

FERC-917 (OMB Control No. 1902-0233)
Docket No. RM21-17-000
RIN # 1902-AF87

Supporting Statement for Final Rule in Docket No. RM21-17-000
“Building for the Future Through Electric Regional Transmission Planning and Cost Allocation”

FERC-917 (Electric Transmission Filings)

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the modification and extension of the information collection requirements in FERC-917 (“Electric Transmission Filings”) for a three-year period. FERC-917 is an existing information collection and is being modified by the final rule in Docket No. RM21-17-000.

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.

This information collection request involves Commission implementation of section 206 via:

- 18 CFR 35.28 (“Non-Discriminatory Open Access Transmission Tariff”); and
- The *pro forma* Open Access Transmission Tariff (OATT).

The Commission’s regulations at 18 CFR 35.28 (2023) require certain types of entities to have on file an 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. Other provisions in section 35.28 of the Commission’s regulations 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.

The *pro forma* OATT, as originally developed by the Commission, is included in the final rule designated as Order No. 888, 61 FR 21540, at 21706 through 21724 (May 10,

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.

1996). As the term “*pro forma*” implies, the tariff contains standardized terms and conditions that public utilities must adopt in their own tariffs, unless they demonstrate that unique practices in a geographic region require modifications. The currently effective *pro forma* OATT² has been modified several times and is being modified by the final rule in Docket No. RM21-17-000.

The final rule builds on Order Nos. 888, 890, and 1000, in which the Commission incrementally developed the requirements that govern regional transmission planning and cost allocation processes to ensure that Commission-jurisdictional rates and practices remain just and reasonable and not unduly discriminatory or preferential.

The Commission believes that the existing regional transmission planning and cost allocation requirements are inadequate to ensure that Commission-jurisdictional rates and practices remain just and reasonable and not unduly discriminatory or preferential, because they fail to ensure that transmission providers (1) perform a sufficiently long-term assessment of Long-Term Transmission Needs; (2) adequately account on a forward-looking basis for known determinants of Long-Term Transmission Needs; and (3) consider the broader set of benefits and beneficiaries of regional transmission facilities planned to meet those Long-Term Transmission Needs. As a result, transmission providers are often not identifying, evaluating, or selecting more efficient or cost-effective regional transmission solutions to meet Long-Term Transmission Needs, which leads to inefficient, ineffective, and piecemeal transmission development. Therefore, the Commission believes it is necessary to reform the existing regional transmission planning and cost allocation requirements to ensure that customers realize the benefits of long-term, forward-looking, and more comprehensive regional transmission planning and cost allocation processes that identify, evaluate, and select more efficient or cost-effective regional transmission solutions to Long-Term Transmission Needs, 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

FERC-917 Information Collection

² Pro Forma OATT – effective March 14, 2022, <https://www.ferc.gov/media/pro-forma-oatt-effective-march-14-2022>

This final rule builds on Order No. 1000, which required public utility transmission providers to participate in a regional transmission planning process that results in the development of a regional transmission plan. The ongoing information collection activities associated with this final rule are the incremental requirements associated with developing a regional transmission plan by, for example, performing Long-Term Regional Transmission Planning (as described in further detail below).

Additionally, the final rule requires public utilities to modify their tariffs and jurisdictional agreements to comply with the Commission's revised transmission planning and cost allocation requirements. 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. Therefore, in addition to the ongoing information collection burdens described below, all of the reforms required by this final rule would entail one-time information collection activities related to changing public utilities' tariffs and jurisdictional agreements.

Overview of Reforms

Pursuant to section 206 of the FPA, the final rule in Docket No. RM21-17-000 requires all public utility transmission providers³ to comply with revised electric regional transmission planning and cost allocation requirements. The final rule revises Attachment K of the *pro forma* OATT to require public utility transmission providers to:

- **Participate in Long-Term Regional Transmission Planning**

In the final rule, the Commission finds that the absence of sufficiently long-term, forward-looking, and comprehensive transmission planning requirements is causing transmission providers to fail to adequately anticipate and plan for future system conditions, as well as appropriately evaluate the benefits of transmission infrastructure, resulting in piecemeal transmission expansion to address relatively near-term transmission needs. The Commission further finds that this status quo causes transmission providers to undertake relatively inefficient investments in transmission infrastructure, the costs of which are ultimately recovered through Commission-jurisdictional rates.

