

1902-0244 (FERC-725A), 1902-0247 (FERC-725D), 1902-0252 (FERC-725G), 1902-0263 (FERC-725M) and 1902-0276 (FERC-725Z)
Order in Docket No. RD22-2-000,

Supporting Statement

FERC-725A, FERC-725D, FERC-725G, FERC-725M and FERC-725Z, Mandatory Reliability Standards

The existing information collection requirements in the currently effective Mandatory Reliability Standards, are approved by OMB under FERC-725A, Mandatory Reliability Standards for the Bulk Power System; FERC-725D, Facilities Design, Connections and Maintenance Reliability Standards; FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: PRC Standards; FERC-725M, Mandatory Reliability Standard: FAC-003-4, Vegetation Management; and FERC-725Z, Mandatory Reliability Standards: IRO Reliability Standards the proposed retirement of FAC-010-3, the proposed FAC-011-4, FAC-014-3, IRO-008-3, TOP-001-6 and proposed corresponding revisions to FAC-003-5, PRC-002-3, PRC-023-5 and PRC-026-2 Reliability Standards.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAcT 2005), was enacted into law¹. EPAcT 2005 added a new section 215 to the Federal Power Act (FPA), which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.

Section 215 of the FPA requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.² Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.³ In 2006, the Commission certified NERC (North American Electric Reliability Corporation) as the ERO⁴ pursuant to section 215 of the FPA.⁵

On March 16, 2007 (pursuant to section 215(d) of the FPA), the Commission issued Order No. 693, approving 83 of the 107 initial Reliability Standards filed by NERC. Order 693 addressed several Reliability Standards. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards.

¹ The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2006).

² *Id.* 824o(c), (d).

³ *Id.* 824o(e).

⁴ “Electric Reliability Organization” or “ERO” means the organization certified by the Commission the purpose of which is to establish and enforce Reliability Standards for the Bulk-Power System, subject to Commission review.

⁵ *North American Electric Reliability Corp.*, 116 FERC ¶ 61,062, *order on reh’g and compliance*, 117 FERC ¶ 61,126 (2006), *order on compliance*, 118 FERC ¶ 61,190, *order on reh’g*, 119 FERC ¶ 61,046 (2007), *aff’d sub nom. Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

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

In general, information collection and record retention requirements related to Reliability Standards are not submitted to, or retained for audit by, FERC. Rather they are submitted to, or retained for audit by, NERC or the Compliance Enforcement Authority, as specified in each individual Reliability Standard. Without collecting this information, reliability of the bulk-power system could become compromised, potentially resulting in outages.

Section 215 of the Federal Power Act (FPA)⁶ requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. The Commission has certified the North American Reliability Corporation (NERC) as the ERO. In addition, a Regional Entity may propose Reliability Standards to be effective in that region.⁷ Once approved, Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.

The number of respondents below is based on an estimate of the NERC compliance registry for balancing authority, transmission operator, generator operator, generator owner and reliability coordinator. The Commission based its paperwork burden estimates on the NERC compliance registry as of January 7, 2022. According to the registry, there are 98 balancing authorities (BAs), 325 transmission owners (TOs), 168 transmission operators (TOPs), 204 transmission planners (TPs), 1,068 generator owners (GOs), 945 generator operators (GOPs), 302 distribution providers (DPs), 63 planning coordinators (PCs) and 12 reliability coordinators (RCs). The estimates are based on the change in burden from the current standards to the standards approved in this Order. The Commission based the burden estimates on staff experience, knowledge, and expertise.

The estimates are based combination on one-time (years 1 and 2) and ongoing execution (year 3) obligations to follow the revised Reliability Standards.

The Project 2015-09 Establish and Communicate System Operating Limits Standard Drafting Team (SDT): (1) developed proposed revisions to Reliability Standards and their applicable functional entities: FAC-011-4 (RC), FAC-014-3 (PC, RC, TO, TP), IRO-008-3 (RC), and TOP-001-6 (BA, TO, GO, DP); (2) proposed the retirement of FAC-010-3 (PA/PC) and developed corresponding revisions to FAC-003-5 (TO, GO), PRC-002-3 (RC, TO, GO), PRC-023-5 (TO, GO, DP, PC), and PRC-026-2 (TO, GO, PC) Reliability Standards to remove or replace references to system operating limits (SOLs) and interconnection reliability operating limits (IROLs) established by planning entities.

