

**Consolidated Supporting Statement for
FERC Form No. 60 (Annual Report of Centralized Service Companies); FERC-61
(Narrative Description of Service Company Functions); and FERC-555A (Preservation of
Records of Holding Companies and Service Companies Subject to PUHCA 2005)**

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) approve, for three years, the information collection requirements in FERC Form Nos. 60, FERC-61, and FERC-555A under OMB Control No. 1902-0215, with no changes to the reporting requirements:

- FERC Form No. 60 (Annual Report of Centralized Service Companies);¹
- FERC-61 (Narrative Description of Service Company Functions);² and
- FERC-555A (Preservation of Records of Holding Companies and Service Companies Subject to PUHCA 2005).³

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

In accordance with the Energy Policy Act of 2005, the Commission implemented the repeal of the Public Utility Holding Company Act of 1935 (PUHCA 1935) and implemented the provisions of a newly enacted Public Utility Holding Company Act of 2005 (PUHCA 2005). Pursuant to PUHCA 2005, the Commission requires centralized service companies to file FERC Form No. 60 or FERC-61 and comply with FERC-555A's requirements unless the company is exempted or granted a waiver pursuant to the Commission's regulations. The information collected in FERC Form No. 60 and FERC-61 enables better monitoring for cross-subsidization and aids the Commission in carrying out its statutory responsibilities. In addition, centralized service companies are required to follow the Commission's preservation of records requirements for centralized service companies.

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

FERC Form No. 60

FERC Form No. 60 is an annual reporting requirement for centralized service companies set forth in 18 C.F.R. § 366.23. The report's function is to collect financial information (including balance sheet, assets, liabilities, billing and charges for associated and non-associated companies) from centralized service companies subject to the Commission's jurisdiction. Unless the Commission exempts or grants a waiver pursuant to 18 C.F.R. §§ 366.3 and 366.4 to the

¹ 18 C.F.R. Parts 366.23(a)(1) and 369.1.

² 18 C.F.R. Part 366.23(a)(2).

³ 18 C.F.R. Part 368.

holding company system, every centralized service company in a holding company system must prepare and file electronically FERC Form No. 60 with the Commission, pursuant to the General Instructions in the form.

FERC-61

FERC-61 is a filing requirement for service companies in holding company systems (including special purpose companies) that are currently exempt or granted a waiver of FERC's regulations and would not have to file FERC Form No. 60. Instead, those service companies are required to annually file a narrative description of the service company's functions during the prior calendar year (FERC-61). In complying, a holding company may make a single filing on behalf of all of its service company subsidiaries.

FERC-555A

The Commission's regulations prescribe a mandated preservation of records requirement for holding companies and service companies (unless otherwise exempted by FERC). This requires them to maintain and make available to FERC, their books and records. The preservation of records requirement provides for uniform records retention by holding companies and centralized service companies subject to PUHCA 2005.

Data from FERC Form No. 60, FERC-61, and FERC-555A provide a level of transparency that: 1) helps protect ratepayers from pass-through of improper service company costs, 2) enables the Commission to review and determine cost allocations (among holding company members) for certain non-power goods and services, 3) aids the Commission in meeting its oversight and market monitoring obligations, and 4) benefits the public, both as ratepayers and investors. In addition, the Commission's audit staff uses these records during compliance audits, reviews and special analyses.

If data from FERC Form No. 60, FERC-61, and FERC-555A were not available, it would be difficult for the Commission to meet its statutory responsibilities under EPCA 1992, EPCA 2005, and PUHCA 2005, and the Commission would have fewer of the regulatory mechanisms necessary to ensure transparency and protect ratepayers.

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

FERC Form No. 60 is filed electronically in XBRL pursuant to the requirements of Order No. 859. Further details regarding submission of FERC Form No. 60 and FERC-61 can be found at <https://www.ferc.gov/filing-forms/service-companies-filing-forms>. FERC-61 can also be electronically filed.

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 SECTION NO. 2

While some jurisdictional entities may file similar financial information with the Securities and Exchange Commission (SEC), the level of detail concerning assets, liabilities, stockholders' equity along with the revenues, expenses, gains, and losses is different for the Commission and the SEC. The financial statements filed with the SEC are on a consolidated, or parent company basis. The Commission notes that a majority of the jurisdictional entities that it regulates file financial information with the SEC that consolidates their assets, liabilities, and profits with their parent company, or combine 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 its regulatory needs. Therefore, the Commission has required jurisdictional entities to file financial information on a jurisdictional entity level basis using a uniform system of accounts.

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

The information requirements under FERC Form No. 60 apply to jurisdictional entities. Companies that do not file FERC Form No. 60 use the FERC-61 to reduce burden on those small entities. In general, holding companies to which the rules apply are not small entities. If the reporting requirements represent an undue burden on small businesses, the affected entity may seek a waiver of the reporting requirements from the Commission. However, the Commission believes that the information collected on these forms is the minimum necessary to provide a meaningful review of financial conditions and would impose the least possible burden on entities.