³ As defined at 18 CFR 37.3(a) a “Transmission Provider” is any public utility that owns, operates, or controls facilities for the transmission of electric energy in interstate commerce.

To remedy this issue, the final rule requires transmission providers to participate in a regional transmission planning process that includes Long-Term Regional Transmission Planning. As part of this Long-Term Regional Transmission Planning, transmission providers are required to:

- 1) identify Long-Term Transmission Needs through the development and use of at least three plausible and diverse Long-Term Scenarios and additional sensitivity analyses that account for known determinants of Long-Term Transmission Needs. The Long-Term Scenarios must incorporate seven specific categories of factors (e.g., federal, federally recognized Tribal, state, and local laws affecting the resource mix and demand), must use no less than a 20-year transmission planning horizon, and must use best available data inputs;
- 2) measure seven required benefits to evaluate Long-Term Regional Transmission Facilities over a time horizon that covers, at a minimum, 20 years starting from the estimated in-service date of the transmission facilities;
- 3) include in their tariffs an evaluation process, including criteria, that they will use to evaluate Long-Term Regional Transmission Facilities for selection to address Long-Term Transmission Needs. The selection criteria must be transparent and not unduly discriminatory and must seek to maximize benefits accounting for costs over time without over-building transmission facilities;
- 4) include in their tariffs provisions that require transmission providers—in certain circumstances and subject to limitations—to reevaluate Long-Term Regional Transmission Facilities that were previously selected.

The final rule requires transmission providers to perform Long-Term Regional Planning, including reassessing and revising the Long-Term Scenarios, at least once every five years. Thus, in addition to the one-time information collection activity for public utility transmission providers to modify their tariffs and jurisdictional agreements to comply with the final rule, the requirement to participate in Long-Term Regional Transmission Planning involves ongoing information collection activities.

- **Long-Term Regional Transmission Cost Allocation**

The final rule requires transmission providers to file revisions to their tariff to include an *ex ante* Long-Term Regional Transmission Cost Allocation Method (or Methods) to allocate the costs of selected Long-Term Regional Transmission Facilities (or a portfolio of such Facilities). The final rule further requires transmission providers, in the process

of developing a compliance filing for the final rule, to provide a one-time six-month forum (i.e., the Engagement Period) for the negotiation of potential Long-Term Regional Cost Allocation Methods that enables robust participation by Relevant State Entities. This information collection activity would be required only during Year 1.

The final rule also allows (but does not require) transmission providers to adopt a State Agreement Process by which one or more Relevant State Entities may voluntarily agree to a cost allocation method for Long-Term Regional Transmission Facilities (or a portfolio of such Facilities) either before or no later than six months after they are selected.

- **Consideration of Alternative Transmission Technologies:**

In the final rule, the Commission finds that existing regional transmission planning requirements fail to ensure that transmission providers consider whether to incorporate alternative transmission technologies into regional transmission facilities as part of their regional transmission planning processes and, consequently, fail to ensure that transmission providers are identifying more efficient or cost-effective regional transmission solutions through those processes. As a result, transmission providers overlook or undervalue the benefits of certain alternative transmission technologies and, in turn, undertake relatively inefficient and less cost-effective investments in transmission infrastructure, the costs of which are ultimately recovered through Commission-jurisdictional rates.

For this reason, the final rule requires transmission providers to evaluate the benefits of certain alternative transmission technologies (i.e., dynamic line ratings, advanced power flow control devices, advanced conductors, and transmission switching) in Long-Term Regional Transmission Planning and existing Order No. 1000 regional transmission planning and cost allocation processes.

This reform will result in ongoing information collection activities.

- **Enhanced Transparency of Local Transmission Planning and Coordination with Regional Transmission Planning**

In the final rule, the Commission finds that existing requirements governing transparency in local transmission planning processes and coordination between local and regional transmission planning processes are unjust, unreasonable, and unduly discriminatory or preferential. Specifically, the Commission finds that local transmission planning processes lack adequate provisions for transparency and meaningful input from

stakeholders.

