

James Hunter Poole, Thomasville, GA.

Affidavit of Paperwork Burden Evaluation, Energy Infrastructure Impact Analysis, and Administrative Record Establishment

ROUTED TO: Office of Management and Budget (OMB) and Office of Information and Regulatory Affairs (OIRA)

Paperwork Reduction Act Burden Challenge and Oversight Referral (Federal Energy Regulatory Commission)

Prepared by:

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and

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Dated: January 11, 2026

Filed and Submitted Pursuant To:

28 U.S.C. § 1746;

5 U.S.C. § 553(c);

5 U.S.C. § 706(2)(A);

44 U.S.C. § 3101;

the Paperwork Reduction Act (44 U.S.C. § 3501 et seq.);

the Regulatory Flexibility Act (5 U.S.C. §§ 601â€"612);

the Federal Power Act;

OMB Circular A-4 (Regulatory Analysis);

OMB Circular A-130 (Managing Information as a Strategic Resource);

and Executive Orders governing centralized regulatory review, national

energy security, infrastructure resilience, cost minimization, and paperwork

reduction, including Executive Orders 12866, 13563, 13771, 13807, 14094, and

14192, and Presidential directives emphasizing energy dominance,

deregulation, infrastructure acceleration, and elimination of waste, fraud,

and abuse.

Formal Referral and Interagency Review Request

This affidavit constitutes a formal Paperwork Reduction Act burden challenge and an explicit request that the Federal Energy Regulatory Commission transmit this submission in fullâ€"including all supporting burden, economic, infrastructure, and workforce analysisâ€"to the Office of Management and Budget and the Office of Information and Regulatory Affairs for centralized interagency review.

This submission further requests immediate oversight review by:
the Government Accountability Office, and

the FERC Office of Inspector General,

to determine whether FERCâ€™s existing and proposed information-collection practices:

â€¢ materially exceed statutory necessity;

â€¢ constitute excessive or duplicative paperwork under the PRA;

â€¢ suppress infrastructure development and capital formation;

â€¢ conflict with Executive Order directives on deregulation and energy security;

â€¢ and reflect potential waste, mismanagement, or systemic over-collection.

I. Declaration and Purpose

I, James Poole, being duly authorized as Chief Executive Officer of Obelisk Tech Systems Inc. and Save the American Communities LLC, declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the statements herein are true and correct to the best of my knowledge and belief.

Obelisk Tech Systems Inc. and Save the American Communities LLC provide federal consulting, compliance engineering, infrastructure risk analysis, and defense-adjacent services related to regulatory burden, energy-system resilience, national infrastructure protection, and economic security. These statements are based on operational analysis, audit-grade compliance review, and observed real-world impacts of FERC and related energy-sector documentation, reporting, and compliance mandates on:

â€¢ utilities and grid operators;

â€¢ infrastructure contractors;

â€¢ regional transmission organizations;

â€¢ and infrastructure-dependent industries critical to national security.

Purpose of this affidavit and public comment

This submission is intended to:

â€¢ Formally oppose the proposed FERC rule as written due to materially understated paperwork and compliance burden;

â€¢ Establish a clear administrative record demonstrating that FERCâ€™s burden estimates fail to reflect real-world operational conditions and

cumulative compliance realities;

â€¢ Trigger mandatory escalation of the burden analysis to OMB, OIRA, GAO, and the FERC Inspector General prior to any lawful finalization. This affidavit is submitted as significant relevant matter requiring a substantive response and permanent preservation in the administrative record.

II. Position Statement

I do not support the proposed FERC rule as written.

While grid reliability and energy oversight are legitimate federal interests, the Commissionâ€™s current approach relies on excessive, layered, and duplicative documentation requirements that far exceed what is necessary to achieve safety, reliability, or market integrity.

From an audit, compliance, and infrastructure-security perspective, the rule improperly treats compliance as a clerical reporting exercise while ignoring the full operational reality, including:

â€¢ cumulative and repetitive documentation cycles;

â€¢ redundant filings across FERC, NERC, and regional entities;

â€¢ diversion of engineering, legal, and operations staff into compliance roles;

â€¢ project delays caused by administrative bottlenecks rather than technical constraints;

â€¢ suppressed private investment in grid expansion and modernization.

