Supporting Statement for
FERC-725Z (Mandatory Reliability Standards: IRO Reliability Standards

The Federal Energy Regulatory Commission (Commission or FERC) requests the Office of Management and Budget (OMB) review and approve the mandatory reliability standards associated with FERC-725Z for three years. This request includes the retirement of the current effective standard IRO-010-5 and updating to the reliability standard IRO-010-6.

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.

On February 19, 2026, the Commission issued an order in Docket No. RD26-1-000, approving Reliability Standard IRO-010-6 (Reliability Coordinator Data and Information Specification and Collection) to require reliability coordinators to maintain inverter-based resources (IBR) specific data.

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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).

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

RD26-1-000 for IRO-010-6

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 IRO-010-6 is "to prevent instability, uncontrolled separation, or [c]ascading outages that adversely impact reliability, by ensuring each [r]eliability [c]oordinator has the data and information it needs to plan, monitor and assess the operation of its [r]eliability [c]oordinator [a]rea."[3] 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 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 plans, violation risk factors, and violation severity levels for Reliability Standard IRO-010-6. In addition, the Commission approved the retirement of currently effective Reliability Standard IRO-010-5.

[3] NERC MOD-032-2, IRO-010-6, and TOP-003-8 Petition at 59-60.
[4] *Id.* at 60.
[5] *Id.* at 60-61.
[6] *Id.* at 62.

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 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 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.[7]

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

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

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 related to the FERC-725Z 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.[8] 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 IRO-010-5 (Docket No. RD26-3-000) and approval of new IRO-010-6, which included a 60-day public notice, on February 24, 2025,[9] no comments were received. The 30-day notice was published on October 15, 2026.[10]

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

[8] 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.
[9] 91 FR 8864.
[10] 91 FR 65538.

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."[11] 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, 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 Standard IRO-010-6, 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.

The estimated annual burden and cost related to the reporting and recordkeeping requirements for FERC-725Z are as follows.

Proposed Changes in Burden IRO-010-6 Docket No. RD26-1

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

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	96 hrs. $6,097.92
	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)[14]	1	1333	8 hrs. $508.16	10,664 hrs. $677,377.28
	170 (TOP)	1	170	8 hrs. $508.16	1,360 hrs. $86,387.20
	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

[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 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.

Total for IRO-010-6			4,086		32,688 hrs. $2,076,341.76

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no non-labor hour cost associated with FERC-725Z.

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, 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-725Z 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'[15] 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-725Z is as follows:

For FERC-725Z	Number of Employees (FTE)	Estimated Annual Federal Cost
Analysis and Processing of filings	0.0	$0
PRA Administrative Cost		$8,404
FERC Total		$8,404

[15] 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]).

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

Due to the revision of IRO-010-5 (now IRO-010-6) the burden increased to 6,752 (increase of 3,273 responses) annual responses and 88,788 (increase of 25,992 burden hours) annual burden hours.

	Total Request	Previously Approved	Change due to Adjustment in Estimate	Program Change Due to Agency Discretion
Annual Number of Responses	6,752	3,479	0	3,273
Annual Time Burden (Hrs.)	88,788	62,796	0	25,992
Annual Cost Burden ($)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

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

17. DISPLAY OF EXPIRATION DATE

The expiration date for FERC-725Z 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.