

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

The reporting and recordkeeping requirements for Reliability Standards TPL-001-5.1 (Transmission System Planning Performance Requirements), TPL-007-4 (Transmission System Planning Performance Requirements) TPL-008-1 (Transmission System Planning Performance Requirements for Extreme Temperatures Events)¹ are included in FERC-725N. The Federal Energy Regulatory Commission (Commission or FERC) is requesting that the Office of Management and Budget (OMB) approve the reporting and recordkeeping requirements in FERC-725N for a three year extension. The text of the reporting and recordkeeping requirements of Reliability Standards TPL-001-5.1, TPL-007-4, and TPL-008-1 are included in ROCIS and reginfo.gov under Supplementary Documents.

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.² 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 Federal Power Act (FPA),³ the Commission proposes to approve Reliability Standards TPL-001-5.1 (Transmission System Planning Performance Requirements), TPL-007-4 (Transmission System Planning Performance Requirements) TPL-008-1 (Transmission System Planning Performance Requirements for Extreme Temperatures Events).

Reliability Standard TPL-001-5.1 requires planning coordinators and transmission planners to establish Transmission system planning performance requirements within the planning horizon to develop a Bulk Electric System (BES) that will operate reliably over a broad spectrum of System conditions and following a wide range of probable Contingencies.

¹ 16 U.S.C. 824o(d)(2).

² 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.

³ 16 U.S.C. 824o(d)(2).

Reliability Standard TPL-007-4 (Transmission System Planning Performance Requirements). Reliability Standard TPL-007-4 requires owners and operators of the Bulk-Power System (“BPS”) to conduct initial and on-going vulnerability assessments of the potential impact of defined geomagnetic disturbance (“GMD”) events on BPS equipment and the BPS as a whole.

Reliability Standard TPL-008-1 requires planning coordinators and transmission planners to establish Transmission system planning performance requirements to develop a Bulk Power System (BPS) that will operate reliably during extreme heat and extreme cold temperature events.

The overall function of the NERC TPL (Transmission System Planning) standards is to establish mandatory performance requirements for the Bulk Electric System (BES). It ensures the grid is planned and developed to operate reliably under a broad spectrum of conditions, including normal operations and a wide range of probable contingencies

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

The purpose of Reliability Standard TPL-001-5.1 requires planning coordinators and transmission planners to establish Transmission system planning performance requirements within the planning horizon to develop a Bulk Electric System (BES) that will operate reliably over a broad spectrum of System conditions and following a wide range of probable Contingencies. These entities maintain System models within their respective areas for performing the studies needed to complete its Planning Assessment, which documented evaluation of future Transmission System performance and Corrective Action Plans to remedy identified deficiencies.

The purpose of proposed Reliability Standard TPL-007-4, which remains unchanged from prior versions of the standard, is to “[e]stablish requirements for Transmission system planned performance during geomagnetic disturbance (GMD) events.” The applicability of the proposed standard also remains unchanged from prior versions: the standard applies to registered: (1) Planning Coordinators and Transmission Planners whose planning areas have a Facility that includes a power transformer with a high side, wye-grounded winding with terminal voltage greater than 200 kV; and (2) Transmission Owners and Generator Owners that own a Facility that includes such equipment.

The purpose of Reliability Standard TPL-008-1 requires planning coordinators and transmission planners to establish Transmission system planning performance

requirements to develop a Bulk Power System (BPS) that will operate reliably during extreme heat and extreme cold temperature events. This effort documents evaluation of future Bulk Electric System performance for extreme heat and extreme cold benchmark temperature events and creation of corrective action plans.

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.

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 508.⁴

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

For TPL-001-5.1 if this standard and the associated information collection requirements did not exist or were performed less frequently, it would result in failure to maintain System models within their respective areas for performing the studies needed to complete its Planning Assessment. With inaccurate studies the bulk-electric system efficient operations would be in jeopardy and may lead to potential system events.

For TPL-007-4, 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.

For TPL-008-1, if this standard and the associated information collection requirements did not exist or were performed less frequently the extreme temperature assessment may not be accurately performed every five years and the coordination of across entities could impact the reliability of the bulk electric system leading to entities not being able to manage system operations in periods of extreme weather.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to the Reliability Standards TPL-001-5.1, TPL-007-4 and TPL-008-1.

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

⁴ Details 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 notice⁵ and a 30-day notice⁶ to the public regarding this information collection on 3/4/2026 and 5/29/2026 respectively. Within the public notices, the Commission noted that it would be requesting a three-year extension of the public reporting burden. 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

For each TPL Reliability Standard the number of respondents has been reviewed using the NERC Compliance Registration information of February 9, 2026, for unique US

⁵ 91 FR 10592

⁶ 91 FR 32035

entities. With this renewal, the tables more accurately represent the entities on a yearly basis who have to comply.

