

Supporting Statement for  
**FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: PRC Standards, as modified by the Proposed Rule in RM25-3-000**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: PRC Standards (Newly implemented PRC standards PRC-024-4 and PRC-029-1) under OMB Control Number 1902-0252. PRC-024-4 and PRC-029-1 are reliability standards for frequency and voltage protection settings and ride-through for Inverter-Based Resources (IBR).

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

On August 8, 2005, The Electricity Modernization Act of 2005, which is Title XII of the Energy Policy Act of 2005 (EPAAct 2005), was enacted into law<sup>1</sup>. EPAAct 2005 added a new section 215 to the Federal Power Act (FPA), which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.

Section 215 of the FPA requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.<sup>2</sup> Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.<sup>3</sup> In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO<sup>4</sup> pursuant to section 215 of the FPA.<sup>5</sup>

On March 16, 2007 (pursuant to section 215(d) of the FPA), the Commission issued Order No. 693, approving 83 of the 107 initial Reliability Standards filed by NERC. Order 693 addressed several Personal Performance, Training, and Qualification (PER)

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<sup>1</sup> The Energy Policy Act of 2005, Pub. L. No 109-58, Title XII, Subtitle A, 119 Stat. 594, 941 (2005), codified at 16 U.S.C. 824o (2006).

<sup>2</sup> Id. 824o(c), (d).

<sup>3</sup> Id. 824o(e).

<sup>4</sup> “Electric Reliability Organization” or “ERO” means the organization certified by the Commission the purpose of which is to establish and enforce Reliability Standards for the Bulk-Power System, subject to Commission review.

<sup>5</sup> North American Electric Reliability Corp., 116 FERC ¶ 61,062, order on reh’g and compliance, 117 FERC ¶ 61,126 (2006), order on compliance, 118 FERC ¶ 61,190, order on reh’g, 119 FERC ¶ 61,046 (2007), *aff’d sub nom. Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

and Protection and Control (PRC) Reliability Standards. Some of them were approved, but others were approved with a Commission directive for NERC to make modifications. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards.

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

On November 4, 2024,<sup>6</sup> in response to Order No. 901, NERC submitted for Commission approval the proposed definition of the term Ride-through for the NERC Glossary of Terms, proposed Reliability Standards PRC-024-4 and PRC-029-1, the associated violation risk factors and violation severity levels, implementation plans and effective dates for Reliability Standards PRC-024-4 and PRC-029-1, and the retirement of currently effective Reliability Standard PRC-024-3.<sup>7</sup> NERC asserts that proposed Reliability Standards PRC-024-4 and PRC-029-1 would ensure that applicable Bulk-Power System-connected resources Ride-through system disturbances, avoiding reliability risks associated with unnecessary tripping and momentary cessation.<sup>8</sup> According to NERC, proposed Reliability Standard PRC-029-1 addresses 13 of the Order No. 901 directives.<sup>9</sup>

As a result, the Commission proposes to approve proposed Reliability Standards PRC-024-4 (Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and Type 2 Wind Resources, and Synchronous Condensers) and PRC-029-1 (Frequency and Voltage Ride-through Requirements for Inverter-Based Resources).

The information that FERC proposes to collect includes:

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<sup>6</sup> Following the issuance of Order No. 901, NERC submitted an informational filing that included its Order No. 901 Work Plan with four key milestones for meeting the directives of Order No. 901. Milestone 1: submit Work Plan (completed Jan. 17, 2024). Milestone 2: submit new or modified Reliability Standards to address performance requirements and post-event performance validation for registered IBRs (completed with NERC's filing of three petitions on Nov. 4, 2024). Milestone 3: submit new or modified Reliability Standards to address data sharing and model validation by Nov. 4, 2025. Milestone 4: submit new or modified Reliability Standards to address planning and operational studies requirements for all IBRs by Nov. 4, 2026. NERC, Informational Filing Regarding the Development of Reliability Standards Responsive to Order No. 901, Docket No. RM22-12-000, at 6 (filed Jan. 17, 2024).