⁶ 16 U.S.C. 824o

⁷ 16 U.S.C. § 824o(e)(4). A Regional Entity is an entity that has been approved by the Commission to enforce Reliability Standards under delegated authority from the ERO. See 16 U.S.C. § 824o(a)(7) and (e)(4).

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The developed proposed revisions to Reliability Standards are:

- FAC-011-4 is applicable to the RC and its purpose is to ensure that SOLs used in the reliable operation of the bulk electric system are determined based on an established RC methodology or methodologies. NERC clarified acceptable system performance criteria for the operations horizon and developed an SOL risk-based notification framework through the RC's SOL methodology.
- FAC-014-3 is applicable to the PC, RC, TOP and TP and its purpose is to ensure that SOLs used in the reliable operation of the bulk electric system are determined based on an established RC methodology or methodologies and that Planning Assessment performance criteria is coordinated with these methodologies. NERC removed references to planning horizon SOLs and IROLs and clearly delineate specific functional entity responsibility for determining and communicating each type of SOL used in operations.
- IRO-008-3 is applicable to the RC and requires RCs to perform analyses and assessments to prevent instability, uncontrolled separation, or cascading. NERC added a new requirement requiring a RC to use its SOL methodology when determining SOL exceedances for its analyses and assessments and further revised a requirement requiring the RC to use its SOL risk-based notification framework when communicating SOL or IROL exceedances.
- TOP-001-6 is applicable to the BA, TOP, GOP, and DP but the proposed revisions only impact the TOP. NERC added a new requirement requiring a TOP to use its RC SOL methodology when determining SOL exceedances and further revised a requirement requiring TOP notifications regarding SOL exceedances to be done according to the risk-based approach in the RC's SOL methodology.

NERC further proposes the retirement of currently effective Reliability Standard FAC-010-3 that requires PCs and TPs to establish SOLs for the planning horizon. The proposed retirement of FAC-010-3 is mainly due to its redundancy with currently effective TPL-001-4 Standard and new requirements in proposed FAC-014-3.

In addition, the proposed retirement of FAC-010-3 developed corresponding revisions to proposed Reliability Standards FAC-003-5, PRC-002-3, PRC-023-5, and PRC-026-2 as follows:

- FAC-003-5 is applicable to TOs and GOs and NERC proposes to modify Applicability Sections 4.2.2 and 4.3.1.2 of FAC-003-5 to replace references to “elements of an IROL under NERC Standard FAC-014 by the Planning Coordinator” with references to facilities:
 - “Identified by the Planning Coordinator or Transmission Planner, per its Planning Assessment of the Near-Term Transmission Planning Horizon as a Facility that if lost or degraded are expected to result in instances of instability, Cascading, or uncontrolled separation that adversely impacts the reliability of the Bulk Electric System for a planning event.”
- PRC-002-3 is applicable to the RC, TO and GO and NERC proposes to modify the applicability of the PRC-002-3 standard to remove PCs as a responsible entity subject to the standard and replace any references in the standard that would have included PCs

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with references to RCs. NERC concluded that the RC was the appropriate entity to carry out the duties that currently apply to PCs in certain interconnections, including the identification of BES elements that are part of an IROL or stability-related SOL.

- PRC-023-5 is applicable to the TO, GO, DP and PC and NERC proposes to modify Section B2 of Attachment B to PRC-023-5 as follows:
“B2. The circuit is selected by the Planning Coordinator or Transmission Planner based on Planning Assessments of the Near-Term Transmission Planning Horizon that identify instances of instability, Cascading, or uncontrolled separation, that adversely impact the reliability of the Bulk Electric System for planning events. “

Attachment B sets the criteria used to determine the circuits in a Planning Coordinator area for which Transmission Owners, Generator Owners, and Distribution Providers must comply with certain requirements in the standard applicable to protective relays.

- PRC-026-2 is applicable to the GO, PC and TO and NERC proposes modification to the PRC-026-2 standard, Requirement R1, Criteria 1, 2, and 4 to replace references to planning horizon SOLs with references to the TPL-001-4 Planning Assessment.

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

FERC-725-A

The use of current or improved technology is not covered in Reliability Standards and is therefore left to the discretion of each reporting entity. Nearly all the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity’s portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

FERC-725D, 725G

The use of current or improved technology is not covered in Reliability Standards and is therefore left to the discretion of each reporting entity. Commission staff estimates that nearly all the respondents are likely to make and keep related records in an electronic format. Each of the eight Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity’s portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

FERC-725M, 725Z

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The use of current or improved technology and the medium are not covered in Reliability Standards.

