

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 modification of 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 6/30/2026), for a three-year period. Both collections are an existing information collection and are being modified by the final rule in Docket No. RM22-14-000.

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

Section 206 of the Federal Power Act (FPA), 16 U.S.C. 824e, 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 FPA 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 (2022) 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 utilities¹ 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.

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The Commission originally developed the *pro forma* LGIP and *pro forma* LGIA in Order No. 2003.² In Order No. 2003, the Commission determined that standard interconnection procedures and agreements 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.³ Order No. 2003 required all public utilities that own, control, or operate facilities used for transmitting electric energy in interstate commerce to have on file OATTs that include standard procedures and a standard agreement for interconnecting generators larger than 20 megawatts (MW).⁴ Similarly, the Commission adopted standard procedures and agreements for interconnecting generators with a capacity of 20 MW or less in Order No. 2006.⁵

Since the issuance of Order Nos. 2003 and 2006, 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, 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 is necessary 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 are 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

² *Standardization of Generator Interconnection Agreements & Procs.*, Order No. 2003, 104 FERC ¶ 61,103 (2003), *order on reh'g*, Order No. 2003-A, 106 FERC ¶ 61,220, *order on reh'g*, Order No. 2003-B, 109 FERC ¶ 61,287 (2004), *order on reh'g*, Order No. 2003-C, 111 FERC ¶ 61,401 (2005), *aff'd sub nom. Nat'l Ass'n of Regul. Util. Comm'rs v. FERC*, 475 F.3d 1277 (D.C. Cir. 2007).

³ Order No. 2003, 104 FERC ¶ 61,103 at P 12.

⁴ *Id.* at P 1.

⁵ *Standardization of Small Generator Interconnection Agreements & Procs.*, Order No. 2006, 111 FERC ¶ 61,220, *order on reh'g*, Order No. 2006-A, 113 FERC ¶ 61,195 (2005), *order granting clarification*, Order No. 2006-B, 116 FERC ¶ 61,046 (2006).

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Overview of Reforms

Pursuant to section 206 of the FPA, the final rule in Docket No. RM22-14-000 adopts reforms to 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 final rule requires all public utilities to modify their tariffs and jurisdictional agreements to comply with the Commission's revised standard generator interconnection procedures and agreements.⁶ The Commission will use the information collected in compliance filings to this final rule 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 final rule, the Commission adopts 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 adopts a narrower set of reforms to the *pro forma* SGIP and *pro forma* SGIA that would require public utilities to incorporate consideration of certain enumerated alternative transmission technologies into the generator interconnection process and to include requirements for the provision of modeling information and ride through requirements for non-synchronous generating facilities.

These 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

Three of the final rule's revisions would result in both one-time and ongoing information collection activities related to FERC-516 that require transmission providers to:

- **Interconnection Information Access:** Adopt a requirement that transmission providers publicly post available information pertaining to generator interconnection in the form of a heatmap of estimated incremental injection capacity showing several types of information;

⁶ The Final Rule also adds new section (f)(1) to 18 CFR section 35.28.

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- **First-Ready, First-Served Cluster Study Process:** Adopt the elimination of serial first-come, first-served study processes and instead adopt a first-ready, first-served cluster study process, with revised timelines and processing requirements for generator interconnection;
- **Elimination of Reasonable Efforts Standard:** Eliminate the reasonable efforts standard applied to transmission providers for the processing of interconnection requests, and the imposition of financial penalties for transmission providers' failure to meet interconnection study deadlines, with the opportunity to appeal such penalties to the Commission.

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

The final rule requires public utilities to update their tariffs and jurisdictional agreements. The revisions below would result in one-time information collection activities related to changing public utilities' tariffs and jurisdictional agreements in Year 1, as relevant to FERC-516. This information collection will be submitted through a compliance filing. For the following reforms, the Commission estimates no ongoing information collection burden.

