

Supporting Statement for
FERC-920, Electric Quarterly Report (EQR)

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve the modifications to the FERC-920 Electric Quarterly Report (EQR) information collection as reflected in the Final Rule titled *Filing Process and Data Collection for the Electric Quarterly Report* in Docket No. RM23-9-000.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The Commission set forth the EQR filing requirements in Order No. 2001 (Docket No. RM01-8-000, issued April 25, 2002, available through the link at [Order No. 2001](#)). Order No. 2001 requires public utilities to electronically file EQRs summarizing the contractual rates, terms and conditions in their agreements for all jurisdictional services, including market-based rate power sales, cost-based power sales, and transmission service, and transaction information for short-term and long-term market-based rate power sales and cost-based power sales.¹ The Commission established the EQR reporting requirements to help ensure the collection of information needed to perform its regulatory functions over wholesale electricity sales and transmission, while making data more useful to the public and allowing public utilities to better fulfill their responsibility under FPA section 205(c) to have information related to their rates, terms, and conditions of service on file in a convenient form and place. As noted in Order No. 2001, EQR data is designed to “provide greater price transparency, promote competition, enhance confidence in the fairness of the markets, and provide a better means to detect and discourage discriminatory practices.”²

Since issuing Order No. 2001, the Commission has provided guidance and refined the reporting requirements, as necessary, to simplify the filing requirements and reflect changes in the

¹ *Revised Pub. Util. Filing Requirements*, Order No. 2001, 99 FERC ¶ 61,107, *reh’g denied*, Order No. 2001-A, 100 FERC ¶ 61,074, *reh’g denied*, Order No. 2001-B, 100 FERC ¶ 61,342, *order directing filing*, Order No. 2001-C, 101 FERC ¶ 61,314 (2002), *order directing filing*, Order No. 2001-D, 102 FERC ¶ 61,334, *order refining filing requirements*, Order No. 2001-E, 105 FERC ¶ 61,352 (2003), *order on clarification*, Order No. 2001-F, 106 FERC ¶ 61,060 (2004), *order revising filing requirements*, Order No. 2001-G, 120 FERC ¶ 61,270, *order on reh’g and clarification*, Order No. 2001-H, 121 FERC ¶ 61,289 (2007), *order revising filing requirements*, Order No. 2001-I, 125 FERC ¶ 61,103 (2008).

² Order No. 2001, 99 FERC ¶ 61,107 at P 31.

Commission's rules and regulations. The Commission also adopted an EQR Data Dictionary, which provides the definitions of certain terms and values used in filing EQR data.³

To increase transparency across all wholesale electricity markets subject to the Commission's jurisdiction, the Commission issued Order No. 768 in 2012.⁴ Order No. 768 required market participants that are excluded from the Commission's jurisdiction under Federal Power Act (FPA) section 205 (i.e., non-public utilities), and that have more than a *de minimis*⁵ market presence, to file EQRs with the Commission. In addition, Order No. 768 revised the EQR filing requirements to build upon the Commission's prior improvements to the reporting requirements and further enhance the goals of providing greater price transparency, promoting competition, instilling confidence in the fairness of the markets, and providing a better means to detect and discourage anti-competitive, discriminatory, and manipulative practices.

In the Final Rule on *Filing Process and Data Collection for the Electric Quarterly Report*, in Docket No. RM23-9-000, the Commission is updating and streamlining the collection of data to improve data quality, increase market transparency, and decrease the costs, over time, of preparing the necessary data for submission and compliance with future changes to the filing requirements set forth by the Commission. Under the final rule, the EQR data collection will be modified to:

1. Implement a new collection method based on the eXtensible Business Reporting Language-comma separated values (XBRL-CSV) standard;
2. Require regional transmission organizations (RTOs) and independent system operators (ISOs) to produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy; and
3. Clarify EQR reporting requirements by updating to a modified Data Dictionary.

³ See Order No. 2001-G, 120 FERC ¶ 61,270 (2007). The current version of the EQR Data Dictionary is available at: https://www.ferc.gov/sites/default/files/2020-11/Data_Dictionary_V3_5_Clean.pdf.