<sup>7</sup> NERC Petition at 2-3, 5. Proposed Reliability Standards PRC-024-4 and PRC-029-1 are not attached to this notice of proposed rulemaking. The proposed Reliability

Standards are available on the Commission's eLibrary document retrieval system in Docket No. RM25-3-000 and on the NERC website, [www.nerc.com](http://www.nerc.com).

<sup>8</sup> *Id.* at 1, 19.

<sup>9</sup> *Id.* Ex. D (Standards Development Consideration of Directives from FERC Order No. 901).

### **PRC-024-4**

- NERC explains that proposed Reliability Standard PRC-024-4 removes language relating to IBR functionality in Requirements R1, R2, R3, and R4 because IBR performance requirements are included in proposed Reliability Standard PRC-029-1. Instead, proposed Reliability Standard PRC-024-4 would maintain capability-based requirements for synchronous generators, synchronous condensers, and type 1 and type 2 wind resources. NERC also notes that, consistent with the proposed definition for IBRs in the NERC Glossary of Terms, type 1 and type 2 wind resources, which operate as asynchronous resources and lack modern controllers capable of riding through system events as they do not have a power electronic device, are not considered IBRs. Moreover, NERC explains that, because synchronous units do not require performance-based requirements to Ride-through system disturbances, proposed Reliability Standard PRC-024-4 would continue to address Ride-through compatible frequency and voltage protection setting ranges for synchronous generators, synchronous condensers, and type 1 and type 2 wind resources.
- Specifically, NERC modified section 4.1.1 to restrict the applicability of proposed Reliability Standard PRC-024-4 to synchronous generators and type 1 and type 2 wind resources, and NERC added section 4.2.2 to include synchronous condensers and associated equipment as applicable facilities

### **PRC-029-1 - proposed Requirements: R1-R4**

#### **R1**

Under proposed Requirement R1 each generator owner of a NERC-registered IBR must “ensure the design and operation is such that each IBR meets or exceeds Ride-through requirements, in accordance with the ‘must Ride-through zone’ as specified in Attachment 1” of proposed Reliability Standard PRC-029-1, except in the following four conditions specified by the Standard:<sup>10</sup>

- The IBR needed to electrically disconnect in order to clear a fault;
- The voltage at the high-side of the main power transformer went outside an accepted hardware limitation, in accordance with Requirement R4;
- The instantaneous positive sequence voltage phase angle change is more than 25 electrical degrees at the high-side of the main power transformer and is initiated by

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<sup>10</sup> *Id.* at 25.

- a non-fault switching event on the transmission system; or
- The Volts per Hz (V/Hz) at the high-side of the main power transformer exceed 1.1 per unit for longer than 45 seconds or exceed 1.18 per unit for longer than 2 seconds.<sup>11</sup>

## **R2**

Under proposed Requirement R2, each generator owner of a NERC-registered IBR must adhere to voltage Ride-through performance criteria during system disturbances unless a documented hardware limitation exists in accordance with Requirement R4.<sup>12</sup> Similar to Requirement R1, NERC asserts that proposed Requirement R2 satisfies the following directives: (1) that NERC develop performance-based Reliability Standards that require IBRs to ride through voltage system disturbances; and (2) that IBRs inject current and perform frequency support during a disturbance by requiring IBRs remain connected and fulfill control and regulation functions to Ride-through a system disturbance.<sup>13</sup>

## **R3**

Under proposed Requirement R3, each generator owner of a NERC-registered IBR must ensure that its IBR adheres to Ride-through requirements during frequency excursion events by continuing to exchange current and remain electrically connected in accordance with the “must ride-through zone” as specified in the proposed Reliability Standard’s Attachment 2 and while the “absolute rate of change of frequency (RoCoF) magnitude is less than or equal to 5 Hz/second, unless a documented hardware limitation exists in accordance with Requirement R4.”<sup>14</sup> NERC explains that proposed Requirement R3 contains a wider frequency Ride-through band than presently exists in Reliability Standard PRC-024-3 and is consistent with IEEE 2800-2022.<sup>15</sup>

## **R4**

Proposed Requirement R4 would allow each generator owner of an existing legacy IBR, i.e., one in service by the effective date of PRC-029-1, to obtain an exemption to the voltage and frequency Ride-through requirements if the generator owner would need hardware replacements to comply with Requirements R1 through R3. Specifically, Requirement R4 provides that “[e]ach Generator Owner identifying an IBR that is in-service by the effective date of PRC-029-1, has known hardware limitations that prevent the IBR from meeting Ride-through criteria as detailed in Requirements R1-R3, and

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<sup>11</sup> *Id.* at 26.