These reforms require transmission providers to:

- **Allocation of Cluster Study Costs:** Adopt a cost allocation for cluster study costs paid by interconnection customers according to a per capita and per megawatt of capacity ratio proposed by each transmission provider, provided that such ratio falls within a specified range;
- **Allocation of Cluster Network Upgrade Costs:** Adopt a cost allocation method that allocates the costs of system network upgrades needed for a cluster of interconnection customers using a proportional impact method, and allocates the cost of substation network upgrades allocated equally among all interconnection customers in the cluster interconnecting to the same substation;
- **Study Deposits:** Adopt a tiered study deposit framework in which the deposit to enter the interconnection queue increases based on the size of the generating facility;
- **Demonstration of Site Control:** Adopt requirements that interconnection customers demonstrate 90% site control for their proposed generating facilities when submitting their interconnection requests and 100% site control before entering a facilities study, based on publicly-posted acreage requirements specific to the generating facility type;
- **Commercial Readiness:** Adopt a requirement that interconnection customers submit commercial readiness deposits under which the interconnection customer's total commercial readiness deposit held by the transmission provider increases as the interconnection customer's interconnection request proceeds through the interconnection queue;

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- **LGIA Deposit:** Adopt an LGIA deposit amount of 20% of the expected network upgrade costs;
- **Withdrawal Penalties:** Adopt a requirement that transmission providers impose withdrawal penalties, absent qualification for one of the limited exemptions, on interconnection customers that withdraw or are deemed withdrawn from the interconnection queue, based on (1) the actual allocated costs of the interconnection studies performed up until the point of withdrawal and a multiplier if withdrawal occurs during the cluster study or upon receipt of cluster study results or (2) an increasing percentage of estimated network upgrade costs as the interconnection customer proceeds through the interconnection process after receipt of the cluster study report;
- **Transition Process:** Adopt a transition process that offers existing interconnection customers up to three transition options for transitioning to the new first-ready, first-served cluster study process, depending on which phase of the interconnection study process their interconnection requests are in;
- **Affected System Study Process:** Adopt a clustered affected system study process;
- **Affected System *Pro Forma* Agreements:** Adopt two-party *pro forma* affected system study agreement, multi-party *pro forma* affected system study agreement, two-party *pro forma* affected system facilities construction agreement, and multi-party *pro forma* affected system facilities construction agreement;
- **Affected System Modeling and Study Assumptions:** Adopt the use of Energy Resource Interconnection Service modeling standards when conducting affected system studies;
- **Co-Located Generating Facilities:** Adopt allowing more than one generating facility to share a site and a single interconnection request;
- **Revisions to Modification Process to Require Consideration of Generating Facility Additions:** Adopt revisions to their LGIP that require that the transmission provider evaluate generating facility additions that do not increase an interconnection customer's requested interconnection service level without automatically deeming the addition a material modification prior to the return of the facilities study agreement, except for transmission providers that utilize fuel-based dispatch assumptions;
- **Availability of Surplus Interconnection Service:** Adopt allowing 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:** Adopt the use, at the request of interconnection customers, of operating assumptions that reflect the proposed operation of a generating facility that includes an electric storage component, unless otherwise required to study the generating facility at full capacity based on good utility practice;
- **Incorporating Enumerated Alternative Transmission Technologies into the Generator Interconnection Process:** Adopt a requirement that transmission providers must evaluate the following alternative transmission technologies enumerated in the final rule

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in cluster studies for large generators: static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting;

- **Modeling Requirements:** Adopt a requirement that interconnection customers requesting to interconnect a non-synchronous generating facility provide accurate and validated models needed for interconnection studies;
- **Ride Through Requirements:** Adopt a requirement that any newly interconnecting non-synchronous generating facilities have the ability to ride through abnormal frequency conditions and voltage conditions within the “no trip zone” defined by certain reliability standards; and
- **Applicability of Ride Through Requirements:** Adopt a requirement that all newly interconnecting large generating facilities 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 final rule 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 reforms require transmission providers to:

- **Incorporating Enumerated Alternative Transmission Technologies into the Generator Interconnection Process:** Adopt a requirement that transmission providers must evaluate the following alternative transmission technologies enumerated in the final rule in the feasibility and system impact studies for small generators: static synchronous compensators, static VAR compensators, advanced power flow control devices, transmission switching, synchronous condensers, voltage source converters, advanced conductors, and tower lifting;
- **Modeling Requirements:** Adopt a requirement that interconnection customers requesting to interconnect a non-synchronous small generating facility provide accurate and validated models needed for interconnection studies; and
- **Ride Through Requirements:** Adopt a requirement that any newly interconnecting non-synchronous small generating facilities have the ability to ride through abnormal

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frequency conditions and voltage conditions within the “no trip zone” defined by certain reliability standards.

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 the final rule in this docket by filing electronically using eTariff (described at <https://www.ferc.gov/ferc-online/etariff>). The tariffs are available to the public on the internet through the Commission’s eTariff viewer. The compliance filings and agency action on the filings are also publicly available on [ferc.gov](https://www.ferc.gov) in eLibrary.

Additionally, public utilities are required to maintain OASIS websites to provide transmission customers with equal and timely access to transmission and ancillary service tariff information.⁷ This final rule requires public utilities to post certain data to their OASIS site on an ongoing basis, in a manner similar to other existing reporting requirements.

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.

⁷ See 18 CFR 37.6 (2022) (Information to be posted on the OASIS).

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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.

The reforms adopted by this final rule are necessary because, absent reform, the current interconnection process will continue to cause interconnection queue backlogs, longer development timelines, and increased uncertainty regarding the cost and timing of interconnecting to the transmission system. These backlogs and delays, and the resulting timing and cost uncertainty, hinder the timely development of new generation and thereby stifle competition in the wholesale electric markets, resulting in rates, terms, and conditions that are unjust, unreasonable, and unduly discriminatory or preferential.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

This collection contains no special circumstances.

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 Notice of Proposed Rulemaking (NOPR) on eLibrary. The Office of the Federal Register published the NOPR in the Federal Register on July 5, 2022.⁸ Numerous comments from the public were received, as summarized and addressed in the final rule. The Commission's responses to commenters' suggestions and arguments are provided in the Commission Determination subsections of the final rule, organized topically.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

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

⁸ 87 FR 39934 (NOPR; July 5, 2022).

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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
Hourly Burden: 16,221

The information collection burden of the reforms adopted in this final rule 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 estimate of the number of reporting entities is based on the number of transmission providers that submitted compliance filings to the Commission in response to Order No. 845, which is the Commission's most recent rulemaking that required transmission providers to revise their generator interconnection procedures and agreements, and Order No. 881, which is the Commission's most recent major rulemaking adopting reforms to the *pro forma* tariff.⁹ As such, we estimate that 44 transmission providers, including regional transmission organizations and independent system operators, will be subject to this rulemaking. The burden¹⁰ and cost estimates below are based on (1) the initial need for transmission providers to file revised

⁹ See *Managing Transmission Line Ratings*, Order No. 881, 177 FERC ¶ 61,179 (2021), *order on reh'g*, Order No. 881-A, 179 FERC ¶ 61,125 (2022).

versions of the standard interconnection procedures and agreements in Year 1, and (2) ongoing information collection activities in connection with reporting and disclosure requirements in subsequent years. For many reforms, we estimate no ongoing information collection burden because there is either no information collection aspect of the reform, or the requirements would merely supplant existing ones.

We estimate that the reforms in this final rule would affect the burden and cost of FERC-516 and FERC-516A as follows.

