

Supporting Statement for
FERC-517 (Safety of Water Power Projects and Project Works)

This submission for a request for extension for three years of a currently approved collection FERC-517 (1902-0319).

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Federal Energy Regulatory Commission (Commission or FERC) regulates certain non-federal hydropower projects pursuant to Part I of the Federal Power Act (FPA),¹ which authorizes the Commission to issue hydropower licenses and exemptions to citizens of the United States, or to any association of such citizens, or to any corporation organized under the laws of United States or any State thereof, or to any State or municipality. Holders of such licenses and exemptions may construct, operate, and maintain dams, water conduits, reservoirs, power houses, transmission lines, or other project works necessary or convenient for the development and improvement of navigation and for the development, transmission, and utilization of power across, along, from, or in any of the streams or other bodies of water over which Congress has jurisdiction under its authority to regulate commerce with foreign nations and among the several States, or upon any part of the public lands and reservations of the United States, or for the purpose of utilizing the surplus water or water power from any Government dam, with exceptions.

Section 10(c) of the FPA (16 U.S.C. 803(c)) requires licensees to maintain the project works in a condition of repair adequate for the purposes of navigation and for the efficient operation of said works in the development and transmission of power, to make all necessary renewals and replacements, to establish and maintain adequate depreciation reserves for such purposes, to maintain, and operate said works as not to impair navigation, and to conform to such rules and regulations as the Commission may from time to time prescribe for the protection of life, health, and property.

The regulations in 18 CFR Part 12 and the Engineering Guidelines outline the provisions and reporting requirements for the evaluation of safety of water power projects and project works that apply to:

- (1) Any project licensed under Part I of the Federal Power Act;
- (2) Any unlicensed constructed project for which the Commission has determined that an application for license must be filed under Part I of the Act; and
- (3) Any project exempted from licensing under Part I of the Federal Power Act, pursuant to subparts J or K of 18 CFR Part 4, to the extent that the

¹ 16 U.S.C. Subchapter I (Sections 791a-823g).

Commission has conditioned the exemption on compliance with any particular provisions of 18 CFR Part 12.

The following four sets of Engineering Guidelines for the Evaluation of Hydropower Projects, which are available on the Commission's eLibrary system:

- o Chapter 15 — Supporting Technical Information Document, Docket No. AD20-20-000;
- o Chapter 16 — Part 12D² Program, Docket No. AD20-21-000;
- o Chapter 17 — Potential Failure Mode Analysis, Docket No. AD20-22-000; and
- o Chapter 18 — Level 2 Risk Analysis, Docket No. AD20-23-000.

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

This information collection will assist in the assessment of the safety of waterpower projects and project works licensed by the Commission. The Commission will use the information collection activities to evaluate project-specific dam and public safety assessments, determine whether those assessments are sufficient for the protection of life, health, and property, and to ensure that project works are being maintained in an adequate condition of repair.

The information is necessary in order to determine the urgency, priority, and scope of potential safety improvements or risk reduction measures that might be needed for the protection of life, health, and property.

18 CFR Part 12, Subpart B (Reports and Records)

The regulations at 18 CFR 12.10(a) and (b) require applicants and licensees to report promptly to the Regional Engineer³ any incident resulting in death or serious injury that occurs at the relevant project. Section 12.10(a) requires an oral report to the Regional Engineer by telephone of any condition affecting the safety of a project or projects works, "as soon as practicable after that condition is discovered." Section 12.10(b) requires a written report that includes a description of the cause and location of the accident, which must be submitted within the time specified by the Regional Engineer.

The 18 CFR 12.10(b) requires a written report of any death, serious injury, or rescue. Such reports must describe any remedial actions taken or proposed to avoid or reduce

² "Part 12D" is an abbreviation for 18 CFR Part 12, Subpart D.

³ The Regional Engineer is a member of the Commission's staff.

the chance of similar occurrences in the future and must be verified in accordance with section 12.13.⁴

Section 12.10(b)(3), section 12.10(b)(2)(ii) provides that deaths that are not project-related may be reported by providing a copy of a clipping from a newspaper article, if available. Section 12.10(b)(2)(iii) provides that serious injuries and rescues that are not project-related do not require a written report. The initial report must be made by email or telephone as soon as practicable after the condition is discovered, “preferably within 72 hours.”

18 CFR Part 12, Subpart D (Review, Inspection, and Assessment by Independent Consultant)

Overview of Subpart D

Regulations at 18 CFR Part 12 Subpart D pertain to project safety inspections by independent consultants. These inspections sometimes are colloquially called “Part 12D inspections.” These inspections are licensee-facilitated and are in addition to the project safety inspections conducted regularly by Commission staff.