To remedy this issue, the final rule requires transmission providers to conduct at least three stakeholder meetings in their regional transmission planning process related to local transmission planning:

- (1) A stakeholder meeting to review the criteria, assumptions, and models related to each Transmission Provider's local transmission planning (Assumptions Meeting);
- (2) No fewer than 25 calendar days after the Assumptions Meeting, a stakeholder meeting to review identified reliability criteria violations and other transmission needs that drive the need for local transmission facilities (Needs Meeting); and
- (3) No fewer than 25 calendar days after the Needs Meeting, a stakeholder meeting to review potential solutions to those reliability criteria violations and other transmission needs (Solutions Meeting).⁴

The meetings are required before including each transmission provider's local transmission planning information into the transmission planning region's planning models. The final rule also requires transmission providers to post publicly all materials for stakeholder review before and after each stakeholder meeting and provide opportunities for comments by stakeholders.

This reform will result in ongoing information collection activities.

- **Right Sizing Replacement Transmission Facilities**

In the final rule, the Commission finds that the lack of a requirement for transmission providers in each transmission planning region to evaluate whether replacement transmission facilities could be modified (i.e., right-sized) to more efficiently or cost-effectively address Long-Term Transmission Needs results in a regional transmission planning process that fails to identify opportunities to right-size planned in-kind replacement transmission facilities and may result in the development of inefficiently

⁴ The final rule also requires transmission providers to allow no fewer than 25 calendar days following the Solutions Meeting to review and consider stakeholder feedback on the local transmission solutions identified to meet the local transmission needs before the local transmission plan can be incorporated in the transmission planning region's planning models.

sized or designed, duplicative, or unnecessary transmission facilities that increase costs to customers and render Commission-jurisdictional rates unjust and unreasonable.

To remedy this issue, the final rule requires that, during each Long-Term Regional Transmission Planning cycle, each transmission provider must submit a list of transmission facilities that it owns that operate at or above a specified voltage threshold, and that may need to be replaced over the next 10 years. Upon collecting that information, the final rule requires the transmission providers in each transmission planning region to evaluate whether those transmission facilities can be “right-sized”⁵ to more efficiently or cost-effectively address a Long-Term Transmission Need.

This reform will result in ongoing information collection activities.

- **Consider in the Regional Transmission Planning Processes Regional Transmission Facilities that Address Interconnection-related Needs**

The final rule finds that certain interconnection-related network upgrades identified in the generator interconnection process can provide widespread transmission benefits that extend beyond the interconnection customer. As a result, the current practice of planning these types of upgrades to the transmission system in a piecemeal fashion, exclusively through the generator interconnection process, limits the development of transmission facilities that would provide benefits to the transmission system beyond those received by the interconnection customer. This is the case where interconnection-related network upgrades of substantial cost are repeatedly identified to address interconnection-related transmission needs, but those needs continue to go unresolved through the generator interconnection process.

⁵ The final rule defines a “right-sized replacement transmission facility” as a new transmission facility that: (1) would meet the need to replace an existing transmission facility that a transmission provider has identified in its in-kind replacement estimate as one that it plans to replace with an in-kind replacement transmission facility while also addressing a Long-Term Transmission Need; (2) results in more than an incidental increase in the capacity of an existing transmission facility that a transmission provider has identified for replacement in its in-kind replacement estimate; and (3) is located in the same general route as, and/or uses or expands the existing rights-of-way of, the existing transmission facility that a transmission provider has identified for replacement in its in-kind replacement estimate.

To remedy this issue, the final rule requires transmission providers in each transmission planning region to evaluate for possible selection in the regional transmission plan transmission facilities to address interconnection-related needs that have been identified in at least two interconnection queue cycles during the preceding five years, have a voltage of at least 200kV and an estimated cost of at least \$30 million, and have not been developed due to the withdrawal of interconnection customers.

This reform will result in ongoing information collection activities.