⁴ *Elec. Mkt. Transparency Provisions of Section 220 of the Federal Power Act*, Order No. 768, 77 FR 61895 (Oct. 11, 2012), 140 FERC ¶ 61,232 (2012), *order on reh'g*, Order No. 768-A, 143 FERC ¶ 61,054 (2013), *order on reh'g*, Order No. 768-B, 150 FERC ¶ 61,075 (2015).

⁵ 18 CFR § 35.10b(b) provides that the term "*de minimis* market presence" means "any non-public utility that makes 4,000,000 megawatt hours or less of annual wholesale sales, based on the average annual sales for resale over the preceding three years as published by the Energy Information Administration's Form 861."

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

The FPA provides that “every public utility shall file with the Commission, within such time and in such form as the Commission may designate, and shall keep open in convenient form and place for public inspection schedules showing all rates and charges for any transmission or sale subject to the jurisdiction of the Commission, and the classifications, practices, and regulations affecting such rates and charges, together with all contracts which in any manner affect or relate to such rates, charges, classifications, and services.”⁶ The EQR is the reporting mechanism FERC uses for public utilities to fulfill their filing responsibility under FPA section 205(c).

EQR data falls into four general categories: (1) Identification Data, which ensures that the filings are submitted by authorized personnel; (2) Contract Data, which outlines necessary information about the rates, terms, and conditions of service in contracts; (3) Transaction Data, which provides the specific rates of the transactions, along with other critical information necessary to analyze those rates; and (4) for a small subset of filers that report some or all of their transactions to index price publishers, data regarding the types of transactions that were reported.

EQR data enables the Commission and the public to gain a more complete picture of wholesale electricity and transmission markets by providing information concerning price formation and market concentration in these markets. Public access to wholesale electricity sales and transmission-related information in the EQR improves market participants’ ability to assess supply and demand fundamentals and to price interstate wholesale electricity market transactions. This, in turn, results in greater market confidence, lower transaction costs, and ultimately supports competitive markets. In addition, the data filed in the EQR strengthens the Commission’s ability to exercise its oversight and enforcement responsibilities over wholesale electricity and transmission rates in accordance with the FPA. Without this information, the Commission would lack some of the data it needs to examine and approve or modify electricity rates. EQR data also strengthens the Commission’s ability to identify potential exercises of market power or manipulation and to better evaluate the competitiveness of interstate wholesale electricity markets.

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

⁶ 16 U.S.C. 824d.

Order No. 2001 requires public utilities to electronically file EQRs. Electronically filed EQRs improve the efficiency, convenience, and overall management of the filing process, facilitate public access to wholesale contract information, and reduce the industry's burden and expense associated with reporting and reviewing electric transactions. In addition, in Order No. 770,⁷ the Commission adopted a web-based approach to filing EQRs, which allows a public or non-public utility to file an EQR directly through the Commission's website. A filer submits its EQR through a web interface, which enables the choice of manually entering the information or uploading CSV or Extensible Mark-Up Language-formatted file (XML) files. By adopting Order No. 770's improvements to the filing process, the Commission eliminated the need for EQR filers to download software from the Commission's website.

In this final rule in Docket No. RM23-9-000, the Commission is furthering the use of improved information technology for the EQR data collection by requiring submissions in XBRL-CSV. The use of XBRL-CSV is anticipated to reduce the burden on filers in the future. Although the Commission expects that some filers will choose to implement the proposed XBRL-CSV filing standard by developing their own submission systems, the final rule, in Docket No. RM23-9-000, provides pre-formatted templates⁸ for the preparation of EQR submission files (FERC Templates) that would conform with the formatting requirements of the proposed XBRL-CSV system. The FERC Templates would help reduce the reporting burden for some filers, particularly those reporting transactions occurring outside of RTO and ISO markets. At a minimum, the FERC Templates would preserve the framework of the current CSV-based filing method, which some filers use to prepare their EQR submissions. Furthermore, for those filers that only report Identification Data or Identification and Contract Data in the EQR with no changes from the previous quarter, the final rule allows an option that would only require them to confirm that no changes occurred to their EQR from the previous quarter rather than providing another submission. This option would simplify the EQR filing process for those filers that do not report Transaction Data in successive quarters.

