Supporting Statement

FERC-725L, Mandatory Reliability Standards for the Bulk-Power System: MOD Reliability Standards

(Three-year extension requested)

The Federal Energy Regulatory Commission (FERC or Commission) requests that the Office of Management and Budget (OMB) review and approve the changes in the information collection requirements in FERC-725L under OMB Control No. 1902-0261 for RD26-1, RD26-2, RD26-3. This supporting statement covers the requirements of the FERC-725L information collection. The reporting requirements in the FERC-725L are also contained in FERC's regulations in 18 Code of Federal Regulations (CFR) Part 40.

1. CIRCUMSTANCES THAT MAKE THE COLLECTION OF INFORMATION NECESSARY

On August 8, 2005, The Electricity Modernization Act of 2005, Title XII of the Energy Policy Act of 2005 (EPAct of 2005), was enacted into law.[1] EPAct of 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, 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, the Reliability Standards may be enforced in the United States 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[2] 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 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 (2006).

2 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 Nos. RD26-1-000, RD26-2-000, and RD26-3-000 approving Reliability MOD-032-2 (Data for Power System Modeling and Analysis, MOD-033-3 (Steady-State and Dynamic System Model Validation), and MOD-026-2 (Verification and Validation of Dynamic Models and Data) to improve the modeling of inverter-based resources (IBR) performance.

MOD-025-2, MOD-026-2, MOD-031-3, MOD-032-2 and MOD-033-3 are the reliability standards that fall within the FERC-725L information collection.

MOD reliability standards ensure that generators remain in operation during specified voltage and frequency excursions, properly coordinate protective relays and generator voltage regulator controls, and ensure that generator models accurately reflect the generator's capabilities and equipment performance.

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

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.

In conjunction with Reliability Standards PRC-029-1 and PRC-024-1, the purpose of these generator verification Reliability Standards[3] is to ensure:

- generators remain in operation during specified voltage and frequency excursions and properly coordinate protective relays and generator voltage regulator controls; and
- generator models accurately reflect the generator's capabilities and equipment performance.

The Commission approved NERC's: (1) definition of the term distributed energy resource (DER) for inclusion in the NERC Glossary of Terms Used in NERC Reliability Standards (NERC Glossary); and (2) Reliability Standards MOD-032-2 (Data for Power

3 The reporting requirements for PRC-029-1 and PRC-024-1 Reliability Standards are contained in the FERC-725G information collection (OMB Control No. 1902-0252).

System Modeling and Analysis). The Commission approved NERC's Reliability Standard MOD-033-3 (Steady-State and Dynamic System Model Validation).[4] Lastly, the Commission approved NERC's: (1) definitions of model validation and model verification in the NERC Glossary; and (2) Reliability Standard MOD-026-2 (Verification and Validation of Dynamic Models and Data).[5] In addition, the Commission approved retiring currently effective Reliability Standards MOD-032-1, MOD-033-2, and MOD-026-1, and MOD-027-1 and NERC's associated implementation plants, violation risk factors, and violation severity levels for Reliability Standards MOD-032-2, MOD-033-3, and MOD-026-2.

Reliability Standard MOD-025-2 Requirements

R1. Each Generator Owner shall provide its Transmission Planner with verification of the Real Power capability of its applicable Facilities as follows:

1.1. Verify the Real Power capability of its generating units in accordance with Attachment 1.

1.2. Submit a completed Attachment 2 (or a form containing the same information as identified in Attachment 2) to its Transmission Planner within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.

R2. Each Generator Owner shall provide its Transmission Planner with verification of the Reactive Power capability of its applicable Facilities as follows

2.1. Verify, in accordance with Attachment 1, (i) the Reactive Power capability of its generating units and (ii) the Reactive Power capability of its synchronous condenser units.

2.2. Submit a completed Attachment 2 (or a form containing the same information as identified in Attachment 2) to its Transmission Planner within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.

R3. Each Transmission Owner shall provide its Transmission Planner with verification of the Reactive Power capability of its applicable Facilities as follows:

3.1. Verify, in accordance with Attachment 1, the Reactive Power capability of its synchronous condenser units.

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4 NERC Petition, Docket No. RD26-2-000 (filed Nov. 4, 2025) (NERC MOD-033-3 Petition).

