

Supporting Statement
FERC-725A, Mandatory Reliability Standards for the Bulk Power System

The existing information collection requirements in the currently effective Mandatory Reliability Standards, are approved by OMB under FERC-725A (OMB Control No.1902-0244). FERC is revising this information collection to include only Interchange Scheduling and Coordination (INT) Reliability Standards, Transmission Operations (TOP) Reliability Standards, and the Mandatory Bulk Power-System – recordkeeping and will be transferring/removing the data that has included duplicated or displaced reliability standards and placing them in their respected Information Collections. Requesting for an extension for 3 years.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

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. EPAAct 2005 added a new section 215 to the FPA, which requires a Commission-certified Electric Reliability Organization (ERO) (FERC-725) 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 (FERC-725A).

On February 3, 2006, the Commission issued Order No. 672, implementing section 215 of the Federal Power Act (FPA). Pursuant to Order No. 672, the Commission certified one organization, NERC, as the ERO. The ERO is required to develop Reliability Standards, which are subject to Commission review and approval. The Reliability Standards will apply to users, owners and operators of the Bulk-Power System, as set forth in each Reliability Standard.

On March 16, 2007, the Commission issued Order No. 693, a Final Rule adding part 40, a new part, to the Commission's regulations. The Final Rule states that this part applies to all users, owners and operators of the Bulk-Power System within the United States (other than Alaska or Hawaii). It also requires that each Reliability Standard identify the subset of users, owners and operators to which that Reliability Standard applies. The new regulations also require that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

In order that the Commission is able to perform its oversight function with regard to Reliability Standards that are proposed by the ERO and established by the Commission, it is essential that the Commission receive timely information regarding all or potential violations of Reliability Standards. While section 215 of the FPA contemplates the filing of the record of an ERO or Regional Entity enforcement action, FERC needs information regarding violations and potential violations at or near the time of occurrence. Therefore, it will work with the ERO and regional reliability organizations to be able to use the electronic filing of information, so the Commission receives timely information. The new regulations also require that each Reliability Standard that is approved by the Commission will be maintained on the ERO's Internet website for public inspection.

In accordance with section 39.5 of the Commission's regulations, the ERO must file each Reliability Standard or a modification to a Reliability Standard with the Commission. The filing is to include a concise statement of the basis and purpose of the proposed Reliability Standard, either a summary of the Reliability development proceedings conducted by the ERO or a summary of the Reliability Standard development proceedings conducted by a Regional Entity together with a summary of the Reliability Standard review proceedings of the ERO and a demonstration that the proposed Reliability Standard is "just, reasonable, not unduly discriminatory or preferential, and in the public interest.

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

In general, information collection and record retention requirements related to Reliability Standards are not submitted to, or retained for audit by, FERC. Rather they are submitted to, or retained for audit by, NERC or the Compliance Enforcement Authority, as specified in each individual Reliability Standard. Without collecting this information, reliability of the bulk-power system could become compromised, potentially resulting in outages.

INT-006-5

To ensure that responsible entities conduct a reliability assessment of each Arranged Interchange before it is implemented. By balancing authorities and transmission service providers working together they can ensure the flow between areas improving reliability to customers. Evidence could include dated and time stamped electronic records that can track the interactions of the appropriate entities.

INT-009-3

To ensure that Balancing Authorities implement the Interchange as agreed upon in the Interchange confirmation process. The requirements of this standard help balancing authorities in real-time operations and operation planning horizons reach a common understanding of each balancing authorities' obligations. Evidence could include dated log, voice recordings and electronic records for each party meeting their obligations.

TOP-001-6

To prevent instability, uncontrolled separation, or Cascading outages that adversely impact the reliability of the Interconnection by ensuring prompt action to prevent or mitigate such occurrences. Each Transmission Operator and Balancing Authority are responsible for maintaining the reliability by the own actions and following operating instructions and will keep evidence to support this responsibility. Evidence demonstrating following operating instruction or justification on why the instruction could not be met are preserved as electronic records operator logs and voice recordings.

TOP-002-5

To ensure that Transmission Operators and Balancing Authorities have plans for operating within specified limits. The Transmission Operator and Balancing Authority shall perform

operational planning analysis (OPA) and use the analysis as evidence they met obligations to meet system operating limits and maintained reliability of the bulk electric system.

TOP-003-6.1

To ensure that each Transmission Operator and Balancing Authority has the data and information it needs to plan, monitor, and assess the operation of its Transmission Operator Area or Balancing Authority Area. Applicable entities shall create documents that other entities must supply specified data need to perform operational planning analysis, real-time monitoring and real-time assessments. The data requested and supplied by other entities serves as evidence of meeting the obligations of this standard.