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

⁷ *Revisions to Electric Quarterly Report Filing Process*, Order No. 770, FERC Stats. & Regs. ¶ 31,338 (2012).

⁸ The pre-formatted templates will be available to filers as an option for preparing their EQR submissions is based on our current understanding of how the EQR XBRL-CSV system and how taxonomies could be designed. However, the Commission may adopt another solution to assist filers in preparing their EQR submissions based on the outcome of the XBRL-CSV system design phase.

The EQR is a primary source of transaction-level information for wholesale electricity sales, particularly in bilateral markets. The EQR also provides a uniform platform for comparable and consistent data across different wholesale electricity markets. Furthermore, the Commission's filing and data requirements are periodically reviewed in conjunction with OMB clearance expiration dates. This includes a review of the Commission's regulations and data requirements related to the EQR collection to identify any duplication.

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

For non-public utilities, the Commission has exempted those entities under the *de minimis* market presence threshold of 4,000,000 MWh or less of annual wholesale sales (based on an average of the wholesale sales it made in the preceding three years). This *de minimis* threshold therefore excludes small non-public utilities. If the reporting requirements present an undue burden on a small business, the affected entity may seek a waiver of the EQR reporting requirements from the Commission.

For the final rule in Docket No. RM23-9-000, FERC requires RTOs/ISOs to produce and make available transaction data reports that adhere to the FERC EQR taxonomies for use by their market participants in submitting EQRs. This information will be available to market participants and may significantly reduce the burden of responding for all entities, including small entities.

To estimate the number of small entities, the Commission reviewed the entities that report to the Commission. In the second quarter of 2022 (Q2 2022), the Commission received 3,111 EQR filings. Among the filers were electric utilities and other companies that are required to file the EQR and therefore are subject to the requirements adopted by this rule. To evaluate if this final rule will significantly impact small entities, the Commission used a random sample (342 entities) of Q2 2022 filers and researched the number of companies that would be categorized as small as defined by the Small Business Administration (SBA). Since the EQR is required by a range of filers, there was also a range in number of employees due to the type of power generation, transmission, or distribution. The employee totals ranged from 250 employees (e.g., solar) to 1,000 employees (e.g., electric power distribution).

Using the random sample of 342 filers for Q2 2022, the Commission estimates 143 entities would be considered small as defined by SBA regulations. In fact, all of the small entities in our analysis fall either under the 250 employee threshold or are unknown, in which case, we assume they are small entities. Furthermore, the Commission estimates that 199 entities would surpass the small business threshold according to the SBA standards. Respectively, out of the

Commission's random sample, approximately 42 percent of respondents would be considered small and 58 percent, the majority of the respondents, would not be considered small. The Commission considers these estimates to continue to be relevant.

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

The quarterly information in the EQR provides the Commission and the public with updated and timely information regarding a company's wholesale electricity and transmission sales. Quarterly filings allow for regular and consistent review of the market and strengthen the Commission's ability to ensure that public utility rates are just, reasonable, and not unduly discriminatory. If the collection were conducted less frequently, the Commission would have difficulty performing its mandated oversight and review responsibilities.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances.

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

Commission staff conducts regular outreach with the filing community. Outreach efforts range from assistance with required filings to researching more complex filer issues. Commission staff conducts EQR User Group meetings and/or technical conferences to discuss various aspects of the EQR program. EQR meetings and technical conferences are generally attended by several hundred participants. The meetings and conferences promote dialog between staff and the filing community and raise attention to filer concerns.

The Commission also solicited comments on the NOPR which was published in the Federal Register on 10/27/2023 (88 FR 73784). FERC received 15 comments which are all available through the Commission's eLibrary system at <https://elibrary.ferc.gov/eLibrary/search> by searching for the docket number RM23-9-000 across all date ranges.

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts to respondents of the FERC-920.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

The information contained in the FERC-920 information collection 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

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.