5 NERC Petition, Docket No. RD26-3-000 (filed Nov. 4, 2025) (NERC MOD-026-2 Petition).

3.2. Submit a completed Attachment 2 (or a form containing the same information as identified in Attachment 2) to its Transmission Planner within 90 calendar days of either (i) the date the data is recorded for a staged test; or (ii) the date the data is selected for verification using historical operational data.

Measures

M1. Each Generator Owner will have evidence that it performed the verification, such as a
completed Attachment 2 or the Generator Owner form with the same information or dated information collected and used to complete attachments, and will have evidence that it submitted the information within 90 days to its Transmission Planner; such as dated electronic mail messages or mail receipts in accordance with Requirement R1.

M2. Each Generator Owner will have evidence that it performed the verification, such as a
completed Attachment 2 or the Generator Owner form with the same information, or dated information collected and used to complete attachments and will have evidence that it submitted the information within 90 days to its Transmission Planner; such as dated electronic mail messages or mail receipts in accordance with Requirement R2.

Reliability Standard MOD-031-3 purpose is to provide authority for applicable entities to collect Demand, energy and related data to support reliability studies and assessments and to enumerate the responsibilities and obligations of requestors and respondents of that data. Provides planners and operators access to actual and forecast demand and energy data as needed to perform resource adequacy studies.

M3. Each Transmission Owner will have evidence that it performed the verification, such as a completed Attachment 2 or the Transmission Owner form with equivalent information or dated information collected and used to complete attachments, and will have evidence that it submitted the information within 90 days to its Transmission Planner; such as dated electronic mail messages or mail receipts in accordance with Requirement R3.

Evidence Retention

The following evidence retention periods identify a period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention specified below is shorter than the time since the last compliance audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Generator Owner and Transmission Owner shall each keep the data or evidence to show compliance as identified below, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Generator Owner shall retain the latest MOD-025 Attachment 2 and the data behind Attachment 2 or Generator Owner form with equivalent information and submittal evidence for Requirements R1 and R2, Measures M1 and M2 for the time period since the last compliance audit.
- The Transmission Owner shall retain the latest MOD-025 Attachment 2 and the data behind Attachment 2 or Transmission Owner form with equivalent information and submittal evidence for Requirement R3, Measure M3 for the time period since the last compliance audit. If a Generator Owner or Transmission Owner is found noncompliant, it shall keep information related to the noncompliance until mitigation is complete or for the time specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

Reliability Standard MOD 26-2

Requirements

R1. Each Transmission Planner shall provide the following requested information to the Generator Owner within 90 calendar days of receiving a written request:

- Instructions on how to obtain the list of excitation control system or plant volt/var control function models that are acceptable to the Transmission Planner for use in dynamic simulation,
- Instructions on how to obtain the dynamic excitation control system or plant volt/var control function model library block diagrams and/or data sheets for models that are acceptable to the Transmission Planner, or
- Model data for any of the Generator Owner's existing applicable unit specific excitation control system or plant volt/var control function contained in the Transmission Planner's dynamic database from the current (in-use) models, including generator MVA base.

R2. Each Generator Owner shall provide for each applicable unit, a verified generator excitation control system or plant volt/var control function model, including documentation and data (as specified in Part 2.1) to its Transmission Planner in accordance with the periodicity specified in MOD-026.

R3. Each Generator Owner shall provide a written response to its Transmission Planner within 90 calendar days of receiving one of the following items for an applicable unit:

- Written notification from its Transmission Planner (in accordance with Requirement R6) that the excitation control system or plant volt/var control function model is not usable,
- Written comments from its Transmission Planner identifying technical concerns with the verification documentation related to the excitation control system or plant volt/var control function model, or
- Written comments and supporting evidence from its Transmission Planner indicating that the simulated excitation control system or plant volt/var control function model response did not match the recorded response to a transmission system event.

The written response shall contain either the technical basis for maintaining the current model, the model changes, or a plan to perform model verification3 (in accordance with Requirement R2).

R4. Each Generator Owner shall provide revised model data or plans to perform model verification4 (in accordance with Requirement R2) for an applicable unit to its Transmission Planner within 180 calendar days of making changes to the excitation control system or plant volt/var control function that alter the equipment response characteristic.

R5. Each Generator Owner shall provide a written response to its Transmission Planner, within 90 calendar days following receipt of a technically justified unit request from the Transmission Planner to perform a model review of a unit or plant that includes one of the following:

- Details of plans to verify the model (in accordance with Requirement R2), or
- Corrected model data including the source of revised model data such as discovery of manufacturer test values to replace generic model data or updating of data parameters based on an on-site review of the equipment.

