FERC-725G (OMB Control No. 1902-0252)
RD25-10 ORDER: 12/22/2025
60-day notice 12/23/2025; 30-day notice 3/03/2026

Supporting Statement for

FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: PRC Standards, as modified by RD25-10

The Federal Energy Regulatory Commission (Commission or FERC) requests that the Office of Management and Budget (OMB) review and approve FERC-725G, Mandatory Reliability Standards for the Bulk-Power System: Protection and Control (PRC) Standards (Newly implemented PRC standards PRC-012-2 and PRC-017-1) under OMB Control Number 1902-0252. PRC-012-2 and PRC-017-1 are reliability standards for frequency and voltage protection settings and ride-through for Inverter-Based Resources (IBR).

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 (EPAct 2005), was enacted into law[1]. EPAct 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 a Commission-certified ERO to develop mandatory and enforceable Reliability Standards, subject to Commission review and approval.[2] Once approved, the Reliability Standards may be enforced by the ERO subject to Commission oversight or by the Commission independently.[3] In 2006, the Commission certified the North American Electric Reliability Corporation (NERC) as the ERO[4] pursuant to section 215 of the FPA.[5]

On March 16, 2007 (pursuant to section 215(d) of the FPA), the Commission issued Order No. 693, approving 83 of the 107 initial Reliability Standards filed by NERC.

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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] Id. 824o(c), (d).

[3] Id. 824o(e).

[4] "Electric Reliability Organization" or "ERO" means the organization certified by the Commission the purpose of which is to establish and enforce Reliability Standards for the Bulk-Power System, subject to Commission review.

[5] North American Electric Reliability Corp., 116 FERC ¶ 61,062, order on reh'g and compliance, 117 FERC ¶ 61,126 (2006), order on compliance, 118 FERC ¶ 61,190, *order on reh'g*, 119 FERC ¶ 61,046 (2007), *aff'd sub nom. Alcoa Inc. v. FERC*, 564 F.3d 1342 (D.C. Cir. 2009).

Order 693 addressed several Personal Performance, Training, and Qualification (PER) and Protection and Control (PRC) Reliability Standards. Some of them were approved, but others were approved with a Commission directive for NERC to make modifications. In the intervening years, numerous changes have been made to update, eliminate, or establish various Reliability Standards.

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

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.[6] Reliability Standards may be enforced by the ERO, subject to Commission oversight, or by the Commission independently.[7] Pursuant to section 215 of the FPA, the Commission established a process to select and certify an ERO,[8] and subsequently certified NERC.[9]

On October 1, 2025, in Docket No. RD25-10, the Commission approved NERC's filing of a petition seeking approval of two revised NERC definitions, generator owner and generator operator as "to align the definitions of the Generator Owner and Generator Operator terms in the NERC Glossary with the recently revised Generator Owner and Generator Operator registration functions in the NERC Rules of Procedure Statement of Compliance Registry Criteria," [10] approved by the Commission in Docket No. RR24-2-000 on June 27, 2024.[11] The terms generator owner and generator operator now include non-bulk electric system (BES) inverter-based resources (IBR) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA,

[6] 16 U.S.C. 824o(c).

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

[8] *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).

9 *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).

[10] NERC Petition at 4

[11] *Order on Approving Revisions to N. Am. Elec. Reliability Corp. Rules of Proc. & Requiring Compliance Filing*, 187 FERC ¶ 61,196 (June 27, 2024).

connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (category 2). Consequently, the new definitions in the Glossary of Terms Used in NERC Reliability Standards (NERC Glossary) will impose paperwork burdens on category 2 generator owners and generator operators that will now need to comply with applicable Reliability Standards.

The approved revision to the definition of generator operator in the NERC Glossary is[12]: The entity that: 1) operates generating Facility(ies) and performs the functions of supplying energy and Interconnected Operations Services (Category 1 GOP); or 2) operates non-BES Inverter-Based Resource(s) that either have or contribute to an aggregate nameplate capacity of greater than or equal to 20 MVA, connected through a system designed primarily for delivering such capacity to a common point of connection at a voltage greater than or equal to 60 kV (Category 2 GOP).

As a result of the inclusion of category 2 resources in the NERC Glossary, applicable responsible entities will have to comply with reporting requirements for this information collection for each of the eight reliability standards included in NERC's implementation plan associated with Docket No. RD25-10. The eight applicable Reliability Standards are: BAL-001-TRE-2; IRO-010-5; MOD-032-1; PRC-012-2; PRC-017-1; TOP-003-6.1; VAR-001-5; and VAR-002-4.1.

