

Supporting Statement for
FERC-920, Electric Quarterly Report (EQR)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve the modifications to the FERC-920 [Electric Quarterly Report (EQR)], as reflected in the Notice of Proposed Rulemaking (NOPR) on *Revisions to the Filing Process and Data Collection for the Electric Quarterly Report* in Docket No. RM23-9-000. The FERC-920 reporting requirements are being modified based on the proposed changes in the NOPR, along with corresponding proposed changes in Title 18 Code of Federal Regulations (CFR) Part 35.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Commission set forth the EQR filing requirements in Order No. 2001 (Docket No. RM01-8-000, issued April 25, 2002, available through the link at [Order No. 2001](#)). Order No. 2001 requires public utilities to electronically file EQRs summarizing the contractual rates, terms and conditions in their agreements for all jurisdictional services, including market-based rate power sales, cost-based power sales, and transmission service, and transaction information for short-term and long-term market-based rate power sales and cost-based power sales.¹ The Commission established the EQR reporting requirements to help ensure the collection of information needed to perform its regulatory functions over wholesale electricity sales and transmission, while making data more useful to the public and allowing public utilities to better fulfill their responsibility under FPA section 205(c) to have information related to their rates, terms, and conditions of service on file in a convenient form and place. As noted in Order No. 2001, EQR data

¹ *Revised Pub. Util. Filing Requirements*, Order No. 2001, 99 FERC ¶ 61,107, *reh'g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh'g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh'g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, 125 FERC ¶ 61,103 (2008).

is designed to “provide greater price transparency, promote competition, enhance confidence in the fairness of the markets, and provide a better means to detect and discourage discriminatory practices.”²

Since issuing Order No. 2001, the Commission has provided guidance and refined the reporting requirements, as necessary, to simplify the filing requirements and reflect changes in the Commission’s rules and regulations. The Commission also adopted an EQR Data Dictionary, which provides the definitions of certain terms and values used in filing EQR data.³

To increase transparency across all wholesale electricity markets subject to the Commission’s jurisdiction, the Commission issued Order No. 768 in 2012.⁴ Order No. 768 required market participants that are excluded from the Commission’s jurisdiction under Federal Power Act (FPA) section 205 (i.e., non-public utilities), and that have more than a *de minimis*⁵ market presence, to file EQRs with the Commission. In addition, Order No. 768 revised the EQR filing requirements to build upon the Commission’s prior improvements to the reporting requirements and further enhance the goals of providing greater price transparency, promoting competition, instilling confidence in the fairness of the markets, and providing a better means to detect and discourage anti-competitive, discriminatory, and manipulative practices.

In the NOPR on *Revisions to the Filing Process and Data Collection for the Electric Quarterly Report*, in Docket No. RM23-9-000, the Commission proposes to update and

² Order No. 2001, 99 FERC ¶ 61,107 at P 31.

³ See Order No. 2001-G, 120 FERC ¶ 61,270 (2007). The current version of the EQR Data Dictionary is available at:

https://www.ferc.gov/sites/default/files/2020-11/Data_Dictionary_V3_5_Clean.pdf.

⁴ *Elec. Mkt. Transparency Provisions of Section 220 of the Federal Power Act*, Order No. 768, 77 FR 61895 (Oct. 11, 2012), 140 FERC ¶ 61,232 (2012), *order on reh’g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013), *order on reh’g*, Order No. 768-B, 150 FERC ¶ 61,075 (2015).

⁵ 18 CFR § 35.10b(b) provides that the term “*de minimis* market presence” means “any non-public utility that makes 4,000,000 megawatt hours or less of annual wholesale sales, based on the average annual sales for resale over the preceding three years as published by the Energy Information Administration’s Form 861.”

streamline the collection of data, improve data quality, increase market transparency, and decrease the costs, over time, of preparing the necessary data for submission and complying with future changes to the filing requirements set forth by the Commission. Under the NOPR proposal, the EQR data collection would be modified to:

1. Implement a new collection method based on the eXtensible Business Reporting Language-comma separated values (XBRL-CSV) standard;
2. Require regional transmission organizations (RTOs) and independent system operators (ISOs) to produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy;and
3. Modify or clarify EQR reporting requirements.