There are no questions of a sensitive nature that are considered private in the FERC-920 information collection.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The estimated burden¹⁰ and cost¹¹ (rounded) for the reporting requirements follow.

Respondent Sellers

The final rule requires sellers to adapt to two primary changes that will result in additional burden in years 1 through 3 after system implementation: 1) adopting the modified Data Dictionary; and 2) transitioning to XBRL-CSV. The burden associated with these changes is separate from and in addition to the base burden of collecting and reporting information in the EQR.

One-time Submission Burden due to Adopting Data Dictionary

The compliance burden for adopting the modified Data Dictionary shown in Table No. 1 includes the time required to review the modified Data Dictionary and comply with the modifications of the data fields. FERC anticipates that the burden will vary significantly across respondents with an average estimated burden of 7.6 hours per year. This is in addition to the base burden of 18.1 hours per quarter, or 72 hours per year, for collecting and reporting information, which is not impacted by this final rule.

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>.

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 5 C.F.R. § 1320.3.

¹¹ The proposed rule will affect entities required to file an EQR and RTOs/ISOs. The estimated hourly cost is based on FERC's 2025 Commission-wide average salary cost (salary plus benefits) of \$103/hour. The Commission staff believes the FERC full-time equivalent (FTE) average cost for wages plus benefits is representative of the corresponding cost for the industry respondents.

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Table No. 1 - Changes in Burden for the Data Collected Due to Modification of Data Fields and Associated Requirements

No.	Formula	Incremental Burden Category	Current	Updated Total for the Data Collected in the EQR	Difference Between Current and Updated Total
(a)		Number of Respondents ¹²	3,672	3,672	0
(b)		Annual Number of Responses per Respondent	4	4	0
(c)	(a)(b) = (c)	Total Annual Number of Responses	14,688	14,688	0
(d)		Average Burden Hours per Response ¹³	18.1	20.0	1.9
(e)		Hourly Cost per Response	\$103	\$103	\$0
(f)	(b)(d) = (f)	Total Annual Burden Hours per Respondent ¹⁴	72	80	8
(g)	(d)(e) = (g)	Total Burden Cost per Response	\$1,864	\$2,060	\$196
(h)	(b)(g) = (h)	Total Annual Burden Cost per Respondent	\$7,457	\$8,240	\$783
(i)	(a)(f) = (i)	Total Annual Burden Hours for All Respondents	265,853	293,760	27,907
(j)	(e)(i) = (j)	Total Annual Burden Cost for All Respondents	\$27,382,859	\$30,257,280	\$2,874,421

¹² The Number of Respondents of 3,672 is based on the 2025 OMB inventory of respondents. The Number of Respondents of 3,672 is the total number of EQR filers as of Q2 2025, which matches the current OMB inventory.

¹³ The estimated increase in Average Burden Hours per Response of 1.9 hours is a weighted average estimate for Year 1 through Year 3.

¹⁴ The formulas shown in Table No. 1 apply solely to the columns labeled Current and Updated Total for the Data Collected in the EQR.

Short term Submission Burden – transition to XBRL reporting

This rule also includes short-term burden related to changing the submission format to XBRL-CSV. FERC estimates that the transition costs will be spread across three years, with the greatest amount required in Year 1 Q1, and lower amounts during Year 1 Q2-4. After Year 1, FERC estimates minor additional burden to transitioning to XBRL-CSV. After three years, FERC does not anticipate additional burden for adopting XBRL-CSV.

These tables reflect an overall increase in the burden estimates included in the NOPR based, in part, on comments received in response to the NOPR and further review of the costs associated with transitioning to XBRL-CSV. The Commission recognizes that the burden on an individual filer may differ from the estimated burden in this final rule because the burden estimates are based on an average of the burden for all EQR filers. EQR filers vary significantly in the size and scope of filings based, in part, on the size of the company and the number of quarterly transactions it must report to the EQR.

When the final rule is implemented, FERC projects that there will be three different types of submitters that:

- (1) submit EQRs using pre-formatted FERC Templates that adhere to the FERC EQR taxonomies;
- (2) create a submission system based on the XBRL-CSV standard, or
- (3) submit a response that indicates there was no change from the previous quarter.

