

Supporting Statement for
**FERC-549, Natural Gas Policy Act (NGPA) Section 311 Transactions,
Natural Gas Act (NGA) Blanket Certificate Transactions, and
Market-Based Rates for Storage**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-549, NGPA Section 311 Transactions and NGA Blanket Certificate Transactions (OMB Control No. 1902-0086), for a three-year period. FERC-549 is an existing data collection with reporting requirements in 18 CFR Part 284.

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

FERC-549 enables the Commission to implement portions of section 311 of the Natural Gas Policy Act (NGPA) (15 U.S.C. 3371) and portions of sections 4 and 7 of the Natural Gas Act (NGA) (15 U.S.C. 717c and 717f). The relevant reporting requirements are contained in 18 CFR Part 284.

Section 311 of the NGPA authorizes FERC to allow interstate natural gas pipelines and intrastate natural gas pipelines to transport gas “on behalf of” other entities. Congress enacted the NGPA to eliminate the regulatory barriers between the intrastate and interstate markets and to promote the entry of intrastate pipelines into the interstate market.

Under section 311(a)(1) of the NGPA and 18 CFR 284.101 and 284.102, any interstate pipeline may transport natural gas without prior Commission approval “on behalf of” an intrastate pipeline or a local distribution company (LDC). One of the conditions of this authorization is prior certification by the relevant intrastate pipeline or LDC that the interstate pipeline is providing transportation service on its behalf.

Under section 311(a)(2) of the NGPA and 18 CFR 284.122 and 284.123, any intrastate pipeline may, without prior Commission approval, transport natural gas on behalf of any interstate pipeline or on behalf of any LDC served by an interstate pipeline so long as their rates are “fair and equitable” and do not “exceed an amount which is reasonably comparable to the rates and charges interstate pipelines would be permitted to charge for providing similar transportation services.”

FERC reviews applications for construction and operation of natural gas pipelines under the authority of section 7 of the NGA. Under a blanket certificate issued pursuant to section 7(c) of the NGA, a natural gas company may undertake a restricted array of routine activities without the need to obtain a case-specific certificate for each individual project.

Under section 4(f) of the NGA, the Commission may authorize a natural gas company (or any person that will be a natural gas company on completion of any proposed construction) to provide storage and storage-related services at market-based rates (MBRs) for new storage capacity related to a specific facility placed in service after August 8, 2005, notwithstanding the fact that the company is unable to demonstrate that the company lacks market power, if the Commission determines that:

- Market-based rates are in the public interest and necessary to encourage the construction of the storage capacity in the area needing storage services, and
- Customers are adequately protected.

In addition, section 4(f) requires the Commission to ensure that reasonable terms and conditions are in place to protect consumers, and to “review periodically” whether the MBR is just, reasonable, and not unduly discriminatory or preferential.

Finally, the Commission authorizes LDCs and Hinshaw pipelines¹ to apply for NGA section 7 blanket certificates in accordance with 18 CFR 284.224(b)(3). A blanket certificate authorizes an LDC or Hinshaw pipeline to operate subject to FERC's jurisdiction under the NGA to the same extent as an interstate pipeline, except as to the method of setting rates.

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

Transportation by Interstate Pipelines

Under 18 CFR 284.13, an interstate pipeline providing transportation on behalf of an intrastate pipeline or LDC must post information on its web site in downloadable file formats, and must maintain access to that information for a period not less than 90 days

¹ Hinshaw pipelines are local distribution pipelines or companies served by interstate pipelines. Hinshaw pipelines are not subject to Commission jurisdiction by reason of section 1(c) of the NGA (15 U.S.C. 717(c)). A Hinshaw Pipeline must obtain a blanket certificate under 18 CFR Part 284, Subpart G to sell or transport gas in interstate commerce.

from the date of posting. Failure to collect the information would hinder the Commission's fulfilment of its statutory responsibilities to monitor and prevent potentially manipulative or unduly discriminatory activity.