A rule that increases paperwork burden without proportional infrastructure benefit:

â€¢ weakens national energy security;

â€¢ raises consumer and industrial energy costs;

â€¢ delays infrastructure deployment;

â€¢ and directly conflicts with Executive Order mandates to deregulate, streamline permitting, and accelerate critical infrastructure.

III. Paperwork Reduction Act and Regulatory Flexibility Act Violations

A. Extreme PRA Burden Understatement

Under the Paperwork Reduction Act, agencies must accurately estimate total burden hours, including indirect, corrective, rework, audit-response, and opportunity-cost activities.

FERCâ€™s current burden estimates materially understate real-world compliance effort by excluding the full lifecycle of documentation and enforcement exposure.

Illustrative High-Burden FERC / NERC Information Collections

Regulated entities are routinely required to prepare, maintain, revise, and defend documentation associated with at least the following high-burden filings and compliance packages:

FERC Form 1

FERC Form 1-F

FERC Form 2

FERC Form 6

FERC Form 60

FERC Form 714

Interconnection study submissions

Transmission planning documentation

Reliability compliance narratives

Mitigation and corrective action plans

Cybersecurity attestations

Physical security filings

Environmental and siting supplements

Audit response packages

Data validation and correction cycles

Engineering re-certifications

Internal control documentation

Change-management filings

Incident reporting follow-ups

Regional entity duplicative submissions and post-approval monitoring

20. PRA Burden Adjustment (Conservative, Audit-Grade)

For PRA purposes, once engineering analysis, internal review, legal verification, correction cycles, audit readiness, workforce diversion, and opportunity cost are included, actual compliance burden is conservatively at least twenty times higher than FERC's stated form-completion estimates.

This level of understatement:

• invalidates the PRA analysis;

• undermines cost-benefit justification under OMB Circular A-4;

• and requires immediate OMB/OIRA intervention.

B. Regulatory Flexibility Act Violations

Under the Regulatory Flexibility Act, agencies must mitigate disproportionate impacts on small entities.

FERC's fixed documentation and reporting costs:

• disproportionately burden municipal utilities, rural cooperatives, and small transmission operators;

• force small entities to divert scarce technical staff into compliance;

• delay grid upgrades and capacity expansion;

• suppress job creation in construction, engineering, and energy services.

These effects directly contradict Executive Orders emphasizing infrastructure expansion, energy reliability, and economic growth.

IV. National Infrastructure, Economic, and Security Impact

Energy infrastructure constitutes critical national infrastructure essential to economic stability, national defense, public safety, and continuity of government operations.

Excessive administrative documentation and compliance drag imposed by this rule produce measurable and foreseeable economic harm, including:

• Delayed grid expansion and modernization, increasing project timelines by months or years;

• Suppressed private investment, as capital is diverted from construction and engineering into compliance staffing and legal review;

• Increased outage risk, due to delayed upgrades, deferred maintenance, and slower integration of new capacity;

• Reduced resilience during extreme weather and emergencies, where administrative bottlenecks directly impede readiness;

• Higher energy costs for households and businesses, as compliance costs are passed through to ratepayers.

Economic and Job Impact (Conservative Illustrative Estimates)

For purposes of OMB Circular A-4 analysis, the following conservative, illustrative national-level impacts warrant formal review:

• Every \$1 billion delay in grid infrastructure investment is associated with approximately 6,000-7,000 direct and indirect jobs not created or delayed across construction, engineering, manufacturing, and supporting services.

• If excessive paperwork and compliance friction delays even 5-10 percent of planned grid projects nationally in a given year, the result is: tens of thousands of delayed or foregone jobs;

billions of dollars in deferred economic activity;

reduced tax base at federal, state, and local levels.

By contrast, adopting the corrective approach outlined in this submission—reducing duplicative documentation, recalculating burden realistically, and enforcing disciplined reporting—would:

• accelerate project timelines;

â€¢ unlock capital currently held in regulatory limbo;
â€¢ support job growth in skilled trades, engineering, and energy services;
â€¢ lower long-term system costs and consumer energy prices.

National Security Implications

From a national-security perspective, administrative over-documentation that slows infrastructure deployment creates strategic vulnerability. While the United States delays grid modernization due to internal compliance friction, adversarial states are investing aggressively in energy infrastructur

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