

FERC-725G (OMB Control No. 1902-0252)  
Renewal request and updating the transfer of 725G1, 725G4, 725P1 and 725A's (PRC-008, PRC-011, and PRC-017)

Supporting Statement for  
**FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: PRC Standards.**

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 under OMB Control Number 1902-0252. This renewal request is for updating the transfer of 725G1, 725G4, 725P1 and 725A's (PRC-008, PRC-011, and PRC-017). This approval will allow for the discontinuance of 725G1, 725G4, and 725P1.

**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 (EPA 2005), was enacted into law<sup>1</sup>. EPA 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 NERC (North American Electric Reliability Corporation) as the ERO<sup>4</sup> pursuant to section 215 of the FPA.<sup>5</sup>

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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).

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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 PER and 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**

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. Absent the collections of information associated with Reliability Standards, reliability of the bulk-power system could become compromised, potentially resulting in outages.

Section 215 of the Federal Power Act (FPA)<sup>6</sup> requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, which are subject to Commission review and approval. The Commission has certified the North American Reliability Corporation (NERC) as the ERO. In addition, a Regional Entity may propose Reliability Standards to be effective in that region.<sup>7</sup> Once approved, Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently. The Commission collects information under FERC-725G1 in accordance with section 215 of the Federal Power Act (FPA)<sup>8</sup> and 18 CFR Parts 39 and 40. Section 215 of the FPA gives the Commission and the North American Electric Reliability Corporation (as the Commission-approved Electric Reliability Organization) to establish and enforce reliability standards for all users, owners, and operators of the bulk-power system.<sup>9</sup> Once approved, the Reliability

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<sup>6</sup> 16 U.S.C. 824o

<sup>7</sup> 16 U.S.C. § 824o(e)(4). A Regional Entity is an entity that has been approved by the Commission to enforce Reliability Standards under delegated authority from the ERO. See 16 U.S.C. § 824o(a)(7) and (e)(4).

<sup>8</sup> 16 U.S.C.824o.

<sup>9</sup> As defined at 16 U.S.C. 824o(a)(1) and 18 CFR 39.1, the term “bulk-power system” means facilities and control systems necessary for operating an interconnected electric energy transmission network (or any portion thereof), and electric energy from generating facilities needed to maintain transmission system reliability. The term does not include facilities used in the local distribution of electric energy.

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Standards may be enforced by the Electric Reliability Organization subject to Commission oversight, or by the Commission independently.<sup>10</sup>

Reliability Standard PRC-004-6 requires transmission owners, generator owners, and distribution providers to identify and correct causes of mis-operations of certain protection systems for bulk-power system elements. It also requires retention of evidence of misoperations for a minimum of 12 calendar months. The Commission collects information under FERC-725G4 in accordance with section 215 of the FPA and 18 CFR Parts 39 and 40. Reliability Standard PRC-010-2 requires respondents to submit date-stamped documentation of their compliance with the relevant UVLS Program.<sup>11</sup> The Commission collects information under FERC-725P1 in accordance with section 215 of the FPA and 18 CFR Parts 39 and 40. Reliability Standard PRC-005-6 requires that transmission and generation protection systems affecting the reliability of the Bulk-Power System are maintained and tested.

FERC-725A was submitted to notify of the move of the following PRC standards into 725G where all other PRC Standards are maintained. Those PRC Standards consist of PRC-

The FERC-725G information collection currently contains the reporting and recordkeeping requirements for the following (15) Reliability Standards: PRC-002-4, PRC-004-6, PRC-005-6, PRC-006-5, PRC-008-0, PRC-010-2, PRC-011-0, PRC-012-2, PRC-017-1, PRC-019-2, PRC-023-6, PRC-024-3, PRC-025-2, PRC-026-2, and PRC-027-1.

- **PRC-002-4 Disturbance Monitoring and Reporting Requirements**  
The purpose is to have adequate data available to facilitate analysis of Bulk Electric System (BES) Disturb.
- **PRC-004-6 Protection System Misoperation Identification and Correction**  
Identify and correct the causes of Misoperations of Protection Systems for Bulk Electric System (BES) Elements.
- **PRC-005-6 Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance**

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<sup>10</sup> 16 U.S.C. 824o(e).

<sup>11</sup> "Load shedding" means disconnecting consumers from the grid to prevent demand from exceeding supply, which can cause widespread grid collapse. A "UVLS Program" provides for automatic load shedding, utilizing voltage inputs, in specific circumstances and locations.

