From: Electricity2023
To: Morales, Gerson
Subject: FW: Comments on the Proposed 2023 Electric Power Survey Form Changes
Date: Wednesday, October 5, 2022 2:51:08 PM

From: Electricity2023
Sent: Thursday, September 22, 2022 11:24 AM
To: Slayton, Gary <GSlayton@idahopower.com>; Electricity2023 <Electricity2023@eia.gov>
Subject: RE: Comments on the Proposed 2023 Electric Power Survey Form Changes

Hello Mr. Slayton,

Thank you for your interest in EIA's Electric Power Survey Form Changes Proposed for 2023. See responses to your comments below:

Form EIA-930 - Based on comments EIA has received about the proposed changes to form EIA-930, EIA has removed the proposed collection of Demand Response from Form EIA-930.

Form EIA-930A - The proposed new form EIA-930A is needed because it will provide insight into which subset of generators reported on Forms EIA-860 and EIA-860M have their generation reflected in Form EIA-930. Because some balancing authorities do not meter every generating unit in their vicinity, the generation of some small-scale generators reported in Forms EIA-860 and EIA-860M 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 Form EIA-930.

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

Sincerely,

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From: Slayton, Gary [mailto:GSlayton@idahopower.com]
Sent: Thursday, July 7, 2022 12:52 PM
To: Electricity2023 <Electricity2023@eia.gov>
Cc: Baez, Ben <BBaez@idahopower.com>
Subject: [EXTERNAL] Comments on the Proposed 2023 Electric Power Survey Form Changes

Hi,

My comments on the proposed 2023 Electric Power Survey Form changes are:

- EIA 930 changes look fine with exception of why Demand Response is needed?
    - How would this be exactly calculated from the actual load curve?
- EIA 930A does not appear to be need as explained below.

Why is 930A not needed

In the purpose section of the 930A Instructions it says "and ensures that multiple respondents to Form EIA-930 are not reporting generation for the same generators."

- EIA 930 Instructions already ensures that multiple respondents to Form EIA 930 are not reporting generation for the same generators.
    - EIA 930 section on Physical vs. Commercial Operations
        - "Ownership and dispatch are irrelevant to the determination of what is associated with a balancing authority."
        - "Therefore, dynamic transfer arrangements implemented as either pseudo-ties or dynamic schedules are to be ignored in or excluded from reporting, meaning that metered tie line flow s are not to be adjusted and actual demand and net generation should reflect only demand and net generation occurring within the physical tie line boundaries of the balancing authority."
        - "Generators physically embedded within the tie line boundary of your balancing authority, but owned, operated, or dispatched by another balancing authority, are to be included,"
        - "if your balancing authority is supplied from a generator that is owned, operated, or dispatched by you, but is located outside the tie line boundary of your balancing authority, it is not to be included,"
        - "Ultimate customer load that is physically embedded within the tie line boundary of your balancing authority, but is supplied by another balancing authority, is to be included,"
        - "if your balancing authority supplies electricity to ultimate customer load outside the tie line boundary of your balancing authority, it is not to be included"
        - "if ultimate customer load is supplied through your system and the load area is not physically embedded in another balancing authority, include that load in your actual demand, even though you consider the load area outside your metered tie line boundary."
- It appears the EIA 860 and 860M already addresses the generator inventory.

Please let me know your thoughts.

Thank you,
Gary Slayton
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