

**Consolidated Supporting Statement for  
FERC Form Nos. 1, 1-F, and 3-Q (electric and natural gas)**

The Federal Energy Regulatory Commission (Commission or FERC) requests the Office of Management and Budget (OMB) approve FERC Form Nos. 1, 1-F, and 3-Q (electric and gas) for three years. There are no changes to the reporting requirements for the existing information collections.

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

**FERC Form Nos. 1, 1-F, and 3-Q.** In accordance with sections 304(a) and 309 of the Federal Power Act (FPA) and sections 10(a) and 16 of the Natural Gas Act (NGA), FERC is authorized to collect and record data to the extent it considers necessary, and to prescribe rules and regulations concerning accounts, records, and memoranda.

Under the existing regulations, FERC jurisdictional entities subject to its Uniform System of Accounts (USofA) must annually file a complete set of financial statements with the Commission, along with other selected financial and non-financial data through the submission of FERC Form Nos. 1 and 1-F and must file this information quarterly through the submission of FERC Form No. 3-Q.

FERC Form No. 1 is a comprehensive financial and operating report submitted annually for electric rate regulation, market oversight analysis, and financial audits by Major electric utilities, licensees, and others. A Major electric utility, licensee, or other reporter is defined as having, in each of the last three consecutive calendar years, sales or transmission services that exceed one of the following: (1) one million megawatt-hours of total sales; (2) 100 megawatt-hours of sales for resale; (3) 500 megawatt-hours of power exchanges delivered; or (4) 500 megawatt-hours of wheeling for others (deliveries plus losses).<sup>1</sup>

FERC Form No. 1-F is designed to collect financial and operational information from Nonmajor electric utilities and licensees. Nonmajor pertains to utilities and licensees that have total annual sales of 10,000 megawatt-hours or more in each of the last three consecutive years and that are not classified as Major.<sup>2</sup>

FERC Form No. 3-Q is a quarterly financial and operating report for rate regulation, market oversight analysis, and financial audits which supplements (a) FERC Form Nos. 1 and 1-F for the electric industry, or (b) FERC Form Nos. 2 and 2-A for the natural gas industry. FERC Form No. 3-Q is submitted for electric utilities and licensees reporting FERC Form Nos. 1 or 1-F and natural gas companies reporting FERC Form Nos. 2 or 2-A.<sup>3</sup>

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<sup>1</sup> 18 C.F.R. § 141.1. Nonoperating entities formerly designated as Major and new entities that expect to be in the Major category should file as detailed in 18 C.F.R. § 101, General Instructions (1)(A)(3).

<sup>2</sup> 18 C.F.R. § 141.2. Nonoperating entities formerly designated as Nonmajor and new entities that expect to be in the Nonmajor category should file as detailed in 18 C.F.R. § 101, General Instructions (1)(A)(2) and (3).

<sup>3</sup> 18 C.F.R. § 260.1(b) and 18 C.F.R. § 260.2(b). For natural gas, "Major" pertains to a company whose combined gas transported or stored for a fee exceed 50 million Dth in each of the three previous calendar years. 18 C.F.R. §

The Commission collects FERC Form Nos. 1, 1-F, and 3-Q as prescribed in 18 C.F.R. Parts 141.1, 141.2, 141.400, and 260.300. FERC Form Nos. 1, 1-F, and 3-Q provide an informative picture of the jurisdictional entities' financial conditions and other relevant data that are used by the Commission and the public in making economic judgments about the entity or its industry.

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

**FERC Form Nos. 1, 1-F, and 3-Q (electric).** These forms provide information concerning a company's current financial performance, compiled using the Commission's USofA.<sup>4</sup> The forms include a basic set of financial statements: Comparative Balance Sheet, Statement of Income, Statement of Retained Earnings, Statement of Cash Flows, and the Statement of Accumulated Comprehensive Income and Hedging Activities and supporting schedules containing supplementary information. Electric respondents report revenues and the related quantities of electric sales and electricity transmitted, account balances for all electric operation and maintenance expenses, selected plant cost data, and other statistical information.