TOP-010-1(i)

Establish requirements for Real-time monitoring and analysis capabilities to support reliable System operations. Transmission Operators and Balancing Authorities create operating processes or procedures to ensure quality of real-time data needed for assessments. The processes, procedures and actions are evidence of how these entities meet obligations through documents, operator logs and various electronic/voice recordings.

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

The use of current or improved technology is not covered in Reliability Standards and is therefore left to the discretion of each reporting entity. We think that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity's portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

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 periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. Reliability Standards are developed by a collaborative process which requires industry participation. The Commission is unaware of any other source of information similar to the additional requirements.

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

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow an entity to share its compliance burden with other entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.¹

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

In general, information collection requirements in Reliability Standards and requirements help maintain Bulk-Power System reliability. The standard requires entities to report certain disturbance events within 24 hours of meeting an event type threshold or by the end of the next business day if the event occurs on a weekend. Other paperwork related requirements are one-time or done on a yearly basis. 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.

Also, Real-time Assessments (RTAs) are computer cases run every 30 minutes to evaluate the condition of the system and identify potential problems. The time period of 30 minutes aligns with response time for operators to mitigate potential such as exceeding the operating limit of equipment.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are two special circumstances as described in 5 CFR 1320.5(d)(2) related to this information collection.

The data retention requirement in the Reliability Standards indicates that entities maintain data or evidence to show compliance with the requirements since the last audit. Reliability audits are generally every three years, but timing is such that they could be more than three years apart.

This is the language adopted by the standards drafting team and approved by industry representatives during the balloting process. As such, this is the data retention period deemed necessary for the reliability purposes contained in this standard.

The reporting requirements are event driven, and as such, an entity may be required to report more often than quarterly. NERC is responsible for ensuring the reliability of the bulk electric system.

¹ Details of the current ERO Reliability Standard processes are available on the NERC website at <https://www.nerc.com/pa/comp/RegistrationReferenceDocsDL/User%20Guide%20Portal.pdf>.

There may be instances where an entity needs to retain information for periods longer than typical cycle when an instance of non-compliance occurs. Typically, an entity will need to retain records associated with the non-compliance incident until it is resolved. Under those circumstance it can results in retention of information beyond the typical three tear audit cycle.

Real-time Assessments (RTA) are to be done every 30 minutes. This is to reflect actual working condition and status of electrical devices. The RTA runs are saved onto computer storage and referenced if there is a problem. Within the Bulk Electric System (BES) the timeframe to correct operating problems is targeted to be done within 30 minutes. This aligns the RTAs with operating practices for reliability practices.

Emergency electric incidents and disturbances leading to interruptions of power, such as rotating blackouts, could lead to disruptions of critical infrastructures. The national security, economic prosperity, and social wellbeing of the nation depends on the continuing reliability of our increasingly complex and interdependent infrastructures, the key one of which is electric power.

For these reasons we consider the reporting requirements necessary.

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

The Commission published a 60-day notice² in the Federal Register requesting comments. No comments were received in response to the 60-day Notice.

In addition, the Commission is publishing a 30-day Notice in the Federal Register³.

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

There are no specific assurances of confidentiality mentioned to respondents.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

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

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The estimated annual burden and cost related to the reporting and recordkeeping requirements

² 89 FR 66375, August 15, 2024

³ 89 FR 88269, November 7, 2024

for FERC-725A are as follows.

The existing burden inventory for the entire FERC-725A collection is estimated at 1,103,040 burden hours (Table 1). FERC-725A contains the information collection requirements for nearly all of the US wide Reliability Standards. The collection started in 2007 when FERC approved 83 Reliability Standards with an estimated 1,252,680 burden hours. Since that time, NERC has revised many of the original standards (as well as proposed new standards) resulting in many incremental additions to the total burden hours. Additionally, over time FAC-003, FAC-008, PER-003; INT-006; INT-009; TOP-001, TOP-002, TOP-003, TOP-010 revisions were captured in 725A collection. In August 2024, the associated manhours and cost for PER-003-2 are being relocated from 725A into 725Y (Table 2). This change will not result in change in the number of respondents in 725A as the same group of responsible entities have other obligation under 725A but the associated cost per entity will decrease slightly overall (Table 3).

In an effort to target similar NERC Reliability Standards by family in this 725A renewal, manhours associated with two FAC (Facilities) Reliability Standards (FAC-008-5 and FAC-003-2) will be transferred from 725A and then added to the 725D, where other FAC standards are collected. This should facilitate future three-year renewal efforts and more accurate tracking of for the FAC Reliability Standards.