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Reforms	Number of Respondents (1)	Annual Number of Responses Per Respondent (2)	Total Number of Responses (Rounded) (1) * (2) = (3)	Average Burden (Hr.) & Cost (\$) Per Response¹¹ (4)	Total Annual Burden Hours & Total Annual Cost (\$) (Rounded) (3) * (4) = (5)
FERC-516:					
Interconnection Information Access	44 (TPs) ¹²	Year 1: 1 Ongoing: 2	Year 1: 44 Ongoing: 88	Year 1: 4 hr; \$364 Ongoing: 4 hr; \$364	Year 1: 176 hr; \$16,016 Ongoing: 352 hr; \$32,032
First-Ready, First-Served Cluster Study Process	44 (TPs)	Year 1: 1 Ongoing: 4	Year 1: 44 Ongoing: 176	Year 1: 80 hr; \$7,280 Ongoing: 4 hr; \$364	Year 1: 3,520 hr; \$320,320 Ongoing: 704 hr; \$64,064
Allocation of Cluster Study Costs	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Allocation of Cluster Network Upgrade Costs	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0

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

¹¹ Commission staff estimate that respondents’ hourly wages plus benefits are comparable to those of Commission employees. Therefore, the hourly cost used in this analysis is \$91 per hour (\$188,922 per year).

¹² Transmission providers (TPs).

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Study Deposits and LGIA Deposit	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Demonstration of Site Control	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Commercial Readiness	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Withdrawal Penalties	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Transition Process	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Elimination of Reasonable Efforts Standard ¹³	44 (TPs)	Year 1: 1 Ongoing: 4	Year 1: 44 Ongoing: 176	Year 1: 80 hr; \$7,280 Ongoing: 4 hr; \$364	Year 1: 3,520 hr; \$320,320 Ongoing: 704 hr; \$64,064

¹³ Commission staff only estimates the information collection burden associated with the requirements outlined in the Final Rule and does not estimate the potential appeal process burden, which an applicant can pursue voluntarily.

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Affected System Study Process	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Affected System <i>Pro Forma</i> Agreements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Affected System Modeling and Study Assumptions	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Co-Located Generating Facilities Behind One Point of Interconnection with Shared Interconnection Requests	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Revisions to Modification to Require Consideration of Generating Facility Additions	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0

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Availability of Surplus Interconnection Service	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Operating Assumptions for Interconnection Studies	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Incorporating Enumerated Alternative Transmission Technologies into the Generator Interconnection Process	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Modeling Requirements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Ride Through Requirements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Applicability of Ride Through Requirements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0

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Total New Burden for FERC-516 (due to Docket No. RM22-14-000)			Year 1: 924¹⁴ Ongoing: 484	Year 1: 30,448 hr; \$2,770,768 Ongoing: 1,760 hr; \$160,160	
FERC- 516A					
Incorporating Enumerated Alternative Transmission Technologies into the Generator Interconnection Process	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 80 hr; \$7,280 Ongoing: 0	Year 1: 3,520 hr; \$320,320 Ongoing: 0
Modeling Requirements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0
Ride Through Requirements	44 (TPs)	Year 1: 1 Ongoing: 0	Year 1: 44 Ongoing: 0	Year 1: 4 hr; \$364 Ongoing: 0	Year 1: 176 hr; \$16,016 Ongoing: 0

¹⁴ There are 21 reforms that affect FERC 516 that TP’s will need to incorporate into their procedures and agreements and compliance will be satisfied by a single compliance filing. Additionally, all of the one-time costs in FERC 516 will occur in the first year and since OMB approvals are good for three years, we further annualized the one-time costs by annualizing the numbers in the ROCIS entry. To satisfy ROCIS, we state that 44 respondents, will submit a 7 responses per year (21/3=7) to account for an annualized count of each reform. To determine the hours per response, we divided the total “one-time” hours in year 1, by 44 TP’s (692) then further divided by the 7 reponses per year to annualize the hours per response which results in 32.95 (rounded) hours per response.

