Supporting Statement for Proposed FERC-1002 (Customer Engagement Management Survey)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve proposed survey FERC-1002 (Customer Engagement Management Survey), for a three-year period. FERC-1002 will be included under new OMB Control Number 1902-TBD.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The collection of information is necessary because the Commission-regulated industries are highly complex and technical. Without the collection of information, FERC would have difficulty helping members of the public and members of the regulated community who have questions or concerns regarding FERC matters. In addition, the Commission would have difficulty informing interested individuals and organizations of their ability to participate in FERC proceedings that could result in agency actions that impact their communities, businesses, or property.

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

Proposed FERC-1002²

This survey covers: (1) the collection of information on individual or stakeholder interests to support outreach via the Office of Public Participation (OPP); and (2) the collection of name and email address from parties wishing to receive the Office of External Affairs' (OEA) "Insight Newsletter." We note that the first notice for proposed FERC-1002 covered some information for the administration of the Commission's Electric Quarterly Reports which are no longer part of the instant proposed FERC-1002.

¹ FERC is no longer soliciting comments on the previously proposed survey FERC-1001 (Hotline and Helpline Survey). The FERC-1001 was included in the 60-day notice but was removed from the 30-day notice and is no longer being proposed.

² Proposed FERC–1002 covers two areas of outreach for customer engagement (1) from the OPP: <u>Subscribe for Updates From the Office of Public Participation | Federal Energy Regulatory Commission (at https://www.ferc.gov/office-of-public-participation-subscribe), and (2) from the OEA: FERC Insight Newsletter | Federal Energy Regulatory Commission (https://www.ferc.gov/ferc-insight-newsletter).</u>

³ Industry burden associated with the Electric Quarterly Report is covered under FERC-920 (OMB Control No. 1902-0255).

This information collection is needed to provide customer service and to conduct customer engagement activities. Customer service and customer engagement is needed to further the Commission's goal of facilitating the public's understanding of FERC's work and encouraging their participation in FERC matters. This information will allow FERC to understand which areas of its work are of greater interest to the public and where additional public outreach and educational materials or other resources are needed the most.

Office of Public Participation

FERC proposes to voluntarily collect information on individual or stakeholder interests to engage with them by providing, to the extent possible, targeted information consistent with their expressed interest. The OPP focuses its outreach efforts on the following types of stakeholders: 1) landowners; 2) environmental justice communities; 3) Tribal members and indigenous peoples' organizations; and 4) consumer, environmental, and community advocates. The OPP proposes to collect contact name and information about a participant's areas of interest including type of stakeholder, and to keep email distribution lists to be used to inform interested individuals of scoping meetings, technical conferences, workshops, certain proceedings, press releases, or newsletters. The OPP anticipates offering a web-based form to collect such information.

Office of the External Affairs' Customer Engagement

This survey covers outreach via the OEA' Insight Newsletter and proposes to voluntarily collect contact name and email and keep email distribution lists to be used to inform interested individuals of technical conferences, workshops, certain proceedings, press releases, or newsletters.

In addition, the proposed survey includes questions intended to collect input on educational materials and accessibility needs to improve its customer support and engagement activities.

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Without this information, the Commission would have difficulty providing customer service and responding to the public's information needs. In addition, without some of this information, the Commission would have difficulty including representatives from different sectors of society potentially affected by the Commission's actions in the agency's decision-making process. This information will allow the agency to benefit from increased access to information and viewpoints leading to better decision-making.

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

FERC-1002 (OMB Control No. 1902-TBD) (Proposed in Docket No. AD22-14)

There is an ongoing effort to determine the potential and value of improved information technology to reduce the burden. The public will be able to submit information via the agency website, email, phone, or fax, as discussed above. FERC provides several possible methods of submittal to ease the burden of the filer (respondent).

4. DESCRIBE EFFORTS TO IDENTIFY DUPLICATON 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 published a 60-day PRA notice in the Federal Register (87 FR 54998, 9/8/2022) to solicit public comment and to help identify any duplication of the information. The responses to the proposed surveys are not duplicative as they relate to the specific needs and situation of each individual respondent (or filer).

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

FERC provides several options for responding to the surveys (on a voluntary basis) including email, telephone, fax, and/or webform, as discussed above. FERC is providing several possible methods of submittal to ease the burden of the filer (respondent).

