilities under applicable legislation.

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

The collection of this data imposes the least possible burden for small and large entities while collecting the information the Commission deems necessary to perform its statutory responsibilities.

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

If the Commission conducted these collections less frequently or did not conduct them at all, the Commission would be unable to fulfill its statutory obligation to ensure that rates, terms, and conditions of Commission-jurisdictional services are just and reasonable and not unduly discriminatory or preferential.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

One requirement proposed in this NOPR could potentially be seen as raising special circumstances. The NOPR proposes to require transmission providers to provide affected system operators with data monthly, or more frequently as needed, during the affected system study process if it is triggered by an individual generator interconnection request. It is crucial for this requirement to apply monthly during the affected system study process (as opposed to quarterly) because the data is intended to help expedite and coordinate the affected system study process specific to individual generator interconnection requests; therefore, the sharing of such data is most relevant and useful when the affected system study process is ongoing.

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

The Commission's 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 June 16, 2022, the Commission published the NOPR on eLibrary. The Office of the Federal Register published the NOPR in the Federal Register on July 5, 2022[3].

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission makes no payments or gifts to respondents as part of this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

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

The collection does not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The currently approved information collection burden is:

FERC-516:
Number of responses: 6,768
Hourly Burden: 542,919

FERC-516A:
Number of responses: 3,241

[3] 87 FR 39934 (NOPR July 5, 2022)

Hourly Burden: 16,221

The information collection burden of the reforms proposed in this NOPR is explained in further detail in the following table, which includes agency adjustments to number of respondents and hourly burden (as described in question 15):

Our estimates are based on the number of transmission providers that submitted compliance filings in response to Order No. 845, which is the Commission's most recent interconnection rulemaking that required transmission providers to significantly revise their interconnection procedures and agreements. As such, we estimate that 45 transmission providers, including the RTOs/ISOs, will be subject to this rulemaking. The burden[4] and cost estimates below are based on (1) the initial need for transmission providers to file revised versions of the standard generator interconnection procedures and agreements in Year 1 and (2) ongoing information collection activities in connection with reporting and disclosure requirements in subsequent years. With regards to ongoing information collection activities, the NOPR proposes to add annual and quarterly information collection activities regarding the provision of public interconnection information, compilation and posting of metrics related to completion of cluster studies, compilation and posting of metrics related to penalties for late interconnection studies following the elimination of the reasonable efforts standard, and reporting related to the consideration of alternative technologies in interconnection requests. The NOPR also proposes an information collection requirement in which transmission providers will provide affected system operators with data monthly, or more frequently as needed, during the affected system study process. For other proposed reforms, we estimate no ongoing information collection burden. We estimate that the reforms proposed in this NOPR would affect the burden and cost of FERC-516 and FERC-516A as follows.

[4] "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 C.F.R. § 1320.3.

Estimated Burden of Proposed Reforms Due to NOPR in Docket No. RM22-14-000					
Proposed Requirements	**Number of Respondents (1)**	**Annual Number of Responses Per Respondent (2)**	**Total Number of Responses (Rounded) (1) * (2) = (3)**	**Average Burden (Hr.) & Cost ($) Per Response[5] (4)**	**Total Annual Burden Hours & Total Annual Cost ($) (Rounded) (3) * (4) = (5)**
FERC-516:					
Informational Interconnection Study	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Public Interconnection Information	45 (TPs)	Year 1: 1 Ongoing: 2	Year 1: 45 Ongoing: 90	Year 1: 4 hr; $348 Ongoing: 4 hr; $348	Year 1: 180 hr; $15,660 Ongoing: 360 hr; $31,320
Cluster Study	45 (TPs)	Year 1: 1 Ongoing: 4	Year 1: 45 Ongoing: 180	Year 1: 80 hr; $6,960 Ongoing: 4 hr; $348	Year 1: 3600 hr; $313,200 Ongoing: 720 hr; $62,640
Allocation of Cluster Study Costs	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Allocation of Cluster Network Upgrades	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Shared Network Upgrades	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0

[5] Commission staff estimates that respondents' hourly wages plus benefits are comparable to those of FERC employees. Therefore, the hourly cost used in this analysis is $87.00 ($180,703 per year).