We think that nearly all the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password-protected user interface.

In general, the Commission supports the use of information technology to reduce burden.

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATION AND SHOW SPECIFICALLY WHY ANY SIMILAR INFORMATION ALREADY AVAILABLE CANNOT BE USED OR MODIFIED FOR USE FOR THE PURPOSE(S) DESCRIBED IN INSTRUCTION NO. 2

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. Reliability Standards are developed by a collaborative process which requires industry participation. The Commission is unaware of any other source of information similar to the additional requirements.

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

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow an entity to share its compliance burden with other entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.⁸

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

⁸Details of the current ERO Reliability Standard processes are available on the NERC website at https://www.nerc.com/AboutNERC/RulesOfProcedure/Appendix_3A_SPM_Clean_Mar2019.pdf#search=Appendix%203A .

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FERC-725D

FAC-001-3 imposes the obligation to document, maintain, and publish interconnection requirements. Failure to properly maintain the interconnection requirement documents and make them available to entities upon request could adversely impact reliable planning and operation of the Bulk Electric System because data needed to perform studies to determine the impact of interconnecting facilities on existing interconnections as well as on affected systems may not be provided. Further, lack of these documents could result in inaccurate and uncoordinated interconnection studies, leading to possible instances of instability, uncontrolled separation, and cascading failures. The requirements include retention periods that identify the period of time an entity is required to retain specific evidence to demonstrate compliance.

For Reliability Standard FAC-002-3, all applicable entities need to cooperate in sharing data so valid and complete studies can be performed to accurately assess the reliability impact of interconnecting new or materially modified facilities. Failing to conduct studies of these interconnecting facilities could lead to instances of violation with other national and regional standards. Also, actual system performance under normal and emergency conditions may not match the results of steady-state, short circuit, and dynamic studies, which could impact Bulk Electric System reliability and lead to instances of instability, uncontrolled separation, and cascading failures. These requirements include retention periods that identify the period of time an entity is required to retain specific evidence to demonstrate compliance. If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved.

As for FAC-010-3 (being retired), FAC-011-3, and FAC-014-2, the establishment of how to identify SOLs and use it within the planning and operating horizons is critical to the reliability of the BPS. Failure to keep accurate data could cause contingency cases to be out of date and problem areas not being properly identified.

FERC-725M

Based on information from industry and the Commission, the Reliability Standard and requirements covered by FERC-725M are critical and essential to the Commission's mission. The Reliability Standard requires information to be collected quarterly and annually. If the Reliability Standard and related FERC-725M information were not required or collected less frequently, it could jeopardize the reliability of the nation's Bulk Power System and lead to additional sustained power outages and to public harm.

FERC-725G

PRC Reliability Standards were established such that the declining frequency is arrested and recovered in accordance with NPCC performance requirements. The collection cannot be collected less frequently, as the proper targets need to be set in terms load tripping at the required frequency set points. Over time the amount of load on will

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change and if not reviewed it may result in missing targeted values and cause frequency decline that would trip generation leading to widespread uncontrolled outages.

The frequency this information is currently required is once per calendar year by the transmission owner and distribution provider to its planning coordinator and generator owners shall provide information upon request.

Having a yearly “develop and review” without taking any further action is strictly administrative and does nothing for reliability (P-81 type of issue).

FERC-725Z

NERC stated in its Petition that “[a]s the Western Interconnection prepares to transition to an environment in which more than one Reliability Coordinator will be providing services, focused coordination of these Reliability Coordinators will be of critical importance. To promote coordination among these Reliability Coordinators and help ensure reliability in the Western Interconnection, WECC developed the proposed regional Variance reflected in proposed Reliability Standard IRO-002-6.”

Failure to implement the changes could directly affect the ability to effectively monitor and control and ensure reliability of the Western interconnection in the bulk electric system.

FERC-725A

In general, information collection requirements in Reliability Standards and requirements help maintain Bulk-Power System reliability. The standard requires entities to report certain disturbance events within 24 hours of meeting an event type threshold or by the end of the next business day if the event occurs on a weekend. Other paperwork related requirements are one-time or done on a yearly basis. If the disturbance events were reported less frequently, it would undermine NERC’s (and others’) ability to mitigate the current event and prepare for a possible next event.