For firm service and for release transactions, the pipeline must post with respect to each contract, or revision of a contract for service, the following information no later than the first nomination under a transaction:

- The full legal name of the shipper, and identification number, of the shipper receiving service under the contract, and the full legal name, and identification number, of the releasing shipper if a capacity release is involved or an indication that the pipeline is the seller of transportation capacity;
- The contract number for the shipper receiving service under the contract, and, in addition, for released transactions, the contract number of the releasing shipper's contract;
- The rate charged under each contract;
- The maximum rate, and for capacity release transactions not subject to a maximum rate, the maximum rate that would be applicable to a comparable sale of pipeline services;
- The duration of the contract;
- The receipt and delivery points and the zones or segments covered by the contract, including the location name and code adopted by the pipeline for each point, zone or segment;
- The contract quantity or the volumetric quantity under a volumetric release;
- Special terms and conditions applicable to a capacity release transaction;
- Whether there is an affiliate relationship between the pipeline and the shipper or between the releasing and replacement shipper;
- Whether a capacity release is a release to an asset manager and the asset manager's obligation to deliver gas to, or purchase gas from, the releasing shipper; and
- Whether a capacity release is a release to a marketer participating in a state-regulated retail access program.

For interruptible service, the pipeline must post on a daily basis no later than the first nomination for service under an interruptible agreement, the following information:

- The full legal name, and identification number, of the shipper receiving service;
- The rate charged;
- The maximum rate;
- The receipt and delivery points between which the shipper is entitled to transport gas at the rate charged, including the location name and code adopted by the pipeline for each point, zone, or segment;
- The quantity of gas the shipper is entitled to transport;

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- Special details pertaining to the agreement, including conditions applicable to a discounted transportation contract and all aspects in which the agreement deviates from the pipeline's tariff; and
- Whether the shipper is affiliated with the pipeline.

Transportation by Intrastate Pipelines

18 CFR 284.123(b) provides that intrastate gas pipeline companies may file for Commission approval of rates for services performed in the interstate transportation of gas. An intrastate gas pipeline company may elect to use rates contained in one of its then-effective transportation rate schedules on file with an appropriate state regulatory agency for intrastate service comparable to the interstate service or file for approval of rates and supporting information showing the rates are cost based and are fair and equitable. Failure to collect this information would prevent the Commission from sufficient monitoring and evaluation of pipeline transactions to meet its statutory obligations under the NGPA and the NGA.

Within 150 days after the application is filed for approval of cost-based rates, the rate is deemed to be fair and equitable unless the Commission either extends the time for action, institutes a proceeding, or issues an order providing for rates it deems to be fair and equitable.

18 CFR 284.123(e) requires that within 30 days of commencement of new service, any intrastate pipeline engaging in the transportation of gas in interstate commerce must file a statement that includes the interstate rates and a description of how the pipeline will engage in the transportation services, including operating conditions. If an intrastate gas pipeline company changes its operations or rates it must amend the statement on file with the Commission. Such amendment is to be filed not later than 30 days after commencement of the change in operations or change in rate election.

18 CFR 284.123(f) requires that all filings must be made electronically consistent with requirements set forth in Order No. 714.

18 CFR 284.102(e) requires interstate pipelines to obtain proper certification in order to ship natural gas on behalf of intrastate pipelines and LDCs. This certification consists of a letter from the intrastate pipeline or LDC authorizing the interstate pipeline to ship gas on its behalf. In addition, interstate pipelines must obtain from its shippers certifications including sufficient information to verify that their services qualify under 18 CFR 284.102.

Transportation by LDCs and Hinshaw Pipelines

Under 18 CFR 284.224, an application for a blanket certificate may be filed by any LDC served by an interstate pipeline or any Hinshaw pipeline. Failure to collect the information in such applications would hinder the Commission's fulfillment of its statutory responsibilities to monitor and prevent potentially manipulative or unduly discriminatory activity.

