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Supporting Statement for

**RM22-8-000 Final Rule, “Updating Regulations for Engineering and Design Materials for Liquefied Natural Gas Facilities Related to Potential Impacts Caused by Natural Hazards,”
FERC-539 (OMB Control No. 1902-0062, Gas Pipeline Certificate: Import/Export of LNG**

The Federal Energy Regulatory Commission (FERC or Commission) has issued a Final Rule in Docket No. RM22-8-000 that includes modifications of certain reporting and recordkeeping requirements in FERC-537 (OMB Control No. 0060), FERC-539 (OMB Control No. 1902-0062), and FERC-577 (OMB Control No. 1902-0128).¹ These information collections include requirements pertaining to liquefied natural gas (LNG). This supporting statement pertains only to FERC-539.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The information collection activities in Docket No. RM22-8-000 will assist the Commission in implementing sections 3 and 7 of the Natural Gas Act (NGA)² and section

¹ In the Notice of Proposed Rule (NOPR) in Docket No. RM22-8-000, FERC-539A and FERC-577A were temporary placeholder designations for the permanently designated collections of FERC-539 and FERC-577, which at the time were pending renewal at OMB. The temporary placeholder designations were necessary because only one request is allowed at a time for any information collection.

OMB issued “comment and continue” types of decisions for all three of the information collection requests associated with the NOPR at Docket No. RM22-8-000. As part of those decisions, OMB assigned new control numbers for FERC-539A and FERC-577A (i.e., 1902-0326 and 1902-0327, respectively).

The previously pending requests for FERC-539 and FERC-577 have been approved and are now available for use in connection with the Final Rule.

In the metadata in ROCIS for FERC-539 and FERC-577, we are listing the NOPR as a 60-day notice and the Final Rule as a 30-day notice so that we may characterize our request for each of those collections as a “regular” type of request.

² 15 U.S.C. 717b and 717f, respectively.

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102(2)(C) of the National Environmental Policy Act (NEPA).³ Section 3(a) of the NGA authorizes the Commission to approve or deny proposals to import or export natural gas.⁴ Section 3(e) of the NGA authorizes the Commission to approve or deny applications for the siting, construction, expansion, or operation of an LNG terminal. Under section 7(c) of the NGA,⁵ the Commission may issue certificates of public convenience and necessity (PCN certificates) for facilities used for the transportation of natural gas (including LNG) in interstate commerce.

When acting on applications filed pursuant to these provisions of the NGA, the Commission serves as the lead federal agency regarding NEPA.⁶ The Commission's regulations implementing these authorities are codified in 18 CFR Parts 153, 157, and 380, which require prospective applicants⁷ and applicants to provide information necessary for the Commission to process their applications.⁸

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

The Commission takes the following actions in the Final Rule.

- Removes references to the National Bureau of Standards, which has been renamed

³ 42 U.S.C. 4332(2)(C).

⁴ The 1977 Department of Energy (DOE) Organization Act (42 U.S.C. 7151(b)) placed all section 3 jurisdiction under DOE. The Secretary of Energy subsequently delegated authority to the Commission to “[a]pprove or disapprove the construction and operation of particular facilities, the site at which such facilities shall be located, and with respect to natural gas that involves the construction of new domestic facilities, the place of entry for imports or exit for exports.” DOE Delegation Order No. S1-DEL-FERC-2006, section 1.21A (May 16, 2006).

⁵ 15 U.S.C. 717f(c).

⁶ See 15 U.S.C. 717n(b)(1).

⁷ Applicants to construct LNG terminals are required to comply with the Commission's pre-filing process prior to filing an application with the Commission. 15 U.S.C. 717b-1(a); 18 CFR 157.21.

⁸ See 18 CFR 153.8(a)(5), 153.8(a)(6), 153.8(a)(7)(i), 157.14(a)(7), 157.21, 380.3, and 380.12. 18 CFR 153.8(a)(7) contains an errant subparagraph (i), which the NOPR would remove.