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

The FPA provides that “every public utility shall file with the Commission, within such time and in such form as the Commission may designate, and shall keep open in convenient form and place for public inspection schedules showing all rates and charges for any transmission or sale subject to the jurisdiction of the Commission, and the classifications, practices, and regulations affecting such rates and charges, together with all contracts which in any manner affect or relate to such rates, charges, classifications, and services.”⁶ The EQR is the reporting mechanism FERC uses for public utilities to fulfill their filing responsibility under FPA section 205(c).

EQR data falls into four general categories: (1) Identification Data, which ensures that the filings are submitted by authorized personnel; (2) Contract Data, which outlines necessary information about the rates, terms, and conditions of service in contracts; (3) Transaction Data, which provides the specific rates of the transactions, along with other critical information necessary to analyze those rates; and (4) for a small subset of filers that report some or all of their transactions to index price publishers, data regarding the types of transactions that were reported.

⁶ 16 U.S.C. 824d.

EQR data enables the Commission and the public to gain a more complete picture of wholesale electricity and transmission markets by providing information concerning price formation and market concentration in these markets. Public access to wholesale electricity sales and transmission-related information in the EQR improves market participants' ability to assess supply and demand fundamentals and to price interstate wholesale electricity market transactions. This, in turn, results in greater market confidence, lower transaction costs, and ultimately supports competitive markets. In addition, the data filed in the EQR strengthens the Commission's ability to exercise its oversight and enforcement responsibilities over wholesale electricity and transmission rates in accordance with the FPA. Without this information, the Commission would lack some of the data it needs to examine and approve or modify electricity rates. EQR data also strengthens the Commission's ability to identify potential exercises of market power or manipulation and to better evaluate the competitiveness of interstate wholesale electricity markets.

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

Order No. 2001 requires public utilities to electronically file EQRs. Electronically filed EQRs improve the efficiency, convenience, and overall management of the filing process, facilitate public access to wholesale contract information, and reduce the industry's burden and expense associated with reporting and reviewing electric transactions. In addition, in Order No. 770,⁷ the Commission adopted a web-based approach to filing EQRs, which allows a public or non-public utility to file an EQR directly through the Commission's website. A filer submits its EQR through a web interface, which enables the choice of manually entering the information or uploading CSV or Extensible Markup Language-formatted file (XML) files. By adopting Order No. 770's improvements to the filing process, the Commission eliminated the need for EQR filers to download software from the Commission's website.

In the present NOPR, in Docket No. RM23-9-000, the Commission is proposing to further the use of improved information technology for the EQR data collection by

⁷ *Revisions to Electric Quarterly Report Filing Process*, Order No. 770, FERC Stats. & Regs. ¶ 31,338 (2012).

requiring submissions in XBRL-CSV. The use of XBRL-CSV is anticipated to reduce the burden on filers in the future. Although the Commission expects that some filers will choose to implement the proposed XBRL-CSV filing standard by developing their own submission systems, the NOPR, in Docket No. RM23-9-000, proposes to provide pre-formatted templates⁸ for the preparation of EQR submission files (FERC Templates) that would conform with the formatting requirements of the proposed XBRL-CSV system. The proposed FERC Templates would help reduce the reporting burden for some filers, particularly those reporting transactions occurring outside of RTO and ISO markets. At a minimum, the proposed FERC Templates would preserve the framework of the current CSV-based filing method, which some filers use to prepare their EQR submissions. Furthermore, for those filers that only report Identification Data or Identification and Contract Data in the EQR with no changes from the previous quarter, the NOPR proposes an option that would only require them to confirm that no changes occurred to their EQR from the previous quarter. This proposed option would simplify the EQR filing process for those filers that do not report Transaction Data.

