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| **From:** | Electricity2023 |
| **To:** | Morales, Gerson |
| **Subject:** | FW: Feedback to EIA 2023 data collection |
| **Date:** | Wednesday, July 20, 2022 9:27:55 AM |

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**From:** Electricity2023
**Sent:** Monday, June 6, 2022 11:51 AM
**To:** Joachim Seel <jseel@lbl.gov>; Electricity2023 <Electricity2023@eia.gov>
**Subject:** RE: Feedback to EIA 2023 data collection

Hi Joachim,

Thank you for your recommendations. EIA has limited flexibility to accommodate additional changes to the surveys beyond what we have proposed. However, we offer the following observations

The wind manufacturer was added because it offered a means of collecting additional design data at a lesser burden that breaking out the questions. We have not researched the issue around solar module manufacturer to the same extent, however if there is a similar advantage to collecting solar manufacturer then we would certainly consider adding it in future reclearance opportunities.

The proposal to add interconnection costs to the EIA-860 correctly references the period of the form in which those costs were collected. In 2013, we determined that a maintain a burden-neutral proposal was to change the cost data that we collected to the generator rather than the interconnection. We still hold the view that the generator cost is the more valuable of those two options. Adding the interconnection cost to the generator cost would be a significant respondent burden. While we can consider such a change in a future reclearance, we would have to assess that burden relative to the value of the data collected.

The recommendation for adding monthly data collection for renewable resources to the EIA-923 is under consideration (please refer to the proposed form and instructions posted here).

Best,

Sara

Sara Hoff, Ph.D.
Office of Energy Production, Conversion and Delivery
Office of Energy Statistics
U.S. Energy Information Administration (EIA)

**From:** Joachim Seel [mailto:jseel@lbl.gov]

**Sent:** Monday, June 6, 2022 9:45 AM
**To:** Electricity2023 <Electricity2023@eia.gov>
**Subject:** Feedback to EIA 2023 data collection

Dear EIA,

Many scientists at the Lawrence Berkeley National Lab are using your data for research sponsored by the US Department of Energy. We have a couple of suggestions for changes how the data collection could become even more useful for us:

- EIA 860 Solar module manufacturer and model information: I saw that for wind the form inquires about turbine manufacturer and turbine model (EIA 860 annual 25, 26) - would it be possible to get similar information for solar modules (EIA-63B does not quite provide this information) ? I have been asked several times by the US Department of Energy / White House about such statistics and we spend a lot of time scrapping that data manually from a variety of sources.

- EIA 860 generator interconnection costs: EIA used to (2003-2012) compile interconnection costs in Form EIA-860 Data - Schedule 5, 'Interconnection Data' (for completed projects). Since then, the topic of interconnection costs has become more important. Based on many interviews with developers as well as public testimony (e.g. in the context of the FERC ANOPER on transmission planning) they now seem to represent a large obstacle for many generators, at times leading to project cancellations. The US Department of Energy leads a new effort to increase data transparency about interconnection costs (https://www.energy.gov/eere/i2x/about-interconnection-innovation-e-xchange-i2x), but data is hard to come by. We have spent large amounts of funding on manual data collection of interconnection costs from interconnection requests pdf at major ISOs. The data collected is problematic for a variety of reasons: It is limited to some ISOs, the sample is small and doesnt go far back in time, it is inaccessible to many stakeholders and generators identified in BA interconnection queues are difficult to match to EIA projects IDs once they are operational. We ask for the EIA to collect data on point-of-interconnection costs and network upgrade costs that had to be paid for a project that became operational. If data privacy concerns exist for this type of cost information, Berkeley Lab would be willing to engage in NDAs with EIA, similar to the agreements that we have for capital costs.

EIA923: EIA currently collects annual data from all solar and wind plants and monthly data from a subset of solar and wind plants. EIA then find an average monthly profile for solar and wind in each state based on the subset of monthly data they collect, and apply that monthly profile to all other solar or wind plants in each state. Berkeley Lab uses project-level hourly generation profiles to estimate impacts of increased solar and wind penetration on grid operations, reliability, and market value and leverages EIA 923 data to debiase generator-level simulated data. It would be great if EIA moved back to collecting monthly generation for all plants, rather than just a sample of plants.

Thank you very much and kind regards,
Dr. Joachim Seel
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Joachim (Jo) Seel (*Pronunciation Help*)

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