Information in the forms is used by the Commission, state regulatory agencies, and others in the review of the financial condition of regulated companies. FERC Form Nos. 1 and 1-F provide data that enables the Commission to develop and monitor cost-based rates, such as evaluating cost of service rates and formula rate proposals pursuant to FPA sections 205 and 206.<sup>5</sup> The information contained in the forms is used to analyze costs of different services and classes of assets and compare costs across lines of business. It is also used in market oversight, the Commission's audit programs, and for the computation of annual charges based on certain schedules contained on the forms. Finally, the information provided in the form is used by state regulators to understand a utility's financial position and how it affects electric service.

Additionally, the uniformity in FERC Form Nos. 1, 1-F, and 3-Q (electric) reporting helps accurately present the entity's financial condition and produces comprehensive data related to the entity's financial history which acts as a guide for future action. FERC Form Nos. 1, 1-F, and 3-Q reporting relies on the Commission's USofA and related accounting instructions as a framework to permit comparability and financial statement analysis of data provided by jurisdictional entities. Comparability of data and financial statement analysis for a particular entity from one period to the next, or between entities, within the same industry, would be

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260.2(b). "Nonmajor" pertains to a company not meeting the filing threshold for Major, but having total gas sales or volume transactions exceeding 200,000 Dth in each of the three previous calendar years. 18 C.F.R. § 260.2(b).

<sup>4</sup> See 18 C.F.R. Part 101 (Uniform System of Accounts Prescribed For Public Utilities And Licensees Subject To The Provisions Of The Federal Power Act).

<sup>5</sup> See *Revisions To Forms, Statements and Reporting Requirements For Electric Utilities and Licensees*, 124 FERC ¶ 61,273, at P 13 (2008). See also *Quarterly Financial Reporting and Revisions to the Annual Reports*, Order No. 646, 106 FERC ¶ 61,113, at PP 3-4 (2004). See also *Transource Kansas, LLC*, 151 FERC ¶ 61,010, at P 54 (2015) (recognizing the company's proposed formula rate is a forward-looking formula whereby the company first forecasts and later "determines a true-up of the forecasted values after the actual data become available in the FERC Form No. 1."), *order on reh'g and compliance*, 154 FERC ¶ 61,011 (2016), *Kansas Corp. Commission v. FERC*, 881 F.3d 924 (D.C. Cir. 2018) (rehearing en banc denied).

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difficult to achieve if each company maintained its own accounting records using dissimilar accounting methods and classifications to record similar transactions and events.<sup>6</sup>

If data from FERC Form Nos. 1, 1-F and 3-Q (electric) were not available, it would be difficult for the Commission to meet its mandatory responsibilities to ensure just and reasonable rates for wholesale sales of electricity and transmission in interstate commerce for jurisdictional utilities, power marketers, power pools, power exchanges, and independent system operators and to oversee the issuance of certain stock and debt securities, assumption of obligations and liabilities, and mergers because the Commission would have fewer regulatory mechanisms to ensure transparency and to protect ratepayers. The financial information filed with the Commission represents, in most cases, the only source of financial data presented in a format and detail suitable for the Commission to exercise its duties and responsibilities under the FPA.<sup>7</sup>

**FERC Form No. 3-Q (gas).** FERC Form No. 3-Q (gas) is a quarterly financial and operating report for rate regulation, market oversight analysis, and financial audits which supplements FERC Form No. 2 (Annual Report for Major Natural Gas Companies; OMB Control No. 1902-0028) and FERC Form No. 2-A (Annual Report for Nonmajor Natural Gas Companies; OMB Control No. 1902-0030), for the natural gas industry. FERC Form No. 3-Q (gas) is submitted for all natural gas companies.

This form provides information concerning a company's current performance, compiled using the Commission's USofA.<sup>8</sup> FERC Form No. 3-Q (gas) includes a basic set of financial statements: Comparative Balance Sheet, Statement of Income, Statement of Retained Earnings, Statement of Cash Flows, and the Statement of Accumulated Comprehensive Income and Hedging Activities and supporting schedules containing supplementary information. The form also includes monthly and quarterly quantities of gas transported and associated revenues; storage, terminalling, and processing services; natural gas customer accounts and details of service; and operational expenses, depreciation, depletion, and amortization of gas plant.

The form provides information concerning a company's past performance and its future prospects and is based on the companies' financial and other information. Supporting schedules containing supplementary information are filed, including revenues and the related quantities of products sold or transported; account balances for various operating and maintenance expenses; selected plant cost data; and other information.