Reliability Standards PRC-012-2 and PRC-017-1 are currently located in the FERC-725G (OMB Control No. 1902-0252) collection. The purpose of PRC-012-2 is to ensure that remedial action schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the BES. The stated purpose of Reliability Standard PRC-017-1 is to ensure that all RAS are properly designed, meet performance requirements, and are coordinated with other protection systems and to ensure that maintenance and testing programs are developed and misoperations are analyzed and corrected. The category 2 generator owners, that are part of a RAS, will now have to follow Requirements R1, R3, and R5 through R8 in Reliability Standard PRC-012-2 and Requirements R1 and R2 in Reliability Standard PRC-017-1. Specifically, Reliability Standard PRC-012-2 requires that generator owners that own all or part of a RAS to review and provide information to their reliability coordinator in R1 and R3; and to test, analyze performance, and take corrective action, if needed, in Requirements R5 through R8. Requirements R1 and R2 of Reliability Standard PRC-017-1 require generator owners that own a RAS to maintain and document a system maintenance and testing program.

The following PRC standards are currently incorporated in FERC-725G: PRC-002, PRC-006, PRC-012, PRC-017, PRC-019, PRC-023, PRC-024, PRC-025, PRC-026, PRC-027, PRC-028, PRC-029, and PRC-030. A high-level description of the purpose of each standard is provided below with details of the requirements and measures (reporting requirements), and evidence retention requirements (reporting requirements) provided in the ROCIS Supplementary document section.

[12] NERC Petition at 3-4.

PRC-002-5 (Disturbance Monitoring and Reporting Requirements)

Purpose is to have adequate data available to facilitate analysis of Bulk Electric System (BES) Disturbances.

PRC-006-5 (Protection System, Automatic Reclosing, and Sudden Pressure Relaying Maintenance)

Purpose: To establish design and documentation requirements for automatic underfrequency load shedding (UFLS) programs to arrest declining frequency, assist recovery of frequency following underfrequency events and provide last resort system preservation measures.

PRC-012-2 (Remedial Action Schemes)

Purpose: To ensure that Remedial Action Schemes (RAS) do not introduce unintentional or unacceptable reliability risks to the Bulk Electric System (BES).

PRC-017-1 (Remedial Action Scheme Maintenance and Testing)

Purpose: to ensure that all Remedial Action Schemes (RAS) are properly designed, meet performance requirements, and are coordinated with other protection systems. Also, to ensure that maintenance and testing programs are developed and misoperations are analyze and corrected.

PRC-019-2 (Coordination of Generating Unit or Plant Capabilities, Voltage Regulating Controls, and Protection)

Purpose is to verify coordination of generating unit Facility or synchronous condenser voltage regulating controls, limit functions, equipment capabilities and Protection System settings.

PRC-023-6 (Transmission Relay Loadability)

Purpose: Protective relay settings shall not limit transmission loadability; not interfere with system operators' ability to take remedial action to protect system reliability and; be set to reliably detect all fault conditions and protect the electrical network from these faults.

PRC-024-4 (Frequency and Voltage Protection Settings for Synchronous Generators, Type 1 and Type 2 Wind Resources, and Synchronous Condensers)

Purpose is to assure that protection of synchronous generators, type 1 and type 2 wind resources, and synchronous condensers do not cause tripping during defined frequency and voltage excursions in support of the Bulk Power System (BPS).

PRC-025-2 (Generator Relay Loadability)

Purpose is to set load-responsive protective relays associated with generation Facilities at a level to prevent unnecessary tripping of generators during a system disturbance for conditions that do not pose a risk of damage to the associated equipment.

PRC-026-2 (Relay Performance During Stable Power Swings)

Purpose is to ensure that load-responsive protective relays are expected to not trip in response to stable power swings during non-Fault conditions.

PRC-027-1 (Coordination of Protection Systems for Performance During Faults)

Purpose is to maintain the coordination of Protection Systems installed to detect and isolate Faults on Bulk Electric System (BES) Elements, such that those Protection Systems operate in the intended sequence during Faults.

PRC-029-1 (Frequency and Voltage Ride-through Requirements for Inverter-based Resource)

Purpose is to ensure that IBRs Ride-through to support the Bulk Power System (BPS) during and after defined frequency and voltage excursions.

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. Commission staff estimates that nearly all of the respondents are likely to make and keep related records in an electronic format. Each of the eight 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.

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 filing requirements concurrent with OMB review or as the Commission deems necessary to eliminate duplicative filing and to minimize the filing burden. This information is not available elsewhere. 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 additional requirements.
The standard-developing group (the ERO and various stakeholders) think these areas need to be addressed and documented as indicated in the NERC Petition.

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

Small entities generally can reduce their burden by taking part in a joint registration organization or a coordinated function registration. These options allow an entity the ability to share its compliance burden with other similar entities.

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

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

PRC Reliability Standards on Bulk-Power System elements are an integral part of reliable grid operation. Protection systems are designed to detect and isolate faulty elements on a system, thereby limiting the severity and spread of system disturbances, and preventing possible damage to protected elements. The Commission finds that the currently effective Reliability Standards do not adequately address the risks posed by the increasing numbers of IBRs connecting to the Bulk-Power System. The collection cannot be collected less frequently, as the voltage and frequency protection must be set to avoid tripping during defined frequency and voltage excursions. The ride-through requirements of PRC-029, Requirements R1 through R3 should strengthen the reliability of the Bulk-Power System by ensuring that IBRs are designed and operated to remain connected to the Bulk-Power system and continue to inject real and/or reactive current during system disturbances. PRC Reliability Standards were established such that the declining frequency is arrested and recovered in accordance with NPCC performance requirements. The collection cannot be collected less frequently, as the proper targets need to be set in terms load tripping at the required frequency set points. Over time the amount of load on will change and if not reviewed it may result in missing targeted values and cause frequency decline that would trip generation leading to widespread uncontrolled outages.

