

Supporting Statement for
FERC-604, Cash Management Agreements

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-604 (Cash Management Agreements; OMB Control No. 1902-0267), for three years. FERC-604 is an existing data collection and there are no proposed changes to the reporting requirements.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

This collection of information is authorized by the following statutory provisions:

- Sections 8 and 10 of the Natural Gas Act (NGA), 15 U.S.C. 717g and 717i;
- Sections 301 and 304 of the Federal Power Act (FPA), 16 U.S.C. 825 and 825c; and
- Sections 20(1) and 20(5) of the Interstate Commerce Act (ICA), 49 App. U.S.C. 20(1) and 20(5).

These statutes authorize the Commission to require entities that are subject to the Commission's jurisdiction to preserve accounts and related records, and to file reports found to be necessary or appropriate to assist the Commission in the proper administration of each statute.

Regulations at 18 CFR §§ 141.500, 260.400, and 357.5 provide for implementation of this information collection in accordance with these statutes. These regulations apply to FERC-regulated entities that are subject to the Commission's Uniform System of Accounts and that participate in cash management programs.

The pertinent regulations require each affected entity to file "cash management agreements" with the Commission within 10 days of the entity's entry into a cash management program. The regulations also require that any subsequent change in a cash management agreement be filed with the Commission within 10 days of the change.

The Commission promulgated these regulations in 2003 upon determining that these reporting requirements are needed to:

- Ensure that rates paid by the customers of FERC-regulated entities are just and reasonable;
- Aid the Commission in meeting its oversight and market monitoring obligations; and
- Benefit the investing public.¹

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

¹ See *Regulation of Cash Management Practices*, Order No. 634-A, 105 FERC ¶ 61,098 (2003); see also *Quarterly Financial Reporting and Revisions to the Annual Reports*, Order No. 646, 106 FERC ¶ 61,113 (2004).

Cash management or “money pool” programs typically concentrate affiliates’ cash assets in joint accounts for the purpose of providing financial flexibility and lowering the cost of borrowing. Cash management agreements typically contain terms of repayment into a consolidated corporate-wide “money pool” from which money is drawn by an operating company. Terms may include timing of repayment, maximum/minimum draws, interest rates, and potentially covenants/conditions that the drawing company must maintain. There are various aspects of these terms that affect whether an entity is charging just and reasonable rates. For example, the interest rate on these draws is typically considered a short-term interest rate, which is factored into calculating a utility’s cost of financing construction projects (i.e., increases revenue requirements).

If FERC did not collect the information, the Commission would have difficulty monitoring the impacts of cash management agreements on rates.

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

The Commission allows respondents to file the cash management agreements electronically. Based on the Commission’s eLibrary, the Commission estimates that all respondents are utilizing eFiling to submit their agreements.

3. 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 initiated cash management program documentation and filing rules because the information was not available from other sources. The Securities and Exchange Commission sometimes requires holding companies (a small subset of the respondent universe) to file cash management agreements. However, FERC is the only agency that collects the needed information from all the relevant entities.

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

The Commission estimates that this collection requires 1.5 hours of burden per year per respondent. In fact, if a company does not participate in a cash management agreement or makes no changes to its existing agreement, there is no burden. While the Commission does regulate small entities, it does not consider the minimal burden harmful to small entities.

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

The Commission requires entities to file cash management agreements when such agreements are entered into or when there are changes to the agreements. If the Commission delayed the

filings, neither the Commission nor interested parties would have access to current information regarding cash management agreements.

6. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION

There could be special circumstances because the relevant regulations require the filing of a cash management agreement within 10 days of a change. If a cash management agreement is changed frequently, the agreement would have to be filed more often.

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

In accordance with OMB requirements, the Commission published notices in the Federal Register inviting public comments on this information collection. In each notice, 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 Commission published a 60-day notice in the Federal Register on July 7, 2025 (90 FR 29861). The public comment period ended on September 5, 2025. The Commission received no comments in response. The Commission published a 30-day notice in the Federal Register on September 18, 2025 (90 FR 45038).

8. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

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

9. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information collected in FERC-604 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.² The Commission will review each request for confidential treatment on a case-by-case basis.

10. 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

There are no questions of a sensitive nature associated with the reporting requirements.

11. ESTIMATED BURDEN COLLECTION OF INFORMATION

² 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 Commission estimates the annual public reporting burden and cost of the information collection as:

Number of Respondents (1)	Number of Responses Per Respondent (2)	Total Number of Responses (1) * (2) = (3)	Average Burden Hours & Average Cost³ per Response (\$) (4)	Total Annual Burden Hours & Total Annual Cost (\$) (3) * (4) = (5)	Cost per Respondent (\$) (5) ÷ (1) = (6)
45	1	45	1.5 hours; \$155	67.5 hours; \$6,953	\$155

12. 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.

13. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The estimate of the cost for “analysis and processing of filings”⁴ 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 collection. The corresponding annual and hourly FERC costs use the figures for 2025, as noted.

The Paperwork Reduction Act (PRA) Administrative Cost⁵ 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.

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of Filings	0.3	\$64,228
PRA Administrative Cost ⁶		\$7,978

³ 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.

⁴ The estimate uses FERC’s FY 2025 average annual salary plus benefits of one FERC FTE (full-time equivalent [\$214,240 per year or \$103 per hour]). (These estimates were updated in January 2025.)

⁵ This estimate was updated January 2025.

⁶ The PRA Administration Cost includes preparing supporting statements, notices, and other activities associated with Paperwork Reduction Act compliance.

FERC Total		\$72,206
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14. REASONS FOR CHANGES IN BURDEN INCLUDING THE NEED FOR ANY INCREASE

There are no changes to the proposed burden.

15. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no publications for the collection of information.

16. DISPLAY OF EXPIRATION DATE

FERC provides the OMB control numbers of the information collections along with their expiration dates at <https://data.ferc.gov/ferc-information-collections-management/information-collections-approved/>.

17. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.