

## Ken Ambrose

---

**From:** Daniel Stone <danielaaronstone@gmail.com>  
**Sent:** Saturday, April 18, 2026 5:06 PM  
**To:** DataClearance  
**Subject:** [External] Docket No. IC26-9-000 | FERC-600

You don't often get email from danielaaronstone@gmail.com. [Learn why this is important](#)

**⚠ Caution:** This message does not originate from a known FERC email system. Use caution if this message contains attachments, links or requests for information.

Docket No. IC26-9-000 | FERC-600

Submitted via email to DataClearance@FERC.gov

### I. Introduction

This comment addresses the accuracy of the burden estimate, the adequacy of the methodology, and the demonstration of practical utility in the Commission's February 17, 2026 notice regarding FERC-600.

### II. The Burden Estimate Is Not Objectively Supported

The notice does not identify the empirical method, data source, or task-level decomposition used to derive the 160-hour per-response burden estimate, leaving the estimate not objectively supported and preventing evaluation under 5 CFR 1320.8. A bare assertion of 160 hours per response, without explanation of how that figure was derived, cannot be evaluated for accuracy. OMB cannot confirm accuracy where no methodology is visible.

### III. The Aggregated Burden Estimate Is Not Accurate

The notice applies a single burden estimate across complaint regimes and respondent types with materially different complexity profiles, making the aggregate figure incapable of being accurate for any identifiable subgroup and therefore not an accurate estimate of burden. FERC-600 covers distinct complaint regimes under 18 CFR 385.206 and Part 343, with respondents ranging from represented entities to pro se individuals. These categories differ materially in complexity and required effort. The notice offers no justification for treating them as equivalent.

### IV. The Hourly Cost Estimate Is Not Grounded in Respondent Reality

The notice derives its hourly cost estimate from FERC's 2025 staff salary and benefits average and applies it to external respondents. The notice states that "the average respondent...is similarly situated to the Commission," but provides no support for that assumption. The cost estimate as presented is not a respondent cost estimate — it is an agency cost estimate applied to non-agency parties.

### V. Practical Utility Has Not Been Demonstrated

The notice does not identify the specific information obtained through complaint filings that constitutes the collection, nor explain how that information—as opposed to the complaint process itself—is used in Commission decision-making.

### VI. The No-Change Extension Lacks Retrospective Justification

The notice asserts a three-year extension without change but provides no retrospective evaluation, no burden trend data, and no analysis of whether electronic filing has reduced respondent burden since the

prior approval cycle. The record provides no basis for concluding that the collection requires no revision.

#### VII. Required Clarifications

The Commission should provide, on the record:

1. The empirical method, data source, or task-level decomposition supporting the 160-hour estimate.
2. The data supporting the 62 respondent figure and the period used.
3. Differences in burden across complaint types (18 CFR 385.206 vs. Part 343).
4. Differences in burden across respondent types (represented entities vs. pro se individuals).
5. The respondent wage data used and the basis for treating FERC staff compensation as representative.
6. The specific information elements that constitute the collection and how they are used in decision-making.
7. The evidence supporting the conclusion that no revision is warranted.

#### VIII. Conclusion

The notice does not provide the information necessary for OMB to make the required findings on accuracy, methodology, or practical utility. The record should be supplemented to address these deficiencies before OMB approval.

Respectfully submitted