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 EQR is a primary source of transaction-level information for wholesale electricity sales, particularly in bilateral markets. The EQR also provides a uniform platform for comparable and consistent data across different wholesale electricity markets. Furthermore, the Commission's filing and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements related to the EQR collection to identify any duplication.

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

⁸ The proposal to make pre-formatted templates available to filers as an option for preparing their EQR submissions is based on our current understanding of how the EQR XBRL-CSV system and taxonomies could be designed. However, the Commission may adopt another solution to assist filers in preparing their EQR submissions based on the outcome of the XBRL-CSV system design phase.

For non-public utilities, the Commission has exempted those entities under the *de minimis* market presence threshold of 4,000,000 MWh or less of annual wholesale sales (based on an average of the wholesale sales it made in the preceding three years). This *de minimis* threshold therefore excludes small non-public utilities. If the reporting requirements present an undue burden on small businesses, the affected entity may seek a waiver of the EQR reporting requirements from the Commission.

For the NOPR in Docket No. RM23-9-000:

In the second quarter of 2022 (Q2 2022), the Commission received 3,111 EQR filings. Among the filers were electric utilities and other companies that are required to file the EQR, and therefore are subject to the requirements adopted by this rule. To evaluate if this NOPR will significantly impact small entities, the Commission used a random sample (342 entities) of Q2 2022 filers and researched the number of companies that would be categorized as small as defined by the Small Business Administration (SBA). Since the EQR is required by a range of filers, there was also a range in number of employees due to the type of power generation, transmission, or distribution. The employee totals ranged from 250 employees (e.g., solar) to 1,000 employees (e.g., electric power distribution).

Using the random sample of 342 filers for Q2 2022, the Commission estimates 143 entities would be considered small as defined by SBA regulations. In fact, all of the small entities in our analysis fall either under the 250 employee threshold or are unknown, in which case, we assume they are small entities. Furthermore, the Commission estimates that 199 entities would surpass the small business threshold according to the SBA standards. Respectively, out of the Commission's random sample, approximately 42 percent of respondents would be considered small and 58 percent, the majority of the respondents, would not be considered small.

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

The quarterly information in the EQR provides the Commission and the public with updated and timely information regarding a company's wholesale electricity and transmission sales. Quarterly filings allow for regular and consistent review of the

market and strengthens the Commission's ability to ensure that public utility rates are just, reasonable, and not unduly discriminatory. If the collection were conducted less frequently, the Commission would have difficulty performing its mandated oversight and review responsibilities.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances.

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

Commission staff conducts regular outreach with the filing community. Outreach efforts range from assistance with required filings to researching more complex filer issues. Commission staff conducts EQR User Group meetings and/or technical conferences to discuss various aspects of the EQR program. EQR meetings and technical conferences are generally attended by several hundred participants. The meetings and conferences promote dialog between staff and the filing community and raise attention to filer concerns.

In regard to the NOPR, in Docket No. RM23-9-000, the Commission is also soliciting comments on the NOPR, which was published in the Federal Register on 10/27/2023 (88 FR 73784).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts to respondents of the FERC-920.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information contained in the FERC-920 is publicly available. However, the Commission will consider specific requests for confidential treatment (e.g., Critical

Energy/Electric Infrastructure Information [CEII] or non-public) to the extent permitted by law.⁹

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 that are considered private in the FERC-920.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The estimated burden¹⁰ and cost¹¹ (rounded) for the reporting requirements follow.

The revisions proposed in this NOPR would: (a) implement a new collection method based on the XBRL-CSV standard; (b) require RTOs and ISOs to produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy; and (c) make substantive changes to eliminate or modify the information collected in the EQR. The information collected in the EQR is required to be submitted quarterly to the Commission under existing regulations and reporting requirements adopted under the FPA. Compliance with the changes proposed in this NOPR would be mandatory. We estimate that affected respondents would incur the following burden and other costs.