Subpart D requires two tiers of independent consultant inspections for licensed project developments that meet the criteria shown at section 12.30 includes two types of inspections: a comprehensive assessment (CA) and a periodic inspection (PI). Each comprehensive assessment will be performed at a ten-year interval, with the periodic inspection occurring midway between comprehensive assessments. A periodic inspection will focus on a project’s performance over the previous five years, and will include a field inspection, a review of project operations, an in-depth review of monitoring data trends and behavior, and an evaluation of whether any potential failure modes are occurring. A comprehensive assessment will build on a periodic inspection with a deep dive into every aspect of a project, including a detailed review of the design basis, analyses of record, and construction history; an evaluation of spillway adequacy; a Potential Failure Mode Analysis; and a Risk Analysis.

Engineering Guidelines – Chapters 15 & 16

Chapter 15 of the Engineering Guidelines provides guidance on a Supporting Technical Information Document (STID). A STID serves as a compendium of knowledge and information about a project and greatly facilitates the review and evaluation of the safety and performance of project works by licensees, consultants, and Commission staff. The STID consists of a hard copy and a digital reference. It is required for all projects subject

⁴ Section 12.13 specifies how to verify the authenticity of a document submitted in accordance with 18 CFR Part 12.

to 18 CFR 12D and is used for assessing the completeness and appropriateness of technical information.

The STID summarizes the project elements and details that, except in the event of detailed studies or construction, do not change significantly over time. The digital reference (e.g., a CD, DVD, or other form of electronic media) includes a compilation of all available source material and additional supporting information, formatted so that the licensee, commission staff, or consultants can identify and retrieve the information they need. A searchable electronic version of the hard copy material must be included on the digital reference. The licensee is responsible for compiling the information for the STID and for creating and maintaining the document for use by themselves, the Part 12D independent consultants, and Commission staff.

Chapter 16 of the Engineering Guidelines requires licensees to submit a detailed Part 12D Inspection Plan prior to conducting either type of inspection (i.e., a periodic inspection or comprehensive assessment) that describes the scope of the inspection, proposes an Independent Consultant Team, and establishes the proposed schedule. Section 16-3.3.1 of Chapter 16 of the Engineering Guidelines provides that the Part 12D Inspection Plan must include the following information:

- Project name, FERC number, and state(s) where the project is located;
- Type of Part 12D Inspection (Comprehensive Assessment or Periodic Inspection), and a reminder that a Risk Analysis must be completed for a Comprehensive Assessment;
- A brief description of the project features;
- A proposed team of Independent Consultants, including the identification and assessment of technical disciplines to be represented on the team of Independent Consultants; the names and resumes for the Independent Consultants; a list of supporting team member roles and their intended areas of expertise; and the names and resumes of facilitators for any Potential Failure Mode Analysis or Risk Analysis as needed; and
- A schedule for Part 12D Inspection-related activities.

Under Chapter 16, members of the Independent Consultant Team are required to prepare a Pre-Inspection Preparation Report to document their initial findings from their review of project documentation, instrumentation data, and other information prior to the field inspection. Chapter 16 provides an outline for this PRA activity.

Chapter 16 also provides outlines for, and describes the scope of, the periodic inspections and comprehensive assessments that are required in 18 CFR Part 12 Subpart D.

Chapters 17 and 18 provide additional details and licensee guidance for conducting a Potential Failure Mode Analysis and a Level 2 Risk Analysis, which are required components of a comprehensive assessment.

Independent Consultant Team Proposals and Reports

The regulations at 18 CFR 12.31(a) and 12.31(b), respectively, list specific qualifications that are required of independent consultants and independent consultant teams. The regulation at 18 CFR 12.34(a) requires that the licensee obtain written approval of the independent consultant team from the Director of the Division of Dam Safety and Inspections (D2SI) prior to performing a periodic inspection or comprehensive assessment.

The regulation at 18 CFR 12.34(b) requires that the licensee submit a detailed independent consultant team proposal to the Director of D2SI at least 180 days prior to performing a periodic inspection or comprehensive assessment. As part of this, the licensee must submit documentation of the experience and qualifications for all members of the independent consultant team, including one or more independent consultants and additional contributing members, as needed. This enables the Commission staff to evaluate the breadth and depth of the team's experience and ensure that it is commensurate with the scale, complexity, and technical disciplines of the project and type of review being performed. The Commission intends for a comprehensive assessment to require a higher level of experience and expertise than a periodic inspection, due to the broader scope of the comprehensive assessment.