<sup>12</sup> *Id.* at 29-33.

<sup>13</sup> *Id.* at 42.

<sup>14</sup> *Id.* at 33.

<sup>15</sup> *Id.* at 36.

requires an exemption from specific Ride-through criteria shall ... [d]ocument information supporting the identified hardware limitation... .”<sup>16</sup> Each generator owner of an IBR must provide the information (unless it is considered proprietary by the original equipment manufacturer) to each planning coordinator, transmission planner, transmission operator, and reliability coordinator in the footprint in which the legacy IBR is located.<sup>17</sup> Moreover, the generator owner must submit documentation to the relevant Compliance Enforcement Authority—typically a Regional Entity—that “must accept that all aspects of the documentation specified in proposed Requirement R4 have been provided by the Generator Owner before an exemption can [be] granted.”<sup>18</sup> According to NERC, this last requirement “would ensure that NERC has visibility into each hardware exemption that is granted and that [it has] been accurately limited to the particular limitation of the hardware.”<sup>19</sup>

NERC explains that it determined that an exemption process for generator owners of legacy IBRs for voltage and frequency performance requirements is necessary. In its petition, NERC expressed concern that hardware limitations would lead entities to take units offline to retrofit IBRs or risk noncompliance and could determine that the economically prudent course of action is to retire the units.<sup>20</sup> The implementation plan gives generator owners 12 months to request an exemption following the effective date of the Reliability Standard, after which NERC will not accept further exemption requests.<sup>21</sup> If the hardware causing the limitation is replaced later, the generator owner must communicate this information to the planning coordinator, transmission planner, reliability coordinator, and transmission operator within 90 days of the hardware replacement and comply with Requirements R1 through R3.<sup>22</sup> Further, NERC explains that the exemptions must be specific and limited to the voltage or frequency bands and associated duration that cannot be satisfied or as to the number of cumulative voltage deviations within a ten-second period that the equipment can Ride-through if it is less than four deviations within any ten-second period.<sup>23</sup>

NERC asserts that proposed Requirement R4 meets the directive that NERC determine whether the new or modified Reliability Standards provide an opportunity for certain generator owners of IBRs that are currently in operation and unable to meet performance

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<sup>16</sup> *Id.* at 36-37.

<sup>17</sup> *Id.* at 37.

<sup>18</sup> *Id.* at 40.

<sup>19</sup> *Id.*

<sup>20</sup> *Id.* at 38.

<sup>21</sup> *Id.* at 37.

<sup>22</sup> *Id.* at 41.

<sup>23</sup> *Id.* at 39.

requirements to request an exemption from voltage ride-through performance requirements.<sup>24</sup> NERC determined that a frequency exemption was also necessary and appropriate because of hardware-based capability limitations for a significant amount of installed IBRs, a concern that was raised during the IBR technical conference convened by NERC.<sup>25</sup>

The Commission proposes to direct NERC to develop and submit two informational filings 12 months and 24 months after the conclusion of NERC's proposed 12-month exemption request period for existing IBRs. The Commission seeks to understand the volume of exemptions, the circumstances in which entities have invoked the exemption provision, and ultimately to understand what if any effect the exemption provision has on the efficacy of Reliability Standard PRC-029-1. Therefore, the Commission proposes to direct that NERC submit two informational filings that provide details on requested exemptions from generator owners of legacy IBRs for frequency and/or voltage Ride-through requirements. The Commission proposes NERC submit an informational filing with the following data for (1) each Interconnection and (2) each reliability coordinator area (within that interconnection) within the United States:

- Total number of IBRs for which NERC-registered generator owners will be subject to compliance with Reliability Standard PRC-029-1;
- Aggregated megawatts (MW) capacity of IBRs for which NERC-registered generator owners will be subject to compliance with Reliability Standard PRC-029-1;
- Total number of IBRs for which NERC-registered generator owners requested exemptions;
- Aggregated MW capacity of IBRs for which NERC-registered generator owners requested exemptions;
- Total number of IBRs for which NERC-registered generator owners were granted exemptions;
- Aggregated MW capacity of IBRs for which NERC-registered generator owners were granted exemptions;
- Total number of granted exemptions by exemption type (voltage and/or frequency);

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<sup>24</sup> *Id.* at 44.

<sup>25</sup> *Id.* at 38-39.

- Aggregated MW capacity of granted exemptions by exemption type (voltage and/or frequency);
- Total number of granted exemptions by IBR type (wind, solar PV, BESS, fuel cell); and
- Aggregated MW capacity of granted exemptions by IBR type (wind, solar PV, BESS, fuel cell).

Additionally, the Commission proposes that each informational filing include an analysis of the reasons that entities provided for exemptions (both granted and denied), an evaluation of the efficacy of the exemption process, and any recommendations to modify either the substance or procedural aspects.

The following PRC standards are currently incorporated in FERC-725G: PRC-002, PRC-006, PRC-012, PRC-019, PRC-023, PRC-024, PRC-025, PRC-026, and PRC-027. A high-level description of the purpose of each standard is provided below with details of the requirements and measures (reporting requirements), and evidence retention requirements (reporting requirements) provided in the Attachment to this supporting statement.

#### **PRC-002-4 (Disturbance Monitoring and Reporting Requirements)**

Purpose is to have adequate data available to facilitate analysis of Bulk Electric System (BES) Disturbances.

#### **PRC-006-5 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance)**

Purpose: To establish design and documentation requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures.

#### **PRC-012-2 (Remedial Action Schemes)**

Purpose: To ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the Bulk Electric System (BES).

#### **PRC-019-2 (— Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection)**

Purpose is to verify coordination of generating unit Facility or synchronous condenser voltage regulating controls, limit functions, equipment capabilities and Protection System settings.

**PRC-023-6 (Transmission Relay Loadability)**

Purpose: Protective relay settings shall not limit transmission loadability; not interfere with system operators' ability to take remedial action to protect system reliability and; be set to reliably detect all fault conditions and protect the electrical network from these faults.

**PRC-024-3 (Frequency and Voltage Protection Settings for Generating Resources - soon to be retired)**

Purpose is to ensure Generator Owners set their generator protective relays such that generating units remain connected during defined frequency and voltage excursions.

**PRC-025-2 (Generator Relay Loadability)**

Purpose is to set load-responsive protective relays associated with generation Facilities at a level to prevent unnecessary tripping of generators during a system disturbance for conditions that do not pose a risk of damage to the associated equipment.

**PRC-026-2 (Relay Performance During Stable Power Swings)**

Purpose is to ensure that load-responsive protective relays are expected to not trip in response to stable power swings during non-Fault conditions.

**PRC-027-1 (Coordination of Protection Systems for Performance During Faults)**

Purpose is to maintain the coordination of Protection Systems installed to detect and isolate Faults on Bulk Electric System (BES) Elements, such that those Protection Systems operate in the intended sequence during Faults.

**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. Commission staff estimates that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the eight 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. This information is not available elsewhere. The standard-developing group (the ERO and various stakeholders) think these areas need to be addressed and documented as indicated in the NERC Petition.

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

Small entities generally can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity the ability to share its compliance burden with other similar entities.

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.<sup>26</sup>

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

PRC Reliability Standards on Bulk-Power System elements are an integral part of reliable grid operation. Protection systems are designed to detect and isolate faulty elements on a system, thereby limiting the severity and spread of system disturbances, and preventing possible damage to protected elements. The Commission finds that the currently effective Reliability Standards do not adequately address the risks posed by the increasing numbers of IBRs connecting to the Bulk-Power System. The collection cannot be collected less frequently, as the voltage and frequency protection must be set to avoid tripping during defined frequency and voltage excursions. The Ride-through requirements of proposed PRC-029, Requirements R1 through R3 should strengthen the reliability of the Bulk-Power System by ensuring that IBRs are designed and operated to

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<sup>26</sup>

remain connected to the Bulk-Power system and continue to inject real and/or reactive current during system disturbances.

