From:	Electricity2023
To:	Morales, Gerson
Subject:	FW: BPA COMMENTS: EIA-930 AND EIA-930A
Date:	Wednesday, October 5, 2022 2:51:28 PM

From: Electricity2023
Sent: Thursday, September 22, 2022 11:41 AM
To: Donahoo,Ashley D (BPA) - TOI-DITT-2 <addonahoo@bpa.gov>; Electricity2023 <Electricity2023@eia.gov>
Subject: RE: BPA COMMENTS: EIA-930 AND EIA-930A

Hello Ms. Donahoo,

Thank you for your interest in EIA's Electric Power Survey Form Changes Proposed for 2023.

Thank you for your detailed comments regarding the proposed changes to Form EIA-930 and proposed Form EIA-930A. We have highlighted your comments, removed duplicate comments, and provided responses:

BPA Comment for the EIA-930 Report: BPA believes it is most accurate, prudent, and efficient to define its "geographic" boundary identical to its true electronic BA boundary, thereby aligning with FERC and NERC definitions.

> **Response**: EIA understands that BPA views their operation from a perspective consistent with FERC and NERC conventions. However, with the Form EIA-930 data collection, EIA is attempting to represent electric system operations in as purely a physical way as possible. EIA recognizes that this difference in perspective presents a reporting challenge for some BAs within the Western Interconnection. As a result EIA has proposed changing the form instructions to allow BAs to include dynamic transfer arrangements implemented as either pseudo-ties or dynamic schedules in the reporting of generation, demand, and interchange. This flexibility will allow neighboring BA's to mutually agree to report data on form EIA-930 using FERC and NERC conventions. However, EIA will not require the change recommended by BPA. This will avoid the potential risk of increased burden to other BA's.

BPA Comment for the EIA-930A Report: In general, BPA is concerned that the new EIA-930A Report would result in significant duplication of work and cause further confusion, as the information provided in the EIA-930 Report and EIA-860 Report already provide the information requested in the new EIA-930A Report.

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> **Response**: EIA recognizes the burden associated with a new survey. However, the proposed new Form EIA-930A is necessary because it will provide insight into which subset of generators reported on Form EIA-860 have their generation reflected in Form EIA-930 and which subset do not. Because some balancing authorities do not meter every generating unit in their vicinity, the generation of some small-scale generators reported in Form EIA-860

is not included in the generation reported in Form EIA-930. The proposed new form EIA-930A will clarify which specific generating resources are reflected in the Form EIA-930. To reduce the respondent burden associated with completing this proposed form, EIA intends to pre-fill form EIA-930A with a preliminary inventory based on information collected on Form EIA-860.

BPA Comment for the EIA-930A Report (Continued): Most importantly, BAs in the Western Interconnection are intertwined in ways that make it very difficult to provide "details about electric generators physically imbedded within the tie line boundary of your balancing authority, or which were owned, operated, or dispatched by your balancing authority." For example, BPA is a large territory that is intertwined with at least 19 other BAs, including two generation-only BAs. Since the Western Interconnection doesn't use physical, geographic boundaries, this requirement would cause an undue burden to the BAs when the information can already be found in the EIA-930 and EIA-860.

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Response: Based on this feedback EIA intends to update the instructions for Form EIA-930A to clarify that the generator inventory should be reported using the same set of generators used to complete Form EIA-930.

BPA Comment about EIA-930 reporting net generation by energy source: BPA is concerned the increased granularity will be more difficult to manage and track due to the combinations of generation installed initially and added by generators later on.

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Response: EIA has expanded the list of energy sources used to produce electricity to keep up with changes in technology. If BA's do not know the primary source of energy used to produce electricity for a generator, BA's may report the generation using data code UNK ("unknown").

BPA Comment about EIA-930 Data Quality (energy balance): "This relationship should continue…" BPA finds this sentence confusing and not sure what it's referring to. BPA recommends not adding this additional language. It provides confusion and makes it seem like EIA is asking for something different than what is already being asked of the BAs.

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Response: EIA intends to remove this paragraph.

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BPA Comment about EIA-930 Data Quality (energy balance): What tolerance and level-of-accuracy values are expected? BPA feels this could also be very time-and-labor intensive.

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Response: EIA will clarify the instructions to address the MWh thresholds that are expected.

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BPA Comment regarding the added paragraph at the end of section "Physical vs. commercial operations" (EIA-930): BPA doesn't believe the added paragraph at the end of this section resolves BPA's concerns. For example, a BA could tell all of the adjacent BAs that it is no longer going to report on generation that is pseudo-tied into other BAs and that it is their responsibility to include that generation in their BA with the associated tie lines.

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Response: Based on this feedback EIA intends to update the instructions to clarify that once an agreement has been communicated to EIA, none of the impacted balancing authorities should alter that reporting agreement without mutual agreement of all impacted balancing authorities.

BPA Comment regarding the burden for Form EIA-930: BPA feels that the estimated burden of seven hours per month per BA is not accurate. During the past couple of years, the large amount of reconciliation of data has been significantly more burdensome. BPA recommends that the request should be to report per the NERC/WECC identified BA boundary method in order to significantly reduce the reporting burden on BAs to be commensurate with the value.

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Response: EIA's 83 hour annual burden estimate only includes the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. It does not include the time to revise or reconcile data submitted incorrectly. However, to help reduce respondent burden EIA has proposed instructions to provide an avenue for BPA to report per the "NERC/WECC identified BA boundary method."

As always, we are thankful for your comments and suggestions.

Sincerely,

Paul F. McArdle, Ph.D.
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From: Donahoo,Ashley D (BPA) - TOI-DITT-2 [mailto:addonahoo@bpa.gov]
Sent: Friday, July 22, 2022 11:14 AM
To: Electricity2023 <Electricity2023@eia.gov>
Cc: DeVilbiss, Jonathan <Jonathan.DeVilbiss@eia.gov>; Cathcart,Michelle M (BPA) - TO-DITT-2 <mmcathcart@bpa.gov>; Gregory,Michael A (CONTR) - TOI-DITT-2 <magregory@bpa.gov>
Subject: BPA COMMENTS: EIA-930 AND EIA-930A
Importance: High

RE: ELECTRIC POWER SURVEY FORM CHANGES PROPOSED FOR 2023

The Bonneville Power Administration (BPA) appreciates this opportunity to comment on the Federal Register Notice (FRN) of proposed changes to the Hourly and Daily Balancing Authority Operations Report Data Format and Transmittal Instructions (EIA-930 Report) and the proposed new Annual Balancing Authority Generator Inventory Report (EIA-930A Report).

Attached are BPA's comments:

- BPA Response EIA Proposed Changes to the EIA-930 EIA-930A Reports July 19 2022_FINAL **(executive summary overview)**
- BPA Comments EIA-930 Report July 19, 2022 **(BPA red-lined comments to the official EIA-930 form)**
- BPA Comments EIA-930A Report July 19, 2022 **(BPA red-lined comments to the official EIA-930A form)**
- EIA 903 Definition of BPA Geographic Boundary **(BPA's white paper)**

Please contact me if you have questions.

Thank you,

Ashley Donahoo
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