FERC anticipates the burden for adopting XBRL will decrease over time. Detailed reporting burden for each approach is presented in Table Nos. 2-5 below.

Table 2 - One-Time Formatting Submission in XBRL-CSV for First Filing Quarter of First Year, Burden Estimate for Submission in XBRL-CSV

Row No.	Formula	Incremental Burden Category	Filers Using FERC Templates for Submissions (A)	Filers Creating Custom Submissions (B)	Filers with No Change to Submission (C)
(a)		Number of Respondents ¹⁵	2,203	918	551
(b)		Number of Responses per Respondent	1	1	1
(c)	(a)(b) = (c)	Total Number of Responses	2,203	918	551
(d)		Average Burden Hours per Response	10	40	1
(e)		Hourly Cost per Response	\$103	\$103	\$103
(f)	(b)(d) = (f)	Total Burden Hours per Respondent	10	40	1
(g)	(d)(e) = (g)	Total Burden Cost per Response	\$1,030	\$4,120	\$103
(h)	(b)(g) = (h)	Total Annual Burden Cost per Respondent	\$1,030	\$4,120	\$103
(i)	(a)(f) = (i)	Total 1st Quarter Burden Hours	22,030	36,720	551
(j)	(e)(i) = (j)	Total 1st Quarter Burden Cost	\$2,269,090	\$3,782,160	\$56,753

For the filers using the FERC Templates, the Total Burden Hours per Respondent for the first filing quarter of the first year would be 10 hours and would decrease to 4 hours on a quarterly basis for filing quarters 2 through 4 of the first year, as shown in Table Nos. 2 and 3. In each quarter of years 2 and 3, the estimated Average Burden Hours per Response is expected to decrease further to 1 hour, as shown in Table No. 4.

¹⁵ FERC estimates that 60 percent of Respondents would use the FERC Templates for submissions, 25 percent would create an XBRL-CSV submission, and 15 percent would have no change to their submission over the prior quarter.

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For filers creating custom XBRL-CSV submissions, the Total Burden Hours per Respondent would follow a similar downward quarterly trend over time. The Total Burden Hours per Respondent for filers creating their own XBRL-CSV submissions, decreases on a quarterly basis from 40 hours in the first quarter of Year 1 (Table No. 2, row (f)), to 18 hours for the three remaining filing quarters of Year 1 (Table No. 3, row (p)), and Total Annual Burden Hours per Respondent of 4 hours per year in Years 2 through 3 (Table No. 4, row (D)).

For filers that make a submission with no change to the data from the previous quarter, the Average Burden Hours per Response is estimated to be 1 hour for each quarter of year 1 (Table Nos. 2-3) and .25 hours per quarter in Years 2-3 (Table No. 4, row (x)).

Table 3 - Burden Estimate for Second, Third, and Fourth Filing Quarters of First Year Submission in XBRL-CSV

Row No.	Formula	Burden Category	Filers Using FERC Templates for Submissions	Filers Creating Custom Submissions	Filers with No Change to Submission
			(A)	(B)	(C)
(k)		Number of Respondents	2,203	918	551
(l)		Number of Responses per Respondent for Quarters 2, 3, and 4 of First Year	3	3	3
(m)	(k)(l) = (m)	Total Number of Responses for Quarters 2, 3, and 4 of First Year	6,609	2,754	1,653
(n)		Average Burden Hours Per Response	4	6	1
(o)		Hourly Cost Per Response	\$103	\$103	\$103
(p)	(l)(n) = (p)	Total Burden Hours per Respondent	12	18	3
(q)	(n)(o) = (q)	Total Burden Cost per Response	\$412	\$618	\$103
(r)	(l)(q) = (r)	Total Annual Burden Cost per Respondent	\$1,236	\$1,854	\$309
(s)	(k)(p) = (s)	Total Burden Hours for Quarters 2-4 of First Year	26,436	16,524	1,653
(t)	(o)(s) = (t)	Total Burden Cost for Quarters 2-4 of First Year	\$2,722,908	\$1,701,972	\$170,259