In an effort to target similar NERC Reliability Standards by family in this 725A renewal, manhours associated with three PRC (Protection and Control) Reliability Standards (PRC-008-0, PRC-011-0, and PRC-017-1) will be transferred from 725A Bulk-Power System and then added to the 725G, where other PRC standards are collected. This should facilitate future three-year renewal efforts and more accurate tracking of for the PRC Reliability Standards. PRC-008 (Underfrequency and Documentation of Underfrequency Load Shedding Equipment Maintenance Program) represents responsibility of TOs and GOs to create and follow their maintenance program to ensure that underfrequency relays operate when needed to drop system load to preserve the BES. PRC-011-0 (Undervoltage Load Shedding (UVLS) System Maintenance and Testing) identifies that TOs and DPs that own a UVLS system to create and follow their maintenance program to ensure that undervoltage relays operate when needed to drop system load to preserve voltage collapse or voltage instability. Not every TO or DP has a UVLS program, staff is estimating that half of the registered TOs and DPs need to follow PRC-011-0. PRC-017-1 (Remedial Action Scheme (RAS) Maintenance and Testing) System Maintenance and Testing) identifies that TOs, DPs, GOs that their RASs are properly designed, meet expected performance, and are coordinated with other protection systems.⁴ The maintenance and testing programs for RAS are reviewed by engineers and when a relay mis-operations occurs the RAS is reviewed and corrected. PRC-008-0 and PRC-011-0 have been in-service since April 2005 and PRC-017-1 was revised in November 2015.

⁴ RAS are automatic protection systems designed to detect abnormal or predetermined system conditions and take corrective actions other than and/or in addition to the isolation of faulted components to maintain system reliability.

*Estimate of Annual Burden*⁵: The Commission estimates the burden and cost for this information collection as follows.

IC24-23-000 Renewal of 725A

The following table represents the current burden associated with all Mandatory Reliability

Standards that fall under FERC-725A

Original 725 A IC24-23-000-from 60-day notice						
	Number and Type of Respondents (1)⁶	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2)=(3)	Avg. Burden & Cost Per Response⁷ (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3)*(4)=(5)	Cost per Respondent (\$) (5) ÷ (1)
Annual Review of 725A	3,711	1	3,711	379.21 hrs. \$26,798.77	1,407,238 hrs. \$99,449,509.46	\$26,798.77

⁵ 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. For further explanation of what is included in the information collection burden, refer to 5 CFR Part 1320.

⁶ This is a list of NERC registered entities who under 725A need to follow the NERC Standards. BA=Balancing Authority (98); DP = Distribution Provider (371); GP = Generator Owner (1,210); Generator Operator (1028); PA/PC Planning Authority/Planning Coordinator (62); RC=Reliability Coordinator (12); RP = Resource Planner (159); RSG = Reserve Sharing Group (8); FRSG = Frequency Response Sharing Group (1); TO = Transmission Owner (324); TOP = Transmission Operator (165); TP = Transmission Provided (203); TSP = Transmission Service Provider (70); for a sum total of (3,711). The same entity may have multiple registration obligation to follow under 725A, so an individual entity’s obligation increases based on registration functions. These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

⁷ The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., 79.31 x .75 = 59.4825 (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., \$44.74 x .25% = 11.185 (\$11.19 rounded) (\$11.19/hour), for a total (\$59.48+\$11.19 = \$70.67/hour).

TOTAL		1,407,238 hrs. \$99,449,509 .46	
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Original 725 A moving to FERC-725Y in Docket No. IC24-16-000 Reliability Standard PER-003-2						
	Number and Type of Respondents⁸ (1)	Annual Number of Responses per Respondent (2)	Total Number of Responses (1)*(2) =(3)	Avg. Burden & Cost Per Response⁹ (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3)*(4)=(5)	Cost per Respondent (\$) (5) ÷ (1)
Annual Review of Credentials	12 (RC)	1	12	60 hrs. \$4,758.60	720 hrs. \$57,103.20	\$4,758.60
	98 (BA)	1	98	60 hrs. \$4,758.60	5,880 hrs. \$466,342.80	\$4,758.60
	165 (TOP)	1	165	60 hrs. \$4,758.60	9,900 hrs. \$785,169	\$4,758.60
Record Retention	(RC, BA, TOP) 275	1	275	60 hrs. \$2,915.40	16,500 hrs. \$801,735	\$2,915.40

⁸ For PER-003-2: RC=Reliability Coordinator; BA=Balancing Authority; TOP=Transmission Operator; TO=Transmission Owner; GOP=Generator Operator. The NERC compliance registry table April 16, 2024, was used to perform analysis.

