FERC Form 549D (OMB Control No. 1902-0253)
Docket No. IC26-41-000

Supporting Statement

FERC Form No. 549D: Quarterly Transportation and Storage Report for Intrastate Natural Gas and Hinshaw Pipelines

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the FERC Form No. 549D (Quarterly Transportation and Storage Report for Intrastate Natural Gas and Hinshaw Pipelines) for a three-year period under OMB Control Number 1902-0253. FERC-549D is an existing data collection.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

The reporting requirements under FERC Form No. 549D[1] set forth the Commission's policies in accordance with the general authority in Section 1(c) of the Natural Gas Act (NGA)[2], and Section 311 of the Natural Gas Policy Act of 1978 (NGPA).[3]

Subpart C of the Commission's open access regulations[4] includes the provisions of NGPA Section 311 concerning transportation by intrastate pipelines. 18 C.F.R. § 284.224 provides for the issuance of blanket certificates to Hinshaw pipelines to provide open access transportation service to the same extent and in the same manner as intrastate pipelines authorized to perform such service by Subpart C. Further, the Commission finds that certain types of additional information should be published in order to enable shippers, other market participants, and for the Commission to determine the extent to which particular transactions are comparable to one another (a prerequisite for determining the rights of similarly situated shippers and for detecting undue discrimination). The Commission has not imposed on intrastate pipelines. All of Part 284 requirements imposed on interstate pipelines[5] remain consistent with the NGPA's goal of encouraging intrastate pipelines to provide interstate service.

1 18 C.F.R. § 284.126
2 15 U.S.C. 717-817w
3 15 U.S.C. 3301-3432
4 18 C.F.R. Part 284
5 Associated Gas Distributors v. FERC, 824 F.2d 981, 1002-1003 (D.C, Cir. 1987) (AGD); Mustang Energy Corp. v. Federal Energy Regulatory Commission, 859 F.2d 1447, 1457 (10th Cir. 1988), cert. denied, 490 U.S. 1019 (1988); see also EPGT Texas Pipeline, 99 FERC ¶ 61,295 (2002).

The requirement of Section 311 intrastate and Hinshaw pipelines to report this additional information concerning each transaction makes the reporting requirements for those pipelines more comparable to the transactional posting requirements for interstate pipelines. Section 284.13(b)(1) requires interstate pipelines to post similar information concerning contract rates, duration, receipt and delivery points, entitlements to service, and affiliate relationships.[6] Most of the remaining information which Section 284.13(b) requires interstate pipelines to post is not required of Section 311 or Hinshaw pipelines to report.

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

This collection promotes transparency by collecting and making available intrastate and Hinshaw pipeline transactional information. The Commission collects the data upon a standardized form with all requirements outlined in 18 C.F.R. § 284.126.

The FERC Form No. 549D collects the following information:

- Full legal name and identification number of the shipper receiving service, including whether the pipeline and the shipper are affiliated;
- Type of service performed;
- The rate charged under each contract;
- The primary receipt and delivery points for each contract;
- The quantity of natural gas the shipper is entitled to transport, store, or deliver for each transaction;
- The duration of the contract, specifying the beginning and (for firm contracts only) ending month and year of current agreement;
- Total volumes transported, stored, injected or withdrawn for the shipper; and
- Annual revenues received for each shipper excluding revenues from storage services.

Filers submit Form No. 549D on a quarterly basis. The data requirements help the Commission to carry out its responsibilities under both the NGA and the NGPA to monitor the activities and evaluate transactions of the natural gas industry to ensure competitiveness and to assure the improved efficiency of the industry's operations. The Commission's Office of Energy Market Regulation, Office of Enforcement and Regulatory Accounting, and the Office of the General Counsel use the data in rate proceedings to review rate and tariff changes by natural gas companies for the transportation of gas, for general industry oversight, and to supplement the

6 See 18 C.F.R. § 284.13(b)(1)(ii), (iv), (v), and (vii) and (2)(iv)(v)(vi) and (ix).

documentation used during the Commission's audit process.

The Commission would be unable to monitor and evaluate transactions and operations of interstate pipelines and perform its regulatory functions without collecting this data.

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

The Commission has implemented the capability and requirement for electronic tariff filings. Further, the Commission has improved the security for submitting electronic tariff filings. In addition, the Commission has improved the pipelines' online process of appointing and modifying agents with the authority to make an electronic tariff filing on the pipeline's behalf.

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.

Commission filings 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 to identify duplication. No duplication of the information collection requirements has been found.