In summary, without the information collected in FERC Form No. 3-Q (gas), it would be difficult for the Commission to ensure, as required by the NGA, that a natural gas provider's transportation rates remain just and reasonable, and to evaluate rates and new rate proposals

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6 See *Pacific Gas and Electric Company*, 189 FERC ¶ 61,178 (2024) ("Comparable financial information amongst public utilities is important as it allows the Commission to make informed decisions, establish benchmarks, and perform analysis that relates to an individual public utility and to the industry as a whole... [A]ccurate accounting and reporting is important to all users of financial statements as it presents reliable, meaningful, and decision-useful information and maintains transparency, accountability, and credibility of reported data.")

7 Order No. 646 at P 16.

8 See 18 C.F.R. Part 201 (Uniform System Of Accounts Prescribed For Natural Gas Companies Subject To The Provisions Of The Natural Gas Act).

pursuant to NGA sections 4 and 5,<sup>9</sup> respond to Congressional and outside inquires, and make decisions in a timely manner. The financial information filed with the Commission represents, in most cases, the only source of financial data presented in a format and detail suitable for the Commission to exercise its duties and responsibilities under the NGA.<sup>10</sup>

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

The forms are filed electronically in XBRL pursuant to the requirements of Order No. 859.<sup>11</sup> Order No. 859 updated the filing methodology for financial forms in 2019 to achieve efficiencies and match the financial reporting system used by the SEC.<sup>12</sup>

**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's filing and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates.

**FERC Form Nos. 1, 1-F, and 3-Q.** While some jurisdictional entities may file similar financial information with the Securities and Exchange Commission (SEC), the Commission's reporting requirements contain a much greater level of detail concerning assets, liabilities, stockholders' equity, along with the revenues, expenses, gains, and losses as compared to SEC reporting. The financial statements filed with the SEC are provided on a consolidated, or parent company basis. A majority of the jurisdictional entities that FERC regulates file financial information with the SEC that consolidates their assets, liabilities, and profits with their parent company, or combines the regulated and unregulated operations in the reports to the SEC. While consolidation is appropriate for SEC reporting, the Commission requires more detailed information concerning the results of operations, and the financial position of each jurisdictional entity in order to meet the Commission's regulatory needs. Pursuant to the FPA, the Commission regulates the rates, terms, and conditions of each jurisdictional entity. Accordingly, entity-specific financial and operational information is required as it provides detailed components of an entity's approved rate on file with FERC. For this reason, the Commission requires jurisdictional entities to file financial information on a jurisdictional entity level basis using a uniform system of accounts. Additionally, FERC regulates several private companies, cooperatives, and governmental entities at various levels that are not required to file financial statements with the SEC.

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<sup>9</sup> See Order No. 646, 106 FERC ¶ 61,113, at PP 3-4 (2004). See also *Tuscarora Gas Transmission Company*, 154 FERC ¶ 61,030, at PP 4-8 (2016) (initiating an NGA section 5 proceeding to determine whether the company's rates were just and reasonable based on a "review[] of the cost and revenue information provided by Tuscarora in its Form 2..."), *order denying reh'g and granting clarification*, 154 FERC ¶ 61,273 (2016).

<sup>10</sup> Order No. 646 at P 16.

<sup>11</sup> *Revisions to the Filing Process for Commission Forms*, Order No. 859, 167 FERC ¶ 61,241 (2019).

<sup>12</sup> *Id.*

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

**FERC Form Nos. 1, 1-F, and 3-Q.** As noted previously, FERC Form No. 1 is filed by major utilities or licensees and as such does not apply to small entities. FERC Form No. 1-F is only filed by nonmajor public utilities with total sales of 10,000 megawatt-hours or more. FERC Form No. 3-Q is filed only by electric or natural gas companies that file Forms Nos. 1, 1-F, 2, or 2-A, and therefore excludes companies that do not qualify as Major or Nonmajor. If the reporting requirements represent an undue burden on small businesses, the affected entity may seek a waiver of the disclosure requirements from the Commission.<sup>13</sup> However, the Commission believes that the information collected on these forms is the minimum necessary to provide a meaningful review of financial conditions and imposes the least possible burden on entities.