Table 4 - Years 2 & 3 Annual Burden Estimate for Submission in XBRL-CSV

Row No.	Formula	Burden Category	Filers Using FERC Templates for Submissions	Filers Creating Custom Submissions	Filers with No Change to Submission
			(A)	(B)	(C)
(u)		Number of Respondents	2,203	918	551

(v)		Annual Number of Responses Per Respondent	4	4	4
(w)	(u)(v) = (w)	Total Annual Number of Responses	8,812	3,672	2,204
(x)		Average Burden Hours Per Response	1	1	0.25
(y)		Hourly Cost Per Response	\$103	\$103	\$103
(z)	(x)(y) = (z)	Total Burden Cost per Response	\$103	\$103	\$26
(D)	(v)(x) = (D)	Total Annual Burden Hours per Respondent	4	4	1
(E)	(D)(y) = (E)	Total Annual Burden Cost per Respondent	\$412	\$412	\$103
(F)	(x)(w) = (F)	Total Annual Burden Hours for All Respondents	8,812	3,672	551
(G)	(F)(y) = (G)	Total Annual Burden Cost for All Respondents	\$907,636	\$378,216	\$56,753

Table 5 - Summary of Burden for Formatting Submissions in XBRL-CSV for Filing Years 1 through 3

Row No.	Formula	Description	Totals
(H)	$(iA) + (iB) + (iC) + (sA) + (sB) + (sC) + 2((FA) + 2(FB) + 2(FC)) = (H)$	Three-Year Total Burden Hours	129,984
(I)	$(H)/3 = (I)$	Average Burden Hours Per Year (forecast through third year)	43,328
(J)		Hourly Cost	\$103
(K)	$(H)(J) = (K)$	Three-Year Total Burden Cost	\$13,388,352
(L)	$(K)/3 = (L)$	Average Annual Total Burden Cost (forecast through third year)	\$4,462,784

RTO/ISO – Transaction Data Reports

In addition to the modified Data Dictionary and adoption of the XBRL-CSV standard, the final rule requires RTOs/ISOs to produce and make available transaction data reports that adhere to the FERC EQR taxonomies for use by their market participants in submitting EQRs. Table Nos. 6 through 8 estimate the burden on RTOs/ISOs to produce these reports and make them available to their market participants. Table No. 6 outlines the burden estimate for RTOs/ISOs and includes the one-time burden to implement this proposed requirement in the first year. Specifically, for RTOs/ISOs that currently make available transaction data reports to their market participants, the first year’s Total Burden Hours per Respondent to create XBRL-CSV formatted reports, as shown in Row (g), Column (A) of Table No. 6, is estimated to be 80 hours. For RTOs/ISOs that do not currently make available transaction data reports to their market participants, the first year’s Total Burden Hours per Respondent is estimated to be 800 hours, as shown in Row (g), Column (B) of Table No. 6. Table No. 7 reflects 36 hours as Average Annual Burden Hours per Response for Years 2-3.

Table 6 - Burden Estimate for developing the RTO/ISO Reports

Row No.	Formula	Burden Category	RTOs/ISOs With Existing Transaction Data Reports (A)	RTOs/ISOs Without Existing Transaction Data Reports (B)
(a)		Number of Respondents	5	1
(b)		Response per Respondent to Incorporate New System Requirements	1	1
(c)	$(a)(b) =$	Total Number of	5	1

	(c)	Responses		
(d)		Average Burden Hours per Response	80	800
(e)		Hourly Cost per Response	\$103	\$103
(f)	(d)(e) = (f)	Total Burden Cost per Response	\$8,240	\$82,400
(g)	(b)(d) = (g)	Total Burden Hours per Respondent	80	800
(h)	(g)(e) = (h)	Total Burden Cost per Respondent	\$8,240	\$82,400
(i)	(a)(g) = (i)	Total Annual Burden Hours for All Respondents	400	800
(j)	(i)(e) = (j)	Total Annual Burden Cost	\$41,200	\$82,400

Annual Burden Estimate for RTO/ISO Reports, Forecasted for Years 2 and 3
Table No. 7