Increased Study Deposits and LGIA Deposit	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Demonstration of Site Control	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0
Commercial Readiness	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Withdrawal Penalties	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Transition Process	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0
Elimination of Reasonable Efforts Standard	45 (TPs)	Year 1: 1 Ongoing: 4	Year 1: 45 Ongoing: 180	Year 1: 80 hr; $6,960 Ongoing: 4 hr; $348	Year 1: 3600 hr; $313,200 Ongoing: 720 hr; $62,640
Affected Systems Study Process	45 (TPs)	Year 1: 5 Ongoing: 5[6]	Year 1: 225 Ongoing: 225	Year 1: 80 hr; $6,960 Ongoing: 80 hr; $6960	Year 1: 18,000 hr; $1,566,000 Ongoing: 18,000 hr; $1,566,000

[6] The ongoing burden estimated here reflects the estimated yearly average of the requirement to provide affected system operators with data monthly during the affected system study process. The NOPR proposes to require the affected system study process to take 90 days; therefore, transmission providers will only be required to provide affected system operators with this data on a monthly basis during that time period. We estimate that the average transmission provider will be required to share data with affected system operators 5 times over the course of a year.

Affected Systems Pro Forma Agreements	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Affected Systems Modeling and Study Assumptions	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Optional Resource Solicitation Study	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Co-Located Generation Sites Behind One Point of Interconnection with Shared Interconnection Requests	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Revisions to Material Modification to Require Consideration of Generating Facility Additions	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0
Availability of Surplus Interconnection Service	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Operating Assumptions for Interconnection Studies	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0

Consideration of Alternative Transmission Technologies in Interconnection Studies Upon Request of Interconnection Customer	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0
Annual Informational Report	45 (TPs)	Year 1: 1 Ongoing: 1	Year 1: 45 Ongoing: 45	Year 1: 4 hr; $348 Ongoing: 4 hr; $348	Year 1: 180 hr; $15,660 Ongoing: 180 hr; $15,660
Modeling Requirements	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Ride Through	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Applicability of Ride Through	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Total for FERC-516			**Year 1: 1,305 Ongoing: 720**	**Year 1: 49,680 hr; $4,322,160 Ongoing: 19,980 hr; $1,738,260**	
FERC-516A:					
Consideration of Alternative Transmission Technologies in Interconnection Studies Upon Request of Interconnection Customer	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 80 hr; $6,960 Ongoing: 0	Year 1: 3600 hr; $313,200 Ongoing: 0

Modeling Requirements: Transmission Providers	45 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 45 Ongoing: 0	Year 1: 4 hr; $348 Ongoing: 0	Year 1: 180 hr; $15,660 Ongoing: 0
Total for FERC-516A			**Year 1: 90 Ongoing: 0**	**Year 1: 3780 hr; $328,860 Ongoing: 0**	
Grand Total[7] (FERC-516 plus FERC-516A, including all respondents)			**Year 1: 1,395 Ongoing: 720**	**Year 1: 53,460 hr; $4,651,020 Ongoing: 19,980 hr; $1,738,260**	
Grand Total Average Per Entity Cost (45 TPs)				**Year 1: $103,356 Ongoing: $38,628**	

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor start-up or other non-labor costs.

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

All of the costs associated with burden hours (labor) are described in Questions #12 and #15 in this supporting statement.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimates of the cost for analysis and processing of filings are based on salaries and benefits for professional and clerical support. The estimated cost represents staff analysis, decision-making, and review of any actual filings submitted 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 vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings, other changes to the collection, and publications in the Federal Register.