⁹ The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024. The estimates for cost per response are loaded hourly wage figure (includes benefits) based on two occupational categories for 2023 found on the Bureau of Labor Statistics website (http://www.bls.gov/oes/current/naics2_22.htm):

- Electrical Engineer (Occupation Code: 17-2071): \$79.31 (to calculate the reporting requirements)
- Office and Administrative Support (Occupation Code: 43-0000): \$48.59 (to calculate the recordkeeping requirements)

TOTAL		33,000 hrs. \$2,110,350	
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FAC-008-5 transfer from FERC 725A to FERC 725D

	Number of Entity¹⁰ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response¹¹ (4)	Total Burden Hours (3) *(4) = (5)
FERC-725A Decrease					
Annual review and record retention	324 (TO)	1	324	200 hrs. \$ 70.67/hrs.	64,800 hrs. -\$4,579,416
	1210 (GO)	1	1210	80 hrs. \$ 70.67/hrs.	96,800 hrs. \$6,840,856
Total Reduction in 725A for FAC-008-5					161,600 hrs. \$11,420,272

FAC-003-2 transfer from FERC 725A to FERC 725D

¹⁰ These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

¹¹ The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., $79.31 \times .75 = 59.4825$ (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., $44.74 \times .25 = 11.185$ (\$11.19 rounded) (\$11.19/hour), for a total $(\$59.48 + \$11.19 = \$70.67/\text{hour})$.

	Number of Entity¹² (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response¹³ (4)	Total Burden Hours (3) *(4) = (5)
FERC-725A Decrease					
Annual review and record retention	324 (TO)	1	324	-24 hrs. \$ 70.67/hrs.	-7,776 hrs. - \$549,529.92
Total Reduction in 725A for FAC-003-2					-7,776 hrs. - \$549,529.92

PRC-008-0 transfer from 725A to 725G

	Number of Entity¹⁴ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response¹⁵ (4)	Total Burden Hours (3) *(4) = (5)
FERC-725A Reduction					

12 These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

13 The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., $79.31 \times .75 = 59.4825$ (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., $44.74 \times .25 = 11.185$ (\$11.19 rounded) (\$11.19/hour), for a total ($59.48 + 11.19 = 70.67$ /hour).

14 These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

15 The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., $79.31 \times .75 = 59.4825$ (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., $44.74 \times .25 = 11.185$ (\$11.19 rounded) (\$11.19/hour), for a total ($59.48 + 11.19 = 70.67$ /hour).

Annual review and record retention	324 (TO)	1	324	-24 hrs. -\$1,696.08/hr.	-7,776 hrs. -\$549,529.92
	371 (DP)	1	371	-24 hrs. -\$1,696.08/hr.	-8,904 hrs. -\$629,245.68
Total Reduction in 725A for PRC-008-0					-18,680 hrs. -\$1,178,775.60

PRC-011-0 transfer from FERC 725A to FERC 725G¹⁶

Reliability Standard & Requirement	Number of Entity¹⁷ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response¹⁸ (4)	Total Burden Hours (3) *(4) = (5)
FERC-725A Reduction					
Annual review and record retention	162 (TO)	1	162	-24 hrs. \$1,696.08/hr.	-3,888 hrs. -\$274,764.96
	181 (DP)	1	181	-24 hrs. -\$1,696.08/hr.	-4,344 hrs. -\$306,990.48
Total Reduction in 725A for PRC-011-0					-8,232 hrs. -\$581,755.44

PRC-017-1 transfer from FERC 725A to FERC 725G

16 For PRC-011-0 (Undervoltage Load Shedding System Maintenance and Testing) Reliability Standard, not ever applicable TO (324) and DP (371) have UVLS programs. Staff estimates that fifty percent of the TOs and DPs need to follow PRC-011-0, so the number of entities will be TO (162) and DP (181).

17 These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities. For PRC-011-0 only half of the TO = Transmission Owner (324/2 = 162) and DP = Distribution Provider (371/2 = 180.5, rounded to 181).

18 The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., 79.31 x .75 = 59.4825 (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., \$44.74 x .25% = 11.185 (\$11.19 rounded) (\$11.19/hour), for a total (\$59.48+\$11.19 = \$70.67/hour).

