

Supporting Statement for

**FERC-725F, Mandatory Reliability Standard for Nuclear Plant Interface Coordination  
Extension**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve the FERC-725F, Mandatory Reliability Standard for Nuclear Plant Interface Coordination, for a three-year period. FERC-725F is an existing Commission data collection, as stated by 18 Code of Federal Regulations, Part 40.

**Background.** FERC-725F includes only one Reliability Standard (NUC-001-4<sup>1</sup>). Compliance with this Reliability Standard is mandatory and enforceable for the applicable categories of entities identified in the Reliability Standard. Reliability Standards are approved by the Commission pursuant to its authority under section 215 of the Federal Power Act (FPA), which authorizes the Commission to approve a Reliability Standard proposed by the Electric Reliability Organization (ERO) if the Commission determines that it is just and reasonable, not unduly discriminatory or preferential and in the public interest. The NERC petition states as the load-serving entity is no longer a NERC registration category, NERC proposes to remove this entity from the list of applicable transmission entities in the applicability section of proposed Reliability Standard NUC-001-4. Removing this function from the list of transmission entities will not change the estimated burden associated with this standard.

**A. Justification**

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

In the aftermath of the 1965 Blackout in the northeast United States, the electric industry established the North American Electric Reliability Council (NERC)<sup>2</sup>, a voluntary reliability organization. Since its inception, NERC has developed Operating Policies and Planning Standards that provide voluntary guidelines for operating and planning the North American bulk-power system. In April 2005, NERC adopted “Version 0” reliability standards that translated the NERC Operating Policies, Planning Standards and compliance requirements into a comprehensible set of measurable standards. While NERC had developed a compliance enforcement program to ensure compliance with the reliability standards it developed, industry compliance had been voluntary and not subject to mandatory enforcement penalties. Although

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<sup>1</sup> Reliability Standard NUC-001-4 was approved petition and exhibits are posted in the Commission’s eLibrary system in Docket No. RD20-4-000 ([Standards Alignment with Registration Petition](#)).

<http://www.nerc.com/pa/Stand/Reliability%20Standards/NUC-001-4.pdf> .

<sup>2</sup> On January 1, 2007, NERC became the North American Electric Reliability Corporation and continues to use the same acronym.

NERC's efforts had been important in maintaining the reliability of the nation's bulk-power system, NERC itself had recognized the need for mandatory, enforceable reliability standards and had been a proponent of legislation to establish a FERC-jurisdictional ERO that would propose and enforce mandatory reliability standards.

On August 8, 2005, the Electricity Modernization Act of 2005, which is Title XII, Subtitle A, of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law.<sup>3</sup> EPAAct 2005 added section 215 to the FPA, which requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight, or the Commission can independently enforce Reliability Standards.<sup>4</sup>

On February 3, 2006, the Commission issued Order No. 672, implementing section 215 of the FPA.<sup>5</sup> Pursuant to Order No. 672, the Commission certified one organization, NERC, as the ERO.<sup>6</sup> The Reliability Standards developed by the ERO and approved by the Commission apply to users, owners and operators of the Bulk-Power System, as set forth in each Reliability Standard.

In accordance with section 215(d)(2) of the FPA and § 39.5(c) of the Commission's regulations, the Commission is required to give due weight to the technical expertise of the ERO with respect to the content of a Reliability Standard or to a Regional Entity organized on an Interconnection-wide basis with respect to a proposed Reliability Standard or a proposed modification to a Reliability Standard to be applicable within that Interconnection.<sup>7</sup>

The ERO must file with the Commission each new or modified Reliability Standard that it proposes to be made effective (or standard proposed for deletion) under section 215 of the FPA. The Commission can then approve or remand the Reliability Standard. The Commission also can, among other actions, direct the ERO to modify an approved Reliability Standard to address

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<sup>3</sup> Energy Policy Act of 2005, Pub. L. No. 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), 16 U.S.C. 824o.

<sup>4</sup> 16 U.S.C. 824o(e)(3).