R6. Each Transmission Planner shall provide a written response to the Generator Owner within 90 calendar days of receiving the verified excitation control system or plant volt/var control function model information in accordance with Requirement R2 that the model is usable (meets the criteria specified in Parts 6.1 through 6.3) or is not usable.

6.1. The excitation control system or plant volt/var control function model initializes to compute modeling data without error,

6.2. A no-disturbance simulation results in negligible transients, and

6.3. For an otherwise stable simulation, a disturbance simulation results in the excitation control and plant volt/var control function model exhibiting positive damping.
If the model is not usable, the Transmission Planner shall provide a technical description of why the model is not usable.

Measures

M1. The Transmission Planner must have and provide the dated request for instructions or data, the transmitted instructions or data, and dated evidence of a written transmittal (e.g., electronic mail message, postal receipt, or confirmation of facsimile) as evidence that it provided the request within 90 calendar days in accordance with Requirement R1.
M2. The Generator Owner must have and provide dated evidence it verified each generator excitation control system or plant volt/var control function model according to Part 2.1 for each applicable unit and a dated transmittal (e.g., electronic mail message, postal receipt, or confirmation of facsimile) as evidence it provided the model, documentation, and data to its Transmission Planner, in accordance with Requirement R2.
M3. Evidence for Requirement R3 must include the Generator Owner's dated written response containing the information identified in Requirement R3 and dated evidence of transmittal (e.g., electronic mail message, postal receipt, or confirmation of facsimile) of the response.
M4. Evidence for Requirement R4 must include, for each of the Generator Owner's applicable units for which system changes specified in Requirement R4 were made, a dated revised model data or plans to perform a model verification and dated evidence (e.g., electronic mail message, postal receipt, or confirmation of facsimile) it provided the revised model and data or plans within 180 calendar days of making changes.
M5. Evidence for Requirement R5 must include the Generator Owner's dated written response containing the information identified in Requirement R5 and dated evidence (e.g., electronic mail message, postal receipt, or confirmation of facsimile) it provided a written response within 90 calendar days following receipt of a technically justified request.
M6. Evidence of Requirement R6 must include, for each model received, the dated response indicating the model was usable or not usable according to the criteria specified in Parts 6.1 through 6.3 and for a model that is not usable, a technical description; and dated evidence of transmittal (e.g., electronic mail message, postal receipt, or confirmation of facsimile) that the Generator Owner was notified within 90 calendar days of receipt of model inform

Data Retention

The following evidence retention periods 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 may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.
The Generator Owner and Transmission Planner shall each keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Transmission Planner shall retain the information/data request and provided response evidence of Requirements R1 and R6, Measures M1 and M6 for three calendar years from the date the document was provided.
- The Generator Owner shall retain the latest excitation control system or plant volt/var control function model verification evidence of Requirement R2, Measure M2.
- The Generator Owner shall retain the information/data request and provided response evidence of Requirements R3 through R5, and Measures M3 through M5 for three calendar years from the date the document was provided.

If a Generator Owner or Transmission Planner is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete or approved or for the time specified above, whichever is longer.
The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

MOD-031-3 contains four requirements:
R1. Each Planning Coordinator or Balancing Authority that identifies a need for the collection of Total Internal Demand, Net Energy for Load, and Demand Side Management data shall develop and issue a data request to the applicable entities in its area.
1.1. A list of Transmission Planners, Balancing Authorities, and Distribution Providers that are required to provide the data ("Applicable Entities").
1.2. A timetable for providing the data. (A minimum of 30 calendar days must be allowed for responding to the request).
1.3. A request to provide any or all of the following actual data, as necessary:
1.3.1. Integrated hourly Demands in megawatts for the prior calendar year.
1.3.2. Monthly and annual integrated peak hour Demands in megawatts for the prior calendar year.