⁹ 18 C.F.R. §§ 388.112 and 388.113. More information on the CEII definition, program and requirements is posted at <http://www.ferc.gov/legal/ceii-foia/ceii.asp>.

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

¹¹ The proposed rule will affect entities required to file an EQR and RTOs/ISOs. The estimated hourly cost is based on FERC's 2022 Commission-wide average salary cost (salary plus benefits) of \$91.00/hour. The Commission staff believes the FERC full-time equivalent (FTE) average cost for wages plus benefits is representative of the corresponding cost for the industry respondents.

**Changes in Burden for the Data Collected Due to Modification of Data Fields and
Associated Requirements
Table No. 1**

No.	Formula	Incremental Burden Category	Currently Approved	Updated Total for the Data Collected in the EQR	Difference Between Currently Approved and Updated Total
(a)		Number of Respondents ¹²	2,929	3,111	182
(b)		Annual Number of Responses per Respondent	4	4	0
(c)	(a)(b) = (c)	Total Annual Number of Responses	11,716	12,444	728
(d)		Average Burden Hours per Response ¹³	18.1	20.3	2.2
(e)		Hourly Cost per Response ¹⁴	\$87	\$91	\$4
(f)	(b)(d) = (f)	Total Annual Burden Hours per Respondent ¹⁵	72.4	81.2	8.8

¹² The Number of Respondents of 2,929 is based on the OMB inventory of respondents, current as of the issuance of this NOPR.

¹³ The estimated increase in Average Burden Hours per Response is 2.2 hours, where the estimated Year 1 hours are 3.6, Year 2 hours are 2, and Year 3 hours is 1 ((3.6 + 2 + 1)/3 = 2.2 hours).

¹⁴ The estimated hourly cost is based on FERC’s 2022 Commission-wide average salary cost (salary plus benefits) of \$91.00/hour. The Commission staff believes the FERC FTE average cost for wages plus benefits is representative of the corresponding cost for the industry respondents. Therefore, we are updating the hourly pay rate of \$87 used in the 2021 OMB renewal of the EQR collection to reflect the cost of \$91.00/hour.

¹⁵ The formulas shown in Table No. 1 apply solely to the Columns labeled Currently Approved and Updated Total for the Data Collected in the EQR.

(g)	(d)(e) = (g)	Total Burden Cost per Response	\$1,575	\$1,847	\$272
(h)	(b)(g) = (h)	Total Annual Burden Cost per Respondent	\$6,300	\$7,389	\$1,089
(i)	(a)(f) = (i)	Total Annual Burden Hours for All Respondents	212,060	252,613	40,553
(j)	(e)(i) = (j)	Total Annual Burden Cost for All Respondents	\$18,449,220	\$22,987,783	\$4,538,563

The compliance burden estimate for the proposed substantive changes to the information collected in the EQR are reflected as changes to previously approved estimates submitted to OMB for the EQR (FERC-920 (OMB Control No. 1902-0255)), as shown in Table No. 1 in the Column labeled Currently Approved. We estimate that the number of respondents has increased to 3,111.¹⁶ The estimated burden increase of 2.2 hours per response to comply with the modification of data fields and associated requirements, as shown in Table No. 1, Row (d), results in a new total Average Burden Hours per Response of 20.3 hours. The Annual Burden Cost per Respondent for complying with the proposed modifications to the EQR reporting requirements would increase by \$1,600, bringing the total estimated Annual Burden Cost per Respondent to \$7,389 (Table No. 1, Row (h)).

¹⁶ The estimated number of respondents is based on the 2022 Q3 EQR submissions.