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

**FERC Form Nos. 1, 1-F, and 3-Q.** The Commission requires FERC Form Nos. 1 and 1-F to be submitted annually. Annual reporting is consistent with the reporting to the companies' own management, the Internal Revenue Service, state and other Federal agencies' requirements. FERC Form No. 3-Q filings provide quarterly updates to supplement FERC Form Nos. 1, 1-F, 2, and 2-A. This quarterly information provides the Commission and the public with updated and timely information regarding a company's financial and operational status.

Some of the information in particular filings may change markedly from one year to the next. If the information were collected less frequently, the Commission would have difficulty performing its mandated review and oversight in a timely and accurate manner.

## **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**

The Commission published a 60-day Notice<sup>14</sup> in the Federal Register on February 7, 2025, and issued a 30-day Notice<sup>15</sup> to the public on June 20, 2025, providing the public with an opportunity to comment on the information collections. In the public notices, the Commission noted that it would be requesting a three-year extension of the public reporting burden with no change to the existing requirements concerning the collection of data. The Bureau of Economic Analysis

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<sup>13</sup> See Order No. 646 at P 110 (finding that "if the recordkeeping requirements represent an undue burden on small businesses, the entity affected may seek a waiver from the Commission").

<sup>14</sup> 90 FR 9151

<sup>15</sup> 90 FR 26280

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(BEA), Energy and Policy Institute (EPI), Edison Electric Institute (EEI), and nine electric utility companies<sup>16</sup> filed comments.<sup>17</sup>

*Comments regarding the necessity, quality, utility, and clarity of the information collected, as well as ways to minimize the burden on respondents.*

BEA explains that it uses data from FERC Form Nos. 1 and 1-F indirectly in estimating the United States Census Bureau's Construction Value Put-In Place (VPIP) for electric utilities. BEA further explains that census VPIP serves as a major source data input to the national income and product account (NIPA) structures investment estimates. BEA states that while it uses the information indirectly through the VPIP program, it is considered an indispensable data source to the NIPA estimates.

BEA states that it relies heavily on the data collected in the FERC Form No. 3-Q for the accurate calculation of many key components of both the industry and national economic accounts. BEA argues that data collected in FERC Form No. 3-Q are indispensable to estimates of gross output, intermediate input, and value added in the U.S. economy for the utilities industry (NAICS 22). BEA explains that it uses data from the Energy Information Administration's (EIA) Form 861M for electricity and EIA's natural gas monthly programs as source data for the utilities industry, and that these programs integrate utility and natural gas company financial and operational information from FERC Form No. 3-Q. BEA further explains that it also uses FERC tabulations indirectly to estimate the Census Bureau's construction VPIP for electric, gas, and pipeline utilities. Census' VPIP estimates serve as a major source data input to the national income and product account's NIPA fixed investment in structures estimates. BEA further explains that its fixed asset accounts (FAA), estimates of private fixed investment in structures by the utilities industry rely upon selected FERC data sets published by the EIA.

EEI, AEP, Duke Energy, Entergy, Exelon, FirstEnergy, PGE, and PPL state they are supportive of the Commission's overall objective to achieve vigilant oversight of reporting entities. They believe that the Commission meets this objective through the data presently collected in the annual FERC Form No. 1. They note that FERC Form No. 1 is used, among other things, by the Commission in calculating rates for jurisdictional customers, by state commissions in calculating retail rates, and by various other parties in making investment decisions.

EEI and the Electric Utility Companies filed comments that propose eliminating FERC Form No. 3-Q. They claim that FERC Form No. 3-Q has little to no value to the Commission's objective to achieve vigilant oversight of reporting, argue that FERC Form No. 3-Q does not lend itself to identification of emerging trends or the economic effects of significant transactions and events, and assert that FERC Form No. 3-Q has no bearing on formula rate determinations.

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16 The nine electric utilities companies are: American Electric Power Service Corporation (AEP); Duke Energy Corporation (Duke Energy); Entergy Services, LLC (Entergy); Exelon Corporation (Exelon); Evergy, Inc. (Evergy); FirstEnergy Service Company (FirstEnergy); Portland General Electric Company (PGE); PPL Services Corporation (PPL); and Southern California Edison Company (SCE) (collectively, Electric Utility Companies).