1.3.2.1. If the annual peak hour actual Demand varies due to weather related conditions (e.g., temperature, humidity or wind speed), the Applicable Entity shall also provide the weather
normalized annual peak hour actual Demand for the prior calendar year.
M1. The Planning Coordinator or Balancing Authority shall have a dated data request, either in hardcopy or electronic format, in accordance with Requirement R1.
R2. Each Applicable Entity identified in a data request shall provide the data requested by its Planning Coordinator or Balancing Authority in accordance with the data request issued pursuant to Requirement R1.
M2. Each Applicable Entity shall have evidence, such as dated e-mails or dated transmittal
letters that it provided the requested data in accordance with Requirement R2.
R3. The Planning Coordinator or the Balancing Authority shall provide the data listed under Requirement R1 Parts 1.3 through 1.5 for their area to the applicable Regional Entity within 75 calendar days of receiving a request for such data, unless otherwise agreed upon by the parties.
M3. Each Planning Coordinator or Balancing Authority, shall have evidence, such as dated e-mails or dated transmittal letters that it provided the data requested by the applicable Regional Entity in accordance with Requirement R3.
R4. Any Applicable Entity shall, in response to a written request for the data included in parts 1.3-1.5 of Requirement R1 from a Planning Coordinator, Balancing Authority, Transmission Planner or Resource Planner with a demonstrated need for such data in order to conduct reliability assessments of the Bulk Electric System, provide or otherwise make available that data to the requesting entity. This requirement does not modify an entity's obligation pursuant to Requirement R2 to respond to data requests issued by its Planning Coordinator or Balancing Authority pursuant to Requirement R1.
This entity:

- shall not be required to alter the format in which it maintains or uses the data;
- shall provide the requested data within 45 calendar days of the written request, subject to part 4.1 of this requirement; unless providing the requested data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements.

4.1. If the Applicable Entity does not provide data requested because (1) the requesting entity did not demonstrate a reliability need for the data; or (2) providing the data would conflict with the Applicable Entity's confidentiality, regulatory, or security requirements, the Applicable Entity shall, within 30 calendar days of the written request, provide a

written response to the requesting entity specifying the data that is not being provided and on what basis.

M4. Each Applicable Entity identified in Requirement R4 shall have evidence such as dated e-mails or dated transmittal letters that it provided the data requested or provided a written response specifying the data that is not being provided and the basis for not providing the data in accordance with Requirement R4.

Evidence Retention

The following evidence retention periods 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 may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

- The Applicable Entity shall keep data or evidence to show compliance with Requirements R1 through R4, and Measures M1 through M4, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.
- If an Applicable Entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer.
- The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

Reliability Standards MOD-032-1 and MOD-033-3 were approved by the Commission in an Order in Docket No. RD14-5-000.[6] Both standards were designed to replace, consolidate and improve upon existing MOD standards, "in addressing system-level modeling data and validation requirements necessary for developing planning models and the Interconnection-wide cases that are integral to analyzing the reliability of the Bulk-Power System."[7]

MOD-032-1 Reliability Standard contains four requirements:

- Requirement R1 mandates that each planning coordinator and each of its transmission planners shall jointly develop steady-state, dynamics, and short circuit modeling data requirements and reporting procedures for the planning coordinator's planning area;

6 Approved by the Commission in the Order in Docket No. RD14-5-000 (issued 5/1/2014).
7 NERC Petition for MOD-032-1 at paragraph 2.

- Requirement R2 mandates that each balancing authority, generator owner, load serving entity, resource planner, transmission owner, and transmission service provider shall provide steady-state, dynamics, and short circuit modeling data to its transmission planner(s) and planning coordinator(s) according to the data requirements and reporting procedures developed by its planning coordinator and transmission planner in Requirement R1. For data that has not changed since the last submission, a written confirmation that the data has not changed is sufficient;
- Requirement R3 mandates that upon receipt of written notification from its planning coordinator or transmission planner regarding technical concerns with the data submitted under Requirement R2, including the technical basis or reason for the technical concerns, each notified balancing authority, generator owner, load serving entity, resource planner, transmission owner, or transmission service provider shall respond to the notifying planning coordinator or transmission planner as follows:
    - Provide either updated data or an explanation with a technical basis for maintaining the current data;
    - Provide the response within 90 calendar days of receipt, unless a longer time period is agreed upon by the notifying planning coordinator or transmission planner.
- Requirement R4 mandates that each planning coordinator shall make available models for its planning area reflecting data provided to it under Requirement R2 to the Electric Reliability Organization (ERO) or its designee to support creation of the Interconnection-wide case(s) that includes the planning coordinator's planning area.