**One-Time Formatting Submission in XBRL-CSV for First Quarter of First Year,
Burden Estimate for Submission in XBRL-CSV
Table No. 2**

Row No.	Formula	Incremental Burden Category	Filers Using FERC Templates for Submissions	Filers Creating XBRL-CSV Submissions	Filers with No Change to Submission
			(A)	(B)	(C)
(a)		Number of Respondents ^{17, 18}	1,866	778	467
(b)		Number of Responses per Respondent	1	1	1
(c)	(a)(b) = (c)	Total Number of Responses	1,866	778	467
(d)		Average Burden Hours per Response	5	20	1
(e)		Hourly Cost per Response	\$91	\$91	\$91
(f)	(b)(d) = (f)	Total Burden Hours per Respondent	5	20	1
(g)	(d)(e) = (g)	Total Burden Cost per Response	\$455	\$1,820	\$91
(h)	(b)(g) = (h)	Total Burden Cost per Respondent	\$455	\$1,820	\$91
(i)	(a)(f) = (i)	Total 1st Quarter Burden Hours	9,330	15,560	467
(j)	(e)(i) = (j)	Total 1st Quarter Burden Cost	\$849,030	\$1,415,960	\$42,497

¹⁷ For the first filing of Year 1: 60 percent of Respondents would use the FERC Templates for submissions, 25 percent would create an XBRL-CSV submission, and 15 percent would have no change to their submission.

¹⁸ This estimate is annualized in OMB’s ROCIS system since this is a one time burden reflected over a three year approval period. This annualization results in the total respondents burden hour entries reflect the following: Filers using FERC templates include 622 respondents and 3,110 hours. Filers not using FERC templates include 259.3 (rounded) respondents and 5,180 (rounded) hours. No change filers include 155.67 respondents (rounded) and 156 hours.

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**First Year, Quarters 2, 3 & 4 Burden Estimate for Submission in XBRL-CSV
Table No. 3**

Row No.	Formula	Burden Category	Filers Using FERC Templates for Submissions	Filers Creating XBRL-CSV Submissions	Filers with No Change to Submission
			(A)	(B)	(C)
(k)		Number of Respondents ^{19, 20}	1,866	778	467
(l)		Number of Responses per Respondent for Quarters 2, 3, and 4 of First Year	3	3	3
(m)	(k)(l) = (m)	Total Number of Responses for Quarters 2, 3, and 4 of First Year	5,598	2,334	1,401
(n)		Average Burden Hours Per Response	2	3	1
(o)		Hourly Cost Per Response	\$91	\$91	\$91
(p)	(l)(n) = (p)	Total Burden Hours per Respondent	6	9	3
(q)	(n)(o) = (q)	Total Burden Cost per Response	\$182	\$273	\$91
(r)	(l)(q) = (r)	Total Burden Cost per Respondent	\$546	\$819	\$273

¹⁹ For Year 1, quarters 2 through 4: 60 percent of Respondents would use the FERC Templates for submissions, 25 percent would create an XBRL-CSV submission, and 15 percent would have no change to their submission.

²⁰ This estimate is annualized in OMB’s ROCIS system since this is a one time burden reflected over a three year approval period. This annualization results in the total respondents burden hour entries reflect the following: Filers using FERC templates include 622 respondents, 1866 responses, and 3,732 hours. Filers not using FERC templates include 259.3 (rounded) respondents, 777 responses, and 2,331 hours. No change filers include 155.67 (rounded) respondents, 468 responses, and 468 hours.

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(s)	(k)(p) = (s)	Total Burden Hours for Quarters 2-4 of First Year	11,196	7,002	1,401
(t)	(k)(r) = (t)	Total Burden Cost for Quarters 2-4 of First Year	\$1,018,836	\$637,182	\$127,491