An application under 18 CFR 284.224 must be accompanied by a fee or a petition for waiver of the fee, and must include:

- The exact legal name of applicant
- The applicant's principal place of business;
- Whether the applicant is an individual, partnership, corporation or otherwise;
- The state under the laws of which the applicant is organized or authorized;
- The agency having jurisdiction over rates and tariffs;
- The name, title, and mailing address of the person or persons to whom communications concerning the application are to be addressed;
- The volumes of natural gas which were received during the most recent 12-month period by the applicant within or at the boundary of a state, and were exempt from the Natural Gas Act jurisdiction of the Commission by reason of section 1(c) of the Natural Gas Act, if any
- The total volume of natural gas received by the applicant from all sources during the same time period;
- Citation to all currently valid declarations of exemption issued by the Commission under section 1(c) of the Natural Gas Act if any;
- A statement that the applicant will comply with the same rates and charges, terms and conditions, and reporting requirements that apply to a transaction authorized for an intrastate pipeline transportation of natural gas by any intrastate pipeline on behalf of an interstate pipeline or an LDC served by an interstate pipeline;
- A form of notice suitable for publication in the Federal Register, which will briefly summarize the facts contained in the application in such way as to acquaint the public with its scope and purpose; and
- A statement of the methodology to be used in calculating rates for services to be rendered.

Initial Approval of Market-Based Rates (MBRs) for Storage

Section 4(f) of the NGA authorizes the Commission to permit natural gas storage service providers to charge market-based rates (MBRs) for storage, subject to conditions and requirements set forth in the statute. The Commission implements this authority under 18 CFR 284.501 through 284.505.

The regulation at 18 CFR 284.502(a) provides that an application to use MBRs for

storage may be submitted along with a certificate application. Service, notice, intervention, and protest procedures for such filings must conform with those applicable to the certificate application.

Applicants Providing Service under 18 CFR Subpart B or Subpart G

The regulation at 18 CFR 284.502(b) applies to applications to use MBRs for storage that are not filed as part of certificate applications. The applicant must file with the Commission a request for a declaratory order if the applicant provides service under 18 CFR Subpart B or Subpart G.² In addition, the applicant must file a request for a market-power determination that sets forth its specific request adequately demonstrates that it lacks market power in the market to be served, and include in an executive summary a statement of position and a statement of material facts. The statement of material facts must include citations to the supporting statements, exhibits, affidavits, and prepared testimony.

In addition, the application must include:

- A description of the geographic markets for storage services in which the applicant seeks to establish that it lacks significant market power;
- The product market or markets for which the applicant seeks to establish that it lacks significant market power;
- A description of the applicant's own facilities and services, and those of all parent, subsidiary, or affiliated companies, in the relevant markets;
- A description of available alternatives in competition with the applicant in the relevant markets and other competition constraining the applicant's rates in those markets;
- A description of potential competition in the relevant markets;
- A general system map and maps by geographic markets;
- The calculation of the market concentration of the relevant markets using the Herfindahl-Hirschman Index;³
- A description of any other factors that bear on the issue of whether the applicant lacks significant market power in the relevant markets; and
- The proposed testimony in support of the application and will serve as the applicant's case-in-chief, if the Commission sets the application for hearing.

² Subpart B pertains to transportation of natural gas under section 311(a)(1) of the NGPA by an interstate pipeline on behalf of an intrastate pipeline or LDC. Subpart G pertains to transportation of natural gas under section 7 of the NGA by an LDC or Hinshaw pipeline holding a blanket certificate.

³ The Herfindahl-Hirschman Index is a common measure of market concentration that is used to determine market competitiveness.

Applicants that Provide Service under 18 CFR Subpart C

If an applicant to use MBRs for storage provides service under 18 CFR Subpart C,⁴ the regulation at 18 CFR 284.123 provides that the applicant may elect one of the following options for its rates.