- **Revise Interregional Transmission Coordination Procedures to Reflect Long-Term Regional Transmission Planning**

The final rule requires transmission providers to revise their interregional transmission coordination processes to reflect the Long-Term Regional Transmission Planning reforms. Specifically, transmission providers (1) must share information regarding transmission needs and transmission facilities identified through Long-Term Regional Transmission Planning with neighboring transmission planning regions and (2) identify and jointly evaluate interregional transmission facilities proposed to meet Long-Term Transmission Needs.

Additionally, to enhance transparency, the final rule requires transmission providers to publicly post certain information regarding interregional transmission coordination processes applied to Long-Term Regional Transmission Planning.

This reform will result in ongoing information collection activities.

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

The Commission 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 in eLibrary.

Additionally, the Commission requires public utility transmission providers to provide transmission customers with equal and timely access to transmission and ancillary service tariff information through Open Access Same-Time Information System (OASIS)

website postings.⁶ OASIS website posting is ongoing and used by the public utility transmission providers and stakeholders to improve the processes of: (1) planning transmission projects; (2) considering transmission needs; (3) determining possible alternatives that would be more efficient or cost effective; and (4) allocating costs of transmission projects among the beneficiaries of the projects. 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 is the only federal agency to regulate interstate electric power transmission; therefore, other agencies would not be expected to collect this tariff-specific information. There is no other known source for the information.

The Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden.

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.

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 existing regional transmission planning and cost allocation requirements fail to ensure that

⁶ See 18 CFR 37.6 (explaining the information to be posted on the OASIS).

transmission providers: (1) perform a sufficiently long-term assessment of Long-Term Transmission Needs; (2) adequately account on a forward-looking basis for known determinants of Long-Term Transmission Needs; and (3) consider the broader set of benefits and beneficiaries of regional transmission facilities planned to meet those Long-Term Transmission Needs. As a result, transmission providers are often not identifying, evaluating, or selecting more efficient or cost-effective regional transmission solutions to meet Long-Term Transmission Needs, which leads to inefficient, ineffective, and piecemeal transmission development.

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 July 15, 2021, the Commission published an Advance Notice of Proposed Rulemaking⁷ (ANOPR) seeking public comments on a broad range of transmission-related issued, including some that are summarized and addressed in the Notice of Proposed Rulemaking (NOPR). The Commission also held a technical video conference on November 15, 2021, and issued a transcript of that conference.

On May 4, 2022, the NOPR was published in the *Federal Register* at 87 FR 26502. 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. The Commission received one comment regarding the burden estimate for the information collection requirements arguing that the Commission underestimated the cost for

⁷ 86 FR 40266.

transmission providers to perform Long-Term Regional Transmission Planning as proposed by the NOPR.⁸ In response to the comment, the Commission revised the burden estimate table (see the response to Question 12 below) in the final rule to increase the estimated amount of labor required for a transmission provider to perform Long-Term Regional Transmission Planning.

The Final rule was issued on May 13, 2024 and was published in the Federal Register on June 11, 2024 (89 FR 49280).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

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

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-917:

Number of responses: 324

Hourly Burden: 152,129

The information collection burden of the reforms adopted in this final rule is explained in

8 PJM Initial Comments at 125-129, Docket No. RM21-17-000 (filed August 17, 2022).

in the following table.

Our estimate of the number of reporting entities is based on the NERC Compliance Registry as of January 11, 2024, which indicates that there are 48 transmission service providers⁹ with OATTs and 118 transmission owners that are registered within the United States and are subject to this rulemaking.¹⁰ Because 41 of the 118 transmission owners are also included in the count of 48 transmission service providers, there are 125 distinct entities (i.e., 125 distinct transmission providers¹¹) in total that must comply this final rule. The burden¹² and cost estimates below are based on (1) the initial need for transmission providers to file revised 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.

We estimate that the reforms in this final rule would affect the burden and cost of FERC-917 as follows.

Changes Due to Final Rule in Docket No. RM21-17-000¹³				
A.	B.	C.	D.	E.

⁹ The transmission service provider (TSP) function is a NERC registration function, which is similar to the transmission provider that is referenced in the pro forma OATT. The TSP function is being used as a proxy to estimate the number of transmission providers that are impacted by this proposed rulemaking.