Years 2 & 3 Annual Burden Estimate for Submission in XBRL-CSV
Table No. 4

Row No.	Formula	Burden Category	Filers Using FERC Templates for Submissions	Filers Creating XBRL-CSV Submissions	Filers with No Change to Submission
			(A)	(B)	(C)
(u)		Number of Respondents ²¹	1,866	778	467
(v)		Annual Number of Responses Per Respondent	4	4	4
(w)	(u)(v) = (w)	Total Annual Number of Responses	7,464	3,112	1,868
(x)		Average Burden Hours Per Response	1	1	0.25
(y)		Hourly Cost Per Response	\$91	\$91	\$91
(z)	(x)(y) = (z)	Total Burden Cost per Response	\$91	\$91	\$23
(D)	(v)(x) = (D)	Total Annual Burden Hours per Respondent	4	4	1
(E)	(D)(y) = (E)	Total Annual Burden Cost per Respondent	\$364	\$364	\$91
(F)	(x)(w) = (F)	Total Annual Burden Hours for All Respondents	7,464	3,112	467
(G)	(F)(y) = (G)	Total Annual Burden Cost for All Respondents	\$679,224	\$283,192	\$42,497

²¹ For Years 2 and 3: 60 percent of Respondents would use the FERC Templates for submissions, 25 percent would create an XBRL-CSV submission, and 15 percent would have no change to their submission.

**Summary of Burden for Formatting Submission in XBRL-CSV
for Years 1 through 3
Table No. 5**

Row No.	Formula	Description	Totals
(H)	$(iA) + (iB) + (iC) + (sA) + (sB) + (sC) + 2((FA) + (FB) + (FC)) = (H)$	Three-Year Total Burden Hours	67,042
(I)	$(H)/3 = (I)$	Average Burden Hours Per Year (forecast through third year)	22,347
(J)	$(H)(yA) = (J)$	Three-Year Total Burden Cost	\$6,100,822
(K)	$(J)/3 = (K)$	Average Annual Total Burden Cost (forecast through third year)	\$2,033,607

The burden estimate related to changing the submission format to XBRL-CSV is shown in Table Nos. 2 through 5. The estimate presents three options, in different time periods, for filers to: (1) submit the EQRs using pre-formatted FERC Templates that adhere to the FERC EQR taxonomies (Column (A) of Table Nos. 2-4); (2) prepare XBRL-CSV submission files that adhere to the FERC EQR taxonomies (Column (B) of Table Nos. 2-4), or (3) submit a response that indicates there was no change from the previous quarter (Column (C) of Table Nos. 3-4).

We estimate that 60 percent of filers would be able to use the FERC Templates and that the burden would decrease over time. For the filers using the FERC Templates, the Total Burden Cost per Respondent for the first quarter of the first year would be \$455, and would decrease to \$182 on a quarterly basis for quarters 2 through 4 of the first year, and would decrease further to \$91 per response for Years 2 and 3. For the filers creating XBRL-CSV submissions, the Total Burden Cost per Respondent would follow a similar downward quarterly trend over time. For the filers that only report Identification Data or Identification and Contract Data, and have no change to the submission from the previous quarter, the Total Burden Cost per Respondent would remain one hour per quarter over Years 1-3. This proposed submission option would simplify the EQR filing process for those filers that do not report Transaction Data.

As shown in Table No. 4, Row (u), after the first submission in XBRL-CSV, we estimate that 467 Respondents, i.e., 15 percent of the 3,111 Total Respondents, as shown in Table No. 1, Row (a), would elect to use the proposed new option that would only require filers to confirm that no changes to the EQR occurred from the previous quarter. We estimate that 1,866 Respondents, as shown in Table No. 3, Row (k), i.e., 60 percent of 3,111 Total Respondents, would continue to use the FERC Templates in the second quarter of Year 1 and beyond. The Average Burden Hours per Respondent for filers creating their own XBRL-CSV submissions (i.e., 778 Respondents),²² as shown in Table No. 3, Row (k), Column (B), decreases on a quarterly basis from 20 hours in the first quarter of Year 1, to 9 hours for each of the remaining quarters of Year 1, and 4 hours for each quarter in Years 2-3. We anticipate that the Annual Burden Hours per Respondent would decrease further, as these Respondents become more familiar with the new system.