Also, Real-time Assessments (RTAs) are computer cases run every 30 minutes to evaluate the condition of the system and identify potential problems. The time period of 30 minutes aligns with response time for operators to mitigate potential such as exceeding the operating limit of equipment.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

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FERC-725A

There are two special circumstances for as described in 5 CFR 1320.5(d)(2) related to this information collection.

The data retention requirement in the Reliability Standards indicates that entities maintain data or evidence to show compliance with the requirements since the last audit. Reliability audits are generally every three years, but timing is such that they could be more than three years apart.

This is the language adopted by the standards drafting team and approved by industry representatives during the balloting process. As such, this is the data retention period deemed necessary for the reliability purposes contained in this standard.

The reporting requirements are event driven, and as such, an entity may be required to report more often than quarterly. NERC is responsible for ensuring the reliability of the bulk electric system. General statement.

There may be instances where an entity needs to retain information for periods longer than typical cycle when an instance of non-compliance occurs. Typically, an entity will need to retain records associated with the non-compliance incident until it is resolved. Under those circumstance it can results in retention of information beyond the typical three tear audit cycle.

Real-time Assessments (RTA) are to be done every 30 minutes. This is to reflect actual working condition and status of electrical devices. The RTA runs are saved onto computer storage and referenced if there is a problem. Within the Bulk Electric System (BES) the timeframe to correct operating problems is targeted to be done within 30 minutes. This aligns the RTAs with operating practices for reliability practices.

Emergency electric incidents and disturbances leading to interruptions of power, such as rotating blackouts, could lead to disruptions of critical infrastructures. The national security, economic prosperity, and social wellbeing of the nation depends on the continuing reliability of our increasingly complex and interdependent infrastructures, the key one of which is electric power. For these reasons we consider the reporting requirements necessary.

FERC-725M

There are some special circumstances as described in 5 CFR 1320.5(d)(2) related to this information collection.

Requirements R1 and R2 require that vegetation be managed on a real-time basis to prevent vegetation encroachment inside the flash-over clearance of applicable transmission lines. These requirements may require entities to review or produce documentation more often than quarterly, for example, real-time operator logs, and voice recordings may be necessary to review to mitigate the cause of a vegetation outage.

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Some entities may have to retain information for longer than three years if directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

These special circumstances are necessary to ensure reliability on the bulk power system.

FERC-725G, FERC-725D, and FERC-725Z have no special circumstances associated with the information collection.

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

The Commission published a 60-day notice⁹ in Docket No. RD22-2 in the Federal Register requesting comments. No comments were received in response to the 60-day Notice.

In addition, the Commission is publishing a 30-day Notice in the Federal Register¹⁰.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

There are no specific assurances of confidentiality mentioned to respondents.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

This collection does not include any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission estimates that the NERC proposal, which would retire FAC-010-3, moves impacted and revised Reliability Standards without adding new obligations on registered entities resulting in a change in burden for industry of 128 hours. The proposed retirement of FAC-010-3 is mainly due to its redundancy with currently effective TPL-001-4 Standard and new requirements in proposed FAC-014-3. The

⁹ 87 FR 22202, April 14, 2022

¹⁰ 87 FR 55422, September 9, 2022

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Commission based the change in burden estimates on staff experience, knowledge, and expertise.

Proposed Changes Due to the approval of NERC's proposed Reliability Standards and the retirement of FAC-010-3 in Docket No. RD22-2					
Reliability Standard	Type¹¹ and Number of Entity (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response (4)	Total Burden Hours (3) *(4) = (5)
FERC-725D					
FAC-010-3¹² Retire	PA/PC (63)	1	(63)	(220.6 hrs.) (\$19,192)	(13,898 hrs.) (\$1,209,109)
FAC-010-2.1, R5¹³ (FERC-725D)	PA	1	(63)	(25.4 hrs.) (\$2,209.8)	(1,600 hrs.) (\$139,217)
Total Retirement for FAC-010-3¹⁴	PA	1	(63)	(246)	(15,498 hrs.) (\$1,348,326)
One Time Estimate Years 1 and 2					
FAC-011-4	RC (12)	1	12	176 hrs. \$15,312	2,112 hrs. \$183,744
FAC-014-3	RC (12)	1	12	64 hrs. \$5,568	768 hrs. \$66,816