Row No.	Formula	Burden Category	All RTO/ISO (E)
(k)		Number of Respondents	6
(l)		Annual Number of Responses per Respondent	1
(m)	(k)(l) = (m)	Total Number of Responses	6
(n)		Average Burden hours per Response	36
(o)		Hourly Cost per Response	\$103
(p)	(n)(o) = (p)	Total Burden Cost per Response	\$3,708
(q)	(l)(n) = (q)	Total Annual Burden Hours per Respondent	36
(r)	(l)(p) = (r)	Total Burden Cost per Respondent	\$3,708
(s)	(k)(q) = (s)	Total Annual Burden Hours	216
(t)	(o)(s) = (t)	Total Annual Burden Cost	\$22,248

Summary of Burden for All RTOs/ISOs for Years 1 through 3
Table No. 8

Row No.	Formula	Burden Category	Totals
(u)	(iA) + (iB) + 2(sE) = (u)	Three-Year Total Burden Hours	1,632
(v)	(v) = (u)/3	Average Burden Hours Per Year	544
(w)		Hourly Cost	\$103
(x)	(u)(w) = (x)	Three-Year Total Burden Cost	\$168,096
(y)	(y) = (x)/3	Average Annual Total Burden Cost	\$56,032

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no costs which are not related to burden hours. Cost burdens are explained in Questions 12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Commission bases its cost estimate of the “Analysis and Processing of filings” to the Federal Government 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 Paperwork Reduction Act of 1995 (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.

The estimated annual federal cost (rounded) related for FERC-920 follows:

	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of filings ¹⁶	3.5	\$749,326
PRA Administrative Cost ¹⁷		\$7,978
FERC Total		\$757,304

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

The final rule in Docket No. RM23-9-000 will result in an increase in burden for market participants during the adoption of the modified Data Dictionary and implementation of the XBRL-CSV standard. However, FERC anticipates that the modernized collection method will reduce the burden on filers over time.

¹⁶ Based upon FERC’s 2025 average wages plus benefits of one FTE (full-time equivalent) of \$214,093/year (or \$103/hour).

¹⁷ Based upon FERC’s 2025 estimated average annual PRA Administrative Cost of \$7,978.

FERC-920 (Electric Quarterly Report [EQR], OMB Control No. 1902-0255)
Final Rule in Docket No. RM23-9-000
RIN # 1902-AG11

Annual Burden For Respondents (Non-RTO/ISO)

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	14,688	14,688	-	0
Annual Time Burden (Hr.)	337,088	265,853	-	+71,235
EQR baseline reporting	265,853	265,853		0
Annual Time Burden Adopting modified Data Dictionary	27,907	0		+27,907
Annual Time Burden Adopting XBRL-CSV ¹⁸	43,328	0		+43,328
Annual Cost Burden (\$)	0	0		0

In addition, the final rule requires RTOs and ISOs to produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy.

Annual Burden for RTOs/ISOs in Response to Requirements in Final Rule

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	6	0	-	+6
Annual Time Burden (Hr.)	544	0	-	+544
Annual Cost Burden (\$)	0	0	-	0

The total burden associated with FERC-920 includes both the burden for respondents and for RTOs/ISOs.

¹⁸ ROCIS shows this as 43,330 due to rounding. The correct amount from the final rule is 43,328.

Summary – Annual Burden for FERC-920

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses ¹⁹	14,694	14,688	-	+6
Annual Time Burden (Hr.)	337,632	265,853	-	+71,779
Annual Cost Burden (\$)	0	0	-	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

The EQR submissions are made publicly available once submitted.

17. DISPLAY OF EXPIRATION DATE

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

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.

¹⁹ FERC has added information collections to describe the burden associated with adopting the modified data dictionary and for adopting the XBRL-CSV standard. While ROCIS shows responses associated with these information collections, this burden is incorporated into the existing responses. The correct number of annual responses is 14,694 including 14,688 for non-RTO/ISO Respondents, and 6 RTOs/ISOs must produce reports containing market participant transaction data in XBRL-CSV format that adhere to the FERC EQR taxonomy.