MOD-033-2 Reliability Standard contains two requirements:
Purpose is to establish consistent validation requirements to facilitate the collection of accurate data and building of planning models to analyze the reliability of the interconnected transmission system.
R1. Each Planning Coordinator shall implement a documented data validation process that includes the following:
1.1. Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning power flow model to actual system behavior, represented by a state estimator case or other Real-time data sources, at least once every 24 calendar months through simulation;
1.2. Comparison of the performance of the Planning Coordinator's portion of the existing system in a planning dynamic model to actual system response, through simulation of a dynamic local event, at least once every 24 calendar months (use a dynamic local event that occurs within 24 calendar months of the last dynamic local event used in comparison, and complete each comparison within 24 calendar months of the dynamic

local event). If no dynamic local event occurs within the 24 calendar months, use the next dynamic local event that occurs;

1.3. Guidelines the Planning Coordinator will use to determine unacceptable differences in performance under Part 1.1 or 1.2; and

1.4. Guidelines to resolve the unacceptable differences in performance identified under Part 1.3.

M1. Each Planning Coordinator shall provide evidence that it has a documented validation
process according to Requirement R1 as well as evidence that demonstrates the implementation of the required components of the process.

R2. Each Reliability Coordinator and Transmission Operator shall provide actual system behavior data (or a written response that it does not have the requested data) to any Planning Coordinator performing validation under Requirement R1 within 30 calendar days of a written request, such as, but not limited to, state estimator case or other Real-time data (including disturbance data recordings) necessary for actual system response validation.

M2. Each Reliability Coordinator and Transmission Operator shall provide evidence, such as email notices or postal receipts showing recipient and date that it has distributed the requested data or written response that it does not have the data, to any Planning Coordinator performing validation under Requirement R1 within 30 days of a written request in accordance with Requirement R2; or a statement by the Reliability Coordinator or Transmission Operator that it has not received notification regarding data necessary for validation by any Planning Coordinator.

Evidence Retention

The following evidence retention periods 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 may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit. The applicable entity shall keep data or evidence to show compliance with Requirements R1 through R2, and Measures M1 through M2, since the last audit, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation. If an applicable entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved, or for the time specified above, whichever is longer. The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

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 and the medium are not covered in Reliability Standards. We think that nearly all the respondents are likely to make and keep related records in an electronic format. Each of the six Regional Entities possesses 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 similar to the requirements in the Reliability Standards.

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.[8]

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8 NERC's Rule of Procedure http://www.nerc.com/FilingsOrders/us/RuleOfProcedureDL/NERC_ROP_Effective_20161031.pdf.

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 the standards 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 the IBR modeling needed to ensure the reliable operation 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 related to the FERC-725L 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.[9] 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 notice[10] and a 30-day notice[11] to the public regarding this information collection on February 24, 2026, and October 15, 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 in response to the 60-day notice regarding the FERC-725L information collection.

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 91 FR 8864.
11 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 these Reliability Standards to FERC. Rather, they submit the information to NERC, the regional entities, or maintain it internally. Since there are no submissions made to FERC, FERC provides no specific provisions in order to protect confidentiality.

According to the NERC Rule 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."[12] This serves to protect confidential information submitted to NERC or Regional Entities.

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 in the reporting requirements.

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION

The number of respondents that are subject to mandatory compliance with Reliability Standards MOD-032-2, MOD-033-3, and MOD-026-2, in the tables 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

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

Compliance Registry to reach an estimate of the total number of generator owners and generator operators. The burden for the FERC-725L information collection includes estimates related to each of the six previously approved Reliability Standards.

Estimate of Annual Burden[13]*:* The Commission estimates the annual public reporting burden and cost for the information collection as:

Proposed Changes in Burden MOD-032-2 Docket No. RD26-1					
Reliability Standard	**Type and Number of Entity[14] (1)**	**Number of Annual Responses Per Entity (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[15] (4)**	**Total Burden Hours (3)*(4)=(5)**
Annual Collection MOD-032-2 FERC-725 L					
Annual review and record retention	97 (BA)	1	97	8 hrs. $ 508.16	776 hrs. $ 49,291.52
	299 (DP)	1	299	8 hrs. $508.16	2,392 hrs. $ 151,939.84

13 "Burden" is defined 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.

14 The "Number of Entity" data is compiled from the December 3, 2025, edition of the NERC Compliance Registry. "BA" means balancing authority; "DP" means distribution provider; "GO" means generator owner; "PC" means planning coordinator; "RP" means resource planner; "TO" means transmission owner; "TP" means transmission planner; "TSP" means transmission service provider; "GOP" means generator operator; "RC" means reliability coordinator; and "TOP" means transmission operator."

15 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).

	1,834 (GO)[16]	1	1834	8 hrs. $508.16	14,672 hrs. $931,965.44
	62 (PC)	1	62	16 hrs. $1016.32	992 hrs. $63,011.84
	157 (RP)	1	157	8 hrs. $508.16	1,256 hrs. $79,781.12
	341 (TO)	1	341	8 hrs. $508.16	2,728 hrs. $173,282.56
	208 (TP)	1	208	16 hrs. $1016.32	3,328 hrs. $211,394.56
	70 (TSP)	1	70	8 hrs. $508.16	560 hrs. $35,571.20
Total for MOD-032-2			3,068		26,704 hrs. $1,696,238.08

Proposed Burden MOD-033-3 Docket No. RD26-2					
Reliability Standard	**Type and Number of Entity[17] (1)**	**Number of Annual Responses Per Entity (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[18] (4)**	**Total Burden Hours (3)*(4)=(5)**

16 For this collection the GO will include category 1 entities (1,343 entities) from the December 3, 2025, NERC Compliance Registry; and NERC's estimate to Commission staff in August 2025 of category 2 generator owners registered entities in the United States (491 entities) for a total of (1,343 + 491) = 1,834. The estimate for category 2 generator owner entities is subject to change according to NERC due to: (1) facility cancellations or facilities with an expected commercial operation date delayed past May 15, 2026; (2) identification of type 1 and type 2 wind facilities that do not qualify as category 2 resources; (3) identification of facilities as category 1 resources; and (4) facilities can be inaccurately reported and subsequently removed from the list. NERC, Inverter-Based Resources Work Plan Progress Update, Docket No. RD22-4-001, at 2 n.7 (filed Oct. 31, 2025) (NERC October 2025 Work Plan Update).

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

18 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).

Annual Collection MOD-033-3 FERC-725 L					
Annual review and record retention	62 (PC)	1	62	8 hrs. $508.16	496 hrs. $31,505.92
	12 (RC)	1	12	8 hrs. $508.16	96 hrs. $6,097.92
	170 (TOP)	1	170	8 hrs. $508.16	1,360 hrs. $86,387.20
Total for MOD-033-3			244		1,952 hrs. $123,991.04

Proposed Changes in Burden MOD-26-2 Docket No. RD26-3					
Reliability Standard	**Type and Number of Entity[19]** (1)	**Number of Annual Responses Per Entity** (2)	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[20] (4)**	**Total Burden Hours (3)*(4)=(5)**
Annual Collection MOD-026-2 FERC-725 L					
Annual review and record retention	1,834 (GO)	1	1834	12 hrs. $762.24	22,008 hrs. $1,397,948.16
	62 (PC)	1	62	8 hrs. $508.16	496 hrs. $31,505.92
	341 (TO)	1	341	8 hrs. $508.16	2,728 hrs. $173,282.56
	208 (TP)	1	208	10 hrs. $635.20	2,080 hrs. $132,121.60
Total for MOD-026-2			2,445		27,312 hrs. $1,734,858.24

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no non-labor costs currently associated with the FERC-725L.

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

20 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).

All of 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 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. The data for FERC-725-L 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'[21] is based on salaries and benefits for professional and clerical support. The PRA Administrative Cost is a Federal 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-725L is as follows:

	Number of Employees (FTE)	**Estimated Annual Federal Cost**
FERC-725L Analysis and Processing of filings	0	$0
PRA[22] Administrative Cost		$8,404
FERC Total		$8,404

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

The burden for Reliability Standards MOD-032-2, MOD-033-3, and MOD-026-2 (retiring Reliability Standards MOD-032-1, MOD-033-2, MOD-026-1, and MOD-027-1)

21 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]).
22 Paperwork Reduction Act of 1995 (PRA).

increase due to their respective annual burdens due to the creation of Generator Owners for the new Category 1 and Category 2 implementation for RD26-1, RD26-2, RD26-3.

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FERC-725L	Total Request	Previously Approved	Change due to Adjustment in Estimate	Program Change Due to Agency Discretion
Annual Number of Responses	7,574	6,227	0	1,347
Annual Time Burden (Hr.)	69,294	58,479	0	10,815
Annual Cost Burden ($)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

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

17. DISPLAY OF EXPIRATION DATE

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

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

There are no exceptions.