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

Data from FERC Form No. 60 and FERC-61 provide a level of transparency that: 1) helps protect ratepayers from pass-through of improper service company costs, 2) enables the Commission to review and determine cost allocations (among holding company members) for certain non-power goods and services, 3) aids the Commission in meeting its oversight and market monitoring obligations, and 4) benefits the public, both as ratepayers and investors. In

addition, the Commission's audit staff use these records during compliance reviews and special analyses.

If data from FERC Form No. 60 and FERC-61 were collected less frequently, the Commission would have difficulty performing its mandated review responsibilities and would have fewer of the regulatory mechanisms necessary to ensure transparency, protect ratepayers, and confirm that rates are just and reasonable.

FERC-555A. These records are not filed with the Commission but are retained by jurisdictional companies. Absent the availability of these records, the Commission would have fewer of the regulatory mechanisms necessary to ensure transparency, protect ratepayers, and confirm that rates are just and reasonable.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

The Commission assumed responsibility for the reporting requirements formerly required by the SEC and streamlined those requirements. The FERC-555A recordkeeping requirements are based on the FERC-555⁴ recordkeeping requirements (OMB Control No. 1902-0098) pertaining to regulated public utilities, natural gas companies, and oil pipeline companies subject to the Commission's jurisdiction.

Most, if not all, of the holding companies that are subject to these FERC-555A requirements include electric, gas, and oil utilities as part of their corporate structure. For this reason, it is critical that the information collection for the holding and service companies mirror generally the public utility retention requirements. For this reason, some record schedules in 18 C.F.R. Part 368.3 (included at Attachment A) require retention longer than three years.⁵ Those items include:

- organizational documents
- accountants' and auditors' reports
- ledgers
- journal entries and vouchers

These documents provide a level of transparency that assist the Commission in carrying out its mandated review responsibilities. Jurisdictional companies may file for a request for a rate change at any time but are not required to do so. In addition, the Commission can require prospective changes to a company's rates based on its own motion or upon complaint from an

⁴ 18 C.F.R. Parts 125 and 225.

⁵ 5 C.F.R. Part 1320.5(d)(2)(iv).

interested party. Thus, retention of data beyond three years is necessary for Commission staff to adequately assess data submitted by entities, including the holding and service companies. In addition, the Commission conducts audits of selected entities, and these periods under audit can require data beyond three years to demonstrate compliance with the audited areas.

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

In accordance with OMB requirements,⁶ the Commission published a 60-day Notice⁷ on February 7, 2025 and published a 30-day Notice on May 15, 2025⁸, 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. No comments were received.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

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

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information collected in FERC Form No. 60 and FERC-61 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.⁹ The Commission will review each request for confidential treatment on a case-by-case basis.

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.

These collections do not contain any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

⁶ 5 C.F.R. § 1320.8(d).

⁷ 90 FR 9144

⁸ 90 FR 20649

⁹ 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>.

The following tables provide the estimated annual burden¹⁰ and cost¹¹ related to the FERC Form No. 60, FERC-61, and FERC-555A information collection requirements:

FERC-60 Annual Burden Estimate					
B. No. of Respondents	C. Annual No. of Responses per Respondent	D. Total No. of Responses (Column B x Column C)	E. Average Burden Hours & Cost Per Response	F. Total Annual Burden Hours & Cost (Column D x Column E)	G. Cost per Respondent (Column F ÷ Column B)
37	1	37	78 hrs. \$7,800	2,886 hrs. \$288,600	\$7,800

FERC-61 Annual Burden Estimate					
B. No. of Respondents	C. Annual No. of Responses per Respondent	D. Total No. of Responses (Column B x Column C)	E. Average Burden Hours & Cost Per Response	F. Total Annual Burden Hours & Cost (Column D x Column E)	G. Cost per Respondent (Column F ÷ Column B)
14 ¹²	1	14	0.5 hrs. \$50	7 hrs. \$700	\$50

FERC-555A Annual Burden Estimate

¹⁰ Burden is defined as the total time, effort, or financial resources expended by persons to generate, maintain, retain, disclose, or provide information to or for a federal agency. For further explanation of what is included in the information collection burden, refer to Title 5 Code of Federal Regulations 1320.3. The burden hours and costs are rounded for ease of presentation.

¹¹ The cost for the FERC Form No. 60 and FERC-61 is based on FERC's 2024 Commission-wide average salary cost (salary plus benefits) of \$100/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. For the FERC-555A, the \$39.53 hourly cost figure comes from the average cost (wages plus benefits) of a file clerk (Occupation Code 43-4071) as posted on the BLS website (https://www.bls.gov/oes/current/naics2_22.htm).

¹² Previously, the Commission estimated the number of FERC-61 respondents by including the potential for a holding company to file for a group of companies. In contrast, the current estimate is updated to instead reflect the actual number of filers filing the FERC-61, as opposed to the potential number of companies represented by the population of filers. The current approach is more precise as it can be confirmed by reviewing the most recent number of FERC-61 filers. It is also consistent with how the number of respondents is estimated for other Commission collections. The varying corporate sizes and complexities inherent in the filing community is already taken into account via the burden hours estimate that is based on average filer burden.

