

Supporting Statement for  
**FERC-567, Gas Pipeline Certificates: Annual Reports of System Flow Diagrams and System Capacity**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and extend its approval to information collection requirements in FERC-567 (Gas Pipeline Certificates: Annual Reports of System Flow Diagrams and System Capacity, OMB Control No. 1902-0005) for three years.

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

In accordance with 18 CFR 260.8, the FERC-567 information collection requires each major natural-gas pipeline company<sup>1</sup> to file an annual report consisting of a diagram or diagrams and associated information reflecting operating conditions on the pipeline's main transmission system. This annual reporting requirement is authorized by section 10 of the Natural Gas Act (NGA),<sup>2</sup> which requires every natural-gas company to file with the Commission such annual and other periodic or special reports as the Commission may by rules and regulations (such as 18 CFR 260.8) or order prescribe as necessary or appropriate.

The Commission reviews the FERC-567 information to evaluate the need for a certificate of public convenience and necessity under section 7 of the Natural Gas Act (NGA).<sup>3</sup> Applicants must seek such a certificate before engaging in the transportation of natural gas in interstate commerce, before undertaking the construction or extension of facilities for such transportation, or before acquiring or operating any such facility.

Besides assisting the Commission in determining the need for a certificate, the Commission uses the FERC-567 information in developing and evaluating alternatives to proposed facilities as a means to mitigate environmental impact of certificate applications. In addition, the Commission may use the FERC-567 information to investigate interconnections with other pipelines, locations of gas supply sources, and the flow of gas and interconnections with customers' facilities.

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

The Commission uses the information collected under FERC-567 to obtain accurate data on pipeline facilities. The information in FERC-567 includes:

- The configuration of installed pipeline facilities;

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<sup>1</sup> The NGA, at 15 U.S.C. 717a(6), defines "natural-gas company" as "a person engaged in the transportation of natural gas in interstate commerce, or the sale in interstate commerce of such gas for resale." FERC-567 respondents are limited to pipelines engaged in transportation of natural gas in interstate commerce.

<sup>2</sup> 15 U.S.C. 717i.

<sup>3</sup> 15 U.S.C. 717f.

- The location of receipt and delivery points;
- The location of emergency interconnections on a pipeline system;
- The location of pipeline segments, laterals and compressor stations;
- Pipeline segment lengths and pipeline diameters;
- The maximum allowable operating pressures and suction and discharge pressures at compressor stations;
- The installed horsepower and volumes compressed at each compressor station;
- The existing shippers and producers currently using each pipeline company.

These data are physical/engineering data not included as part of any other data collection requirements. Without such timely data, the Commission would be impaired in meeting its responsibilities under the NGA.

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

The regulation at 18 CFR 260.8 requires each major natural-gas pipeline<sup>4</sup> to file five copies of a diagram or diagrams reflecting operating conditions on the pipeline's main transmission system with the Commission by June 1<sup>st</sup> of each year. However, FERC-567 reports may be submitted by eFiling. If that option is selected by the respondent, there is no requirement for any paper copies.

The Commission continues to expand the list of filing types that may be submitted electronically to reduce burden on entities. To see a full list of submission guidelines click here: <https://www.ferc.gov/sites/default/files/2020-05/filing.pdf>.

### **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 information collection expiration dates arise or as the Commission may deem necessary in carrying out its regulatory responsibilities under the NGA in an effort to alleviate duplication. All Commission information collections are subject to analysis by Commission staff and are examined for redundancy. The Commission is unaware of any other source of information similar to FERC-567.

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

For FERC-567, small entities have the option of filing electronically through the eFiling interface as a means of reducing their incurred burden. This is how the Commission attempts to minimize the burden of FERC-567 upon small entities. However, eFiling is a means of

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<sup>4</sup> A pipeline is "major" if it has a system delivery capacity exceeding 100,000 Mcf per day. 18 CFR 260.8(a).

FERC-567 (OMB Control No. 1902-0005)

Docket No. IC24-9-000

submission available to all respondents with no regard to size. The burden will vary among applicants since the information is specific for each applicant and site.

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

If the FERC-567 information were collected less frequently, the Commission would be unable to fulfill its statutory mandates under the NGA on a timely basis. The Commission uses system flow diagrams of FERC-567 for regulatory purposes in connection with processing applications filed by interstate pipelines under Sections 7(a), 7(b), and 7(c) of the NGA.

In addition, the FERC-567 information is important to various investigations of pipeline operations such as interconnections with other pipelines, locations of gas supply sources, and the flow of gas and interconnections with customers' facilities.

## **7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION**

If a FERC-567 respondent opts to respond electronically, the requirements of 5 CFR 1320.5 are met. However, if an applicant opts not to file electronically, the respondent must submit five (5) copies per 18 CFR 260.8. While the Commission encourages applicants to submit their filings electronically, this is the applicant's option.