<sup>5</sup> Rules Concerning Certification of the Electric Reliability Organization; Procedures for the Establishment, Approval and Enforcement of Electric Reliability Standards, Order No. 672, 71 FR 8662 (Feb. 17, 2006), FERC Stats. & Regs. 31,204 (2006), order on reh'g, Order No. 672-A, 71 FR 19814 (Apr. 18, 2006), FERC Stats. & Regs. 31,212 (2006).

<sup>6</sup> North American Electric Reliability Corp., 116 FERC 61,062 (ERO Certification Order), order on reh'g & compliance, 117 FERC 61,126 (ERO Rehearing Order) (2006), order on compliance, 118 FERC 61,030 (2007) (Jan. 2007 Compliance Order), appeal docket sub nom. Alcoa, Inc. v. FERC, No. 06-1426 (D.C. Cir. Dec. 29, 2006).

<sup>7</sup> 16 U.S.C.824o as implemented in 18 CFR 39.5(c)(1).

a specific matter if it considers this appropriate to carry out section 215 of the FPA.<sup>8</sup> Only Reliability Standards approved by the Commission will become mandatory and enforceable.

A Reliability Standard defines obligations or requirements of utilities and other entities that operate, plan and use the Bulk Power System in North America. Meeting these requirements helps ensure the reliable planning and operation of the Bulk Power System. Each NERC Reliability Standard details the purpose of the standard, the entities that must comply, the specific actions that constitute compliance, and how the standard and compliance will be measured.

Reliability Standards address aspects of the operation and planning of the bulk power system such as: real-time transmission operations, balancing load and generation, emergency operations, system restoration and blackstart, voltage control, cyber security, vegetation management, facility ratings, disturbance reporting, connecting facilities to the grid, certifying system operators, and personnel training. The Reliability Standards detail how the system should perform, but not how the system should be designed. Individual owners, operators and users of the bulk power system determine if the system should be expanded or changed, and how, in order to achieve the intent of the Standards.

On February 21, 2020, NERC filed a petition in Docket No. RD20-4-000<sup>9</sup> requesting Commission approval of Reliability Standard NUC-001-4 (Nuclear Plant Interface Coordination). RD20-4-000 revised the reliability standard by removing the load-serving entity (LSE) function in the applicability section of proposed Reliability Standard NUC-001-4. LSE was just one of ten other entities that are under the umbrella of Transmission Entities and most of the previous LSE are still applicable to the standard based on other registered functions.

### **Reliability Standard NUC-001-4**

The Reliability Standards implement the Congressional mandate of EPACT 2005 to develop mandatory and enforceable Reliability Standards to better ensure the reliability of the nation's Bulk-Power System. Specifically, the Nuclear Reliability Standard NUC-001-4 ensures that system operating limits (SOLs) used in the reliability planning and operation of the Bulk-Power System are coordinated with nuclear licensing requirements to ensure the safe operation and shut down of nuclear power plants.

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

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<sup>8</sup> Section 215(d)(5) of the FPA.

<sup>9</sup> The petition and exhibits are posted in the Commission's eLibrary system in Docket No. RD20-4-000 ([Standards Alignment with Registration Petition](#)).

Reliability Standard NUC-001-4 applies to nuclear plant generator operators; transmission operators, owners, planners, and service providers; balancing authorities; reliability coordinators; planning coordinators; distribution providers; load-serving entities; and generator owners and operators. Reliability Standard NUC-001-4 requires coordination between Nuclear Plant Generator Operators and Transmission Entities for the purpose of ensuring safe operation and shutdown of nuclear power plants. The NUC-001-4 Reliability Standard requires the Nuclear Plant Generator Operators and Transmission Entities to which they interconnect to execute and implement interface agreements for coordinating operations to meet nuclear licensing requirements. These agreements must incorporate Nuclear Plant Interface Requirements (NPIRs) into their operating analyses of the Bulk Electric System (BES) and operate the Transmission system to comply with the NPIRs.

### **Requirements and Measures**

**R1.** The Nuclear Plant Generator Operator shall provide the proposed NPIRs in writing to the applicable Transmission Entities and shall verify receipt.

**M1.** The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, provide a copy of the transmittal and receipt of transmittal of the proposed NPIRs to the responsible Transmission Entities.