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To document and implement programs for the maintenance of all Protection Systems, Automatic Reclosing, and Sudden Pressure Relaying affecting the reliability of the Bulk Electric System (BES) so that they are kept in working order

- **PRC-006-5 Automatic Underfrequency Load Shedding**  
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-008-0 Implementation and Documentation of Underfrequency Load Shedding Equipment Maintenance Program**  
Provides last resort system preservation measures by implementing an Under Frequency Load Shedding (UFLS) program.
- **PRC-010-2 Undervoltage Load Shedding**  
To establish an integrated and coordinated approach to the design, evaluation, and reliable operation of Undervoltage Load Shedding Programs (UVLS Programs).
- **PRC-011-0 Undervoltage Load Shedding System Maintenance and Testing**  
Provide system preservation measures in an attempt to prevent system voltage collapse or voltage instability by implementing an Undervoltage Load Shedding (UVLS) program.
- **PRC-012-2 Remedial Action Schemes**  
  
To ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the Bulk Electric System (BES).
- **PRC-017-1 Remedial Action Scheme Maintenance and Testing**  
To ensure that all Remedial Action Schemes (RAS) are properly designed, meet performance requirements, and are coordinated with other protection systems. To ensure that maintenance and testing programs are developed and misoperations are analyzed and corrected.
- **PRC-019-2 Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection**  
The purpose is to verify coordination of generating unit Facility or synchronous condenser voltage regulating controls, limit functions, equipment capabilities and Protection System settings.

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- **PRC-023-4 Transmission Relay Load-ability**  
The purpose to verify coordination of generating unit Facility or synchronous condenser voltage regulating controls, limit functions, equipment capabilities and Protection System settings.
- **PRC-024-3 Generator Frequency and Voltage Protective Relay Settings**  
The purpose to set protection such that generating resource(s) remain connected during defined frequency and voltage excursions in support of the Bulk Electric System (BES).
- **PRC-025-2 Generator Relay Load-ability**  
The 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**  
The 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**  
The 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.

Each of these Reliability Standards have three components that impose burden upon affected industry:

- Requirements (*e.g.*, denoted in each Reliability Standard as R1, R2. . .)
- Measures (*e.g.*, denoted in each Reliability Standard as M1, M2. . .)
- Evidence Retention

These three components can be reviewed for the Reliability Standards in North American Electric Reliability Commission (NERC) petitions in FERC's eLibrary system (<http://www.ferc.gov/docs-filing/elibrary.asp>) or on NERC's own website ([www.nerc.com](http://www.nerc.com)).

**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>12</sup>

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<sup>12</sup> Details of the current ERO Reliability Standard processes are available on the NERC website at [http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix\\_3A\\_StandardProcessesManual\\_20130626.pdf](http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/Appendix_3A_StandardProcessesManual_20130626.pdf).

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

PRC Reliability Standards were established such that the declining frequency is arrested and recovered in accordance with NPCC performance requirements. The collection cannot be collected less frequently, as the proper targets need to be set in terms load tripping at the required frequency set points. Over time the amount of load on will change and if not reviewed it may result in missing targeted values and cause frequency decline that would trip generation leading to wide spread uncontrolled outages.

The frequency this information is currently required is once per calendar year by the transmission owner and distribution provider to its planning coordinator and generator owners shall provide information upon request.

Having a yearly "develop and review" without taking any further action is strictly administrative and does nothing for reliability (P-81 type of issue).

**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 60-day notice published on December 31, 2024 (89 FR 107138) with no comments received. The 30-day notice (90 FR 12308) was published on March 17, 2025.

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

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

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**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:

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

	<b>Number of Entity<sup>13</sup></b> <b>(1)</b>	<b>Number of Annual Responses Per Entity</b> <b>(2)</b>	<b>Total Number of Responses</b> <b>(1) *(2) =</b> <b>(3)</b>	<b>Average Number of Burden Hours per Response<sup>14</sup></b> <b>(4)</b>	<b>Total Burden Hours (3) *(4)</b> <b>= (5)</b>
<b>FERC-725A Reduction</b>					

<sup>13</sup> These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

<sup>14</sup> 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).