17 The submittals are posted at <https://elibrary.ferc.gov> under Docket No. IC25-7-000.

EEI, AEP, Duke Energy, Exelon, PGE, and PPL argue that it is unclear exactly how and to what extent FERC uses the 3-Q quarterly data in its oversight capacity. EEI states that its members have never been contacted about a FERC Form No. 3-Q filing. Similarly, of the Electric Utility Companies filing comments in this proceeding, only Duke Energy and AEP stated that they received requests about the information reported in their FERC Form No. 3-Qs in recent years. In addition, FirstEnergy argues that it could not identify any reference in an audit report or FERC enforcement action to FERC Form No. 3-Q.

EEI and Entergy comment that President Trump's Executive Order, Unleashing Prosperity Through Deregulation, states it is the "policy of the executive branch to be prudent and financially responsible in the expenditure of funds, from both public and private sources, and to alleviate unnecessary regulatory burdens placed on the American people."<sup>18</sup> EEI argues that the clear spirit of the Executive Order is for federal agencies to seek opportunities to reduce or eliminate regulations wherever feasible. As a result, EEI explains that it is requesting that the Commission strongly consider what EEI sees as the limited value that FERC Form No. 3-Q has in accomplishing the Commission's oversight mission.

AEP, Duke Energy, PGE, and PPL argue that Order No. 646's<sup>19</sup> goal to identify and evaluate emerging trends, business conditions, and financial issues, and to identify the economic effects of significant transactions and events cannot be accomplished by FERC Form No. 3-Q. They assert that electric utilities are subject to large seasonal variations and, given that FERC Form No. 3-Q covers only three months of data, it provides an incomplete glimpse into a company's expected annual results. They argue that the administrative burden associated with preparing and filing FERC Form No. 3-Q unnecessarily increases costs to customers.

EEI, AEP, Duke Energy, and FirstEnergy state they, or in the case of EEI, its members, file large quantities of financial, operational, facility, and other information with the Commission and other federal and state agencies. They assert that these filings give a detailed picture of company finances and operations. They note that often FERC Form No. 3-Q filings are due in short and overlapping time frames and while the companies are closing their accounting books and preparing financial reports for other agencies.

EEI, AEP, PGE, and PPL state that the Commission has commented in prior Notice of Information Collections that FERC Form No. 3-Q is used to validate the debt and equity information of filings under Part 34 of the Commission's regulations when the most recent 12-month filing occurred more than four months prior to the application under Part 34. However, they argue that this use of FERC Form No. 3-Q does not justify requiring all jurisdictional utilities to file FERC Form No. 3-Q each quarter. Instead, they suggest that the Commission consider amending the Part 34 filing requirements so that the relevant information is only provided when a Part 34 filing is made. Alternatively, they suggest that Commission staff could use data requests to obtain information needed to validate debt and equity balances.

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<sup>18</sup> Exec. Order No. 14,154, 90 Fed. Reg. 8353 (Jan. 20, 2025).

<sup>19</sup> See *Quarterly Financial Reports and Revisions to the Annual Reports*, Order No. 646, 106 FERC ¶ 61,113, at PP 11, 16 and 35 (2004).

While their preference is to eliminate FERC Form No. 3-Q entirely, AEP, Duke Energy, Exelon, PGE, and PPL propose two alternative approaches for the Commission to consider. The first suggestion is to require the filing of a single mid-year FERC Form No. 3-Q filed for the six months ended June 30 of each respective year. They argue that this approach would be a reasonable compromise that could provide FERC with the insight needed for oversight and transparency if it deems an interim report is necessary, but would also provide significant and immediate relief to respondents from the tangible and measurable burden of preparing multiple quarterly filings. PPL and AEP argue that reducing the reporting requirements of FERC Form No. 3-Q will reduce the burden and costs ultimately passed to customers.

The second alternative they propose is to limit the quarterly report to the basic set of financial statements discussed in Order No. 646: the Comparative Balance Sheet, Statement of Income, Statement of Retained Earnings, Statement of Cash Flows, Statement of Other Comprehensive Income, and accompanying Notes to the Financial Statements. PGE states that the creation of the basic financial statements is not overly burdensome, and while the development of the notes to the financial statements requires more extensive effort, the overall burden would be greatly reduced by not having to prepare the supplemental schedules. Duke Energy argues that if there is value in identifying trends and reviewing debt and equity balances, the basic set of financial statements would provide sufficient information to do so. FirstEnergy, SCE, and Evergy also generally support limiting the filing to the basic set of financial statements, although they recommend excluding the notes to the financial statements, and Evergy further recommends excluding the Statement of Cash Flows and Statement of Other Comprehensive Income which, it argues, are burdensome to prepare and not used in ratemaking.