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

This information collection may not be collected less frequently because it is provided on a voluntary basis at the time that an individual or an organization requires assistance regarding FERC matters. If the Commission were to instead offer to collect information on a non-continuous basis, then its provision of "customer" support would be of lower value because FERC matters are often time sensitive.

A less frequent collection of this information would make it difficult for the Commission to help members of the regulated community and the public who seek to understand FERC matters; to participate in FERC proceedings that result in agency actions that impact their communities, businesses, or property.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There are no special circumstances related to this information collection.

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 notice (87 FR 54998, 9/8/2022) requesting public comment. The Commission received no comments.

The Commission also published a 30-day notice (88 FR 33139, 5/23/2023) in the Federal Register for public comment and will submit the materials to OMB for review.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents of this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

With the exceptions indicated below, the Commission does not consider the FERC-1002 information to be confidential. In general, any filer may request non-public treatment of privileged information or Critical Energy/Electric Infrastructure Information [CEII] as discussed in 18 CFR 388.112 and 388.113.

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

The Commission estimates the annual burden⁴ and cost⁵ for the FERC-1002 survey as

⁴ Burden is defined as the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. For further explanation of what is included in the information collection burden, refer to 5 CFR 1320.3.

⁵Commission staff believes the FERC average wages plus benefits are a reasonable approximation of the cost for industry and public respondents. Therefore, we are using the 2022 FERC average cost for wages plus benefits [\$91.00 (rounded) per hour or \$188,922 (rounded) per year].

FERC-1002 (OMB Control No. 1902-TBD) (Proposed in Docket No. AD22-14)

follows.

Estimated Annual Averages for Proposed FERC-1002 Estimated Annual Burden Hours for FERC-1002

Engagement/Filer Type	No. of Respondent s	No. of Responses per Respondent	Total No. of Responses (1) x (2) = (3)	Average Burden Hours per Response	Total Annual Burden Hours (3) x (4) = (5)
OEA Subscriber	2,000	1	2,000	0.083	166
OPP Subscriber	100	1	100	0.13	13
Totals (Rounded) for FERC-1002			2100		179

Estimated Annual Cost for FERC-1002

Engagement/Filer Type	Total No. of Responses (3)	Average Burden Hours per Response	Loaded Cost per Hour (6)	Average Cost per Response (4) x (6) = (7)	Total Annual Cost (3) x (7) = (8)
OEA Subscriber OPP Subscriber	2,000	0.083 0.13	\$91 \$91	\$7.55 \$11.83	\$15,100.00 \$1,183.00
Totals (Rounded) for FERC-1002	2,100				\$16,283

Annual Total for Proposed FERC-1002

	Estimated Estimated	
	Hour	Cost
	Burden	Burden
Estimated Annual		
Total (Rounded)		
for Proposed		
FERC-1002	179	\$16,283

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

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

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for analysis and processing of information is based on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of responses to the survey.

The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings, and other changes to the collection.

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of Information ⁶	2	\$377,844
PRA ⁷ Administrative Cost ⁸		\$7,964
IT system work		\$645,000
		\$1,030,808 (in Year 1
FERC Total		with IT cost significantly
		lower in subsequent years)

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

The collection of information is necessary to help members of the public and regulated community understand FERC matters and to participate in FERC proceedings that may result in agency actions affecting their communities, businesses, or property.

⁶ FERC's 2022 FERC average cost for wages plus benefits is \$91.00 (rounded) per hour or \$188,922 (rounded for one Full-Time Equivalent (FTE)) per year.

⁷ Paperwork Reduction Act of 1995 (PRA).

⁸ Based upon FERC's 2022 estimated average annual PRA Administrative Cost of \$7,694.

The following table shows the total burden of the collection of information (figures rounded). The format, labels, and definitions of the table follow the ROCIS submission system's "Information Collection Request Summary of Burden" for the metadata.

FERC-1002	Total Request (rounded)	Previously Approved	Change due to Adjustment in Estimate (rounded)	Change Due to Agency Discretion
Annual Number of Responses	2,100	0	0	2,100
Annual Time Burden (Hours)	179	0	0	179
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no publications of the information.

17. DISPLAY OF EXPIRATION DATE

The OMB expiration dates are posted on <u>Information Collections | Federal Energy Regulatory Commission (ferc.gov)</u> and will be posted on the survey documents.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.