

Supporting Statement
**FERC-725N, Mandatory Reliability Standards: Transmission Planning (TPL)
Reliability Standards,**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) approve the reporting and recordkeeping requirements in FERC-725N for new Reliability Standard TPL-008-1 (Transmission System Planning Performance Requirements for Extreme Temperature Events). .

**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.¹ 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, which are subject to Commission review and approval. Once approved, the Reliability Standards may be enforced by the ERO, subject to Commission oversight.

Pursuant to section 215(d)(2) of the FPA, we approve proposed Reliability Standard TPL-008-1 as just and reasonable and not unduly discriminatory or preferential and in the public interest.² We approve the proposed Reliability Standard's associated violation risk factors and violation severity levels and the proposed implementation plan. We also approve NERC's proposed definition of "extreme temperature assessment" for inclusion in the NERC Glossary.

NERC explains that proposed Reliability Standard TPL-008-1 would require planning entities in defined zones to coordinate with each other on the development of extreme temperature assessments at least once every five years. If an extreme temperature assessment identifies certain instances where system performance requirements would not be met during extreme heat or extreme cold weather events, the proposed Reliability Standard would require applicable planning entities to develop and share corrective action plans that would remedy the identified problem. If non-consequential load shed is identified as an element of a corrective action plan, the proposed Reliability Standard would require the applicable planning entity to consider and document alternative corrective measures that would avoid load shed. The proposed Reliability Standard would also require planning entities to share their corrective action plans with, and solicit

¹ 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.

² 16 U.S.C. 824o(d)(2).

feedback from, the applicable regulatory authorities or governing bodies responsible for retail electric service.

NERC proposes an implementation plan consisting of phased-in compliance dates over a five-year period. NERC asserts that this implementation plan “balances the urgency in the need to implement the proposed Reliability Standard against the reasonableness of the time allowed for those who must comply to develop the necessary processes and capabilities to perform these new wide-area extreme temperature studies.”

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

In Order No. 896, the Commission directed NERC to submit a new or modified Reliability Standard that addresses the Commission’s identified concerns pertaining to transmission system planning for extreme heat and cold weather events that impact the Reliable Operation of the Bulk-Power System.³ Specifically, the Commission directed NERC to develop a new or modified Reliability Standard that requires the following: (1) development of benchmark planning cases based on major prior extreme heat and cold weather events and/or meteorological projections; (2) planning for extreme heat and cold weather events using steady state and transient stability analyses expanded to cover a range of extreme weather scenarios including the expected resource mix’s availability during extreme heat and cold weather conditions; and (3) development of corrective action plans that mitigate certain instances where performance requirements for extreme heat and cold weather events are not met.

In its petition, NERC asserts that proposed Reliability Standard TPL-008-1 is responsive to the Commission’s directives in Order No. 896. NERC further states that the proposed Reliability Standard “would advance the reliability of the Bulk-Power System by improving how entities plan for the impacts of extreme temperature events on their systems.” NERC explains that the proposed Reliability Standard, which focuses on improving how planning coordinators and transmission planners plan for extreme heat and extreme cold weather events, establishes a framework for the performance of periodic studies⁴ of the wide-area impacts on the Bulk-Power System of extreme heat and extreme cold weather events. These extreme temperature assessments would be developed from

³ *Transmission Sys. Plan. Performance Requirements for Extreme Weather*, Order No. 896, 183 FERC ¶ 61,191 (2023).

⁴ NERC’s petition refers to these periodic studies as “extreme temperature assessments,” which NERC proposes to define in the NERC Glossary as a “[d]ocumented evaluation of future Bulk Electric System performance for extreme heat and extreme cold benchmark temperature events.” *Id.* at 16.

predefined benchmark temperature events established by NERC, based on its analysis of 43 years of historical meteorological data.⁵

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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 think that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities has a well-established compliance portal for registered entities to electronically submit compliance information and reports. The compliance portals allow documents developed by the registered entities to be attached and uploaded to the Regional Entity’s portal. Compliance data can also be submitted by filling out data forms on the portals. These portals are accessible through an internet browser password protected user interface.

The submittals are not made to FERC.

⁵ *Id.* at 23. Conversely, subject to NERC approval, planning coordinators may develop and use benchmark temperature events that meet the criteria outlined in Requirements R2.1-R2.2 of the proposed Reliability Standard. *Id.* at 25.

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 information collection requirements are unique to the proposed Reliability Standard and to the FERC-725N information collection. The Commission does not know of any duplication in the requirements.

