

Supporting Statement for
FERC-725U, Mandatory Reliability Standards: Reliability Standard CIP-014
(Three-year approval for extension requested)

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review the information collection requirements in FERC-725U under OMB Control No. 1902-0274. This supporting statement covers the requirements of the FERC-725U information collection. The reporting requirements in the FERC-725U are also contained in FERC's regulations in 18 Code of Federal Regulations (CFR) Part 40. FERC is also updating information associated with other NERC Reliability Standards that fall under FERC-725U.

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 (EPAct 2005), was enacted into law. EPAct 2005 added a new Section 215 to the Federal Power Act (FPA)¹, 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. In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO pursuant to FPA section 215.²

Reliability Standard CIP-014-1 (inactive as of 10/1/2015)

On 11/20/2014, FERC issued an order³ approving Reliability Standard CIP-014-1. Reliability Standard CIP-014-1 enhanced physical security measures for the critical Bulk-Power System facilities and lessened the overall vulnerability of the Bulk-Power System against physical attacks.

Reliability Standard CIP-014-2 (inactive as of 6/16/2022)

On 7/14/2015, FERC issued a letter order approving Reliability Standard CIP-014-2 (the current version of the Reliability Standard). Reliability Standard CIP-014-2 modified Reliability Standard CIP-014-1 by removing the term "widespread" from Requirement R1. Removing the term ensured that:

- Applicable entities identify appropriate critical facilities under Requirement R1, and
- The electric reliability organization enforces the CIP-014-2 Reliability Standard in a more consistent manner.

¹ 16 U.S.C. 824o.

² North American Electric Reliability Corp., 116 FERC ¶ 61,062, order on reh'g & compliance, 117 FERC ¶ 61,126 (2006), aff'd sub nom. Alcoa, Inc. v. FERC, 564 F.3d 1342 (D.C. Cir. 2009).

³ Order No. 802 (79 FR 70069, 11/25/2014)

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

Section 215 and Mandatory Reliability Standards

Section 215 of the Federal Power Act (FPA) requires a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. The ERO is obligated to file each Reliability Standard or modification to a Reliability Standard that it proposes to be made effective with the Commission.⁴ Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.⁵ Pursuant to section 215 of the FPA, the Commission established a process to select and certify an ERO,⁶ and subsequently certified NERC.⁷

CIP-014-3

In terms of information collection requirements, an applicable entity must create or maintain documentation showing compliance, when appropriate, with each requirement of the Reliability Standard. Reliability Standard CIP-014-3 has six requirements:

- Requirement R1 requires applicable transmission owners (TO) to perform risk assessments on a periodic basis⁸ to identify their transmission stations and transmission substations that, if rendered inoperable or damaged, could result in widespread instability, uncontrolled separation, or cascading within an Interconnection. Requirement R1 also requires transmission owners to identify the primary control center that operationally controls each of the identified transmission stations or transmission substations.

Examples of acceptable evidence may include dated written or electronic documentation

⁴ 16 U.S.C. 824o(d)(1).

⁵ Id. 824o(e).

⁶ Rules Concerning Certification of the Elec. Reliability Org.; & Procedures for the Establishment, Approval, & Enforcement of Elec. Reliability Standards, Order No. 672, 114 FERC ¶ 61,104, order on reh'g, Order No. 672-A, 71 FR 19814 (April 18, 2006), 114 FERC ¶ 61,328 (2006).

⁷ N. Am. Elec. Reliability Corp., 116 FERC ¶ 61,062, order on reh'g and compliance, 117 FERC ¶ 61,126 (2006), aff'd sub nom. Alcoa, Inc. v. FERC, 564 F.3d 1342 (D.C. Cir. 2009).

⁸ The frequency is detailed in the Reliability Standard. For example, R1 states in part:

“1.1 Subsequent risk assessments shall be performed:

At least once every 30 calendar months for a Transmission Owner that has identified in its previous risk assessment (as verified according to Requirement R2) one or more Transmission stations or Transmission substations that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection; or

At least once every 60 calendar months for a Transmission Owner that has not identified in its previous risk assessment (as verified according to Requirement R2) any Transmission stations or Transmission substations that if rendered inoperable or damaged could result in widespread instability, uncontrolled separation, or Cascading within an Interconnection.

1.2. The Transmission Owner shall identify the primary control center that operationally controls each Transmission station or Transmission substation identified in the Requirement R1 risk assessment. “

of the risk assessment of its transmission stations and transmission substations (existing and planned to be in service within 24 months) that meet the criteria in Applicability Section 4.1.1 as specified in Requirement R1.