**R2.** The Nuclear Plant Generator Operator and the applicable Transmission Entities shall have in effect one or more Agreements that include mutually agreed to NPIRs and document how the Nuclear Plant Generator Operator and the applicable Transmission Entities shall address and implement these NPIRs.

**M2.** The Nuclear Plant Generator Operator and each Transmission Entity shall each have a copy of the currently effective Agreement(s) which document how the Nuclear Plant Generator Operator and the applicable Transmission Entities address and implement the NPIRs available for inspection upon request of the Compliance Enforcement Authority.

**R3.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall incorporate the NPIRs into their planning analyses of the electric system and shall communicate the results of these analyses to the Nuclear Plant Generator Operator.

**M3.** Each Transmission Entity responsible for planning analyses in accordance with the Agreement shall, upon request of the Compliance Enforcement Authority, provide a copy of the planning analyses results transmitted to the Nuclear Plant Generator Operator, showing incorporation of the NPIRs. The Compliance Enforcement Authority shall refer to the Agreements developed in accordance with this standard for specific requirements.

**R4.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall.

**4.1.** Incorporate the NPIRs into their operating analyses of the electric system.

**4.2.** Operate the electric system to meet the NPIRs.

**4.3.** Inform the Nuclear Plant Generator Operator when the ability to assess the operation of the electric system affecting NPIRs is lost.

**M4.** Each Transmission Entity responsible for operating the electric system in accordance with the Agreement shall demonstrate or provide evidence of the following, upon request of the Compliance Enforcement Authority:

- The NPIRs have been incorporated into the current operating analysis of the electric system. (Requirement 4.1)
- The electric system was operated to meet the NPIRs. (Requirement 4.2)
- The Transmission Entity informed the Nuclear Plant Generator Operator when it became aware it lost the capability to assess the operation of the electric system affecting the NPIRs

**R5.** Per the Agreements developed in accordance with this standard, the Nuclear Plant Generator Operator shall operate the nuclear plant to meet the NPIRs.

**M5.** The Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, demonstrate or provide evidence that the nuclear power plant is being operated consistent with the NPIRs.

**R6.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities and the Nuclear Plant Generator Operator shall coordinate outages and maintenance activities which affect the NPIRs.

**M6.** The Transmission Entities and Nuclear Plant Generator Operator shall, upon request of the Compliance Enforcement Authority, provide evidence of the coordination between the Transmission Entities and the Nuclear Plant Generator Operator regarding outages and maintenance activities which affect the NPIRs.

**R7.** Per the Agreements developed in accordance with this standard, the Nuclear Plant Generator Operator shall inform the applicable Transmission Entities of actual or proposed changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the electric system to meet the NPIRs.

**M7.** The Nuclear Plant Generator Operator shall provide evidence that it informed the applicable Transmission Entities of changes to nuclear plant design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the Transmission Entities to meet the NPIRs.

**R8.** Per the Agreements developed in accordance with this standard, the applicable Transmission Entities shall inform the Nuclear Plant Generator Operator of actual or proposed changes to electric system design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the electric system to meet the NPIRs.

**M8.** The Transmission Entities shall each provide evidence that the entities informed the Nuclear Plant Generator Operator of changes to electric system design (e.g., protective relay setpoints), configuration, operations, limits, or capabilities that may impact the ability of the Nuclear Plant Generator Operator to meet the NPIRs.

**R9.** The Nuclear Plant Generator Operator and the applicable Transmission Entities shall include the following elements in aggregate within the Agreement(s) identified in R2.

- Where multiple Agreements with a single Transmission Entity are put into effect, the R9 elements must be addressed in aggregate within the Agreements; however, each Agreement does not have to contain each element. The Nuclear Plant Generator Operator and the Transmission Entity are responsible for ensuring all the R9 elements are addressed in aggregate within the Agreements.
- Where Agreements with multiple Transmission Entities are required, the Nuclear Plant Generator Operator is responsible for ensuring all the R9 elements are addressed in aggregate within the Agreements with the Transmission Entities. The Agreements with each Transmission Entity do not have to contain each element; however, the Agreements with the multiple Transmission Entities, in the aggregate, must address all R9 elements. For each Agreement(s), the Nuclear Plant Generator Operator and the Transmission Entity are responsible to ensure the Agreement(s) contain(s) the elements of R9 applicable to that Transmission Entity.