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 functional 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 508.⁶

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

If this standard and the associated information collection requirements did not exist or were performed less frequently, the reduction or elimination of transmission system planning would likely lead to lower system reliability and higher vulnerability and risk, such as transmission system outages and loss of load. During a GMD event, GIC on the BPS may cause transformer hot-spot heating or damage, loss of Reactive Power sources, increased Reactive Power demand, and Misoperation(s), the combination of which may result in voltage collapse and blackout. Conducting the vulnerability assessment and corrective action planning once every 5 years allows for system planners to reassess how changes in the system topology effect their system's GMD vulnerabilities.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to the Reliability Standard TPL-008-1.

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

⁶Details of the current ERO Reliability Standard processes are available in Appendix 3A of the NERC Rules of Procedure on the NERC website at <https://www.nerc.com/AboutNERC/Pages/Rules-of-Procedure.aspx>.

In accordance with OMB requirements, the Commission published a 60-day notice⁷ and a 30-day notice⁸ to the public regarding this information collection on 2/19/2025 and 5/08/2025 respectively. The Commission received no comments from the public regarding this information collection.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to this collection.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rule of Procedure 1502, “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 covered by the approved Reliability Standard to FERC. Rather, they maintain it internally or provide it to NERC or the Regional Entities. Since there are no submittals made to the Commission, FERC provides no specific provisions in order to protect confidentiality unless and until any such information is submitted to FERC as part of an enforcement action or other compliance review.

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 include any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The Commission bases its paperwork burden estimates on the additional paperwork burden presented by the proposed new Reliability Standard TPL-008-1. The new defined term “extreme temperature assessment” is not expected to generate any new burden as it is a definition used within the body of Reliability Standards. Reliability Standards are

⁷ 90 FR 9899

⁸ 90 FR 19484

objective-based and allow entities to choose compliance approaches best tailored to their systems. Additionally, proposed Reliability Standard TPL-008-1, Requirement R1 identifies each responsible entity that shall complete its responsibilities such that the extreme temperature assessment is completed at least once every five calendar years. The NERC Compliance Registry, as of November 20, 2024, identifies unique U.S. entities that are subject to mandatory compliance with proposed Reliability Standard TPL-008-1, as 62 planning coordinators (PC) and 204 transmission planners (TP). Based on these assumptions, we estimate the following reporting burden:

Proposed Burden TPL-008-1 Docket No. RD25-4					
Reliability Standard	Type and Number of Entity⁹ (1)	Number of Annual Responses Per Entity (2)	Total Number of Responses (1)*(2)=(3)	Average Number of Burden Hours per Response¹⁰ (4)	Total Burden Hours (3)*(4)=(5)
Annual Collection TPL-008-1 FERC-725N					
Annual review and record retention	62 (PC)	1	62	88 hrs. \$ 70.67/hr	5,456 hrs. \$385,576
	204 (TP)	1	204	56 hrs. \$ 70.67/hr	11,424 hrs. \$807,334
Total for TPL-008-1			266		16,880 hrs. \$1,192,910

The annual responses and burden hours for proposed Reliability Standard TPL-008-1 will be 266 responses; 16,880 hours.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no non-labor costs associated with the FERC-725N. All of the PRA-related costs due to RD25-4-000 are associated with burden hours (labor) and described in Questions #12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

⁹ Number of entities data taken from the NERC compliance registry, dated November 20, 2024.

¹⁰ 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).

The Regional Entities and NERC do most of the data processing, monitoring and compliance work for Reliability Standards. Any related 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 Paperwork Reduction Act (PRA) Administrative Cost is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. It also includes the cost of publishing the necessary notices in the Federal Register.

FERC-725N	Number of Employees (Full-Time Equivalents [FTEs])	Estimated Annual Federal Cost
FERC-725N, Analysis and Processing of filings	0	0
PRA Administrative Cost ¹¹	0	\$7,978
FERC Total		\$7,978

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

The following table shows the total burden of the collection of information. The format, labels, and definitions of the table follow the ROCIS submission system’s “Information Collection Request Summary of Burden” for the metadata. The Annual responses and burden hours have been updated to only reflect the ongoing burden an record retention for TPL-008-1 and there will be no changes made to the remaining inventory for TPL-001-4 and TPL-007-4. Changes in Burden are due to the newly created TPL-008-1 and have been updated to reflect the current totals.

FERC-725N	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	2,233	1,967	0	+266
Annual Time Burden (Hr.)	130,918	114,038	0	+16,880
Annual Cost Burden (\$)	0	0	0	0

¹¹ Based upon FERC’s 2025 estimated average annual PRA Administrative Cost: \$7,978.

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications related to this collection

17. DISPLAY OF EXPIRATION DATE

The expiration date is displayed in a table posted on ferc.gov at <https://www.ferc.gov/information-collections>.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions