Supporting Statement for

FERC-725A, Mandatory Reliability Standards for the Bulk Power System: Revision and Extension

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the information collection requirements in FERC 725A under OMB control no. 1902-0244 an existing information collection.

In Docket No. RD26-1-000, FERC approved one Reliability Standard being updated within the FERC-725A: Reliability Standard TOP-003-7 is being replaced with version TOP-003-8 that will supersede requirements in TOP-003-7.

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[1] (EPAct 2005), was enacted into law. EPAct 2005 added a new section 215 to the Federal Power Act (FPA),[2] which requires a Commission-certified Electric Reliability Organization (ERO) to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.

Section 215 of the FPA requires the Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval. Once approved by the Commission, the Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.

Pursuant to the requirements of FPA section 215, the Commission established a process to select and certify an ERO[3] and, subsequently, certified the North American Electric Reliability Corporation (NERC) as the ERO. Pursuant to Section 215(d)(1) of the FPA and 18 CFR 39.5, the NERC is authorized to submit for Commission approval proposed Reliability Standards, and to propose revision or retirement of such standards.

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1 16 U.S.C. § 824d(a).

2 *Id.* § 824o.

3 Rules Concerning Certification of the Electric Reliability Organization; and Procedures for the Establishment, Approval, and Enforcement of Electric Reliability Standards, Order No. 672, FERC Stats. & Regs. ¶ 31,204, order on reh'g, Order No. 672-A, FERC Stats. & Regs. ¶ 31,212 (2006).

On February 19, 2026, the Commission issued an order in Docket No. RD26-1-000, approving Reliability Standard TOP-003-8 (Transmission Operator and Balancing Authority Data and Information Specification and Collection) to require transmission operators and balancing authorities to maintain inverter based resource (IBR) specific data.

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

RD26-1 for TOP-003-8

In general, information collection and record retention requirements related to Reliability Standards are not submitted to or retained for audit by the Commission. Rather they are submitted to or retained for audit by NERC (the Commission-approved ERO) or the Compliance Enforcement Authority, as specified in each individual Reliability Standard.

NERC states that the purpose of proposed Reliability Standard TOP-003-8 is "to ensure that each [t]ransmission [o]perator and [b]alancing [a]uthority has the data and information it needs to plan, monitor, and assess the operation of its [t]ransmission [o]perator [a]rea or [b]alancing [a]uthority [a]rea."[4]

The Commission approved NERC's minor modifications to proposed Reliability Standards IRO-010-6 and TOP-003-8 to add "Inverter-based Resource (IBR)-specific data and parameters" to the list of information reliability coordinators, transmission operators, and balancing authorities must address in their documented data specifications.[5] Additionally, both proposed Reliability Standards now include a new proposed Requirement that specifies that requirements for model submission for reliability coordinators, transmission operators, and balancing authorities are to be consistent with "the model submitted for planning purposes, subject to modifications for operations purposes, as applicable."[6] The Commission also approved NERC's associated implementation plants, violation risk factors, and violation severity levels for Reliability Standard TOP-003-8 and the retirement of currently effective Reliability Standard TOP-003-8.

Requirements and Measures

4 NERC MOD-032-2, IRO-010-6, and TOP-003-8 Petition at 60.
5 *Id.* at 60-61.
6 *Id.* at 62.

R1. Each Transmission Operator shall maintain documented specification(s) for the data and information necessary for it to perform its Operational Planning Analyses, Real time monitoring, and Real-time Assessments. The specification shall include, but not be limited to: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning]
1.1. A list of data and information needed by the Transmission Operator to support its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments, as deemed necessary by the Transmission Operator, including non-BES data and information, external network data and information, Inverter-based Resource (IBR)-specific data and parameters, and identification of the entities responsible for responding to the specification.
1.2. Provisions for notification of current Protection System and Remedial Action Scheme (RAS) status or degradation that impacts System reliability.
1.3. Provisions for notification of BES generating unit(s) during local forecasted cold weather to include: 1.3.1. Operating limitations based on: 1.3.1.1. capability and availability; 1.3.1.2. 1.3.1.3. 1.3.1.4. fuel supply and inventory concerns; fuel switching capabilities; and environmental constraints 1.3.2. Generating unit(s) minimum: 1.3.2.1. design temperature; or 1.3.2.2. 1.3.2.3. historical operating temperature; or current cold weather performance temperature determined by an engineering analysis.
1.4. Identification of a mutually agreeable process for resolving conflicts.
1.5. Method(s) for the entity identified in Part 1.1 to provide the data and information that includes but is not limited to: 1.5.1. Specified deadlines or periodicity in which data and information is to be provided; 1.5.2. Performance criteria for the availability and accuracy of data and information as applicable; 1.5.3. Requirements for necessary model submissions to be consistent with the model submitted for planning purposes, subject to modifications for operations purposes, as applicable; 1.5.4. Provisions to update or correct data and information, as applicable or necessary; 1.5.5. A mutually agreeable format; 1.5.6. Mutually agreeable method(s) for securely transferring data and information.
M1. Each Transmission Operator shall make available its dated, current, in force documented specification(s) for data and information. R2. Each Balancing Authority shall maintain documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments. The data specification shall include, but not be limited to: [Violation Risk Factor: Lower] [Time Horizon: Operations Planning] 2.1. A list of data and information needed by the Balancing Authority to support its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments, as deemed necessary by the Balancing Authority, including non Bulk Electric System data and information, IBR-specific data and parameters, and external network data and information, and identification of the entity responsible for responding to the specification. 2.2. Provisions for notification of current Protection System and Remedial

Action Scheme status or degradation that impacts System reliability. 2.3. Provisions for notification of BES generating unit(s) status during local forecasted cold weather to include: 2.3.1. Operating limitations based on: 2.3.1.1. capability and availability; 2.3.1.2. 2.3.1.3. 2.3.1.4. fuel supply and inventory concerns; fuel switching capabilities; and environmental constraints. 2.3.2. Generating unit(s) minimum: 2.3.2.1. design temperature; or 2.3.2.2. 2.3.2.3. historical operating temperature; or current cold weather performance temperature determined by an engineering analysis. 2.4. Identification of a mutually agreeable process in resolving conflicts; 2.5. Methods for the entity identified in Part 2.1 to provide data and information that includes, but is not limited to: 2.5.1. Specific deadlines or periodicity in which data and information is to be provided; 2.5.2. Performance criteria for the availability and accuracy of data and information, as applicable; Page 3 of 11 TOP-003-8 – Transmission Operator and Balancing Authority Data and Information Specification and Collection 2.5.3. Requirements for necessary model submissions to be consistent with the model submitted for planning purposes, subject to modifications for operations purposes, as applicable; 2.5.4. Provisions to update or correct data and information, as applicable or necessary. 2.5.5. A mutually agreeable format. 2.5.6. A mutually agreeable method(s) for securely transferring data and information. M2. Each Balancing Authority shall make available its dated, current, in force documented specification(s) for data and information. R3. Each Transmission Operator shall distribute its data and information specification(s) to entities that have data and information required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning] M3. Each Transmission Operator shall make available evidence that it has distributed its data specification(s) to entities that have data and information required by the Transmission Operator's Operational Planning Analyses, Real-time monitoring, and Real-time Assessments. Such evidence could include, but is not limited to, web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, date and contents, or email records. R4. Each Balancing Authority shall distribute its data and information specification(s) to entities that have data and information required by the Balancing Authority's analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments. [Violation Risk Factor: Lower] [Time Horizon: Operations Planning] M4. Each Balancing Authority shall make available evidence that it has distributed its data specification(s) to entities that have data and information required by the Balancing Authority's analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments. Such evidence could include, but is not limited to, web postings with an electronic notice of the posting, dated operator logs, voice recordings, postal receipts showing the recipient, or email records. R5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a data and information specification(s) in Requirement R3 or R4 shall

satisfy the obligations of the documented specifications. [Violation Risk Factor: Medium] [Time Horizon: Operations Planning, Same-Day Operations, Real-time Operations] M5. Each Transmission Operator, Balancing Authority, Generator Owner, Generator Operator, Transmission Owner, and Distribution Provider receiving a specification(s) in Requirement R3 or R4 shall make available evidence that it has satisfied the obligations of the documented specification. Such evidence could include, but is not limited to, electronic or hard copies of data transmittals or attestations of receiving entities.

Evidence Retention: The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority (CEA) may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.
Each responsible entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation.
• Each Transmission Operator shall retain its dated, current, in force, documented specification for the data and information necessary for it to perform its Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R1 and Measurement M1 as well as any documents in force since the last compliance audit.
• Each Balancing Authority shall retain its dated, current, in force, documented specification(s) for the data and information necessary for it to perform its analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments in accordance with Requirement R2 and Measurement M2, as well as any documents in force since the last compliance audit.
• Each Transmission Operator shall retain evidence for three calendar years that it has distributed its specification(s) to entities that have data required by the Transmission Operator’s Operational Planning Analyses, Real-time monitoring, and Real-time Assessments in accordance with Requirement R3 and Measurement M3.
• Each Balancing Authority shall retain evidence for three calendar years that it has distributed its specification(s) to entities that have data required by the Balancing Authority’s analysis functions, Real-time monitoring, and Near-Term Energy Reliability Assessments in accordance with Requirement R4 and Measurement M4.
• Each Balancing Authority, Generator Owner, Generator Operator,

Transmission Operator, Transmission Owner, and Distribution Provider receiving a specification(s) in Requirement R3 or R4 shall retain evidence for the most recent 90-calendar days that it has satisfied the obligations of the documented specifications in accordance with Requirement R5 and Measurement M5.

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. We 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.

In general, the Commission supports the use of information technology to reduce burden.

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 requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplication and to minimize the burden. Reliability Standards are developed by a collaborative process which requires industry participation. The Commission is unaware of any other source of information like the requirements in the Reliability Standard.

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 its 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.[7]

Detailed information regarding these options is available in NERC's Rules of Procedure at sections 507 and 508.[8]

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

In general, information collection requirements in Reliability Standards and requirements help maintain Bulk-Power System reliability. If this standard and the associated information collection requirements did not exist or were performed less frequently, it would not be possible to ensure that applicable entities have the access to IBR-specific data needed from other entities to ensure reliability of the Bulk-Power System. This would likely lead to lower system reliability and higher vulnerability and risk by operating in an unknown state.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances as described in 5 CFR 1320.5(d)(2) related to the revisions of Reliability Standard TOP-003-8.

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

7 NERC Rules of Procedure Sections 507 and 508 are available at: https://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20190125.pdf.

8 Details of the current ERO Reliability Standard processes are available on the NERC website at https://www.nerc.com/AboutNERC/RulesOfProcedure/NERC ROP effective_20220825_no appendicies.pdf.

providing comments.[9] The NERC-approved Reliability Standards were then submitted by NERC to the FERC for review and approval.

The Commission issued an order approving, among other things, the retirement of Reliability Standard TOP-003-7 (Docket No. RD26-1-000) and approval of new TOP-003-8, which included a 60-day public notice, on February 24, 2025 (91 FR 8864). The Commission received no set of comments or protests in connection with this docket. Further, the Commission published a 30-day notice and invited public comment on October 15, 2026 (91 FR 65538).

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts to respondents.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

Responding entities do not submit the information collected under this Reliability Standard to FERC. Rather, they submit the information to NERC, the regions, or maintain it internally. Since there are no submittals made to FERC, FERC provides no specific provisions to protect confidentiality.

According to the NERC Rules of Procedure section 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."[10] This serves to protect confidential information submitted to or retained for NERC or Regional Entities.

11. PROVIDE ADDITIONAL JUSTIFICATION FOR ANY QUESTIONS OF A SENSITIVE NATURE

This collection does not include any questions of a sensitive nature.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

9 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.

10 NERC's Rule of Procedure Section 1502, Paragraph 2.

The number of respondents that are subject to mandatory compliance with Reliability Standard TOP-003-8, in the table below, are based on the NERC Compliance Registry as of December 3, 2025, and good faith estimates provided by NERC to Commission staff, in August 2025. NERC estimates that there are 491 category 2 generator owners and 310 category 2 generator operators, which will be added to the respective category 1 generator owners and generator operators in the NERC Compliance Registry to reach an estimate of the total number of generator owners and generator operators.

Based on these assumptions, we estimate the following reporting burden:

Proposed Changes in Burden TOP-003-8 Docket No. RD26-1					
Reliability Standard	**Type and Number of Entity[11] (1)**	**Number of Annual Responses Per Entity (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[12] (4)**	**Total Burden Hours (3)*(4)=(5)**
Annual Collection TOP-003-8 FERC-725 A					
Annual review and record retention	170 (TOP)	1	170	8 hrs. $508.16	1,360 hrs. $86,387.20
	97 (BA)	1	97	8 hrs. $508.16	776 hrs. $49,291.52
	1,834 (GO)	1	1834	8 hrs. $508.16	14,672 hrs. $931,965.44
	1,333 (GOP)	1	1333	8 hrs. $508.16	10,664 hrs. $677,377.28
	341 (TO)	1	341	8 hrs. $508.16	2,728 hrs. $173,282.56
	299 (DP)	1	299	8 hrs. $508.16	2,392 hrs. $151,939.84

11 The "Number of Entity" data is compiled from the December 3, 2025, edition of the NERC Compliance Registry.

12 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).

Total for TOP-003-8			4,074		32,592 hrs. $2,070,243.84

The annual responses and burden hours for Reliability Standard TOP-003-8 are 4,074 responses; 32,592 hours. The annual cost burden is $ 2,070,243.84 for Reliability Standard TOP-003-8.

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no non-labor hour cost associated with FERC-725A.
All the costs are associated with burden hours (labor) and described in #12 and 15.

14. ESTIMATED ANNUALIZED COST TO FEDERAL GOVERNMENT

The Regional Entities and NERC do most of the data processing, monitoring, auditing, and compliance work for Reliability Standards. Any involvement by the Commission is covered under the FERC-725 (OMB Control No. 1902-0255) and is not part of this request or package. The data for FERC-725A are not submitted to FERC.

The Commission does incur the costs associated with obtaining OMB clearance for the collection under the Paperwork Reduction Act of 1995 (PRA). The estimate of the cost for 'analysis and processing of filings'[13] is based on salaries and benefits for professional and clerical support. The 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. This average annual cost includes requests for extensions, all associated rulemakings and orders, other changes to the collection, and associated publications in the Federal Register. It also includes the cost of publishing the necessary notices in the Federal Register.

The estimated annualized cost to the Federal Government for FERC-725A is as follows:

	Number of Employees (FTEs)	**Estimated Annual Federal Cost**
Analysis and Processing of filings	0	$0
PRA Administrative Cost		$8,404

13 The estimate uses the FERC's FY 2026 average annual salary plus benefits of one FERC FTE (full-time equivalent [$213,003 per year or $102.00 per hour]).

FERC Total		$8,404

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

There is a change in the burden estimate in this revision due to retirement of Reliability Standard TOP-003-7, replaced with Reliability Standard TOP-003-8. The annual responses and burden hours resulted in an increase of 2,507 responses and decrease of 155,448 annual burden hours.

FERC 725-A	Total Request	Previously Approved	Program Changes due to Agency Discretion
Annual # of Responses	10,462	8,853	+1,609
Annual Time Burden (HR)	947,592	1,109,836	-162,244
Annual Cost Burden ($)	$371,100	$371,100	$0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There is no publication of data associated with the FERC-725A.

17. DISPLAY OF EXPIRATION DATE

The expiration date for FERC-725A will not change as a result of the revision. That expiration date is displayed at Information Collections | Federal Energy Regulatory Commission.

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.