UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION

Docket No. RD26-1-000, RD26-2-000, RD26-3-000

COMMISSION INFORMATION COLLECTION ACTIVITIES (FERC-725A, 725L, and 725Z); COMMENT REQUEST; REVISION

(October 9, 2026)

AGENCY: Federal Energy Regulatory Commission.

ACTION: Notice of information collection and request for comments.

SUMMARY: In compliance with the requirements of the Paperwork Reduction Act of 1995, the Federal Energy Regulatory Commission (Commission or FERC) is soliciting public comment on three currently approved information collections, Mandatory Reliability Standards within Interconnection Reliability Operations and Coordination (IRO); 1) FERC-725Z (OMB#1902-0276) (RD26-1-000) _IRO-010-6 Reliability Coordinator Data and information Specification and Collection, Modeling, Data, and Analysis (MOD); 2) FERC-725L (OMB#1902-0261) (RD26-2-000)_MOD-032-2_MOD-033-3_MOD-026-2 Data for Power System Modeling and Analysis, Bulk-Power System Transmission Operations (TOP); 3) FERC-725A (OMB#1902-0244) (RD26-3-000)_TOP-003-8 Transmission Operator and Balancing Authority Data and Information Specification and Collection.

There are anticipated changes in the reporting requirements for this information collection for each of the eight standards. This order was published for 60-day notice period on December 18, 2025, and received no comments.

DATES: Comments on the collection of information are due **[INSERT DATE 30 DAYS AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER]**.

ADDRESSES: Send written comments on FERC-725B to OMB through,(1) FERC-725L https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr= 202610-1902-001; (2) FERC-725A https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr= 202609-1902-002; (3) FERC-725Z https://www.reginfo.gov/public/do/PRA/icrPublicCommentRequest?ref_nbr= 202610-1902-002. You can also visit https://www.reginfo.gov/public/do/PRAMain and use the drop-down under "Currently under Review" to select the "Federal Energy Regulatory Commission" where you can see the open opportunities to provide comments. Comments should be sent within 30 days of publication of this notice.

Please submit a copy of your comments to the Commission via email to DataClearance@FERC.gov. You must specify the Docket No. (RD26-1-000, RD6-2-000, RD26-3-000) and the FERC Information Collection number (**FERC-725Z, 725L, and 725A**) in your email. If you are unable to file electronically, comments may be filed by USPS mail or by hand (including courier) delivery:

- Mail via U.S. Postal Service Only: Federal Energy Regulatory Commission, Secretary of the Commission, 888 First Street, N.E., Washington, DC 20426.
- All other delivery methods: Federal Energy Regulatory Commission, Secretary of the Commission, 12225 Wilkins Avenue, Rockville, MD 20852.

Docket: To view comments and issuances in this docket, please visit https://elibrary.ferc.gov/eLibrary/search. Once there, you can also sign up for automatic notification of activity in this docket.

FOR FURTHER INFORMATION CONTACT: Kayla Williams, (202) 502-6468. DataClearance@FERC.gov

SUPPLEMENTARY INFORMATION:

Title: FERC-725Z (Reliability Coordinator Data and information Specification and Collection), 725L (Data for Power System Modeling and Analysis), and 725A (Transmission Operator and Balancing Authority Data and Information Specification and Collection).

OMB Control No.: 1902-0276 (725Z), 1902-0261 (725L), and 1902-0244 (725A)

Type of Request: Update information collection requirements with changes to the current reporting requirements.

Abstract: Section 215 of the FPA provides that the Commission may certify an Electric Reliability Organization (ERO), the purpose of which is to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.[1] Reliability Standards may be enforced by the ERO, subject to Commission oversight, or

[1] 16 U.S.C. 824o(c).

by the Commission independently.[2] Pursuant to section 215 of the FPA, the Commission established a process to select and certify an ERO,[3] and subsequently certified NERC.[4] In their first petition, (RD26-1-000), NERC seeks approval of: (1) a proposed 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) proposed Reliability Standards MOD-032-2 (Data for Power System Modeling and Analysis), IRO-010-6 (Reliability Coordinator Data and Information Specification and Collection), and TOP-003-8 (Transmission Operator and Balancing Authority Data and Information Specification and Collection).[5] The second petition (RD26-2-000) seeks approval of Reliability Standard MOD-033-3 (Steady-State and Dynamic System Model Validation).[6] The third petition (RD26-3-000) seeks approval of: (1) proposed definitions of model validation and model verification in the NERC Glossary; and (2) proposed Reliability Standard MOD-026-2 (Verification and Validation of Dynamic

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[2] *Id.* 824o(e).