²² Calculated as 25 percent of 3,111 Total Respondents, as shown in Table No. 4, Row (u).

As reflected in Table Nos. 2 through 4, we estimate that changing the submission format to XBRL-CSV would result in the following expenses. Filers using FERC Templates would incur a total expense of \$1,729 for Years 1 through 3.²³ For those filers creating XBRL-CSV submissions, we expect a total expense of \$3,367 for the same time period.²⁴ Finally, for those filers with no changes to their submissions after the initial quarter of Year 1, we expect a total expense of \$546 for the same time period.²⁵

Table Nos. 6 through 8 estimate the burden on RTOs/ISOs to produce and make available transaction data reports that adhere to the FERC EQR taxonomies for use by their market participants in submitting EQRs. Table No. 6 outlines the burden estimate for RTOs/ISOs to implement this proposed requirement in the first year. Specifically, for RTOs/ISOs that currently produce EQR transaction data reports for their market participants, the first year's Total Burden Cost per Respondent to create XBRL-CSV formatted reports, as shown in Row (h), Column (A) of Table No. 6, is estimated to be \$6,108. For RTOs/ISOs that do not currently produce EQR transaction data reports for their market participants, the first year's Total Burden Cost per Respondent is estimated to be \$24,432, as shown in Row (h), Column (B) of Table No. 6. Table No. 7 reflects the estimated annual costs that RTOs/ISOs would incur in Years 2 and 3 to maintain their systems.

²³ \$1,729 is the sum total of \$455 (Table No. 2, Row (h), Column (A)) + \$546 (Table No. 3, Row (r), Column (A)) + (\$364*2) (Table No. 4, Row (E), Column (A), where \$364 is multiplied by 2 to reflect the Total Annual Burden Cost per Respondent for Years 2 and 3).

²⁴ \$3,367 is the sum total of \$1,820 (Table No. 2, Row (h), Column (B)) + \$819 (Table No. 3, Row (r), Column (B)) + (\$364*2) (Table No. 4, Row (E), Column (B), where \$364 is multiplied by 2 to reflect the Total Annual Burden Cost per Respondent for Years 2 and 3).

²⁵ \$546 is the sum total of \$91 (Table No. 2, Row (h), Column (C)) + \$273 (Table No. 3, Row (r), Column (C)) + (\$91*2) (Table No. 4, Row (E), Column (C), where \$91 is multiplied by 2 to reflect the Total Annual Burden Cost per Respondent for Years 2 and 3).

First Year Burden Estimate for RTO/ISO Reports
Table No. 6

Row No.	Formula	Burden Category	RTOs/ISOs With Existing EQR Transaction Data Reports	RTOs/ISOs Without Existing EQR Transaction Data Reports
			(A)	(B)
(a)		Number of Respondents ²⁶	5	1
(b)		Response per Respondent to Incorporate New System Requirements	1	1
(c)	(a)(b) = (c)	Total Number of Responses	5	1
(d)		Average Burden Hours per Response	80	320
(e)		Hourly Cost per Response ²⁷	\$76.35	\$76.35
(f)	(d)(e) = (f)	Total Burden Cost per Response	\$6,108	\$24,432
(g)	(b)(d) = (g)	Total Burden Hours per Respondent	80	320

²⁶ This estimate is annualized in OMB’s ROCIS system since this is a one time burden reflected over a three year approval period (divide by 3). This annualization results in the total respondents burden hour entries reflect the following: RTOs/ISOs with existing transaction reports include 1.67 respondents (2 in ROCIS) and 160 hours. For RTOs/ISOs without existing reports, there is only 1 respondent, but the hours were divided by 3 to be 106.67(rounded).

²⁷ The estimated hourly costs (salary plus benefits) are based on Bureau of Labor Statistics information, as of May 2022 (at http://www.bls.gov/oes/current/naics2_22.htm, with updated benefits information for March 2022 at <http://www.bls.gov/news.release/ecec.nr0.htm>), for a Computer and Information Analyst (15-1210).