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the National Institute of Standards and Technology (NIST);

- Removes two outdated technical standards for seismic hazard evaluations and seismic design criteria for LNG facilities;⁹ and
- Replaces the language in 18 CFR 380.12(o)(15) with new regulatory text that requires applicants to provide the engineering and design information that they have typically provided in accordance with the Commission’s “Guidance Manual for Environmental Report Preparation for Applications Filed Under the Natural Gas Act,” which was issued in February of 2017.

The Commission’s “Guidance Manual for Environmental Report Preparation for Applications Filed Under the Natural Gas Act” is divided into two volumes. Volume I (at <https://www.ferc.gov/sites/default/files/2020-04/guidance-manual-volume-1.pdf>) describes the information that is required or recommended for natural gas projects. Volume II (at <https://cms.ferc.gov/sites/default/files/2020-04/guidance-manual-volume-pdf>) specifically addresses additional information required or recommended for LNG facilities.¹⁰

FERC-539, Gas Pipeline Certificate: Import/Export of LNG

Section 3 of the Natural Gas Act (NGA)¹¹ provides, in part, that “...no person shall export any natural gas from the United States to a foreign country or import any natural gas from a foreign country without first having secured an order from the Commission authorizing it to do so.”

The 1992 amendments to Section 3 of the NGA concern importation or exportation from/to a nation which has a free trade agreement with the United States and requires that such importation or exportation:

- (1) shall be deemed to be a “first sale” (i.e. not a sale for a resale)
- (2) shall be deemed to be consistent with the public interest, and applications for such importation or exportation shall be granted without modification or delay

The regulatory functions of Section 3 are shared by the Commission and the Secretary of Energy, Department of Energy (DOE). The Commission has the authority to approve or

⁹ The outdated standards are (1) the National Bureau of Standards Information Report (NBSIR) 84-2833 and (2) the Uniform Building Code’s Seismic Risk Map (UBC Map).

¹⁰ See also *Notice of Availability of the Final Guidance Manual for Environmental Preparation*, 82 FR 12088 (Feb. 28, 2017).

¹¹ 15 U.S.C. 717b

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disapprove the construction and operation of particular facilities, the site at which such facilities will be located, and, with respect to natural gas that involves the construction of new domestic facilities, the place of entry for imports or exit for exports. The DOE approves the importation or exportation of the natural gas commodity.¹²

Additionally, pursuant to the DOE Delegation Order and Executive Order Nos. 10485 and 12038, the Commission has the authority to issue Presidential Permits for natural gas facilities which cross an international border of the United States. Persons seeking Section 3 authorizations or Presidential Permits from the Commission file applications for such requests pursuant to Part 153 of the Commission's Regulations (Part 153, Subpart B Application Under Section 3 and Part 153 Subpart C Application for a Presidential Permit).

FERC-539 addresses FERC's implementing regulations in 18 CFR Part 153. The roles of the DOE are not included in FERC-539.

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

The regulations at 18 CFR Part 153 pertain to applications for authorization to site, construct, or operate facilities used to export or import natural gas under section 3 of the NGA. Such applications apply to both LNG and to non-liquefied natural gas.

An application to construct and operate facilities for the export or import of natural gas must include:

- Applicant information;
- Proposal summary;
- Statements demonstrating that the proposal is in the public interest and that the services rendered will be in accordance with existing Commission regulations; and
- Nine required exhibits:
 - Exhibit A – articles of incorporation;
 - Exhibit B – statement of the relationship between the applicant and any other corporation or person;

¹²The Secretary of DOE's current delegation of authority to the Commission relating to import and export facilities was renewed by the Secretary's Delegation Order No. 00-004.00A, effective May 16, 2006.

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- o Exhibit C – affidavit stating that the project will be constructed and operated in accordance with the laws of the state within which they are located;
- o Exhibit D – copy of any construction or operation agreement between the applicant and the operator of the border facilities;
- o Exhibit E – statement affirming that a qualified entity will receive or deliver liquefied natural gas (LNG) and engineering and design information (if an LNG import or export facility is proposed);
- o Exhibit E-1- report on earthquake hazards and engineering, as appropriate;
- o Exhibit F – environmental report;
- o Exhibit G – map of appropriate scale and detail; and
- o Exhibit H – statement identifying each Federal authorization that the proposal will require.