[3] *Rules Concerning Certification of the Elec. Reliability Org.; & Procs. for the Establishment, Approval, & Enf't of Elec. Reliability Standards*, Order No. 672, 71 FR 8662 (Feb. 17, 2006), 114 FERC ¶ 61,104, *order on reh'g*, Order No. 672-A, 71 FR19814 (Apr. 18, 2006), 114 FERC ¶ 61,328 (2006); *see also* 18 CFR 39.4(b).

[4] *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) (Certification Order).

[5] NERC Petition, Docket No. RD26-1-000 (filed Nov. 4, 2025) (NERC MOD-032-2, IRO-010-6, and TOP-003-8 Petition).

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

Models and Data).[7] NERC also seeks approval of the associated implementation plans, violation risk factors, and violation severity levels for Reliability Standards MOD-032-2, IRO-010-6, TOP-003-8, MOD-033-3, and MOD-026-2. In addition, the first petition was for the retirement of currently effective Reliability Standards MOD-032-1, IRO-010-5, and TOP-003-7; the second petition was for the retirement of currently effective Reliability Standard MOD-033-2; and the third petition was for the retirement of currently effective Reliability Standards MOD-026-1 and MOD-027-1.

Type of Respondents: Generator owners and generator operator entities registered with NERC that own or operate category 2 resources.

Estimate of Annual Burden[8]*:* The FERC-725A, FERC-725L, and FERC-725Z information collections requirements are subject to review by the Office of Management and Budget (OMB) under section 3507(d) of the Paperwork Reduction Act of 1995. OMB's regulations require approval of certain information collection requirements imposed by agency rules. Respondents subject to the filing requirements will not be penalized for failing to respond to these collections of information unless the collections of information display a valid OMB control number. The Commission solicits comments on the need for this information, whether the information will have practical utility, the accuracy of the burden estimates, ways to enhance the quality, utility, and clarity of the

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

[8] "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, see 5 CFR 1320.3.

information to be collected or retained, and any suggested methods for minimizing respondents' burden, including the use of automated information techniques.

The Commission bases its paperwork burden estimates on the additional paperwork burden for balancing authorities, generator owners, planning coordinators, reliability coordinators, transmission planners, transmission owners, and transmission operators presented by Reliability Standards MOD-032-2, IRO-010-6, TOP-003-8, MOD-033-3, and MOD-026-2, as modified, and the NERC Glossary definitions of DER, model validation, and model verification. Reliability Standards are objective-based and allow entities to choose compliance approaches best tailored to their systems. The new or modified NERC Glossary definitions are not expected to produce any new burden. The number of respondents that are subject to mandatory compliance with Reliability Standards MOD-032-2, IRO-010-6, TOP-003-8, 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 Compliance Registry to reach an estimate of the total number of generator owners and generator operators.

The Commission estimates the annual 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**	**Number of Annual**	**Total Number of**	**Average Number of**	**Total Burden Hours**

	Entity[9] (1)	Responses Per Entity (2)	Responses (1)*(2)=(3)	Burden Hours per Response[10] (4)	(3)*(4)=(5)
Annual Collection MOD-032-2 FERC-725 L					
Annual review and record retention	97 (BA)	1	97	8 hrs. $ 508.16/hr	776 hrs. $ 49,291.52
	299 (DP)	1	299	8 hrs. $508.16/hr	2,392 hrs. $ 151,939.84
	1,834 (GO)[11]	1	1834	8 hrs. $508.16 /hr	14,672 hrs. $931,965.44
	62 (PC)	1	62	16 hrs. $1016.32 /hr	992 hrs. $63,011.84
	157 (RP)	1	157	8 hrs. $508.16 /hr	1,256 hrs. $79,781.12
	341 (TO)	1	341	8 hrs.	2,728 hrs.

[9] 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."

[10] 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).

[11] 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).