The regulation at 18 CFR 12.34(c) authorizes the Director of D2SI to disapprove an independent consultant team member, regardless of demonstrated experience and qualifications, for good cause, such as having a report rejected by the Commission within the preceding five years. This provision allows the Commission to ensure that independent consultants' inspections are performed by qualified parties.

18 CFR Part 12, Subpart F (Owner's Dam Safety Program)

Overview of Subpart F

The regulation at 18 CFR 12.60 provides that subpart F applies to all licensees with dams or other project works with a high or significant hazard potential. The terms "High hazard potential" and "Significant hazard potential" and "Low hazard potential" are defined at section 12.3(b)(13).

Owner's Dam Safety Program (ODSP) Document

Section 12.62 provides that any ODSP Document that includes one or more dams or project features with a high hazard potential must designate a Chief Dam Safety Engineer.⁵ Other ODSPs may designate either a Chief Dam Safety Engineer or Chief Dam Safety Coordinator.⁶ Section 12.62 also requires that the ODSP must be signed by the Owner and, as applicable, the Chief Dam Safety Engineer or the Chief Dam Safety Coordinator.

The regulation at 18 CFR section 12.63 requires the following additional contents of an ODSP document:

- (a) Dam safety policy, objectives, and expectations;
- (b) Responsibilities for dam safety;
- (c) Dam safety training program;
- (d) Communication, coordination, reporting, and reports;
- (e) Record keeping and databases; and
- (f) Continuous improvement;

The regulation at 18 CFR 12.64 requires any ODSP to be reviewed by the licensee's dam safety staff and discussed with senior management on an annual basis. In addition, section 12.64 requires that any findings, analysis, corrective measures, or revisions be submitted to the D2SI Regional Engineer for possible revision. This requirement applies to any licensee with a dam or other project feature with a high or significant hazard potential.

ODSP Qualification Statement for External Audit or Peer Review

The regulation at 18 CFR 12.65 applies to licensees of one or more dams or other project features classified as having a high hazard potential. Section 12.65(a) requires an independent external audit or peer review of the ODSP and its implementation. The audit or peer review is required to be performed at an interval not to exceed five years.

Before the audit or peer review, 18 CFR 12.65(b) requires the licensee to submit to the Regional Engineer a statement of qualifications of the prospective auditor(s) or peer review team. The licensee must receive written acceptance of the statement of qualifications before performing the audit or peer review.

ODSP External Audit or Peer Review Report

⁵ Section 12.61(a) provides that a Chief Dam Safety Engineer is the designated individual, who is a licensed engineer, who oversees the implementation of the ODSP and has primary responsibility for ensuring the safety of the licensee's dam(s) and other project features.

⁶ Section 12.61(b) provides that a Chief Dam Safety Coordinator is not required to be a licensed engineer but has the same responsibilities as a Chief Dam Safety Engineer.

The regulation at 18 CFR 12.65(c) requires the auditor(s) or peer review team to document their findings in a report. The report must be reviewed by:

- The project's owner,
- The Chief Dam Safety Engineer or Chief Dam Safety Coordinator, and
- Management having responsibility in the area(s) audited or reviewed.

Subsequently, the report on the audit or peer review must be submitted to the Regional Engineer.

ODSP Request for Extension of Time

Typically, the Commission's letters to licensees pertaining to ODSPs and ODSP audits require submittal of a plan and schedule or report within a set period of time (e.g., provide a plan and schedule within 30 days from the date of this letter). Although neither the ODSP regulations nor any of the existing ODSP guidance documents expressly contemplate extension of time requests, there are times when a licensee cannot meet that schedule and therefore files a letter with Commission staff requesting an extension of time to complete ODSP-related tasks.

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

The Commission continually considers the use of improved information technology to reduce burden in the filing requirements for submission of information. All the information that is reported to the Commission in this collection may be submitted electronically, through the Commission's eFiling system (as described at <http://www.ferc.gov/docs-filing/efiling.asp>). In addition, the regulation at 18 CFR 12.10(a) requires an oral report to the Regional Engineer by telephone of any condition affecting the safety of a project or projects works, "as soon as practicable after that condition is discovered."

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 concurrently with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. No similar information is available to satisfy the requirements of the final rule or the Engineering Guidelines.

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

The Commission recognizes that small entities, for the most part, have smaller and generally less complex projects than other entities. These projects do not take the same effort and resources as larger, more complex projects. Recognizing this, the final rule and Engineering Guidelines incorporate a site-specific approach to developing a proposed team to conduct the Independent Consultant Inspection. The estimated burden and costs for these efforts (distinguishing between “Simple” and “Complex” categories of hydroelectric facilities) are reflected in the estimated costs provided in the sections below.