[7] This grand total represents the information collection burden that would be added to the existing approved information collection burden following a final rule in this docket. Thus, this represents an increase in information collection burden.

The chart below represents the existing estimated annualized cost to federal government for FERC-516 and FERC-516A. We do not anticipate any change to the number of employees due to this NOPR.

FERC-516	Number of Employees (Full-Time Equivalents [FTE])	Estimated Annual Federal Cost
Analysis and Processing of FERC-516[8]	20[9]	$3,614,060
PRA[10] Administrative Cost		$8,279
FERC Total		$3,622,339

FERC-516A	Number of Employees (Full-Time Equivalents [FTE])	Estimated Annual Federal Cost
Analysis and Processing of filings[11]	.44	$79,509.32
PRA[12] Administrative Cost[13]		$8,279
FERC Total		$87,788.32

[8] Based upon 2021 FERC FTE average annual salary plus benefits ($180,703/year), or $87/hour.

[9] The number of FTE's is the agency's best estimate for all information collection activities of FERC-516. This includes the cost of analysis and processing for all items listed in the burden table in question 12. FERC will reassess the number of FTE's at the time of the next renewal.

[10] Paperwork Reduction Act of 1995 (PRA).

[11] The cost is based upon FERC's 2021 annual average salary plus benefits of $180,703 (or $87/hour).

[12] Paperwork Reduction Act of 1995 (PRA).

[13] The PRA Administrative Cost is 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. This average annual cost includes requests for extensions, all associated, other changes to the collection, and required publications in the Federal Register. The estimate was updated July 2022 to convert the 900 hrs. FERC Staff Time to a number of employee equivaletnt FTE at .44 .

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

All of the PRA activities resulting from the reforms proposed in the NOPR would be program changes that the Commission has determined will assist in fulfilling its statutory obligations under FPA section 206. The reforms proposed in the NOPR are intended to remedy issues with the Commission's standard generator interconnection procedures and agreements such that interconnection customers are able to interconnect to the transmission system in a reliable, transparent, and timely manner, thereby ensuring that rates, terms, and conditions for Commission-jurisdictional services remain just and reasonable and not unduly discriminatory or preferential.

Some of the PRA activities in the NOPR would increase the total burden of FERC-516. At present, the estimated annual burdens for FERC-516 are not differentiated according to whether they are for Year One or for subsequent years. As shown in ROCIS for the currently active FERC-516 information collection, the approved burdens for FERC-516 are 6,768 responses and 542,919 hours. (These totals do not include the totals for FERC-516A, which is discussed below.)

The proposed rule would affect FERC-516 by adding the cumulative totals of first-year and subsequent-year burdens: an additional 2,025 responses and an additional 69,660 hours. The net effect for FERC-516 would be:

- 6,768 responses plus 2,025 responses = 8,793 responses; and
- 542,919 hours plus 69,660 hours = 612,579 hours.

The remaining PRA activity involved in this proposed rule, in FERC-516A, would be 90 responses and a total of 3,780 hours in Year 1. There would be no burdens after Year 1.

The net effect for FERC-516A would be:

- 3,421 responses plus 90 responses = 3,331 responses; and
- 16,221 hours plus 3,780 hours = 20,001 hours.

FERC-516	Total Request	Previously Approved	Change due to Agency Adjustment in Estimate	Change Due to Agency Discretion
FERC-516				
Annual Number of Re-	8,793	6,510	0	2,025

sponses				
Annual Time Burden (Hours)	612,579	503,486	0	69,660
Annual Cost Burden ($)	$0	$0	$0	$0

FERC-516A	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	3,331	3,241	0	90
Annual Time Burden (Hr.)	20,001	16,221	0	3,780
Annual Cost Burden ($)	0	0	0	0

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

There are no publication plans for the collection of information.

17. DISPLAY OF THE EXPIRATION DATE

The OMB expiration dates are posted on https://www.ferc.gov/enforcement-legal/legal/information-collections.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.