The entities with responsibility for these standards include planning coordinators (PC=60), transmission planners (TP=210), generator owners (GO=1,354) and transmission owners (TO=341) and the entity count represents only unique US entities.

The Commission estimates the burden⁷ and cost⁸ as follows:

Annual Collection TPL-001-5.1 FERC 725N					
Reliability Standard or Process	Type and Number of Entities⁹ (1)	Annual Number of Responses per Entity (2)	Total Number of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost (\$) Per Response (4)	Total Annual Burden Hours & Cost (\$) (rounded) (3)*(4)=(5) rounded
Annual review and record retention	60 (PC)	1	60	148 hrs.; \$9,400.96	8,880 hrs.; \$ 564,057.60
	210 (TP)	1	210	48 hrs.; \$3,048.96	10,080 hrs.; \$640,281.60
TOTAL for TPL-001-5.1			270		18,960 hrs.; \$1,204,339

⁷ “Burden” is the total time, effort, or financial resources expended by persons to generate, maintain, retain, or 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 CFR § 1320.3.

⁸ The estimated hourly cost (salary plus benefits) is a combination of the following categories from the BLS website, http://www.bls.gov/oes/current/naics2_22.htm: 75% of the average of an Electrical Engineer (17-2071) \$71.19/hr., x .75 = 53.3925 (\$53.39-rounded) (\$53.39/hour); and 25% of an Information and Record Clerk (43-4199) \$40.51/hr., \$40.51 x .25 = 10.1275 (\$10.13 rounded) (\$10.13/hour), for a total (\$53.39+ \$10.13 = \$63.52/hour).

⁹ The “Number of Entity” data is compiled from the February 9, 2026, edition of the NERC Compliance Registry. “TP” means transmission planner; “PC” means planning coordinator.”

Annual Collection TPL-007-4 FERC 725N					
Reliability Standard or Process	Type and Number of Entities ¹²¹² (1)	Annual Number of Responses per Entity (2)	Total Number of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost (\$) Per Response (4)	Total Annual Burden Hours & Cost (\$) (rounded) (3)*(4)=(5) rounded
Annual review and record retention	1,354 (GO)	1	1,354	40 hrs.; \$2,540.80	54,160 hrs.; \$3,440,243
	60 (PC)	1	60	40 hrs.; \$2,540.80	2,400 hrs.; \$ 152,448
	210 (TP)	1	210	40 hrs.; \$2,540.80	8,400 hrs.; \$533,568
	341 (TO)	1	341	40 hrs.; \$2,540.80	13,640 hrs.; \$866,413
TOTAL for TPL-007-4			1,965		78,600 hours; \$4,992,672

Annual Collection TPL-008-1 FERC 725N					
Reliability Standard or Process	Type and Number of Entities ¹³¹ ³ (1)	Annual Number of Responses per Entity (2)	Total Number of Responses (1)*(2)=(3)	Average Burden Hrs. & Cost (\$) Per Response (4)	Total Annual Burden Hours & Cost (\$) (rounded) (3)*(4)=(5) rounded

¹²¹² The “Number of Entity” data is compiled from the February 9, 2026, edition of the NERC Compliance Registry. “TP” means transmission planner; “GO” means generator owner; “PC” means planning coordinator; “TO” means transmission owner.”

¹³¹³ The “Number of Entity” data is compiled from the February 9, 2026, edition of the NERC Compliance Registry. “PC” means planning coordinator; “TP” means transmission planner.”

Annual review and record retention	60 (PC)	1	60	88 hrs.; \$5,589.76	5,280hrs.; \$ 335,386
	210 (TP)	1	210	56 hrs.; \$3,557.12	11,760hrs.; \$764,995
TOTAL for TPL-008-1			270		17,040 hrs.; \$1,082,381

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 this collection are associated with burden hours (labor) and described in Questions #12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

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 ¹⁴¹⁴	0	\$8,404
FERC Total		\$8,404

¹⁴¹⁴ Based upon FERC's 2022 estimated average annual PRA Administrative Cost: \$7,694.

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 reflect the ongoing burden that should be the entire inventory for TPL-001-5.1 TPL-007-4, and TPL-008-1. Changes in Burden are due to normal fluctuations, and the burden estimates 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	2,505	2,233	272	0
Annual Time Burden (Hr.)	114,600	130,918	-16,318	0
Annual Cost Burden (\$)	0	0	0	0

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