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Changes Due to Final Rule in Docket No. RM22-14-000					
Reforms	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 (4)	Total Annual Burden Hours & Total Annual Cost (\$) (Rounded) (3) * (4) = (5)
Total New Burden for FERC-516A (due to Docket No. RM22-14-000)¹⁵			Year 1: 132 responses Ongoing: 0		Year 1: 3,872 hr; \$352,352 Ongoing: 0
Grand Total (FERC-516 plus FERC-516A, including all respondents)			Year 1: 1,056 Ongoing: 484	Year 1: 34,320 hr; \$3,123,120 Ongoing: 1,760 hr; \$160,160	
Grand Total Average Per Entity Cost (44 TPs)					Year 1: \$70,980 Ongoing: \$3,640

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

¹⁵ All of the one-time costs in FERC 516A will occur in the first year. Since OMB approvals are good for three years, we annualized the one-time costs by dividing by three in the ROCIS entry. The annualized total result is 44 responses and 1,291 (rounded) hours.

FERC-516 (OMB Control No. 1902-0096)
 FERC-516A (OMB Control No. 1902-0203)
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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)¹⁶ 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.

The chart below represents the existing estimated annualized cost to the federal government for FERC-516 and FERC-516A.

FERC-516	Number of Employees (Full-Time Equivalents [FTE])	Estimated Annual Federal Cost
Analysis and Processing of FERC-516 ¹⁷	38 ¹⁸	\$7,179,036
PRA Administrative Cost		\$7,694
FERC Total		\$7,186,730

FERC-516A	Number of Employees (Full-Time Equivalents [FTE])	Estimated Annual Federal Cost
Analysis and Processing of Filings ¹⁹	0.84 ²⁰	\$158,694.48
PRA ²¹ Administrative Cost ²²		\$7,694.00

¹⁶ 5 CFR 1320.

¹⁷ The Commission's 2022 average wages plus benefits for one full-time equivalent (FTE) is \$188,922 per year.

¹⁸ The number of FTEs 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 FTEs at the time of the next renewal.

¹⁹ FERC's 2022 average wages plus benefits for one FTE (full-time equivalent) is \$188,922 per year.

²⁰ An FTE is 2,080 hours, estimating 1,750 hours to complete (1,750/2,080 = 0.84).

²¹ Paperwork Reduction Act of 1995 (PRA).

FERC-516 (OMB Control No. 1902-0096)
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FERC Total		\$166,388.48
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15. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

All of the PRA activities resulting from the reforms in the final rule would be program changes that the Commission has determined will assist in fulfilling its statutory obligations under FPA section 206. The reforms in the final rule 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, 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.

FERC 516

The PRA activities in the final rule would increase the total burden of FERC-516. Prior to this final rule, there were 17 total information collections (ICs) within the FERC 516. Out of those 17 ICs, 8 of those were one-time costs associated with previous rulemakings, those are now being removed since they are no longer in effect. Furthermore, due to the final rule in Docket No. RM22-14-000, there are four new ICs to account for the one-time updates to respondent’s interconnection procedures and agreements and the three ongoing collections (Interconnection Information Access, First Ready-First Served, and Reasonable Efforts Standard). The total change in responses and burden are reflected in the table below.

FERC-516	Total Request	Previously Approved	Change Due to Agency Adjustment in Estimate	Change Due to Agency Discretion
FERC-516				
Annual Number of Responses	7,504	6,768	0	736
Annual Time Burden (Hours)	554,069	542,919	0	11,150
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

FERC 516A

²² 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. FERC Staff Time to a number of employee equivalent FTE at .84.

FERC-516 (OMB Control No. 1902-0096)
 FERC-516A (OMB Control No. 1902-0203)
 Docket No. RM22-14-000
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The PRA activities in the final rule in Docket No. RM22-14-000 result in an increase in burden. The burden hours are increasing due to the requirement to update the small generator interconnection procedures and agreements. To account for adaptation of the new requirements, there is a new IC that captures the one-time costs associated with updating the procedures and agreements. This was averaged over three years due to OMB clearance is approved for three years. The total change in responses and burden are reflected in the table below.

FERC-516A	Total Request	Previously Approved	Change Due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	3,337	3,293	0	44
Annual Time Burden (Hr.)	17,642	16,351	0	1,291
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. Although some reforms require the posting of information, this will not be done by the Commission.

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.