- Requirement R2 requires that each applicable transmission owner have an unaffiliated third-party with appropriate experience verify the risk assessment performed under Requirement R1. Requirement R2 states that the transmission owner must either modify its identification of facilities consistent with the verifier's recommendation or document the technical basis for not doing so. In addition, Requirement R2 requires each transmission owner to implement procedures for protecting sensitive or confidential information made available to third-party verifiers or developed under the Reliability Standard from public disclosure. Examples of acceptable evidence may include dated written or electronic documentation that the transmission owner completed an unaffiliated third-party verification of the Requirement R1 risk assessment and satisfied all of the applicable provisions of Requirement R2, including, if applicable, documenting the technical basis for not modifying the Requirement R1 identification as specified under Part 2.3.
- Requirement R3 requires the transmission owner to notify a transmission operator (TOP) that operationally controls a primary control center identified under Requirement R1 of such identification to ensure that the transmission operator has notice of the identification so that it may timely fulfill its obligations under Requirements R4 and R5 to protect the primary control center. Examples of acceptable evidence may include dated written or electronic communications that the transmission owner notified each transmission operator, as applicable, according to Requirement R3.
- Requirement R4 requires each applicable transmission owner and transmission operator to conduct an evaluation of the potential threats and vulnerabilities of a physical attack on each of its respective transmission stations, transmission substations, and primary control centers identified as critical in Requirement R1. Examples of evidence may include dated written or electronic documentation that the transmission owner or transmission operator conducted an evaluation of the potential threats and vulnerabilities of a physical attack to their respective transmission station(s), transmission substation(s) and primary control center(s) as specified in Requirement R4.
- Requirement R5 requires each transmission owner and transmission operator to develop and implement documented physical security plans that cover each of their respective transmission stations, transmission substations, and primary control centers identified as critical in Requirement R1. Examples of evidence may include dated written or electronic documentation of its physical security plan(s) that covers their respective identified and verified transmission station(s), transmission substation(s), and primary control center(s) as specified in Requirement R5, and additional evidence demonstrating implementation of the physical security plan.
- Requirement R6 requires that each transmission owner and transmission operator subject to Requirements R4 and R5 have an unaffiliated third-party with appropriate experience

review its Requirement R4 evaluation and Requirement R5 security plan. Requirement R6 states that the transmission owner or transmission operator must either modify its evaluation and security plan consistent with the recommendation, if any, of the reviewer or document its reasons for not doing so. In addition, Requirement R6 requires each transmission owner to implement procedures for protecting sensitive or confidential information made available to third-party reviewers or developed under the Reliability Standard from public disclosure. Examples of evidence may include written or electronic documentation that the transmission owner or transmission operator had an unaffiliated third-party review the evaluation performed under Requirement R4 and the security plan(s) developed under Requirement R5 as specified in Requirement R6 including, if applicable, documenting the reasons for not modifying the evaluation or security plan(s) in accordance with a recommendation under Part 6.3.

Evidence Retention

Transmission owners and transmission operators must keep data or evidence to show compliance with the standard for three years unless directed by its Compliance Enforcement Authority. If a responsible entity is found non-compliant, it must keep information related to the non-compliance until mitigation is complete and approved, or for the three years, whichever is longer.

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

This collection does not require industry to file the information with the Commission. However, FERC-725U does contain information collection and record retention requirements for which using current technology is an option.

The information technology to meet the information collection requirements is not specifically covered in the Reliability Standard.

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 Commission periodically reviews filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. The Commission is unaware of any other source of information related to bulk-electric system physical security.

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

In general, small entities may reduce their burden by taking part in a joint registration organization or a coordinated functional registration. These options allow a small entity to share the compliance burden with other entities and, thus, to minimize their own compliance burden. Detailed information regarding these options is available in NERC's Rule of Procedure at Sections 507 and 508.⁹

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

The paperwork requirements are related with documenting compliance with substantive requirements (including the preparation of a physical security plan) and maintaining such documents. The frequency of the paperwork requirements was vetted and approved by industry consensus in the NERC standard development process and is ultimately meant to support the reliability of the bulk electric system.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances related to the FERC-725U information collection.

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

The ERO process to establish Reliability Standards is a collaborative process with the ERO, Regional Entities, and other stakeholders developing and reviewing drafts and providing comments.¹⁰ The NERC-approved Reliability Standards were then submitted by NERC to the FERC for review and approval.