Alternatively, the applicant may apply for Commission approval, by order, of the proposed rates and charges by filing with the Commission the proposed rates and charges, and information showing the proposed rates and charges are fair and equitable. Each petition for approval filed under this paragraph must be accompanied by the fee set forth in 18 CFR or by a petition for waiver pursuant to 18 CFR 384.106. Upon filing the petition for approval, the intrastate pipeline may commence the transportation service and charge and collect the proposed rate, subject to refund.

Market Based-Rates – Notice of Change in Circumstances

The Commission's regulation at 18 CFR 284.504(b) provides that a storage service provider that has been granted the authority to charge MBRs is required to notify the Commission within 10 days of acquiring knowledge of any significant change occurring in its market power status. The notification should include a detailed description of the new facilities/services and their relationship to the storage service provider. Significant changes include:

- The storage provider expanding its storage capacity beyond the amount authorized;
- The storage provider acquiring transportation facilities or additional storage capacity;
- An affiliate providing storage or transportation services in the same market area; and
- The storage provider or an affiliate acquiring an interest in or is acquired by an interstate pipeline.

Record Retention

The Commission's regulations at 18 CFR 284.288(b) and 284.403(b), respectively, impose a record retention requirement contained in a Code of Conduct applicable to

- Interstate pipelines that provide unbundled natural gas sales service, and

⁴ Subpart C pertains to transportation of natural gas under section 311(a)(2) by any intrastate pipeline on behalf of an interstate pipeline or an LDC served by an interstate pipeline.

- Persons who are not interstate pipelines and whose sales of natural gas are authorized by the “automatic” blanket marketing certificate granted by operation of 18 CFR 284.402.

Any entity fitting one of those descriptions must retain, for a period of five years, all data and information upon which it billed the prices it charged for natural gas it sold pursuant to its market-based sales certificate or the prices it reported for use in price indices. FERC uses these records to monitor the jurisdictional transportation activities and unbundled sales activities of interstate natural gas pipelines and blanket marketing certificate holders.

The record retention period of five years is necessary due to the importance of records related to any investigation of possible wrongdoing and related to assuring compliance with the codes of conduct and the integrity of the market. The requirement is necessary to ensure consistency in prohibiting market manipulation (regulations adopted in Order No. 670, implementing the Energy Policy Act of 2005 (EPAct 2005) anti-manipulation provisions⁵) and the generally applicable five-year statute of limitations where the Commission seeks civil penalties for violations of the anti-manipulation rules or other rules, regulations, or orders to which the price data may be relevant.⁶

Failure to have this information available would mean the Commission would have difficulty performing its regulatory functions to monitor and evaluate transactions and operations of interstate pipelines and blanket marketing certificate holders.

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

The Commission has developed the capability for electronic filing of all submissions that occur under FERC-549. In requesting changes to its rates or statement of operating conditions, the pipeline’s filings must be made electronically per section 284.123(f), thus paper copies are no longer accepted.

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.

⁵ EPAct 2005, Pub. L. No. 109-58, §§ 315, 1283, 119 Stat. 594, 691, 979–80 (2005) (codified as amended at 15 U.S.C. § 717c-1 and 16 U.S.C. § 824v (2012)). 18 CFR 1c.1 and 1c.2, 71 FR 4,244 (2006).

⁶ The general five-year statute of limitations arises out of 28 U.S.C. 2462.

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its responsibilities under the NGPA and the NGA in order to eliminate duplication and ensure that filing burden is minimized.

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

FERC-549 is a filing requirement pertaining to pipeline transportation transaction filing and retention obligations under the applicable regulations for the transportation, and sale of natural gas as stated herein. This filing collects data from both large and small respondent companies. However, most companies that fulfill the FERC-549 filing requirement do not fall within the definition of small entities.

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

Section 311 intrastate pipeline companies or persons holding blanket certificates only provide this information collection through the submission of filings. If the collection were conducted less frequently or discontinued, the Commission would be unable to determine if the rates continue to be fair and equitable.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

The regulation at 18 CFR 284.13(b)(2) requires an interstate pipeline to post information on interruptible service on a daily basis no later than the first nomination for service under an interruptible agreement. This requirement is necessary because the prices for interruptible service can change daily. Without daily information, the Commission would be hindered in monitoring and preventing potentially manipulative or unduly discriminatory activity.