FirstEnergy recommends that the Commission perform a review of each FERC Form No. 3-Q schedule and request comments from stakeholders on the utility of data provided to determine the necessity and usefulness of information and specific pages currently required in FERC Form No. 3-Q. Evergy states that if the Commission is utilizing FERC Form No. 3-Q supplemental page data, the Commission should evaluate whether any of these pages can be eliminated based on relevance and applicability of the pages.

Entergy suggests that the Commission could collect the information in FERC Form No. 3-Q semi-annually and supplement the information with filings made at the SEC or with direct data requests. EEI and Exelon argue that Commission staff can utilize reports filed with the SEC. They comment that the quarterly report on the SEC Form No. 10-Q includes a full set of financial statements along with Management's Discussion and Analysis, as well as other information. Additionally, EEI and Exelon state that the SEC Form No. 8-K is required to disclose material events typically within four days of the event.

EPI states that it is interested in the Commission requiring more disclosure of expenses charged to certain accounts within the USofA, including an itemized list of expenses in Account 909, Informational and Instructional Expenses; Account 913, Advertising Expenses; Account 923, Outside Services Employed; Account 928, Regulatory Commission Expenses; Account 930.1, General Advertising Expenses; 930.2, Miscellaneous General Expenses; Account 426.1, Donations; Account 426.4; Expenditures for Certain Civic, Political and Related Activities; and Account 426.5, Other Deductions. EPI also recommends revisions to clarify instructions and



include additional disclosures on Page 350, Regulatory Commission Expenses, of FERC Form No. 1. EPI recommends additional disclosures and itemization for transactions with associated (affiliated) companies and recommends modifications to enhance reporting of these transactions on page 429, Transactions with Associated (Affiliated) Companies, of FERC Form No. 1. EPI explains that many parties, especially individual ratepayers, lack the resources, access to information, or both that are necessary to challenge the categorization of a cost. EPI argues that through itemization of certain USofA accounts that have been prone to abuse, the Commission can enhance transparency, ensuring just and reasonable rates.

Evergy requests additional instructions on FERC Form Nos. 1 and 3-Q, to explicitly state how information should be reported and what type of details are required for pages 232, Other Regulatory Assets, and 278, Other Regulatory Liabilities. Evergy also states that multiple pages including pages 320-323 and 324-325 are reported differently between FERC Form Nos. 1 and 3-Q. Evergy argues that while some FERC pages contain detail, the detail is not consistent across pages, which results in inconsistent data collection and reporting across the industry. Therefore, Evergy requests additional instructions and clarifications of certain column headings.

FERC Response: The Commission appreciates the comments submitted regarding the necessity, usefulness and ways to minimize burden associated with filing of FERC Form Nos. 1, 1-F, and 3-Q. As previously noted, the Commission uses the information provided on these forms to develop and monitor cost-based rates, conduct market analysis, and perform financial audits, thereby fulfilling its responsibility under the FPA and NGA to ensure that customers pay just and reasonable rates for energy. Additionally, state commissions and other parties use the information provided on these forms for rate development and evaluation and in making investment decisions. In particular, as recognized by EEI and the Electric Utility Companies, FERC Form Nos. 1 and 1-F are critical inputs in the development and updating of formula rates. Regarding FERC Form No. 3-Q, in addition to using the information provided on this form for oversight analysis and the timely evaluation of current financial information, FERC Form No. 3-Q is used to validate the debt and equity information included in filings under Part 34 of the Commission's regulations when the most recent 12-month filing occurred more than 4 months prior to the application. The Commission receives approximately 130 such Part 34 filings in each two-year cycle.

Regarding relying on reports filed with the SEC or other federal and state agencies, as mentioned above, the information included in these reports is not structured in a manner that would meet the Commission's needs under the FPA and NGA. For example, the financial statements filed with the SEC are provided on a consolidated, or parent company, basis and therefore do not provide information at the level of granularity required by the Commission to develop and monitor cost-based rates, conduct market analysis, and perform financial audits. However, the Commission recognizes that there may be opportunities to limit the information required by FERC Form No. 3-Q, reducing the burden on filing parties, while still providing the Commission with the information required to fulfill its responsibilities. While the Commission is not considering modifications to the collection or frequency of collection of FERC Form Nos. 1, 1-F, and 3-Q in this renewal, it may consider doing so in the future, at which time EEI, the Electric Utility Companies, BEA, and other interested parties will be able to submit comments.