The required exhibits are listed at 18 CFR 153.8(a). Previously, paragraph (6) of section 153.8(a) required an applicant to file an Exhibit E-1, which consisted of a report on earthquake hazards and engineering, if the proposed LNG import/export facility was to be located at a site in zones 2, 3, or 4 of the UBC Map, or where there was a risk of surface faulting or ground liquefaction. The regulation previously stated that guidelines for the required report are contained in NBSIR 84-2833.

The Final Rule in Docket No. RM22-8-000 removes paragraph (6) of 18 CFR 153.8(a), on grounds that the UBC Map and NBSIR 84-2833 are outdated, and replaces that paragraph with the relevant recommendations from the Commission’s 2017 Guidance, as codified in new 18 CFR 380.12(o)(15). New § 380.12(o)(15) requires applicants to provide general site-specific engineering information used in the geotechnical and structural design of all structures, systems, and components. Other previously required exhibits that have been approved in FERC-539, and for which a renewal request was pending at OMB at the time the NOPR was published, will continue to be required.

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

There is an ongoing FERC effort to increase the use of improved information technology in order to reduce the compliance burden. Most materials required by FERC-537 may be eFiled through FERC’s eFiling system.

However, due to eFiling’s current limitations, certain modeling and analytical software submittals must be transmitted via alternate methods (such as external hard drives or FTP

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sites). As additional uses of information technology are implemented, respondents may be able to submit all required materials via eFiling.

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

Filing requirements are periodically reviewed as OMB review dates arise or as the Commission may deem necessary in carrying out its regulatory responsibilities under the NGA and NEPA in order to eliminate duplication and ensure that filing burden is minimized. There are no similar sources for information available that can be used or modified for these reporting purposes.

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

The Final Rule will have minimal impacts on respondents, regardless of whether they are small. In addition, the primary impacts will be reduced burdens. The removal of references to a legacy agency and two outdated technical standards, and codification of the Commission's current environmental information practices reduces confusion about the Commission's requirements, which necessitates the issuance of fewer data requests to obtain a complete application that better reflects safe design, construction, maintenance, and operation of proposed LNG facilities.

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

The Commission reviews and analyzes the information subject to FERC-539 to determine whether to approve or deny the requested authorization. If the Commission failed to collect these data, it would lose its ability to review relevant information to determine whether the requested certificate should be authorized.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

FERC-539 presents only one special circumstance. The Commission's regulation at 18 CFR 157.6, which applies to the FERC-539 collection of information, requires applicants to file an original plus seven paper copies. On its face, this regulation exceeds the OMB limitation of two copies at 5 CFR 1320.5(d)(2)(iii). However, the regulation at 18 CFR 157.6 an applicant that uses electronic eFiling is not required to provide seven paper copies. Since eFiling is currently the typical method for submitting information involving FERC-539, the special circumstance presented by 18 CFR 157.6 is rarely pertinent.

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

The NOPR was published in the Federal Register on November 27, 2022 (87 FR 72906). In accordance with OMB requirements, the NOPR invited public comments for a period of 60 days on FERC-537 and the other information collections associated with Docket No. RM22-8-000. The public comment period ended on January 27, 2023.

One set of timely comments was filed jointly by the Center for LNG and the American Petroleum Institute (collectively, Associations). The Commission considered the comments in preparing the Final Rule.