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

There are no special circumstances as described in 5 CFR 1320.5(d)(2).

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

The ERO process to develop Reliability Standards is a collaborative process involving the ERO, Regional Entities and other stakeholders developing and reviewing drafts, and providing comments, vetting, and voting (possibly multiple rounds) on the standards, with the final proposed standard submitted to the FERC for review and approval.

The NOPR for RM25-3 was issued on December 19, 2024, and published on January 21, 2025.

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

The Commission does not make payments or provide gifts for respondents related to these collections.

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

According to the NERC Rules of Procedure, “...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.

Responding entities do not submit the information collected for 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.

**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 contain any questions of a sensitive nature.

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

The Commission’s request to OMB will reflect the following:

The Commission bases its paperwork burden estimates on the additional paperwork burden presented by the proposed Reliability Standards PRC-024-4 and PRC-029-1, as modified and new Reliability Standards, respectively, and the proposed directive for NERC to submit two informational filings related to Ride-through exemption requests.<sup>27</sup> Reliability Standards are objective-based and allow entities to choose compliance approaches best tailored to their systems. The NERC Compliance Registry, as of September 2024, identifies the following unique U.S. entities that are subject to mandatory compliance with Reliability Standard PRC-024-4: 1,230 generator owners will have an additional compliance burden. It is estimated that there will be no additional compliance burden for transmission owners that have synchronous condensers, as that data is not included in the NERC Compliance Registry, and transmission owners are already applicable to PRC-024-4. The estimated unique U.S. entities subject to Reliability Standard PRC-029-1 compliance are based on numbers supplied by NERC, with 591 registered generator owners that own bulk electric system (BES) solar and wind facilities and a median of 755 generator owners that own non-BES facilities.<sup>28</sup> The following table outlines net changes in burden hours and responses as a result of Docket No. RM25-3-000:

<b>Proposed Changes in Burden PRC-024-4 Docket No. RM25-3-000</b>					
<b>Reliability Standard</b>	<b>Type and Number of</b>	<b>Number of Annual</b>	<b>Total Number of</b>	<b>Average Number</b>	<b>Total Burden Hours</b>

<sup>27</sup> See *supra* P 35.

<sup>28</sup> NERC estimates that 591 BES IBRs and a range of 588 to 922 non-BES IBRs, with a median of 755, will be subject to proposed Reliability Standard PRC-029-1 and the other Milestone 2 Reliability Standards that were filed in Docket Nos. RD25-2-000 and RD25-3-000. See NERC, Petition For Approval of Proposed Distribution Monitoring Reliability Standards PRC-028-1 and PRC-002-5, Docket No. RD25-2-000, at 41 n.60 (filed Nov. 4, 2024) (description of NERC estimates of BES IBRs and the

range of non-BES IBRs that would be subject to compliance with proposed Reliability Standard PRC-028-1).

	<b>Entity<sup>29</sup> (1)</b>	<b>Responses Per Entity (2)</b>	<b>Responses (1)*(2)=(3)</b>	<b>of Burden Hours per Response<sup>30</sup> (4)</b>	<b>(3)*(4)=(5)</b>
<b>Annual Collection PRC024-4 FERC-725G</b>					
<b>Annual review and record retention</b>	1,230 (GO)	1	1,230	20 hrs. \$ 70.67/hr.	24,600 hrs. \$ 1,738,482
<b>Total for PRC-024-4</b>			1,230	20 hrs. \$ 70.67/hr.	24,600 hrs. \$ 1,738,482

<b>Proposed Burden PRC-029-1 Docket No. RM25-3-000</b>					
<b>Reliability Standard</b>	<b>Type and Number of Entity<sup>31</sup> (1)</b>	<b>Number of Annual Responses Per Entity (2)</b>	<b>Total Number of Responses (1)*(2)=(3)</b>	<b>Average Number of Burden Hours per Response<sup>32</sup> (4)</b>	<b>Total Burden Hours (3)*(4)=(5)</b>
<b>Annual Collection PRC-029-1 FERC-725G</b>					
<b>Annual review and</b>	591 (BES IBR GO)	1	591	40 hrs. \$	23,640 hrs. \$ 1,670,638.80

<sup>29</sup> The “Number of Entity” data is compiled from the September 24, 2024, edition of the NERC Compliance Registry.