In accordance with OMB requirements, the Commission published a 60-day notice¹¹ and a 30-day notice¹² to the public regarding this information collection on 5/27/2026 and 8/19/2026 respectively. The Commission received no comments from the public in response to either published notice regarding the FERC-725U information collection.

⁹ http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20161031.pdf

¹⁰ Details of the ERO standards development process are available on the NERC website at http://www.nerc.com/pa/Stand/Documents/Appendix_3A_StandardsProcessesManual.pdf.

¹¹ 91 FR 31449

¹² 91 FR 53612

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

There are no gifts or payments given to the respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rules of Procedure,¹³ "...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 collected under the Reliability Standard to FERC. Rather, they maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

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

The number of respondents below is based on an estimate of the NERC compliance registry for transmission owners and transmission operators. The Commission based its paperwork burden estimates on the NERC compliance registry as of April 20, 2026. According to the registry, there are 326 transmission owners and 18 transmission operators who are not registered as transmission owners. The estimate is based on a zero change in burden from the current standard (removal of C.1.1.4) to the standard approved in this Order. The Commission based the burden estimate on staff experience, knowledge, and expertise.

For the new Reliability Standard CIP-014-3, the burden for entities remains the same as they will still need to provide the same evidence to demonstrate compliance whether it is kept on-site or loaded electronically into the SEL. No comments were received that expressed a change in the manhour burden associated with the use of SEL.

Burden Estimates: The Commission estimates the following in the annual public reporting burden and cost¹⁴ as indicated below:

¹³ Section 1502, Paragraph 2, available at NERCs website.

¹⁴ 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 =

FERC-725U: (Mandatory Reliability Standards: Reliability Standard CIP-014)						
	Number of Respondents¹⁵ (1)	Number of Responses per Respondent (2)	Total Number of Responses (1) * (2) = (3)	Average Burden Hours & Cost Per Response (4)	Total Burden Hours & Total Cost (3) * (4) = (5) (rounded)	Average Cost per Respondent (5) ÷ (1)
Change Annual Reporting and Recordkeeping	341 (TO)	1	341	32 hrs.; \$2,032.64	10,912 hrs.; \$693,130	32 hrs.; \$2,032.64
	170 (TOP)	1	170	32 hrs.; \$2,032.64	5,440 hrs.; \$345,549	32 hrs.; \$2,032.64
TOTAL FERC-725U			511		16,352 hrs.; \$1,038,679	

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no start-up or other non-labor costs.

Total Capital and Start-up cost: \$0

Total Operation, Maintenance, and Purchase of Services: \$0

All of the costs related to the FERC-725U information collection are associated with burden hours (labor) and described in Questions #12 and #15 in this supporting statement.

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 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.

\$63.52/hour).

15 The number for TOs (341) and TOPs (170) represent the number of unique US entities and is taken from the NERC compliance registry information as of April 20, 2026.

The estimated annualized cost to the Federal Government for FERC-725U follows:

FERC-725U- CIP standards	Number of Employees (FTEs)	Estimated Annual Federal Cost
FERC-725U Analysis and Processing of filings	0	\$0
Paperwork Reduction Act Administrative Cost ¹⁶		\$8,404
TOTAL		\$8,404

Based on the above table, the total federal cost for FERC-725U is \$8,404.

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

Each requirement (including record-keeping requirements) in CIP-014-3 have been updated to reflect the hours and responses.¹⁷ A increase of 167 in responses and increase of 5,098 in burden hours. In the “previous approved” an older version with 344 respondents accounts for the overlap where an entity is both a transmission owner and transmission operator. In the current request with listing each entity function individually such as 341 (TOs) and 170 (TOPs) as explained in the table. This updated approach allows for better tracking of number respondents, avoidance of double counting and when adjustments are made to a standard it is cleaner and more accurate to update when only certain entities are affected and others are not.

FERC-725U	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	511	344	+167	0
Annual Time Burden (Hr.)	16,352	11,254	+5,098	0
Annual Cost Burden (\$)	\$0	\$0	\$0	\$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There is no tabulating, statistical or tabulating analysis or publication plans for the collection of information.

¹⁶ The PRA Administrative Cost is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act (PRA) for rulemakings, orders, or any other vehicle used to create, modify, extend, or discontinue an information collection. This average annual cost includes requests for extensions, all associated rulemakings, and other changes to the collection.

¹⁷ The hourly burden for each CIP-014-3 requirement was established/approved in CIP-014-3

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.