B. No. of Respondents	C. Annual No. of Responses per Respondent	D. Total No. of Responses (Column B x Column C)	E. Average Burden Hours & Cost Per Response	F. Total Annual Burden Hours & Cost (Column D x Column E)	G. Cost per Respondent (Column F ÷ Column B)
51	1	51	1,080 hrs. \$42,692	55,080 hrs. \$2,177,312	42,692

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no capital or start-up costs related to this information collection request. All costs for FERC Form No. 60 and FERC-61 are related to labor burden hours. However, the costs for FERC-555A include a labor burden (Section 12) and a storage burden (below).

Previously, the estimate included paper storage costs, but firms no longer rely on paper storage to maintain the majority of their records, therefore the Commission is removing the costs for paper storage.¹³ For electronic storage, the Commission estimates \$10 per respondent annually. The total annual estimated electronic storage cost to industry (\$10 x 51 respondents) is \$510. This calculation estimates storage of 1GB per year at \$10. We expect that this estimate should continue to trend downward over time as the cost of electronic storage technology, including cloud storage, continues to decrease. For example, external hard drives of approximately 1000GB are available for approximately \$75. In addition, cloud storage plans from multiple providers for 1TB of storage (with a reasonable amount of requests and data transfers) are available for less than \$7 per month.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and processing of filings’¹⁴ 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 2024, as noted.)

The Paperwork Reduction Act (PRA) Administrative Cost (estimate of \$8,396 per collection annually) is the average annual FERC cost associated with preparing, issuing, and submitting materials necessary to comply with the PRA of 1995 for rulemakings, orders, or any other

¹³ The Commission estimates that 100% of record storage is electronic.

¹⁴ The estimate uses the FERC’s 2024 Commission-wide average salary cost (salary plus benefits) of \$207,786 annually or \$100/hour.

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.

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of filings ¹⁵ for FERC Form No. 60	0.5	\$103,893
Analysis and Processing of filings ¹⁴ for FERC-61	0.1	\$20,779
Analysis and Processing of filings for FERC-555A	0	\$0
PRA Administrative Cost (\$8,396 per filed collection)		\$16,792
FERC Total		\$141,464

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

Program changes. There are no program changes to the reporting or recordkeeping requirements. The last information collection request described one-time costs associated with changing regulatory requirements. The burden is no longer included as submitters have completed these one-time changes.

Adjustment to Estimates.

- The FERC Form No. 60 reporting burden experienced a decrease of 5 responses annually based on fluctuations in market activity. The hourly burden per response remains unchanged. Overall, Form No. 60 reporting burden decreased by 390 hours annually.
- The FERC-61 reporting burden experienced a decrease of 66 responses annually based on a change in methodology for estimating the number of FERC-61 respondents. Previously, the number of responses included the potential for a holding company to file for a group of companies. In contrast, the current estimate is updated to instead reflect the actual number of filers filing the FERC-61, as opposed to the potential number of companies represented by the population of filers. It is also consistent with the manner in which the number of respondents is estimated for other Commission collections. The varying corporate sizes and complexities inherent in the filing community is already taken into account via the burden hours estimate that is based on average filer burden. The hourly burden per response remains unchanged. The decrease in the estimated number of FERC-61 filers resulted in an overall reporting burden decrease of 33 hours annually.
- The FERC-555A reporting burden experienced a decrease of 71 responses annually also based on activity within industry (decrease of five responses) and change due to agency

¹⁵ Based upon FERC's 2024 FTE average salary plus benefits (\$207,786).

adjustment in estimate (decrease of 66 responses) noted above. The hourly burden per response remains unchanged. Overall, FERC-555A reporting burden decreased by 76,680 hours annually.

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.

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
FERC Form No. 60				
Annual Number of Responses	37	42	-5	0
Annual Time Burden (Hr.)	2,886	3,276	-390	0
Annual Cost Burden (\$)	\$288,600	\$285,012	\$3,588	\$0
FERC-61				
Annual Number of Responses	14	80	-66	0
Annual Time Burden (Hr.)	7	40	-33	0
Annual Cost Burden (\$)	\$700	\$3,520	-\$2,820	\$0
FERC-555A				
Annual Number of Responses	51	122	-71	0
Annual Time Burden (Hr.)	55,080	131,760	-76,680	0
Annual Cost Burden (\$)	\$2,177,312	\$4,720,912	-\$2,543,600	\$0
Total				
Annual Number of Responses	102	244	-142	0
Annual Time Burden (Hr.)	57,973	135,076	-77,103	0
Annual Cost Burden (\$)	\$2,466,612	\$5,009,444	-\$2,542,832	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications.

17. DISPLAY OF EXPIRATION DATE

FERC Form Nos. 60, FERC-61, and FERC-555A, Docket No. IC25-6-000
OMB Control No. 1902-0215

FERC provides the OMB Control Numbers of the information collections along with their expiration dates on this site at www.ferc.gov/information-collections.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.