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

Collection of the information on a less frequent basis would increase the interval between reporting periods that could lead to an increase in the frequency of dam safety incidents and failures. The Federal Emergency Management Agency’s (FEMA) Federal Guidelines for Dam Safety⁷ recommend a minimum frequency not to exceed five years for formal dam safety inspections. A periodic inspection and comprehensive assessment both meet the FEMA definition of a formal inspection. That information was used in developing the frequency of inspections and reviews for reporting, as provided in the final rule and in the Engineering Guidelines.

If the information were not collected, the Commission would not be able to fulfill the requirements of the FPA in ensuring that a project is being maintained in a condition of repair adequate for the purposes of navigation and for the efficient operation of said works in the development and transmission of power, and is in conformance with rules and regulations established by the Commission for the protection of life, health, and property.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to these information collections.

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

⁷ Federal Emergency Management Agency, “Federal Guidelines for Dam Safety”, at page 42, prepared by the ad hoc Interagency Committee on Dam Safety, Federal Coordinating Council for Science Engineering and Technology, Washington, DC, June 25, 1979. Available at: <https://www.fema.gov/media-library/assets/documents/2639>.

The Commission published a 60-day notice⁸ 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 Register⁹.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no payments or gifts to respondents.

⁸ 90 FR 311, January 3, 2025

⁹ 90 FR 13,735, March 26, 2025

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The Commission generally does not consider the data to be confidential. However, certain actions have confidentiality provisions which prevent the disclosure of information relating to submittal of Critical Energy/Electric Infrastructure Information (CEII). A request for material to be treated as CEII or privileged may be made under 18 CFR Part 388.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE, SUCH AS SEXUAL BEHAVIOR AND ATTITUDES, RELIGIOUS BELIEFS, AND OTHER MATTERS THAT ARE COMMONLY CONSIDERED PRIVATE.

There are no questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission estimates the burden and cost¹⁰ for this information collection as follows:

In the tables below, the burden estimates for team proposals and reports involving PIs and CAs define a single response as the consolidated filings during the typical ten-year cycle for Independent Consultant's Safety Inspections (one PI and one CA each during the ten-year period). Therefore, the estimated average number of annual responses for the consolidated filings is averaged over the ten-year period and represented as 0.1 responses on average per year.

¹⁰ The Commission staff believes that industry is similarly situated to the Commission in terms of cost for wages and benefits. Based on FERC's current annual average cost of \$207,786 (for salary plus benefits) for a full-time equivalent, the average hourly cost is \$100/hour. Therefore, the hourly cost used in the burden calculation is \$100.

FERC-517 – Direct and Indirect Annual Burden and Cost Changes					
A. Type of Response	B. No. of Respondents	C. Avg. No. of Annual Responses per Respondent	D. Avg. Annual Burden Hrs. and Cost per Response	E. Total No. of Annual Responses (Col. B x Col. C)	F. Total Annual Burden Hrs. and Cost (Col. D x Col. E)
Applicant’s or Licensee’s Report of Project-Related Deaths, Serious Injuries, or Rescues	65	2.14	2 hrs.; \$200	139.10	278.20 hrs.; \$27,820
Ind. Cons. Team Proposals and Reports on PIs and CAs — Simple Facility ¹¹	375	0.1	12 hrs.; \$1,200	37.50	450 hrs.; \$45,000
Ind. Cons. Team Proposals and Reports on PIs and CAs — Complex Facility ¹²	375	0.1	32.6 hrs.; \$3,260	37.50	1,222.50 hrs.; \$122,250
Licensee’s Request for Exemption	10	1	2 hrs.; \$200	10	20 hrs.; \$2,000
ODSP Document – Small Program ¹³	180	0.2	60 hrs.; \$6,000	36	2160 hrs.; \$216,000

¹¹ Includes direct and contracting burden and cost.

¹² Includes direct and contracting burden and cost.

FERC-517 – Direct and Indirect Annual Burden and Cost Changes					
A. Type of Response	B. No. of Respondents	C. Avg. No. of Annual Responses per Respondent	D. Avg. Annual Burden Hrs. and Cost per Response	E. Total No. of Annual Responses (Col. B x Col. C)	F. Total Annual Burden Hrs. and Cost (Col. D x Col. E)
ODSP Document – Large Program ¹⁴	45	0.2	120 hrs.; \$12,000	9	1080 hrs.; \$108,000
ODSP Document Revision	225	1	6 hrs.; \$600	225	1350 hrs.; \$135,000
ODSP Qualification Statement for External Audit or Peer Review	225	0.2	8 hrs.; \$800	45	360 hrs.; \$36,000
ODSP External Audit or Peer Review Report — Small Program ¹⁵	180	0.2	62 hrs.; \$6,200	36	2232 hrs.; \$223,200
ODSP External Audit or Peer Review Report — Large Program ¹⁶	45	0.2	242 hrs.; \$24,200	9	2178 hrs.; \$217,800

¹³ This information collection activity applies to each licensee with dams or other project features with a high or significant hazard potential, but with fewer than three such dams or other project features.

¹⁴ This information collection activity applies to each licensee with three or more dams or project features with a high or significant hazard potential.

¹⁵ This information collection activity applies to each licensee with dams or other project features with a high hazard potential, but with fewer than three such dams or project features. The burden estimates for this activity include direct and contracting burdens and costs.

FERC-517 – Direct and Indirect Annual Burden and Cost Changes					
A. Type of Response	B. No. of Respondents	C. Avg. No. of Annual Responses per Respondent	D. Avg. Annual Burden Hrs. and Cost per Response	E. Total No. of Annual Responses (Col. B x Col. C)	F. Total Annual Burden Hrs. and Cost (Col. D x Col. E)
ODSP Request for Extension of Time	5	1	4 hrs.; \$400	5	20 hrs.; \$2,000
Total Hours and Costs	1730	—	—	590	11,350.5 hrs.; \$1,135,050

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

This includes contracting of professional services and non-labor, as detailed in Table 12-2 above. There are no start-up or other non-labor costs.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimates of the costs for “analysis and processing of filings,” shown in Table 14-1, below, are based on salaries and benefits for professional and clerical support. This estimated costs represent staff analysis, decision-making, and review of any actual filings submitted in response to the information collections. The estimates for the “analysis and processing of filings” are for the incremental changes to 18 CFR Part 12 and the Engineering Guidelines and do not represent the entire effort or cost associated with the complete requirements of 18 CFR Part 12 and the Engineering Guidelines.

**Table 14-1
Estimated Annual Federal Costs for Analysis and Processing of Filings**

A. Type of Filing	B. Estimated Number of	C. Estimated Hours per	D. Estimated Cost per	E. Estimated Federal Cost
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¹⁶ This information collection activity applies to each licensee with three or more dams or project features with a high hazard potential. The burden estimates for this information collection activity include direct and contracting burdens and costs.

	Filings Annually	Filing	Filing (Col. C x \$100)¹⁷	Annually (Col. B x Col. D)
Applicant’s or Licensee’s Report of Project-Related Deaths, Serious Injuries, or Rescues	139	1	\$100	\$13,900
Ind. Cons. Team Proposals and Reports on PIs and CAs — Simple Facility	37.5	1.1	\$110	\$4,125
Ind. Cons. Team Proposals and Reports on PIs and CAs — Complex Facility	37.5	1.8	\$180	\$6,750
Licensee’s Request for Exemption	10	1	\$100	\$1,000
ODSP Document – Small Program	36	8	\$800	\$28,800
ODSP Document – Large Program	9	8	\$800	\$7,200
ODSP Document Revision	225	2	\$200	\$45,000
ODSP Qualification Statement for External Audit or Peer Review	45	2	\$200	\$9,000
ODSP External Audit or Peer Review Report — Small Program	36	8	\$800	\$28,800
ODSP External Audit or Peer Review Report — Large Program	9	8	\$800	\$7,200
ODSP Request for Extension of Time	5	1	\$100	\$500
Totals	590	NA	NA	\$152,275

The PRA Administrative Cost of \$8,396 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

¹⁷The estimate uses the FERC’s FY 2024 average annual salary plus benefits of one FERC full-time equivalent (FTE): \$207,787 per year, or \$100.00 per hour.

an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

Table 14-2, below, shows the total federal costs, i.e., the costs for analysis and processing of filings plus the PRA Administrative Cost.

Table 14-2
Total Estimated Annual Federal Costs

FERC-517	Estimated Annual Federal Cost
Analysis and Processing of Filings	\$152,275
PRA Administrative Cost	\$8,396
Total for FERC-517	\$160,671

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

The recordkeeping and reporting requirements have not changed in this extension request. An increase in overall burden is reflective of higher labor rates used to calculate costs.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There is no publication of the data.

17. DISPLAY OF EXPIRATION DATE

The Commission expects to post the relevant expiration dates at <http://www.ferc.gov>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.