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

The Small Business Administration's (SBA) Office of Size Standards develops the numerical definition of a small business as matched to North American Industry Classification System Codes (NAICS). The SBA (in 13 CFR 121.201) has established a size standard for pipelines transporting natural gas, currently stating that a firm is a small entity if its total annual receipts (in combination with its affiliates) are $41.5 million or less.[7]

The Commission is not imposing on NGPA section 311 and Hinshaw pipelines the same reporting requirements as it imposes on interstate pipelines. FERC is not requiring the NGPA section 311 and Hinshaw pipelines to make daily postings of transactional

7 U.S. Small Business Administration, Table of Small Business Size Standards for Pipeline Transportation of Natural Gas, NAICS Code 486210, Subsector 486 at 13 CFR 121.201.

information on their own websites. The Commission also recognizes that some respondents (with few transactions) may prefer to use PDF rather than XML. However, other respondents with a large number of transactions and experience with XML would probably prefer to use XML. As a result, the Commission will allow respondents to select the method of filing (XML or PDF) that is most appropriate to their circumstances.

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

By requiring NGPA section 311 and Hinshaw pipelines to submit quarterly transactional reports that contain similar information required of interstate pipelines, the Commission aims to enhance transparency while avoiding the imposition of unduly burdensome obligations on these entities. The quarterly reporting frequency under 18 C.F.R. § 284.126(b) ensures that shippers and the Commission receive timely, relevant, and more meaningful insight into the transactions conducted by NGPA section 311 and Hinshaw pipelines.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

The FERC Form No. 549D presents no special circumstances.

8. 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 a 60-day notice[8] and a 30-day notice[9] in Docket No. IC26-41-000 to the public regarding this information collection. 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

There are no payments or gifts made or given to respondents associated with the FERC Form No. 549D.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO

8 91 FR 41629, July 7, 2026

9 91 FR 58428, September 15, 2026

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RESPONDENTS

The Commission does not consider the information collected in FERC Form No. 549D filings to be confidential. There are no confidentiality provisions associated with the data requirements of FERC Form No. 549D.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE THAT ARE CONSIDERED PRIVATE.

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

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

Estimate of Annual Burden:[10] The Commission estimates the estimated annual burden and cost[11] for this information collection, as follows:

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	Number of Respondents (1)	**Average Annual Number of Responses per Respondent (2)**	**Average Annual Total Number of Responses (1) *(2) = (3)**	**Average Burden Hrs. & Cost ($) Per Response (4)**	**Total Annual Burden Hours & Total Annual Cost ($) (rounded) (3) *(4) = (5)**	**Cost per Respondent ($) (5) ÷ (1)**
PDF filings	134	2	268	12.5 hrs. $1,275	3,350 hrs. $341,700	$2,550
TOTAL			**268**		**3,350 hrs.; $341,700**	

10 The Commission defines burden as 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, reference 5 Code of Federal Regulations 1320.3.

11 The Commission staff estimates that the industry's hourly cost for wages plus benefits is similar to the Commission's $102.00 FY 2026 average hourly cost for wages and benefits.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There are no capital or start-up costs that are not associated with the burden hours. All of the costs are related to burden hours and are detailed in Questions #12 and #15.

14. ESTIMATE OF THE TOTAL ANNUAL COST TO FEDERAL GOVERNMENT

The estimate of the cost for ‘analysis and data processing of filings 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 collections. Thus using FERC’s Fiscal Year 2026 average cost per Full-Time Equivalent (salary plus benefits) of $213,003 per year (for 2,080 work hours).

The Paperwork Reduction Act (PRA) Administrative Cost of $8,404 is the average annual FERC cost associated with preparing supporting statements, notices, and other activities associated issuing, and submitting materials necessary to comply with the PRA for, 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 Hours or FTE’s	**Estimated Annual Federal Cost ($)**
PRA Administration Cost	-	$8,404
Data Processing and Analysis Cost	1	$213,003
Total		$221,407

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

The burden estimates associated with FERC-549D are presented in the following table as shown. There was an increase in the number of respondents from 120 to 134, and a decrease in the frequency from 4 to 2 causing a decrease in the number of responses to the reporting requirements yet a decrease in burden hours for this renewal.

	Total	**Previously**	**Change due**	**Change Due to**

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	Request	Approved	to Adjustment in Estimate	Agency Discretion
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Average Annual Number of Responses	268	480	-212	0
Average Annual Time Burden (Hr.)	3,350	6,000	-2,650	0
Annual Cost Burden ($)	$0	$0	$0	$0

16. TIME SCHEDULE FOR THE PUBLICATION OF DATA

There are no publication plans for the collection of information. The data are used for regulatory purposes only.

17. DISPLAY OF EXPIRATION DATE

The Commission collects FERC Form 549D data on a standard, preprinted form which displays the expiration date in the upper right-hand portion of each page of the form. The expiration date is also 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.