11 RC=Reliability Coordinator; BA=Balancing Authority; TP=Transmission Planner; TOP=Transmission Operator; TO=Transmission Owner; GO=Generator Owner; DP=Distribution Provider; PA/PC=Planning Coordinator; and RC=Reliability Coordinator

12 FERC staff estimates that industry costs for salary plus benefits are similar to Commission costs. The FERC 2021 average salary plus benefits for one FERC full-time equivalent (FTE) is \$180,703/year (or \$87.00/hour) posted by the Bureau of Labor Statistics for the Utilities sector (available at

https://www.bls.gov/oes/current/naics3_221000.htm)

13 In Docket No. RM13-8-000 FERC 725D OMB Control: From 1902-0247 for the FAC-010-2.1 Requirement R5 burden of 1,600hrs should be retired with full retirement of FAC-010-3.

14 The total of manhours associated FAC-010-3 equals the sum of 13,898 hrs. + 1,600 hrs. = 15,498 hrs.

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FAC-014-3	PA/PC (63)	1	63	96 hrs. \$8,352	6,048 hrs. \$526,176
FAC-014-3	TP (204)	1	204	96 hrs. \$8,352	19,584 hrs. \$1,703,808
FAC-014-3	TOP (168)	1	168	32 hrs. \$2,784	5,376 hrs. \$467,712
Ongoing Estimate Year 3 ongoing					
FAC-011-4	RC (12)	1	12	16 hrs. \$1,392	192 hrs. \$16,704
FAC-014-3	RC (12)	1	12	16 hrs. \$1,392	192 hrs. \$16,704
FAC-014-3	PA/PC (63)	1	63	16 hrs. \$1,392	1,008 hrs. \$87,696
FAC-014-3	TP (204)	1	204	16 hrs. \$1,392	3,264 hrs. \$334,080
FAC-014-3	TOP (168)	1	168	16 hrs. \$1,392	2,688 hrs. \$233,856
Sub-Total for FERC-725D			918		41,232hrs \$3,637,296
FERC-725M¹⁵					
One Time Estimate Years 1 and 2					
FAC-003-5	TO (325)	4	1,300	8 hrs. \$696	10,400 hrs. \$904,800
FAC-003-5	GO (1068)	4	4,272	8 hrs. \$696	34,176 hrs. \$2,973,312
Sub-Total for FERC-725M			5,572		44,576hrs \$3,878,112
FERC-725G					
One Time Estimate Years 1 and 2					
PRC-002-3 ¹⁶	RC (12)	1	12	32 hrs. \$2,784	384 hrs. \$33,408
PRC-002-3 ¹⁷ Retire	PA/PC (35)	1	(35)	(32 hrs.) (\$2,784)	(2,016 hrs.) (\$175,392)
PRC-023-5 ¹⁸	PA/PC (63)	1	63	32 hrs.	2,016 hrs.

15 Proposed revision is a one-time change to align updated terminology in the NERC Standards.

16 Proposed revision adds burden to the RC only.

17 The removal of the PA/PC from PRC-002-3 is a one-time reduction in burden. Eastern and ERCOT interconnection impacted

18 Proposed revision adds burden to the PA/PC only and is a one-time change to align

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				\$2,784	\$175,392
PRC-026-2 ¹⁹	PA/PC (63)	1	63	32 hrs. \$2,784	2,016 hrs. \$175,392
Ongoing Estimate Year 3 ongoing					
PRC-002-3	RC (12)	1	12	16 hrs. \$1,392	192 hrs. \$16,704
Sub-Total for FERC-725G			150		4,608hrs \$400,896
FERC-725Z					
One Time Estimate Years 1 and 2					
IRO-008-3	RC (12)	1	12	32 hrs. \$2784	384 hrs. \$33,408
Ongoing Estimate Year 3 ongoing					
IRO-008-3	RC (12)	1	12	16 hrs. \$1,392	144 hrs. \$16,704
Sub-Total for FERC-725Z			24		528 hrs. \$50,112
FERC-725A					
One Time Estimate Years 1 and 2					
TOP-001-6 ²⁰	TOP (168)	1	168	32 hrs. \$2,784	5,376 hrs. \$467,712
Ongoing Estimate Year 3 ongoing					
TOP-001-6	TOP (168)	1	168	16 hrs. \$1,392	2,688hrs \$233,856
Sub-Total for FERC-725A			336		8,064 hrs. \$701,568
Total Reductions Due to Docket No. RD22-2-000					99,008 hrs. \$8,667,984

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no start-up or other non-labor hour cost associated with this collection.

updated terminology in the NERC Standards.