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

In accordance with OMB requirements<sup>5</sup>, each FERC activity that results in the revision of an information collection is published in the Federal Register thereby providing the public, state commissions, Federal agencies, and other interested parties an opportunity to submit data, views, comments, and/or suggestions concerning the approved collections of data. The Commission published a 60-day notice for FERC-567 on March 11, 2025 (89 FR 17453) and a correction notice on March 15, 2024 (89 FR 18931).<sup>6</sup> Public comments in response to the 60-day notice were due May 10, 2024. The Commission received no comments. The Commission published a 30-day notice on May 31, 2024 (89 FR 47141).

## **9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS**

The Commission makes no payments or gifts to respondents associated with FERC-567.

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<sup>5</sup> 5 CFR 1320.8(d)

<sup>6</sup> The 60-day notice that was published on March 11, 2024 erroneously stated, "Comments on the collections of information are due [INSERT DATE 60 days after date of publication in the **Federal Register**.]" The correction notice that was published on March 15 correctly stated, "In notice document 2024-05013, appearing on page 17453, in the issue of Monday, March 11, 2024, in the first column, in the **DATES** section, '[INSERT DATE 60 days after publication in the **Federal Register**]' should read, 'May 10, 2024.'"

**10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS**

In general, natural gas pipeline flow diagrams are considered Critical Energy/Electric Infrastructure Information (CEII) and public access to such information is limited. However, supporting information filed with the flow diagrams often should be public.

Pursuant to 18 CFR 388.13(d)(1)(i) and (ii), respondents must clearly label CEII and file such information as a volume separate from public information. Additional information on FERC's CEII program and related landmark orders is available at <https://www.ferc.gov/enforcement-legal/legal/major-orders-regulations/critical-energyelectric-infrastructure-information>.

**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 Commission does not consider any of the questions within the FERC-567 of a sensitive nature, as described above. However, the Commission considers the FERC-567 information as sensitive to the nation's energy infrastructure because the data contains location and operational data on the nation's natural-gas pipelines. Therefore, the FERC-567 information is classified as CEII (described in greater depth within Question #10).

**12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION**

The following table provides the estimated annual burden<sup>7</sup> and cost related to information collection requirements for FERC-567.

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<sup>7</sup> Burden is defined as the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a federal agency. Refer to 5 CFR 1320.3 for additional information.

<b>FERC-567, Gas Pipeline Certificates: Annual Reports of System Flow Diagrams</b>						
<b>Respondents</b>	<b>Number of Respondents<sup>8</sup></b> <b>(1)</b>	<b>Annual Number of Responses per Respondent</b> <b>(2)</b>	<b>Total Number of Responses</b> <b>(1)*(2)=(3)</b>	<b>Average Annual Burden &amp; Cost Per Response<sup>9</sup></b> <b>(4)</b>	<b>Total Annual Burden Hours &amp; Total Annual Cost</b> <b>(3)*(4)=(5)</b>	<b>Average Annual Cost per Respondent</b> <b>(\$)</b> <b>(5)÷(1)</b>
Natural-Gas Pipelines	124	1	124	4 hrs.; \$400	496 hrs.; \$49,600	\$400

**13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS**

There are no non-labor costs currently associated with FERC-567. All costs are associated with burden hours (labor) for both information collections and are addressed in Question #12 and Question #15.

**14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT**

The estimated annualized cost to the Federal Government for FERC-567 follows:

	<b>Number of FTE's</b>	<b>Estimated Annual Federal Cost (\$)</b>
PRA <sup>10</sup> Administration Cost		\$8,396.00
Data Processing and Analysis for FERC-567 <sup>11</sup>	0.06	\$12,467.16
<b>FERC Total</b>		\$20,863.16

The Commission bases its estimate of the ‘Analysis and Processing of filings’ cost 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 made in response to the information collection.

The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information

<sup>8</sup> The number of respondents in the currently approved OMB inventory for FERC-567 is 197. Changes to the estimate were based on average number of respondents over the past three years.

<sup>9</sup> The Commission staff estimates that the average respondent for FERC-567 is similarly situated to the Commission, in terms of salary plus benefits. Based on FERC’s 2024 annual average of \$207,786 (for salary plus benefits), the average hourly cost is \$100/hour.

<sup>10</sup> Paperwork Reduction Act of 1995 (PRA).

<sup>11</sup> Based on 2024 annual cost (salary plus benefits) per FTE of \$\$207,786.00 (for salary plus benefits).

FERC-567 (OMB Control No. 1902-0005)

Docket No. IC24-9-000

collection. This average annual cost includes requests for extensions, all associated rulemakings, other changes to the collection, and publications in the Federal Register.

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

There are no program changes and there are no adjustments. The Commission estimates the annual public reporting burden for FERC-567 is:

<b>FERC-567</b>	<b>Total Request</b>	<b>Previously Approved</b>	<b>Change due to Adjustment in Estimate</b>	<b>Change Due to Agency Discretion</b>
Annual Number of Responses	124	124	0	0
Annual Time Burden (Hr)	496	496	0	0
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

**16. TIME SCHEDULE FOR THE PUBLICATION OF DATA**

There is no publication of data associated with FERC-567 information collections.

**17. DISPLAY OF THE EXPIRATION DATE**

The OMB expiration dates are displayed at <https://www.ferc.gov/enforcement-legal/legal/information-collections>

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

There are no exceptions.