	Number of Entity¹⁹ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response²⁰ (4)	Total Burden Hours (3) *(4) = (5)
FERC-725A Reduction					
Annual review and record retention	324 (TO)	1	324	-80 hrs. -\$5,653.60/hr.	-25,920 hrs. -\$1,831,766.40
	371 (DP)	1	371	-24 hrs. -\$1,696.08/hr.	-8,904 hrs. -\$629,245.68
	1,210 (GO)	1	1,210	-24 hrs. -\$1,696.08/hr.	-29,040 hrs. -\$2,052,256.80
Total Reduction in 725A for PRC-017-1					-63,864 hrs. -\$4,513,268.88

725A Master table

¹⁹ These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

²⁰ The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., $79.31 \times .75 = 59.4825$ (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., $44.74 \times .25 = 11.185$ (\$11.19 rounded) (\$11.19/hour), for a total (\$59.48+\$11.19 = \$70.67/hour).

	Number of Entity²¹ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1) *(2) = (3)	Average Number of Burden Hours per Response²² (4)	Total Burden Hours (3) *(4) = (5)
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21 This is a list of NERC registered entities who under 725A need to follow the NERC Standards. BA=Balancing Authority (98); DP = Distribution Provider (371); GP = Generator Owner (1,210); Generator Operator (1028); PA/PC Planning Authority/Planning Coordinator (62); RC=Reliability Coordinator (12); RP = Resource Planner (159); RSG = Reserve Sharing Group (8); FRSG = Frequency Response Sharing Group (1); TO = Transmission Owner (324); TOP = Transmission Operator (165); TP = Transmission Provided (203); TSP = Transmission Service Provider (70); for a sum total of (3,711). The same entity may have multiple registration obligation to follow under 725A, so an individual entity’s obligation increases based on registration functions. These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

22 The estimated hourly cost (salary plus benefits) is a combination based on the Bureau of Labor Statistics (BLS), as of 2024, for 75% of the average of an Electrical Engineer (17-2071) \$79.31/hr., $79.31 \times .75 = 59.4825$ (\$59.48-rounded) (\$59.48/hour) and 25% of an Information and Record Clerk (43-4199) \$44.74/hr., $44.74 \times .25 = 11.185$ (\$11.19 rounded) (\$11.19/hour), for a total (\$59.48+\$11.19 = \$70.67/hour).

FERC-725A					
INT-006-5	168 (BA, TSP)	1	168	120 hrs. \$8,480.40	20,160 hrs. \$1,424,707.20
INT-009-3	98 (BA)	1	98	120 hrs. \$8,480.40	11,760 hrs. \$831,079.20
TOP-001-6	1,567 (BA, TOP, GOP, DP)	1	1567	120 hrs. \$8,480.40	188,040 hrs. \$13,288,787.80
TOP-002-5	422 (TO, BA)	1	422	120 hrs. \$8,480.40	50,640 hrs. \$3,578,728.80
TOP-003-6.1	1,567 (BA, TOP, GOP, DP)	1	1567	120 hrs. \$8,480.40	188,040 hrs. \$13,288,786.80
TOP-010-1(i)	422 (TO, BA)	1	422	120 hrs. \$8,480.40	50,640 hrs. \$3,578,728.80
725A BPS Record Keeping	3,711 (All)	1	3,711	160 hrs. \$11,307.20	593,760 hrs. \$41,961,019.20
FERC 725A Total					1,103,040 hrs. \$77,951,836.80

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no start-up or other non-labor hour cost associated with this collection.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and processing of filings’²³ 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 Paperwork Reduction Act (PRA) Administrative Cost is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

	Number of Employees	Estimated Annual Federal Cost
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²³The estimate uses the FERC’s FY 2024 average annual salary plus benefits of one FERC FTE (full-time equivalent [\$207,786 per year or \$100.00 per hour]).

	(FTEs)	
Analysis and Processing of filings	0	\$0
PRA Administrative Cost		\$8,396
FERC Total		\$8,396

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

The net changes for 725A, any further adjustments in the total are due to fluctuations, transfer, removal, streamlining collections in industry and corrections of the estimates. Previously approved 7,290 respondents and 1,407,238 hrs. Currently, 665 responses and -304,198 hrs. are an estimate for annual burden. The new updated total for all remaining collections INT-009-3, TOP-001-6, TOP-00205, TOP-003-6.1, TOP-010-1(i), and Bulk-Power System Recordkeeping totals within 725A creates the differences stated in the box below:

FERC-725A	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	7,955	7,290	665	0
Annual Time Burden (Hr.)	1,103,040	1,407,238	-304,198	0
Annual Cost Burden (\$)	371,100	156,953	214,147	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications as part of this collection.

17. DISPLAY OF EXPIRATION DATE

It is not appropriate to display the expiration date because the information is not collected on a preformatted form or is part of a Reliability Standard, which do not display OMB expiration dates.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for this collection. Therefore, the Commission does not certify that the collection uses statistical methods.