**M9.** The Nuclear Plant Generator Operator shall have a copy of the Agreement(s) addressing the elements in Requirement 9 available for inspection upon request of the Compliance Enforcement Authority. Each Transmission Entity shall have a copy of the Agreement(s) addressing the elements in Requirement 9 for which it is responsible available for inspection upon request of the Compliance Enforcement Authority.

### **Data Retention**

The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- For Measure 1, the Nuclear Plant Generator Operator shall keep its latest transmittals and receipts.
- For Measure 2, the Nuclear Plant Generator Operator and each Transmission Entity shall have its current, in-force Agreement.
- For Measure 3, the Transmission Entity shall have the latest planning analysis results.
- For Measures 4, 6 and 8, the Transmission Entity shall keep evidence for two years plus current.
- For Measures 5, 6 and 7, the Nuclear Plant Generator Operator shall keep evidence for two years plus current.

If a Responsible Entity is found non-compliant it shall keep information related to the noncompliance until found compliant. The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

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

Reliability Standard NUC-001-4 does not require information to be filed with the Commission. However, it does contain information collection requirements for which using current technology is an option.

**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 responsibilities under the FPA in order to eliminate duplication and ensure that filing burden is minimized. There are no similar sources of 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**

This Reliability Standard does not contain provisions for minimizing the burden of the collection for small entities. All the requirements in the Reliability Standard apply to every applicable entity, be it large or small. The universe of users, owners, and operators established this standard through a collaborative process with no special provisions for small entities.<sup>10</sup>

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

The NUC-001-4 Reliability Standard requires the Nuclear Plant Generator Operators and Transmission Entities to which they interconnect to execute and implement interface agreements for coordinating operations to meet nuclear licensing requirements. These agreements must incorporate Nuclear Plant Interface Requirements (NPIRs) into their operating analyses of the Bulk Electric System (BES) and operate the Transmission system to comply with the NPIRs. The lack of these agreements or compliance to these agreements can bring about lack of coordination of operations between a nuclear plant and its transmission entities. This lack of communication between entities can lead to an unanticipated separation from the Bulk Power System (BPS) placing the BPS at risk. Since 2011, there have been over a dozen violation of the standard largely through self-reporting, with Requirement R4 most frequently being responsible, that could have lead to circumstances entities not sharing information or being able to meet the

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<sup>10</sup>In general for Reliability Standards, small entities subject to a given Reliability Standard can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity to share its compliance burden with other similar entities. Detailed information regarding these options are available in NERC's Rules of Procedure at <http://www.nerc.com/aboutnerc/pages/rules-of-procedure.aspx> .)

NPIRs. If the disturbance events were reported less frequently, it would undermine NERC's (and others') ability to mitigate the current event and prepare for a possible next event.

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

There are no records retention requirements longer than 3 years as evidenced below and within section #2. Therefore, there are no special circumstances. Data Retention requirements state:

“The Responsible Entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- For Measure 1, the Nuclear Plant Generator Operator shall keep its latest transmittals and receipts.
- For Measure 2, the Nuclear Plant Generator Operator and each Transmission Entity shall have its current, in-force Agreement.
- For Measure 3, the Transmission Entity shall have the latest planning analysis results.
- For Measures 4, 6 and 8, the Transmission Entity shall keep evidence for two years plus current.
- For Measures 5, 6 and 7, the Nuclear Plant Generator Operator shall keep evidence for two years plus current.

If a Responsible Entity is found non-compliant it shall keep information related to the noncompliance until found compliant. The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records. If a Responsible Entity is found non-compliant it shall keep information related to the noncompliance until found compliant.

[The Compliance Enforcement Authority is the Regional Entity.]

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

The 60-day Notice published on March 25, 2024, (89 FR 20647) with no comments received. The 30-day notice published on June 6, 2024 (89 FR 48426).

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



The Commission does not make payments or provide gifts for respondents related to this collection.