The record retention period of five years is necessary due to the importance of records related to any investigation of possible wrongdoing and related to assuring compliance with the codes of conduct and the integrity of the market.

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

In accordance with OMB requirements, the Commission published a 60-day notice⁷ requesting public comments on this information collection. The Commission noted that it would be requesting a three-year extension of the information collection. The Commission received no comments on the 60-day Notice.

The 30-day notice was published on 3/6/2023 (88 FR 13829).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission does not consider the information collected in FERC-549 filings to be confidential.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE

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

12. ESTIMATED BURDEN COLLECTION OF INFORMATION

In Table 12, below, the information collection activity labeled “Transportation by Pipelines” includes the estimated paperwork burden hours and labor costs pertaining to the following categories of transactions:

- Transportation of natural gas by an interstate pipeline on behalf of an intrastate pipeline or LDC;
- Transportation of natural gas by an intrastate pipeline on behalf of an interstate pipeline or an LDC served by an interstate pipeline; and
- Transportation of natural gas by a Hinshaw pipeline or by an LDC served by an interstate pipeline.

The information collection activities labeled “MBR — Initial Approval” and “MBR — Change in Circumstances” pertain to Market-Based Rates for Storage. The information collection activity labeled “Record Retention” pertains to the requirement that applicable

⁷ 87 FR 60670 (October 6, 2022)

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sellers retain, for a period of five years, all data and information upon which they billed the prices it charged for natural gas it sold pursuant to its market-based sales certificate or the prices it reported for use in price indices.

The Commission estimates the annual burden and cost for the information collection as follows.

Table 12: Estimated Hour Burdens and Labor Costs for Natural Gas Policy Act (NGPA) Section 311 Transactions, Natural Gas Act (NGA) Blanket Certificate Transactions, and Market-Based Rates for Storage

	A. Number of Respondents	B. Annual Number of Responses per Respondent	C. Total Number of Responses (Column A x Column B)	D. Average Burden Hrs. & Cost (\$)⁸ Per Response	E. Total Annual Burden Hours & Total Annual Cost (\$) (Column C x Column D)	F. Cost per Respondent (\$) (Column E ÷ Column A)
Transportation by Pipelines	43	2	86	50 hrs.; \$4,550	4,300 hrs.; \$391,300	\$9,100
MBR — Initial Approval	1	1	1	350 hrs.; \$31,850	350 hrs.; \$31,850	\$31,850
MBR — Change in Circumstances ⁹	5	1	5	75 hrs.; \$6,825	375 hrs.; \$6,825	\$1,365

⁸ For the information collection activities labeled “Transportation by Pipelines,” “MBR – Initial Approval,” and “MBR – Change in Circumstances,” Commission staff estimates that respondents’ hourly labor cost is approximated by the Commission’s average hourly cost (for wages and benefits) for 2022, or \$91.00 per hour.

For the information collection activity labeled “Record Retention,” Commission staff estimates that respondents’ hourly labor cost is \$38.71 (for wages and benefits), based on \$27.24 (the mean hourly wage for an information and record clerk, Occupation Code 43-4000 for Utilities as posted at http://www.bls.gov/oes/current/naics2_22.htm), plus \$11.47 (the average hourly cost for benefits for private industry, as posted at <https://www.bls.gov/news.release/pdf/ecec.pdf>).

⁹ This new row was added to account for the differences between initial MBR filings and

	A. Number of Respondents	B. Annual Number of Responses per Respondent	C. Total Number of Responses (Column A x Column B)	D. Average Burden Hrs. & Cost (\$) Per Response	E. Total Annual Burden Hours & Total Annual Cost (\$) (Column C x Column D)	F. Cost per Respondent (\$) (Column E ÷ Column A)
Record Retention	299	1	299	1 hr.; \$38.71	299 hrs.; \$11,574.29	\$38.71
Totals	348		391		5,324 hrs.; \$441,549	

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

In addition to the labor costs for record retention shown in the table above, there are also non-labor costs of record retention and storage. These are estimated as follows:

In calculating the costs of physically retaining records in accordance with FERC-549, we have assumed that each of the 299 affected entities uses 50 percent paper storage and 50 percent electronic storage.

