

FERC-915 (OMB Control No. 1902-0223):

For ease of comparison, we are providing the following information on the burden and cost:

1. currently approved in the OMB inventory and system,
2. this request (for clearance extension through 7/2012), and
3. the related entries in OMB's ROCIS system.

Please note that OMB's ROCIS system truncates and/or rounds off certain components of the calculations for burden and cost. In addition, FERC's calculations are best estimates for annual figures, averaged over a three-year period; they have also been rounded.

Annual Estimates	Number of Respondents Annually (1)	Number of Responses Per Respondent (2)	Average Burden Hours Per Response (3)	Total Annual Burden Hours (1)x(2)x(3)	Annual Private Sector Costs (\$)	Annual Costs to Federal Gov't. (\$)
Current Clearance, approved by OMB through 07/2009 ¹						
	1,150	1	2	2,300	\$2,166,600 ²	\$0 Error: Reference source not found
This Request, for approval through 7/2012						
	1,150	1	1	1,150	\$439,408 Error: Reference source not found	\$1,480 Error: Reference source not found
This request (for extension through 7/2012), as compared to existing OMB approval (expiring 7/2009) Error: Reference source not found <small>Error: Reference source not found</small>						

¹ These figures are from the OMB Notice of Action (NOA) dated 7/12/2006, the associated FERC supporting statement (ICR No. 200605-1902-012, on FERC Docket No. RM06-14-000 (Final Rule)), and the OMB ROCIS system,

² For the current inventory, OMB's system shows estimated annual public and federal costs of \$0. However, the estimated annual costs included in the associated FERC supporting statement were: a) industry cost of \$2,166,600 [2,300 staff hours @ \$17 an hour, for a total staff cost of \$39,100; plus storage cost of 1,150 entities @ \$925 per year x 2, for a storage cost of \$2,127,500], and b) federal cost of \$0. As stated, "[t]here will be no costs to the Federal Government unless a specific entity is the subject of an investigation. Then, the costs will vary per entity and due to the scope of the investigation and the corresponding staffing requirements."

In this clearance package, the current estimate submitted for industry cost is \$439,408 (staff cost of \$19,550 plus storage cost of \$419,858), reflecting the increased use, and less expensive cost, of electronic storage. Similar to the current federal cost figure, the estimated burden on government for analysis is *de minimus*, as the information collection merely requires entities to retain documents, not file them. Any associated burden on the government would be caused by case-specific FERC compliance audits of entities with the requirement. The change in the federal cost is due to including the estimated annual federal cost for Forms Clearance review (\$1,480).

For comparison purposes, the current figures (noted above, in OMB's inventory) from the supporting statements are subtracted from the figures for this clearance request.

	no change	no change	-1	-1,150	-\$1,727,192 Error: Reference source not found	+\$1,480 Error: Reference source not found
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