Each transmission owner, generator owner, and distribution provider

shall provide its planning coordinator, transmission operator, and reliability coordinator with an updated list of circuits associated with those transmission line relays at least once each calendar year.

7. EXPLAIN ANY SPECIAL CIRCUMSTANCES RELATING TO THE INFORMATION COLLECTION

There are no special circumstances as described in 5 CFR 1320.5(d)(2).

8. DESCRIBE EFFORTS TO CONSULT OUTSIDE THE AGENCY: SUMMARIZE PUBLIC COMMENTS AND THE AGENCY'S RESPONSE TO THESE COMMENTS

The ERO process to develop Reliability Standards is a collaborative process involving the ERO, Regional Entities and other stakeholders developing and reviewing drafts, and providing comments, vetting, and voting (possibly multiple rounds) on the standards, with the final standard submitted to the FERC for review and approval.

RD25-10 Order Published on 12/22/2025,
In addition, the Commission is publishing a 30-day Notice in the Federal Register[13].

9. EXPLAIN ANY PAYMENT OR GIFTS TO RESPONDENTS

The Commission does not make payments or provide gifts for respondents related to these collections.

10. DESCRIBE ANY ASSURANCE OF CONFIDENTIALITY PROVIDED TO RESPONDENTS

According to the NERC Rules of Procedure, "…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." This serves to protect confidential information submitted to NERC or Regional Entities.

Responding entities do not submit the information collected for 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.

[13] 91 FR 10388, March 3, 2026

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.

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

12. ESTIMATED BURDEN OF COLLECTION OF INFORMATION
Final Rule RM25-10
The Commission's requests to OMB will reflect the following:

Reliability Standards largely consist of sharing and communicating readily available data and information for category 2 resources. Thus, Commission staff anticipates that the paperwork burden should be minimal for category 2 resources. The number of respondents, in the tables below, are based on good faith estimates provided by NERC, in August 2025, to Commission staff for the number of entities that either own or operate category 2 resources

FERC-725G: Mandatory Reliability Standard for the PRC						
	Number of Respondents[14] (1)	**Annual Number of Responses per Respondent (2)**	**Total Number of Responses (1)*(2)=(3)**	**Average Burden & Cost Per Response[15] (4)**	**Total Annual Burden Hours & Total Annual Cost (3)*(4)=(5)**	**Cost per Respondent ($) (5)÷(1)**
PRC-012-2 Annual Review and Record Retention	491 (GO)	1	491	40 hrs. $2,540.80	19,640 hrs. $1,247,532.80	$2,540.80

[14] See note 10.

[15] See note 11.

PRC-017-1 Annual Review and Record Retention	491 (GO)	1	491	40 hrs. $2,540.80	19,640 hrs. $1,247,532.80	$2,540.80
TOTAL			**982**		**39,280 hrs. $2,495,065.60**	**$5,081.60**

The responses and burden hours for Years 1-3 will total respectively as follows:

13. ESTIMATE OF THE TOTAL ANNUAL COST BURDEN TO RESPONDENTS

There is no start-up, capital, or other non-labor hour cost associated with the Paperwork Reduction Act (PRA) aspects of RD25-10. All costs are associated with burden hours and are addressed in Questions 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 PRA Administrative Cost (estimate of $8,404 per collection annually) is a Federal Cost associated with preparing, issuing, and submitting materials necessary to comply with the Paperwork Reduction Act of 1995 (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 or orders, and other changes to the collection, as well as necessary publications in the Federal Register.

	Number of Employees (FTE)	**Estimated Annual Federal Cost**
Analysis and Processing of filings[16]	0	0

PRA Administrative Cost		$8,404
FERC Total		$8,404

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

FERC-725G	Total Request	Previously Approved	Change due to Adjustment in Estimate	Change Due to Agency Discretion
Annual Number of Responses	22,034	21,052	0	+982
Annual Time Burden (Hr.)	1,055,091	1,015,811	0	+39,280
Annual Cost Burden ($)	0	0	0	0

16. TIME SCHEDULE FOR PUBLICATION OF DATA

There are no data publications.

17. DISPLAY OF EXPIRATION DATE

The expiration date is posted at https://www.ferc.gov/enforcement-legal/legal/information-collections .

18. EXCEPTIONS TO THE CERTIFICATION STATEMENT

The Commission does not use statistical methods for these collections.

[16] Based on the Commission's FY (Fiscal Year) 2026 average cost (for wages plus benefits), $102.00/hour is used.