With respect to EPI and Evergy's interest in modifying the forms, the Commission recognizes that certain instructions may benefit from updated or clarified language. However, as noted above, the Commission is not considering in this renewal modifications to FERC Form Nos. 1, 1-F, and 3-Q, but may consider doing so in the future, at which time EPI, Evergy, and other interested parties will be able to submit comments on this issue.

*Comments regarding the Commission's burden estimate.*

AEP, Duke Energy, Evergy, Entergy, FirstEnergy, PGE, PPL, and SCE state that, while the time for each respondent to complete FERC Form No. 3-Q varies significantly, as each respondent has different systems and processes, they generally support FERC's estimate of approximately 168 hours of annual effort to prepare FERC Form No. 3-Q. They note that, in addition to the cost of preparing FERC Form No. 3-Q, companies incur additional costs to maintain a software package to support the filing requirements including XBRL tagging and/or to utilize a third-party vendor's software to prepare FERC Form No. 3-Q filings in XBRL. FirstEnergy states that, with the implementation of XBRL requirements, both the software costs and labor burden have increased, and it estimates that each report takes nearly 70 hours per respondent each quarter to complete, or 210 hours annually. Entergy comments that because each of its reports are individually prepared by Entergy Services' accounting employees, there are no economies of scale or efficiencies to be had in their preparation. Entergy Services estimates that the yearly hourly expenditure to prepare and file FERC Form No. 3-Qs is 1,050 hours at a total cost of about \$84,000, in addition to the cost of software licenses and other related costs incurred. SCE estimates that it takes their staff approximately 900 hours annually for three quarterly filings. SCE asserts that the required XBRL format has added additional burden without a clear linkage to any benefit by users.

FERC Response: The Commission appreciates the comments providing each company's individual estimate of the total burden, time, and/or costs associated with the quarterly filings. The Commission acknowledges that the burden presented is meant to represent an industry average and that the time for each respondent to complete the forms varies as each respondent has different employee compensation, systems, and processes.

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

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

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

The information collected in FERC Form Nos. 1, 1-F, and 3-Q is publicly available. However, the Commission will consider specific requests for confidential treatment (e.g., Critical Energy/Electric Infrastructure Information [CEII] or non-public) to the extent permitted by law.<sup>20</sup> The Commission will review each request for confidential treatment on a case-by-case basis.

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<sup>20</sup> 18 C.F.R. §§ 388.112 and 388.113. More information on the CEII definition, program and requirements is posted at <http://www.ferc.gov/legal/ceii-foia/ceii.asp>.

**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.**

The forms do not contain questions of a sensitive nature.

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

The estimated burden and cost<sup>21</sup> of the information collections follow.

FERC Form Nos. 1 and 1-F:

<b>Form 1 (OMB Control No. 1902-0021) and Form 1-F (OMB Control No. 1902-0029)</b>						
<b>Requirements</b>	<b>Number of Respondents</b>	<b>Average Annual Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Average Annual Burden Hrs. &amp; Cost Per Response</b>	<b>Total Average Annual Burden Hours &amp; Total Annual Cost</b>	<b>Cost per Respondent (\$)</b>
	(1)	(2)	(1)*(2)=(3)	(4)	(3)*(4)=(5)	(5)÷(1)
Form 1	216	1	216	1,168 \$120,304	252,288 \$25,985,664	\$120,304
Form 1-F	2	1	2	122 \$12,566	244 \$25,132	\$12,566
Total			218		252,532 \$26,010,796	\$132,870

FERC Form Nos. 3-Q (electric and gas):

<b>Form 3-Q (OMB Control No. 1902-0205)</b>						
<b>Requirements</b>	<b>Number of Respondents</b>	<b>Average Annual Number of Responses per Respondent</b>	<b>Total Number of Responses</b>	<b>Average Annual Burden Hrs. &amp; Cost Per Response</b>	<b>Total Average Annual Burden Hours &amp; Total Annual Cost</b>	<b>Cost per Respondent (\$)</b>
	(1)	(2)	(1)*(2)=(3)	(4)	(3)*(4)=(5)	(5)÷(1)
Form 3-Q (Electric)	218	3	654	168 \$17,304	109,872 \$11,316,816	\$51,912
Form 3-Q (Gas)	148	3	444	168 \$17,304	74,592 \$7,682,976	\$51,912
Total					184,464 \$18,999,792	

21 The cost is based on FERC's 2025 Commission-wide average salary cost (salary plus benefits) of \$103.00/hour. The Commission staff believes the FERC FTE (full-time equivalent) average cost for wages plus benefits is representative of the corresponding cost for the industry respondents.