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<b>Annual review and record retention</b>	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
<b>Total for PRC-008-0</b>					18,680 hrs. \$1,178,775.60

**PRC-011-0 transfer from FERC 725A to FERC 725G<sup>15</sup>**

<b>Reliability Standard &amp; Requirement</b>	<b>Number of Entity<sup>16</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>17</sup> (4)</b>	<b>Total Burden Hours (3) *(4) = (5)</b>
<b>FERC-725A Reduction</b>					
<b>Annual review and record retention</b>	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

<sup>15</sup> 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).

<sup>16</sup> 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).

<sup>17</sup> 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).

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<b>Total for PRC-011-0</b>					8,232 hrs. \$581,755.44
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**PRC-017-1 transfer from FERC 725A to FERC 725G**

	<b>Number of Entity<sup>18</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>19</sup> (4)</b>	<b>Total Burden Hours (3) *(4) = (5)</b>
<b>FERC-725A Reduction</b>					
<b>Annual review and record retention</b>	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
<b>Total for PRC-017-1</b>					63,864 hrs. \$4,513,268.88

*Estimate of Annual Burden:* The Commission estimates 930 responses annually, and per-response burdens of 16 hours and \$1,130.72.<sup>20</sup> The total estimated burdens per year are

<sup>18</sup> These values were derived from the NERC Compliance data of April 16, 2024, using only unique United States registered entities.

<sup>19</sup> 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).

<sup>20</sup> Using the November 20, 2024, NERC compliance registration information for entities that are Generator Owners, Transmission Owners, and Distribution Providers (in the US), the number of potential respondents is 1,861. However, not every entity will have a misoperation event during a year. Based on our previous experience with this information collection, we are estimating that approximately half of the 1,861 potential respondents annually will have a reportable misoperation, i.e., 930 (rounded) responses per year for FERC-725G1.

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930 responses, 14,880 hours, and \$1,051,570 (rounded). These burdens are itemized in the following table:

<b>Mandatory Reliability Standards for the Bulk-Power System: Reliability Standard PRC-004-6 (FERC-725G1)</b>					
<b>Annual Estimates of Respondents' Burdens</b>					
<b>A. Number of Respondents</b>	<b>B. Annual Number of Responses per Respondent</b>	<b>C. Total Number of Responses (Column A x Column B)</b>	<b>D. Average Burden &amp; Cost Per Response<sup>21</sup></b>	<b>E. Total Annual Burden Hours &amp; Total Annual Cost (Column C x Column D)</b>	<b>F. Cost per Respondent (\$) (Column E ÷ Column A)</b>
930	1	930	16 hrs.; \$1,130.72	14,880 hrs.; \$1,051,570 (rounded)	\$1,130.72

*Estimate of Annual Burden:* The Commission estimates 25 responses annually, and per-response burdens of 48 hours and \$4,176.<sup>22</sup> The total estimated burdens per year are 25 responses, 1,200 hours, and \$104,400. These burdens are itemized in the following table:

<b>Mandatory Reliability Standards: Reliability Standard PRC-010-2 (Under Voltage Load Shedding) (FERC-725G4)</b>					
<b>Annual Estimates of Respondents' Burdens</b>					

<sup>21</sup> 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).

<sup>22</sup> Using the November 20, 2024, NERC compliance registration information for only unique US entities that are Transmission Owners (325) and Distribution Providers (298), the number of potential respondents is 623, considering overlap between functions. However, not every entity has an under-voltage load shedding program. Approximately five percent of the potential respondents have such a program. Therefore, we estimate 31 (rounded) responses per year for FERC-725G4.

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<b>A. Number of Respondents</b>	<b>B. Annual Number of Responses per Respondent</b>	<b>C. Total Number of Responses (Column A x Column B)</b>	<b>D. Average Burden &amp; Cost Per Response<sup>23</sup></b>	<b>E. Total Annual Burden Hours &amp; Total Annual Cost (Column C x Column D)</b>	<b>F. Cost per Respondent (\$) (Column E ÷ Column A)</b>
31	1	31	48 hrs.; \$3,392.16	1,488 hrs.; \$105,156.96	\$3,392.16

*Estimate of Annual Burden:* The Commission estimates 1,861 responses annually, and per-response burdens of 2 hours and \$141.34.<sup>24</sup> The total estimated burdens per year are 1,861 responses, 3,722 hours, and \$263,033.74. These burdens are itemized in the following table:

<b>Mandatory Reliability Standards: Reliability Standard PRC-005-6 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance) (FERC-725P1)</b>					
<b>Annual Estimates of Respondents' Burdens</b>					
<b>A. Number of Respondents</b>	<b>B. Annual Number of Responses per Respondent</b>	<b>C. Total Number of Responses (Column A x Column B)</b>	<b>D. Average Burden &amp; Cost Per Response<sup>25</sup></b>	<b>E. Total Annual Burden Hours &amp; Total Cost</b>	<b>F. Cost per Respondent (\$) (Column E ÷ Column A)</b>

<sup>23</sup> 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).