				$508.16 /hr	$173,282.56
	208 (TP)	1	208	16 hrs. $1016.32/hr	3,328 hrs. $211,394.56
	70 (TSP)	1	70	8 hrs. $508.16 /hr	560 hrs. $35,571.20
Total for MOD-032-2			3,068		26,704 hrs. $1,696,238.08

Proposed Changes in Burden IRO-010-6 Docket No. RD26-1					
Reliability Standard	**Type and Number of Entity[12] (1)**	**Number of Annual Responses Per Entity (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[13] (4)**	**Total Burden Hours (3)*(4)=(5)**
Annual Collection IRO-010-6 FERC-725 Z					
Annual review and record retention	12 (RC)	1	12	8 hrs. $508.16 /hr	96 hrs. $6,097.92
	97 (BA)	1	97	8 hrs. $508.16 /hr	776 hrs. $49,291.52
	1,834 (GO)	1	1834	8 hrs. $508.16 /hr	14,672 hrs. $931,965.44
	1,333 (GOP)[14]	1	1333	8 hrs.	10,664 hrs.

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

[13] 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).

[14] For this collection the generator operators (GOP) will include category 1 entities (1,023 entities) from the December 3, 2025, NERC Compliance Registry; and NERC's estimate to Commission staff in August 2025 of category 2 generator operators registered entities in the United States (310 entities) for a total of (1,023 + 310) = 1,333. The estimate for category 2 generator operator 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

				$508.16 /hr	$677,377.28
	170 (TOP)	1	170	8 hrs. $508.16 /hr	1,360 hrs. $86,387.20
	341 (TO)	1	341	8 hrs. $508.16 /hr	2,728 hrs. $173,282.56
	299 (DP)	1	299	8 hrs. $508.16 /hr	2,392 hrs. $151,939.84
Total for IRO-010-6			4,086		32,688 hrs. $2,076,341.76

Proposed Changes in Burden TOP-003-8 Docket No. RD26-1					
Reliability Standard	**Type and Number of Entity[15] (1)**	**Number of Annual Responses Per Entity (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Number of Burden Hours per Response[16] (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 /hr	1,360 hrs. $86,387.20
	97 (BA)	1	97	8 hrs. $508.16 /hr	776 hrs. $49,291.52

category 1 resources; and (4) facilities can be inaccurately reported and subsequently removed from the list. NERC October 2025 Work Plan Update at 2 n.7.

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

[16] 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)	1	1834	8hrs. $508.16 /hr	14,672 hrs. $931,965.44
	1,333 (GOP)	1	1333	8 hrs. $565.36 /hr	10,664 hrs. $677,377.28
	341 (TO)	1	341	8 hrs. $508.16 /hr	2,728 hrs. $173,282.56
	299 (DP)	1	299	8 hrs. $508.16 /hr	2,392 hrs. $151,939.84
Total for TOP-003-8			4,074		32,592 hrs. $2,070,243.84

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)**
Annual Collection MOD-033-3 FERC-725 L					
Annual review and record retention	62 (PC)	1	62	8 hrs. $508.16 hr	496 hrs. $31,505.92
	12 (RC)	1	12	8 hrs. $508.16 /hr	96 hrs. $6,097.92
	170 (TOP)	1	170	8 hrs. $508.16 /hr	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**	**Number of Annual**	**Total Number of**	**Average Number of Burden Hours**	**Total Burden Hours**

[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).

	Entity[19] (1)	Responses Per Entity (2)	Responses (1)*(2)=(3)	per Response[20] (4)	(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/hr	22,008 hrs. $1,397,948.16
	62 (PC)	1	62	8 hrs. $508.16 /hr	496 hrs. $31,505.92
	341 (TO)	1	341	8 hrs. $508.16 /hr	2,728 hrs. $173,282.56
	208 (TP)	1	208	10 hrs. $635.20 /hr	2,080 hrs. $132,121.60
Total for MOD-026-2			2,445		27,312 hrs. $1,734,858.24

Comments: Comments are invited on: (1) whether the collection of information is necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility; (2) the accuracy of the agency's estimate of the burden and cost of the collection of information, including the validity of the methodology and assumptions used; (3) ways to enhance the quality, utility and clarity of the information collection; and (4) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

[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).

Debbie-Anne A. Reese,
Secretary.