¹⁰ The number of entities listed from the NERC Compliance Registry reflects the omission of the Texas registered entities. Note that the 48 transmission providers with OATTs do not include non-public utility transmission providers with reciprocity tariffs.

¹¹ See *supra* note 3.

¹² “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.

¹³ In the table, Year 1 figures are one-time implementation hours and cost. “Subsequent years” show ongoing burdens and costs starting in Year 2.

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Area of Modification	Annual Number of Respondents	Total Annual Estimated Number of Responses	Average Burden Hours & Cost¹⁴ per Response	Total Estimated Burden Hours & Total Estimated Cost (Column C x Column D)
FERC-917, Electric Transmission Facilities (OMB Control No. 1902-0233)				
Draft OATT revisions to comply with the requirements of the final rule	48 transmission providers with OATTs	48	One Time: 770 hours; \$71,683 Ongoing: 0 hours per year; \$0 per year	One Time: 36,960 hours; \$3,440,783 Ongoing: 0 hours per year; \$0 per year
Establish a six-month time period during which transmission providers must, among other things, provide a forum for negotiation that enables participation by Relevant State Entities and to discuss potential Long-Term Regional Cost Allocation Methods and/or a State Agreement	48 transmission providers with OATTs	48	One Time: 390 hours; \$36,307 Ongoing: 0 hours per year; \$0 per year	One Time: 18,720 hours; \$1,742,734 Ongoing: 0 hours per year; \$0 per year

¹⁴ The hourly cost (for salary plus benefits) uses the figures from the Bureau of Labor Statistics (BLS) for three positions involved in the reporting and recordkeeping requirements. These figures include salary (based on BLS data for May 2022, issued April 25, 2023, http://bls.gov/oes/current/naics2_22.htm) and benefits (based on BLS data for September 2023; issued December 15, 2023, <http://www.bls.gov/news.release/ecec.nr0.htm>) and are Manager (Occupation Code 11-0000, \$122.48/hour), Electrical Engineer (Occupation Code 17-2071, \$89.04/hour), and File Clerk (Occupation Code 43-4071, \$42.43/hour). The hourly cost for the reporting requirements (\$105.76) is an average of the hourly cost (wages plus benefits) of a manager and engineer. The hourly cost for recordkeeping requirements uses the cost of a file clerk.

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Process.				
Participate in Long-Term Regional Transmission Planning, which includes creating and updating datasets, developing Long-Term Scenarios, evaluating the benefits of Long-Term Regional Transmission Facilities, and establishing criteria in consultation with Relevant State Entities and stakeholders to select Long-Term Regional Transmission Facilities in the regional transmission plan for purposes of cost allocation.	48 transmission providers with OATTs	48	One Time: 0 hours; \$0 Ongoing: 4,500 hours per year; \$418,926 per year	One Time: 0 hours; \$0 Ongoing: 216,000 hours per year; \$20,108,471 per year
	77 transmission providers without OATTs	77	One Time: 0 hours; \$0 Ongoing: 200 hours per year; \$18,619	One Time: 0 hours; \$0 Ongoing: 15,400 hours per year; \$1,433,659 per year
Revise the regional transmission planning process to enhance transparency of local transmission planning and identifying potential opportunities to right-size replacement transmission facilities.	48 transmission providers with OATTs	48	One Time: 30 hours; \$2,793 Ongoing: 120 hours per year; \$11,172 per year	One Time: 1,440 hours; \$134,056 Ongoing: 5,760 hours per year; \$536,226 per year
	77 transmission providers without OATTs	77	One Time: 20 hours; \$1,862 Ongoing: 40 hours per year; \$3,724 per year	One Time: 1,540 hours; \$143,366 Ongoing: 3,080 hours per year; \$286,732 per year
Evaluate whether certain alternative transmission technologies can meet the transmission needs identified in Order No. 1000 regional transmission planning	48 transmission providers with OATTs	48	One Time: 0 hours; \$0 Ongoing: 100 hours per year; \$9,309 per year	One Time: 0 hours; \$0 Ongoing: 4,800 hours per year; \$446,855 per year