Comments on Informational Requirements Applicable to LNG Applications

The Associations endorsed the Commission's efforts to prevent confusion about the informational requirements that the Commission applies to its review of applications for the construction and operation of LNG facilities. However, the Associations recommended that the Commission include in the Final Rule additional clarifications in

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keeping with the National Technology Transfer and Advancement Act of 1995 (NTTAA)¹³ and OMB Revised Circular A119.¹⁴

The Commission responded in the preamble of the Final Rule, noting that the NTTAA requires all federal agencies and departments to use technical standards that are developed or adopted by voluntary consensus standard bodies¹⁵ to carry out policy objectives or activities determined by the agencies and departments unless using such a standard is inconsistent with applicable law or otherwise impractical.¹⁶

The Commission determined that voluntary consensus standards related to natural hazard evaluation and design criteria for LNG structures, systems, and components would be impractical. The Commission's evaluation and analysis of LNG applications, which propose technically diverse types of facilities, must consider the unique locations that the LNG facilities will be sited, constructed, and operated. Over 2,500 standards exist that could be applicable to an LNG structure, system, or component. No one standard would apply to every application that the Commission reviews. Likewise, no individual application would be subject to every standard. To ensure that all types of proposals are covered by a standard would require that the Commission codify every potential consensus standard that could apply in its various LNG proceedings. Such an effort would be infeasible and would confuse applicants about which standards the Commission expects them to apply to their proposal.

Moreover, although some standards set criteria for the siting, design, construction, operation, and maintenance of LNG facilities, they often do not sufficiently detail the engineering information needed in an application to allow the Commission to fully assess

¹³ The NTTAA (Pub. L. No. 104-113) directs Federal agencies to adopt voluntary consensus standards wherever possible (avoiding development of unique government standards) and establishes reporting requirements.

¹⁴ OMB Revised Circular A119 spells out the government strategy for standards development. It promotes agency participation on standards bodies, specifies reporting requirements on conformity assessment activities, and informs agencies of their statutory obligations related to standards setting.

¹⁵ A voluntary consensus standard body is a type of association, organization, or technical society that plans, develops, establishes, or coordinates voluntary consensus standards using a voluntary consensus standards development process that includes following attributes or elements: openness, balance, due process, appeals process, and consensus. Revised OMB Circular A-119, 2(e).

¹⁶ 15 U.S.C. 272 note.

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the reliability and safety of the LNG facilities. As a result, the lack of detail has led to applicants applying these standards inconsistently.

The Commission's practice, informed by the 2017 Guidance, has been to clarify that, when applicants prepare Resource Report 13, they should provide certain specific information regarding the engineering of the proposed LNG facilities. This information includes identifying applicable federal regulations, proposed codes and standards, as well as additional information on the proposed siting, design, construction, and operation. By having the applicants identify all federal regulations, codes, and standards that apply to their project-specific and site-specific proposal, the Commission is then able to evaluate applications for LNG facilities on a case-by-case basis, determine and evaluate the federal regulations, codes, and standards that apply (including any voluntary consensus standards that are adopted into those regulations). Based on the information, the Commission could more effectively coordinate with other federal agencies with jurisdiction over the proposal, evaluate whether the identified regulations, codes, and standards contain informational gaps, and recommend modifications or conditions that should be included in the Commission's authorization based on the proposed LNG facilities and layers of protection that would reduce the risk of adverse effects to the public and the environment and reliability.

For these reasons, the Commission codified its practice of obtaining information necessary for it to fulfill its regulatory mission in lieu of using a voluntary consensus standard, as permitted by the NTTAA.

Comments Requesting Additional Definitions

The commenters requested clarification about the following terms undefined in the NOPR: (i) "structures, systems, and components;" (ii) "associated safety related structures, systems, and components;" (iii) "applicable codes and standards;" and (iv) "generally accepted codes, standards, and specifications." To prevent confusion, they recommend that the Final Rule define these terms and identify which codes and standards should be incorporated by reference into the Commission's regulations.

The Commission found no need to codify a definition for these terms but provided additional clarification in the preamble to the Final Rule.