- Paper storage costs (using an estimate of 12.5 cubic feet x \$6.46 per cubic foot): \$80.75 per respondent annually. Total annual paper storage cost to industry (\$80.75 x 299 respondents): \$24,144.25. This estimate assumes that a respondent stores 12.5 cubic feet of paper. We expect that this estimate should trend downward over time as more companies move away from paper storage and rely more heavily on electronic storage.
- Electronic storage costs: \$3.18 per respondent annually. Total annual electronic storage cost to industry (\$3.18 x 299 respondents): \$950.82. This calculation estimates storage of approximately 200 MB per year with a cost of \$3.18. We expect

filings pertaining to a change in circumstances.

that this estimate should trend downward over time as the cost of electronic storage technology, including cloud storage, continues to decrease.

A summary of these costs is shown below in Table 13.

Table 13: Storage Costs Associated with Record Retention

	A. Total Number of Responses	B. Cost per Response	C. Total Annual Cost (Column A x Column B) (rounded)
Paper Storage	299	\$80.75	\$24,144
Electronic Storage	299	\$3.18	\$951
Total Storage Burden			\$25,095

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for “Analysis and Processing of Filings” is based on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of any actual filings submitted in response to the information collections.

The Paperwork Reduction Act (PRA) Administrative Cost is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

The federal costs are itemized in Table 14.

Table 14: Federal Costs

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of Filings ¹⁰	9	\$1,700,298
PRA ¹¹ Administrative Cost		\$7,694
FERC Total		\$1,707,992

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

Program changes. There are two types of program changes. First, the previous information collection request, as documented in ROCIS, apparently double-counted some of the burdens pertaining to transportation by interstate pipelines by showing two activities that both cited 18 CFR 284.102(e) in their labels. In order to correct this apparent error, we have removed those two activities. Instead, we have shown all of the “Transportation by Pipelines” hour burdens under one combined label.

Second, the previous information collection request combined in one activity all the requirements pertaining to market-based rates for storage. In our recent analysis, we estimated that the hour burden for obtaining initial approval of market-based rates (i.e., 350 hours) is substantially higher than for showing a change in circumstances (i.e., 75 hours). In order to address this difference, we decided to disclose these two activities separately.

Adjustments in Estimates. The number of respondents for the Record Retention IC activity has decreased to 299 (rather than 319), decreasing the hour burden by 20 hours (from 319 to 299 hours). These adjustments are due to normal fluctuations in industry (e.g., companies entering or leaving the field, or merging or splitting).

Tables 15-1 through 15-3, below, summarize the program changes and adjustments.

10 The FERC 2022 average salary plus benefits for one full-time equivalent (FTE) is \$188,922/year (or \$91.00/hour).

11 Paperwork Reduction Act of 1995 (PRA).

Table 15-1: Summary of Program Changes and Adjustments Affecting Responses

A. Types of Previously Approved Responses	B. Types of Requested Responses	C. Number of Previously Approved Responses	D. Number of Requested Responses	E. Net Change(s) (Column D – Column C)
Transportation by Interstate Pipelines (18 CFR 284.102(e)) <i>and</i> Transportation by Pipeline [Interstate & Intrastate] (18 CFR 284.123(b), (e), (g), (h), 284.102(e))	Transportation by Pipelines	1 response for Transportation by Interstate Pipelines (18 CFR 284.102(e)) <i>and</i> 106 responses for Transportation by Pipeline [Interstate & Intrastate] (18 CFR 284.123(b), (e), (g), (h), 284.102(e)) Total of 107 responses	86 responses	Net of 21 fewer responses due to program changes (i.e., removal of two IC activities and addition of one new IC activity)