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processes and in Long-Term Regional Transmission Planning process more efficiently or cost-effectively than transmission facilities without such alternative transmission technologies.	77 transmission providers without OATTs	77	One Time: 0 hours; \$0 Ongoing: 20 hours per year; \$1,862 per year	One Time: 0 hours; \$0 Ongoing: 1540 hours per year; \$143,366 per year
Consider in the Order No. 1000 regional transmission planning processes regional transmission facilities that address certain interconnection-related needs.	48 transmission providers with OATTs	48	One Time: 0 hours; \$0 Ongoing: 50 hours per year; \$4,655 per year	One Time: 0 hours; \$0 Ongoing: 2,400 hours per year; \$223,427 per year
Share with the transmission providers in neighboring transmission planning regions information regarding Long-Term Transmission Needs and potential transmission facilities to meet those needs; identify and jointly evaluate interregional transmission facilities with the transmission providers in neighboring transmission planning regions; and publicly post certain information regarding interregional coordination processes applied to Long-Term Regional Transmission Planning.	48 transmission providers with OATTs	48	One Time: 0 hours; \$0 Ongoing: 25 hours per year; \$2,327 per year	One Time: 0 hours; \$0 Ongoing: 1,200 hours per year; \$111,714 per year
Total burden for the revisions of FERC 917 due to RM21-17	48 transmission providers with OATTs	48	One Time: 1,190 hours; \$110,783 Ongoing: 4,795 hours per year; \$446,390 per year	One Time: 57,120 hours; \$5,317,573 Ongoing: 230,160 hours per year;

			year	\$21,426,693 per year
	77 transmission providers without OATTs	77	One Time: 20 hours; \$1,862 Ongoing: 260 hours per year; \$24,205 per year	One Time: 1,540 hours; \$143,366 Ongoing: 20,020 hours per year; \$1,863,757 per year
	Totals for all 125 transmission providers			One Time: 58,660 hours; \$5,460,939 Ongoing: 250,180 hours per year; \$23,290,450 per year

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

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 Paperwork Reduction Act (PRA) Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA¹⁵ 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

15 5 CFR pt. 1320.

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-917 is shown below:

FERC-917	Number of Employees (FTEs)	Estimated Annual Federal Cost
Analysis and Processing of filings ¹⁶	7	\$1,454,502
Paperwork Reduction Act Administrative Cost		\$8,396
TOTAL for FERC-917		\$1,462,898

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 existing regional transmission planning and cost allocation requirements to ensure that public utility transmission providers adopt sufficiently long-term, forward-looking, and more comprehensive regional transmission planning and cost allocation processes that identify, evaluate, and select more efficient or cost-effective regional transmission solutions to Long-Term Transmission Needs, thereby ensuring that rates, terms, and conditions for Commission-jurisdictional services remain just and reasonable and not unduly discriminatory or preferential.

The PRA activities in the final rule would increase the total burden of FERC-917.

At the NOPR phase, the proposed rule estimated the first-year burdens under the NOPR in Docket No. RM21-17 for FERC-917 would be 625 responses and 52,500 hours. For Year One, the resulting total burdens for FERC-917 would be: 625 responses plus 862 responses = 1,487 responses; and 83,927 hours plus 52,500 hours = 136,427 hours. The requested burdens for subsequent years proposed in the NOPR in Docket No. RM2-17 would be 625 responses per year and 21,875 hours per year. Thus, in subsequent years, the total burden for FERC-917 would be 625 response plus 862 responses = 1,487 responses per year; and 21,875 hours per year plus 52,500 hours per year = 105,802 hours

¹⁶ Based upon FERC's 2024 FTE average annual salary plus benefits (\$207,786).

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per year.

In this final rule, the commission is revising it's estimate based on comments on the proposed rule and changes between what was originally proposed and what is being finalized in Docket RM21-17-000. The result is an increase in burden of 692 responses, and 308,840 hours. Most of these hours were due to increases in the estimates to prepare data sets and information to be used for long-term regional planning processes.

FERC-917 & 918¹⁷	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	1,016	324	0	+692
Annual Time Burden	460,969	152,129	0	+308,840
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.

¹⁷The information collection of FERC 918 is not being changed in this final rule, rather it is included in this OMB control no.