Comments Opposing Retroactive Application of Final Rule

The commenters requested clarification that the requirements in the Final Rule will not be retroactively applied to existing jurisdictional LNG facilities. They are concerned that existing operators who file an application or request Commission approval to modify operations, expand, or add equipment to their LNG facilities would be required to

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upgrade or retrofit the existing facility to comply with the new requirements. To help avoid confusion, they recommend that the Commission amend Parts 153, 157, and 380 by adding a new applicability section that states the new requirements do not apply to existing LNG facilities authorized before the effective date of the Final Rule.

The Commission declined to adopt commenters' recommendation because 18 CFR 380.12(o) already specifies the applicability of the content and formatting requirements for Resource Report 13. Therefore, the requirements in new § 380.12(o)(14) would apply only to applicants who file an application to construct new LNG facilities or recommission existing LNG facilities once the Final Rule is effective. Adding a new applicability section would be redundant and unnecessary.

Comments on Estimated Regulatory Burden

The commenters identified one new requirement that they asserted could introduce a new burden. The NOPR proposed in new § 380.12(o)(15)(iii)(A)(22) that applicants are required to describe the proposed LNG facility's seismic monitoring system, which includes a minimum of one triaxial ground motion recorder installed to register the free-field ground motion and additional triaxial ground motion recorders on each LNG tank system foundation, LNG tank roof, and associated safety related structures, systems, and components. They argued that the term "associated safety related structure, systems, and components" is vague and that it is unclear how many ground motion recorders would be required. The commenters add that applicable codes and standards, such as American Concrete Institute Code 376-11, *Code Requirements for Design and Construction of Concrete Structures for Containment of Refrigerated Liquefied Gases*,¹⁷ do not require accelerometers for LNG tanks with Safe Shutdown Earthquake (SSE) peak ground accelerations less than 0.1 gravity. If the Final Rule requires accelerometers for such LNG tanks and associated systems, structures, and components, it will constitute a new regulatory burden, which the commenters oppose.

The Commission does not anticipate that compliance with this rule will alter current practice. With respect to new § 380.12(o)(15)(iii)(A)(22), contrary to the commenters' argument, the new regulation does not require that LNG facilities have a certain number of seismic monitoring systems or accelerometers. The new requirement, which implements the seismic monitoring system recommendations in the 2017 Guidance, requires only that Resource Report 13 *describe* how the proposed seismic monitoring system would be designed in accordance with all applicable federal requirements and applicable codes and standards. Nevertheless, the Final Rule replaces "a minimum of

¹⁷ The code provides minimum design and construction requirements for reinforced concrete and prestressed structures for the storage and containment of refrigerated liquefied gases.

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one” with “any” in new § 380.12(o)(15)(iii)(A)(22) to avoid unnecessary confusion about whether the Final Rule establishes a specific number of triaxial ground motion recorders. In terms of where the seismic monitoring equipment are required to be located, the new section does not require anything other than a description of what the applicant proposes, which should follow the requirements under federal requirements and applicable codes and standards. If the Commission determines that the specifics of the proposal require additional seismic monitors to ensure safety and reliability, the order authorizing the application would include such a condition.

The commenters contend that the Final Rule will eliminate the flexibility that is purportedly in the 2017 Guidance, which allows applicants to exercise alternative approaches to prepare seismic information. They quote NBSIR 84-2833 for support.

The commenters are mistaken. The flexibilities in the 2017 Guidance are preserved by its codification in this rulemaking. The Final Rule does not enumerate specific federal regulations or codes or standards that applicants must apply to the safe and reliable design, construction, operation, and maintenance of jurisdictional LNG facilities. Instead, consistent with the 2017 Guidance and the Commission’s practice, the Final Rule instructs applicants to identify all applicable federal regulations, including codes and standards when preparing their application, and to explain how their proposal would comply with these regulations and requirements. To the extent that applicants currently identify information that is not necessary in a geotechnical report based on the seismology and geology of the proposed site, applicants are free to continue to identify the unnecessary information and provide an explanation or rationale for their decision. The Commission would review the information that is provided in Resource Report 13 and coordinate with other federal agencies with jurisdiction over the proposed LNG facility to ensure that there is sufficient information to assist in the public safety and reliability review of the proposals. Further, if the Commission finds the application contains insufficient information based on applicable regulations, codes and standards, or is unable to demonstrate that their proposed facilities would be sited, designed, constructed, and operated safely and reliably, the Commission may issue data requests for further information or clarification.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents of FERC-537, FERC-539A, or FERC-577A.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