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

All costs are related to burden hours and are discussed in Questions 12 and 15. There are no capital costs.

### 14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and processing of filings’<sup>22</sup> 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 collections. (The corresponding annual and hourly FERC costs use the figures for 2025, as noted.) The estimated costs are divided equally by three in ROCIS.

The Paperwork Reduction Act (PRA) Administrative Cost<sup>23</sup> 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.

The estimated annualized cost to the Federal Government follows.<sup>24</sup>

<b>Information Collection</b>	<b>Full-Time FERC Staff Equivalents (FTEs) for 'Analysis &amp; Processing of Filings'</b>	<b>FERC Staff Cost of Analysis &amp; Processing of Filings (FTEs * \$214,093/year)</b>	<b>PRA Administrative Cost (\$7,978 per collection)</b>	<b>Estimated Annual Federal Cost (rounded)</b>
<b>FERC Form Nos. 1, 1-F, &amp; 3-Q (electric and gas)</b>	4	\$856,372	\$23,934	\$880,306 (\$293,435 per collection)

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

22 The estimate uses FERC’s FY 2025 average annual salary plus benefits of one FERC FTE (full-time equivalent [\$214,093 per year or \$103 per hour]). (These estimates were updated in January 2025.)

23 This estimate was updated January 2025.

24 The federal costs for FERC Form Nos. 1, 1-F, and 3-Q (for both electric and gas) will be included under the ICR for FERC Form No. 1 in ROCIS and reginfo.gov.

Adjustments in Estimates. The decrease of one FERC Form No. 1 respondent (from 217 to 216) and changes in the number of FERC Form No. 3Q electric and gas responses (from 663 to 654 and 441 to 444, respectively) is due to normal fluctuations in the industry (e.g., companies merging, splitting, entering into, and exiting the industry).

Program Changes. There are no program changes or changes to the reporting or recordkeeping requirements. The previous ICR included a one-time burden associated with updating systems to account for changing reporting requirements, which has now been completed and is no longer included in the burden.

The following table shows adjustments (such as normal industry fluctuations, including companies merging, splitting, going into and leaving the business) and reflects metadata used in ROCIS (and reginfo.gov).

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
<b>FERC Form No. 1</b>				
Annual Number of Responses	216	434	-1	-217
Annual Time Burden (Hr.)	252,288	266,042	-4,206	-9,548
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0
<b>FERC Form No. 1-F</b>				
Annual Number of Responses	2	4	0	-2
Annual Time Burden (Hr.)	244	360	-28	-88
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0
<b>FERC Form No. 3-Q (electric)</b>				
Annual Number of Responses	654	663	-9	0
Annual Time Burden (Hr.)	109,872	111,384	-1,512	0
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0
<b>FERC Form No. 3-Q (gas)</b>				
Annual Number of Responses	444	441	+3	0
Annual Time Burden (Hr.)	74,592	73,647	+945	0
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

Total FERC Form No. 3-Q (electric and gas)				
Annual Number of Responses	1,098	1,104	-6	0
Annual Time Burden (Hr.)	184,464	185,031	-567	0
Annual Cost Burden (\$)	\$0	\$0	\$0	0

## 16. TIME SCHEDULE FOR PUBLICATION OF DATA

The information provided in FERC Form Nos. 1, 1-F and 3-Q is available on the FERC website (<https://www.ferc.gov/general-information-0/electric-industry-forms> and <https://www.ferc.gov/industries-data/natural-gas/industry-forms>). The data is collected for regulatory purposes and not for the purposes of a publication.

## 17. DISPLAY OF EXPIRATION DATE

FERC Form Nos. 1, 1-F and 3-Q display the OMB control numbers and the expiration dates. FERC provides the OMB Control Numbers of the information collections along with their expiration dates at [www.ferc.gov/information-collections](http://www.ferc.gov/information-collections).

## 18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.