19 Proposed revision adds burden to the PA/PC only and is a one-time change to align updated terminology in the NERC Standards.

20 Proposed revision adds burden to the TOP only.

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14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and processing of filings’²¹ 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 collection.

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.

FERC-725A, FERC-725D, FERC-725G, FERC-725M and FERC-725Z (each)	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings	0	\$0
PRA Administrative Cost		\$8,279
FERC Total		\$8,279

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

FERC-725D	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,381	1,957	819	-395
Annual Time Burden (Hr.)	71,306	168,655	23,430	-120,779
Annual Cost Burden (\$)	0	0	0	0

FERC-725M	Total Request	Previously Approved	Change due to Adjustment	Change Due to Agency Discretion
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²¹ The estimate uses the FERC’s FY 2021 average annual salary plus benefits of one FERC FTE (full-time equivalent [\$180,703 per year or \$87.00 per hour]).

1902-0244 (FERC-725A), 1902-0247 (FERC-725D), 1902-0252 (FERC-725G), 1902-0263 (FERC-725M) and 1902-0276 (FERC-725Z)

Order in Docket No. RD22-2-000,

			in Estimate	
Annual Number of Responses	6,494	922	0	5,572
Annual Time Burden (Hr.)	45,290	714	0	44,576
Annual Cost Burden (\$)	0	0	0	0

FERC-725G	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	10,377	10,227	0	150
Annual Time Burden (Hr.)	714,272	709,664	0	4,608
Annual Cost Burden (\$)	0	0	0	0

FERC-725Z	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	977	6,686	-5,733	+12
Annual Time Burden (Hrs.)	53,142	50,167	-1,393	+2,304
Annual Cost Burden (\$)	0	0	0	0

FERC-725A	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	4,494	4,158	0	+336
Annual Time Burden (Hr.)	1,482,462	1,474,398	0	+8,064
Annual Cost Burden (\$)	156,953	156,953	0	0

1902-0244 (FERC-725A), 1902-0247 (FERC-725D), 1902-0252 (FERC-725G), 1902-0263 (FERC-725M) and 1902-0276 (FERC-725Z)
Order in Docket No. RD22-2-000,

For 725D (FAC Reliability Standards), the change (decrease in responses and manhours) is due to agency discretion as we have updated the method to determine affected entities and their responses. Additionally, changes have occurred since last cycle in the number of NERC Registered Entities who have to follow these Reliability Standards. The Standards are represented separately to make it easier for future modifications and adjustments.

For 725M (FAC-003 Reliability Standard), the change (increase in responses and decrease in manhours) is due to agency discretion as we have updated the method to determine affected entities and their responses. The new method of examining entities reflects separating the types of entities where there may have been a previous overlap. The estimate workload by entities is expected to decrease overall as entities have familiar with information collection and burden associated with compliance of the standard and tools in place to reduce the overall burden.

For 725G (PRC Reliability Standards), the change (decrease in responses and decrease in manhours) is due to agency discretion as we have updated the method to determine affected entities and their responses. Additionally, changes have occurred since last cycle in the number of NERC Registered Entities who may have to follow these Reliability Standards.

For 725Z (IRO Reliability Standards), the change (increase in responses and increase in manhours) is due to agency discretion as we have updated the method to determine affected entities and their responses. The new method of examining entities reflects separating the types of entities where there may have been a previous overlap.

For 725A (many families of Reliability Standards), the change (increase in responses and decrease in manhours) is due to agency discretion as we have updated the method to determine affected entities and their responses. The new method of examining entities reflects separating the types of entities where there may have been a previous overlap. The decrease in manhours reflects entities are familiar with the standards having worked with them for many years.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications as part of this collection

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date because the information is not collected on a preformatted form or is part of a Reliability Standard, which do not display OMB expiration dates.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for this collection. Therefore, the Commission does not certify that the collection uses statistical methods.

CUI

1902-0244 (FERC-725A), 1902-0247 (FERC-725D), 1902-0252 (FERC-725G), 1902-0263 (FERC-725M) and 1902-0276 (FERC-725Z)
Order in Docket No. RD22-2-000,