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The Commission does not guarantee the information provided by applicants to be confidential. The Commission encourages applicants to indicate information which may be Critical Energy/Electric Infrastructure Information (CEII), or privileged, and thus initially confidential. CEII as defined in Section 18 CFR 388.113 includes information about proposed or existing natural gas facilities that could be used by a person planning an attack on critical energy infrastructure. Privileged material most often includes proprietary business information, specific cultural resource details and locations, and personal identification information of affected landowners. More information about CEII and privileged security levels of information are posted at <http://www.ferc.gov/legal/ceii-foia/ceii.asp> and <http://www.ferc.gov/legal/ceii-foia/ceii/classes.asp>. The Commission's procedures in Part 388 are designed to ensure that CEII and privileged material are not placed in the Commission's public records. Note that the Commission implemented revised procedures for the appropriate handling of documents and will follow the controlled unclassified information (CUI) labeling system now prescribed; see <http://www.ferc.gov/docs-filing/labeling-guidance.pdf>.

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 FERC-539.

12. ESTIMATED BURDEN COLLECTION OF INFORMATION

The estimated burdens for FERC-539 are not affected by the Final Rule in RM22-8-000. While the Final Rule in Docket No. RM22-8-000 removes paragraph (6) of 18 CFR 153.8(a) and adds new 18 CFR 380.12(o)(15) requiring applicants to provide general site-specific engineering information, there is no impact to the estimated burdens.

Those burdens are as follows:

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Number of Respondents (1)	Number of Responses Per Respondent (2)	Total Number of Responses (1) * (2) = (3)	Average Burden Hours & Average Cost¹⁸ per Response (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3) * (4) = (5)	Cost per Respondent (\$) (5) ÷ (1) = (6)
6	2	12	15 hours; \$1,440	180 hours; \$17,280	\$2,880

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 filings is based on salaries and benefits for professional and clerical support. This estimated cost represents staff analysis, decision-making, and review of any actual filings submitted in response to the information collection.

The Commission incurs costs associated with obtaining OMB clearance for the FERC-604 information collection under the Paperwork Reduction Act (PRA). The PRA Administrative Cost is a federal cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for any vehicle (including a rulemaking) used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings and orders, other changes to the collection, and associated publications in the Federal Register.

The estimated annual federal costs for FERC-539 are itemized in Table 14.

¹⁸ The Commission staff estimates that industry is similarly situated in terms of hourly cost (for wages plus benefits). Based on the Commission's Fiscal Year 2022 average cost (for wages plus benefits), \$96.00/hour is used.

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Table 14
Estimated Annual Federal Costs of Implementing FERC-539

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of Filings ¹⁹	3.5	\$699,534.50
PRA Administrative Cost		\$8,286
FERC Total		\$707,820.50 (rounded in ROCIS to \$707,821)

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

As shown in Table 15, the Final Rule in Docket No. RM22-8-000 will not affect the burden estimates for FERC-539.

Table 15
Changes in Burden for FERC-539 Due to Docket No. RM22-8-000

	Total Request	Previously Approved	Change Due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	12	12	0	0
Annual Time Burden (Hrs.)	180	180	0	0
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There is no publication of data associated with FERC-539 information.

¹⁹ Based upon current FERC FTE average annual salary plus benefits (\$199,867/year or \$96/hour).

Docket No. RM22-8-000, Final Rule (RIN 1902-AG06), FERC-539 (OMB Control No. 1902-0062)

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17. DISPLAY OF EXPIRATION DATE

The expiration date for FERC-539 (i.e., 5/31/2026) is available at [Information Collections | Federal Energy Regulatory Commission \(ferc.gov\)](#).

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.