A. Types of Previously Approved Responses	B. Types of Requested Responses	C. Number of Previously Approved Responses	D. Number of Requested Responses	E. Net Change(s) (Column D – Column C)
Market Based Rates (18 CFR 284.501 through 284.505)	MBR — Initial Approval and MBR — Change in Circumstances	1 response for Market Based Rates (18 CFR 284.501 through 284.505 and 0 responses for MBR — Initial Approval and 0 responses for MBR — Change in Circumstances Total of 1 response	1 response for MBR — Initial Approval and 5 responses for MBR — Change in Circumstances Total of 6 responses	Net of 5 more responses due to program changes program changes ((i.e., removal of one IC activity and addition of 2 new IC activities) (i.e., removal of one IC activity and addition of 2 new IC activities)
Code of Conduct (18 CFR 284.288 & 284.403)	Record Retention	319 responses	299 responses	Net of 20 fewer responses due to adjustment (i.e., normal fluctuations in industry)

A. Types of Previously Approved Responses	B. Types of Requested Responses	C. Number of Previously Approved Responses	D. Number of Requested Responses	E. Net Change(s) (Column D – Column C)
Totals		427 responses	391 responses	Net of 36 fewer responses — program changes resulting in 16 fewer responses plus an adjustment resulting in 20 fewer responses

Table 15-2: Summary of Program Changes and Adjustments Affecting Burden Hours

A. Types of Previously Approved Responses	B. Types of Requested Responses	C. Number of Previously Approved Burden Hours	D. Number of Requested Burden Hours	E. Net Change(s) (Column D – Column C)
Transportation by Interstate Pipelines (18 CFR 284.102(e)) <i>and</i> Transportation by Pipeline [Interstate & Intrastate] (18 CFR 284.123(b), (e), (g), (h),	Transportation by Pipelines	1 hour for Transportation by Interstate Pipelines (18 CFR 284.102(e)) <i>and</i> 5,300 hours for Transportation by Pipeline [Interstate & Intrastate] (18 CFR 284.123(b), (e), (g), (h),	4,300 hours	Net of 1,001 fewer hours due to program changes (i.e., removal of two IC activities and addition of one new IC activity)

A. Types of Previously Approved Responses	B. Types of Requested Responses	C. Number of Previously Approved Burden Hours	D. Number of Requested Burden Hours	E. Net Change(s) (Column D – Column C)
284.102(e))		284.102(e)) Total of 5,301 hours		
Market Based Rates (18 CFR 284.501 through 284.505)	MBR — Initial Approval <i>and</i> MBR — Change in Circumstances	350 hours	350 hours for MBR — Initial Approval <i>and</i> 375 hours for MBR — Change in Circumstances Total of 725 hours	Net of 375 more hours due to program changes (i.e., removal of one IC activity and addition of 2 new IC activities)
Code of Conduct (18 CFR 284.288 & 284.403)	Record Retention	319 hours	299 hours	Net of 20 fewer hours due to adjustment in number of responses (i.e., normal fluctuations in industry)
Totals		5,970 hours	5,324 hours	Net of 626 fewer hours — program changes resulting in 626 fewer hours plus adjustments resulting in 20 fewer hours

Table 15-3: Summary of Program Changes and Adjustments Affecting Storage Costs for Record Retention

A. Type of Previously Approved Responses	B. Type of Requested Responses	C. Number of Previously Approved Storage Costs	D. Number of Requested Storage Costs	E. Net Change(s) (Column D – Column C)
Code of Conduct (18 CFR 284.288 & 284.403)	Record Retention	\$26,774 (rounded)	\$25,095 (rounded)	Net of \$1,679 fewer costs due to adjustment in number of responses (i.e., normal fluctuations in industry)

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no publication plans for the collection of information. The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

The expiration date is displayed in a table posted on ferc.gov at <http://www.ferc.gov/docs-filing/info-collections.asp>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.