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

Responding entities do not submit the information collected or retained (to show compliance with the Reliability Standards) to FERC. Rather, they submit the information to NERC, the Regional Entities, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

According to the NERC Rule of Procedure section 1502<sup>11</sup>, "...a Receiving Entity shall keep in confidence and not copy, disclose, or distribute any Confidential Information or any part thereof without the permission of the Submitting Entity, except as otherwise legally required." This serves to protect confidential information submitted to NERC or Regional Entities.

**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.**

This collection does not include any questions of a sensitive nature.

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

The burden estimates for the current reporting and record retention requirements have been adjusted as noted below in #12 and #15.<sup>12</sup> The Commission estimates the average annual burden and cost<sup>13</sup> for this information collection as follows.

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<sup>11</sup> Section 1502, Paragraph 2, Confidentiality, available at NERC's website ([http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC\\_ROP\\_Effective\\_20160504.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20160504.pdf))

<sup>12</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.

<sup>13</sup> The wage and benefit figures are based on the Bureau of Labor Statistics (BLS) data (at [https://www.bls.gov/oes/current/naics2\\_22.htm](https://www.bls.gov/oes/current/naics2_22.htm)) for May 2023 for Sector 22, Utilities. (The benefits figure is based on BLS data as of May 2023 <http://www.bls.gov/news.release/ecec.nr0.htm>)

The estimated hourly cost (for wages plus benefits) for reporting requirements is \$94.37/hour, based on the average for an electrical engineer (occupation code 17-2071, \$77.29/hour), legal (occupation code 23-0000, \$160.24/hour), and office and administrative staff (occupation code 43-0000, \$45.59/hour). The estimated cost is a combination of job functions with each covering

FERC-725F	No. of Respondents (1)	Annual No. of Responses Per Respondent (2)	Total No. of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost Per Response (\$) (rounded) (4)	Total Annual Burden Hrs. & Total Annual Cost (\$) (rounded) (3)*(4)=(5)	Cost per Respondent (\$) (rounded) (5)÷(1)
NUC001-4 (Reporting and Record Keeping)	54 nuclear plants + 108 transmission entities <sup>14</sup>	2	324	72 hrs.; \$6,794.64	23,328 hrs.; \$2,201,463.36	\$13,589.28
<b>Total</b>			324		23,328 hrs.; <sup>15</sup> \$2,201,463.36	

The Commission estimates that the total universe of respondents for this collection is 162 unique entities.<sup>16</sup> This includes 54 unique owners of nuclear facilities and 108 transmission entities that one-third responsibility. Estimated cost per hour =  $(\$77.29 + \$160.24 + \$45.59)/3 = \$283.12/3 = \$94.37/hr.$

<sup>14</sup> This figure of 108 transmission entities is based on the assumption that each agreement will be between 1 nuclear plant and 2 transmission entities (54 X 2 = 108). However, there is some double counting in this figure because some transmission entities may be party to multiple agreements with multiple nuclear plants. The double counting does not affect the burden estimate, and the correct number of unique respondents will be reported to OMB.

<sup>15</sup> The reporting requirements have not changed. The decrease in the number of respondents is due to:

- a) normal fluctuations in industry (e.g., companies merging and splitting, and coming into and going out of business), and
- b) no new agreements being issued due to the lack of new nuclear plants being developed.

<sup>16</sup> The NUC-001-4 Reliability Standard is applicable to:

4.1. Functional Entities:

4.1.1 Nuclear Plant Generator Operators.

4.2. Transmission Entities shall mean all entities that are responsible for providing services related to Nuclear Plant Interface Requirements (NPIRs). Such entities may include one or more of the following:

provide services related to NPIRs. In order to estimate the burden, the Commission considered two categories: establishing new agreements; and making modifications to existing agreements.

The Commission assumes there may be as many as 10 new agreements established each year. Because applicable entities should already be in compliance with NUC-001-4 (meaning that all nuclear sites should already have agreements in place), new agreements would only come about due to company mergers or new interconnections between nuclear plant sites and other entities. FERC further assumes that each agreement involves one nuclear plant site and an average of two transmission entities.