(h)	(g)(e) = (h)	Total Burden Cost per Respondent	\$6,108	\$24,432
(i)	(a)(g) = (i)	Total Annual Burden Hours for All Respondents	400	320
(j)	(i)(e) = (j)	Total Annual Burden Cost	\$30,540	\$24,432

**Annual Burden Estimate for RTO/ISO Reports, Forecasted
for Years 2 and 3
Table No. 7**

Row No.	Formula	Burden Category	All RTO/ISO (E)
(k)		Number of Respondents	6
(l)		Annual Number of Responses per Respondent	1
(m)	(k)(l) = (m)	Total Number of Responses	6
(n)		Average Burden hours per Response	36
(o)		Hourly Cost per Response	\$76.35
(p)	(n)(o) = (p)	Total Burden Cost per Response	\$2,749
(q)	(l)(n) = (q)	Total Annual Burden Hours per Respondent	36
(r)	(q)(o) = (r)	Total Burden Cost per Respondent	\$2,749
(s)	(k)(q) = (s)	Total Annual Burden Hours	216
(t)	(o)(s) = (t)	Total Annual Burden Cost	\$16,492

**Summary of Burden for All RTOs/ISOs for Years 1 through 3
 Table No. 8**

Row No.	Formula	Burden Category	Totals
(u)	$(iA) + (iB) + 2(sE) = (u)$	Three-Year Total Burden Hours	1,152
(v)	$(v) = (u)/3$	Average Burden Hours Per Year	384
(w)	$(u)(o) = (w)$	Three-Year Total Burden Cost	\$87,955
(x)	$(x) = (w)/3$	Average Annual Total Burden Cost	\$29,318

To help with the initial implementation of the proposed reporting requirements and filing process, the Commission plans to convene staff-led technical conference(s). The conference(s) would be available by webcast. The Commission also proposes to direct staff to assist filers and RTOs/ISOs in transitioning to the new filing process.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no costs which are not related to burden hours. Burden hour costs are explained in Questions 12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Commission bases its cost estimate of the “Analysis and Processing of filings” to the Federal Government 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.

The estimated annual federal cost (rounded) related for FERC-920 follows:

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of filings ²⁸	3.5	\$661,227
PRA ²⁹ Administrative Cost ³⁰		\$7,694
FERC Total		\$668,921

²⁸ Based upon FERC’s 2022 average wages plus benefits of one FTE (full-time equivalent) of \$188,922/year (or \$91/hour).

²⁹ Paperwork Reduction Act of 1995 (PRA).

³⁰ Based upon FERC’s 2022 estimated average annual PRA Administrative Cost of \$7,694.

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

The proposed rule in Docket no. RM23-9-000 causes an increase in burden due to program changes. Commission staff recognizes that the increase in burden will be significant in during the adoption and implementation of the changes, but anticipates that the modernized collection method will reduce burden on filers overtime.

The revisions proposed in this NOPR would: (a) implement a new collection method based on the XBRL-CSV standard; (b) require RTOs and ISOs to produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy; and (c) make substantive changes to eliminate or modify the information collected in the EQR. The information collected in the EQR is required to be submitted quarterly to the Commission under existing regulations and reporting requirements adopted under the FPA.

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	28,317	11,716	-	+16,601
Annual Time Burden (Hr.)	238,563	212,060	-	+26,503
Annual Cost Burden (\$)	0	0	-	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There is no publication of data associated with FERC-920 information.

17. DISPLAY OF EXPIRATION DATE

FERC provides the OMB Control Numbers of the information collections along with their expiration dates at www.ferc.gov/information-collections.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

FERC-920 (Electric Quarterly Report [EQR], OMB Control No. 1902-0255)
Docket No. RM23-9-000
RIN # 1902-AG11

There are no exceptions.