<sup>24</sup> Using the November 20, 2024, NERC compliance registration information for only unique US entities that are Distribution Providers (298), generator owners (1,238) and transmission owners (325). Therefore, we estimate 1,861 (rounded) responses per year for FERC-725P1.

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		<b>B)</b>		<b>Annual Cost (Column C x Column D)</b>	<b>A)</b>
325 (TO)	1	325	2 hrs.; \$141.34	650 hrs.; \$45,935.50	\$141.34
1,238 (GO)	1	1,238	2 hrs.; \$141.34	2,476 hrs.; \$174,978.92	\$141.34
298 (DP)	1	298	2 hrs.; \$141.34	596 hrs.; \$42,119.32	\$141.34
<b>Total</b>		<b>1,861</b>		<b>3,722 hr., 263,033.74</b>	

<b>Mandatory Reliability Standards: Reliability Standard for FERC-725G (1902-0252)</b>				
<b>Annual Estimates of Respondents' Burdens</b>				
<b>FERC-725G</b>	<b>C. Total Annual Responses (Column A x Column B)</b>	<b>D. Total Average Burden &amp; Cost Per Response<sup>26</sup></b>	<b>E. Total Annual Burden Hours &amp; Total Annual Cost (Column C x Column D)</b>	<b>F. Cost per Respondent (\$) (Column E ÷ Column A)</b>
FERC-725-G1 Total PRC-004-6	930	16 hrs.; \$1,130.72	14,880 hrs.; \$1,051,569.60	\$1,130.72
FERC-725-G4 Total PRC-010-2	31	48 hrs.; \$3,392.16	1,488 hrs.; \$105,156.96	\$3,392.16

<sup>25</sup> 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).

<sup>26</sup> 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-725G (OMB Control No. 1902-0252)  
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FERC-725-P1 Total PRC-005-6	1,861	2 hrs.; \$141.34	3,722 hrs.; \$263,033.74	\$141.34
FERC-725A Total PRC-008-0	695	24 hrs.; \$1,696.08	16,680 hrs.; \$1,178,775.60	\$1,696.08
FERC-725A Total PRC-011-0	243	24 hrs.; \$1,696.08	5,832 hrs.; \$412,147.44	\$1,696.08
FERC-725A (DP and GO) Total PRC-017-1	1,581	24 hrs.; \$1,696.08	37,944 hrs.; \$2,681,502.48	\$1,696.08
FERC-725A (TO) Total PRC-017-1	324	80 hrs.; \$5,653.60	25,920 hrs.; \$1,831,766.40	\$5,653.60
Currently approved FERC-725G Totals	11,367		726,718	
<b>FERC-725-G New Total</b>	<b>15,127</b>		<b>833,184</b>	

### 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 PRA collection. 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.

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of	0	0

FERC-725G (OMB Control No. 1902-0252)  
 Renewal request and updating the transfer of 725G1, 725G4, 725P1 and 725A's (PRC-008, PRC-011, and PRC-017)

filings <sup>27</sup>		
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 following changes reflect the transfer of the 3 reliability standards and the merge of 725G1, 725G4, and 725P1 into 725G. There were no changes to any other remaining collections.

<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	17,032	11,367	0	5,665
Annual Time Burden (Hr.)	833,184	726,718	0	106,466
Annual Cost Burden (\$)	0	0	0	0

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

There are no data publications.

**17. DISPLAY OF EXPIRATION DATE**

<sup>27</sup> Based on the Commission's FY (Fiscal Year) 2020 average cost (for wages plus benefits), \$83.00/hour is used.

FERC-725G (OMB Control No. 1902-0252)  
Renewal request and updating the transfer of 725G1, 725G4, 725P1 and 725A's (PRC-008, PRC-011, and PRC-017)

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.