For modifications to existing agreements, the Commission assumes that each nuclear plant site will be required to make up to two modifications a year to existing agreements. Because the Commission assumes that each agreement involves an average of two transmission entities, the burden for this category also includes two transmission entities per nuclear plant site (or 108 in total). FERC estimates that some of these transmission entities are involved in multiple agreements (as stated above, the number of unique transmission entities is estimated at 216).

The Commission believes that this estimate is conservative because most, if not all of the applicable entities currently have interface agreements in place to provide for coordination between a nuclear plant generator operator and its local transmission, distribution and off-site power suppliers. Furthermore, multiple plants are located on certain sites, and one entity may operate multiple plants, providing for potential economies in updating, drafting and executing the interface agreements.

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

The Commission projects the average annualized record storage for NUC-001-4 Reliability Standard cost to be:

$$162 \text{ entities} \times \$15.25/\text{year/entity}^{17} = \$2,470 \text{ (rounded).}$$

All other costs are related to burden hours and are discussed in Questions 12 and 15.

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- 4.2.1 Transmission Operators.
  - 4.2.2 Transmission Owners.
  - 4.2.3 Transmission Planners.
  - 4.2.4 Transmission Service Providers.
  - 4.2.5 Balancing Authorities.
  - 4.2.6 Reliability Coordinators.
  - 4.2.7 Planning Coordinators.
  - 4.2.8 Distribution Providers.
  - 4.2.9 Load-Serving Entities.
  - 4.2.10 Generator Owners.
  - 4.2.11 Generator Operators.

<sup>17</sup> This is based on the estimated cost related to 1 GB of data.

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

The Regional Entities and NERC does most of the data processing, monitoring and compliance work for Reliability Standards, which is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package. Any involvement by the Commission (other than what is listed as PRA Administrative Cost) is also covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

The Commission does incur the costs associated with obtaining OMB clearance for this collection under the Paperwork Reduction Act of 1995 (PRA). The PRA Administrative Cost is a Federal 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. 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 following table contains the cost to the Federal Government for FERC-725F

	<b>Number of Employees (FTE)</b>	<b>Estimated Annual Federal Cost</b>
FERC-725F Analysis and Processing of Filings	0	0
PRA Administrative Cost		\$8,396
<b>FERC Total</b>		<b>\$8,396</b>

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

The proposed Reliability Standard NUC-001-4 modification of removing the load-serving entity from its applicability is not a substantive change and does not require a change in burden. This is due to the current burden assumptions based on: 1) the number of nuclear plants in the United States, and 2) applicability including two transmission entities<sup>18</sup> for each nuclear plant. The removal of load-serving entity from the list of possible transmission entities does not change these assumptions.

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<sup>18</sup> The current Reliability Standard NUC-001-3 defines the phrase “transmission entities” as all entities that are responsible for providing services related to nuclear plant interface requirements (NPIRs). Such entities may include one or more of the following: transmission operators, transmission owners, transmission planners, transmission service providers, balancing authorities, reliability coordinators, planning coordinators, distribution providers, load-serving entities, generator owners, and generator operators.

The estimated burden hours and nos. of respondents and responses have been adjusted to reflect the following:

- the decrease in the number of respondents from 171 to 162 (and resulting change to number of responses) due to normal fluctuations in industry (e.g., companies merging and splitting, and coming into and going out of business),
- the decrease in estimated average burden per response
  - (for reporting and recordkeeping requirements) from 66.67 hrs. per response to 72 hrs. per response

The changes (adjustments) are due to: no new agreements being issued due to the lack of new nuclear plants being developed, the adjustments in hours per response for better accuracy, and the decommissioning of nuclear plants in upcoming years.

The burden associated with Reliability Standard NUC-001-4 follows.

<b>FERC-725F</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	324	342	-18	0
Annual Time Burden (Hr.)	23,328	25,082	-1,754	0
Annual Cost Burden (\$)	\$2,472	\$2,608	-136	0

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

There are no data published as a result of this collection.

**17. DISPLAY OF THE EXPIRATION DATE**

The expiration date is displayed in a table posted on ferc.gov at [Information Collections | Federal Energy Regulatory Commission \(ferc.gov\)](https://www.ferc.gov/information-collections) or <https://www.ferc.gov/information-collections>.

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

There are no exceptions.