<sup>30</sup> The estimated hourly cost (salary plus benefits) is a combination of the following categories from the Bureau of Labor Statistics (BLS) website, [http://www.bls.gov/oes/current/naics2\\_22.htm](http://www.bls.gov/oes/current/naics2_22.htm): 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).

<sup>31</sup> The “Number of Entity” data is compiled from NERC’s petition for approval of proposed Reliability Standard PRC-028-1 in Docket No. RD25-2-000. NERC, Petition For Approval of Proposed Distribution Monitoring Reliability Standards PRC-028-1 and PRC-002-5, Docket No. RD25-2-000, at 41 n.60 (filed Nov. 4, 2024).

<sup>32</sup> The estimated hourly cost (salary plus benefits) is a combination of the following categories from the Bureau of Labor Statistics (BLS) website, [http://www.bls.gov/oes/current/naics2\\_22.htm](http://www.bls.gov/oes/current/naics2_22.htm): 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).

<b>record retention</b>				70.67/hr.	
	755 (Non-BES IBR GO)	1	755	80 hrs. \$ 70.67/hr.	60,400 hrs. \$ 4,268,468.00
<b>Total for PRC-024-4</b>			1,346		84,040 hrs. \$ 5,939,106.80

1. The responses and burden hours for Years 1-3 will total respectively as follows:
  - Year 1-3 each: for proposed Reliability Standard PRC-024-4 will be 1,230 responses; 24,600 hours; and
  - Year 1-3 each: for proposed Reliability Standard PRC-029-1 will be 1,346 responses; 84,040 hours.
  - The annual cost burden for each year One to Three is \$1,738,482 for proposed Reliability Standard PRC-024-4; and \$5,939,106.80 for proposed Reliability Standard PRC-029-1.

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

There is no start-up, capital, or other non-labor hour cost associated with the Paperwork Reduction Act (PRA) aspects of this NOPR in RM25-3-000. All costs are associated with burden hours and are addressed in Questions 12 and 15.

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

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 collection (OMB Control No. 1902-0225) and is not part of this request or package.

The PRA Administrative Cost (estimate of \$8,396 per collection annually) is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act of 1995 (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 or orders, and other changes to the collection, as well as necessary publications in the Federal Register.

	<b>Number of Employees (FTE)</b>	<b>Estimated Annual Federal Cost</b>
Analysis and Processing of filings <sup>33</sup>	0	0
PRA Administrative Cost		\$8,396
<b>FERC Total</b>		\$8,396

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

The adoption of new Reliability Standard PRC-029-1 and the revised PRC-024-4 would result in an increase in the number of responses and annual time burden. Both PRC-024-4 and PRC-029-1 will increase the annual number of responses by 1,573 to 12,940 and 1,573 and increase the annual time burden by 100,616 hours to 827,334 hours, respectively.

<b>FERC-725G</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	12,940	11,367	0	+1,573
Annual Time Burden (Hr.)	827,334	726,718	0	+100,616
Annual Cost	0	0	0	0

<sup>33</sup> Based on the Commission’s FY (Fiscal Year) 2024 average cost (for wages plus benefits), \$100.00/hour is used.

Burden (\$)				
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**16. TIME SCHEDULE FOR PUBLICATION OF DATA**

There are no data publications.

**17. DISPLAY OF EXPIRATION DATE**

The expiration date is posted at <https://www.ferc.gov/enforcement-legal/legal/information-collections> .

**18. EXCEPTIONS TO THE CERTIFICATION STATEMENT**

The Commission does not use statistical methods for these collections.