From: Electricity2023
To: Morales, Gerson
Subject: FW: Comments on Proposed Changes to Form EIA-930 and Form EIA-930A
Date: Wednesday, October 5, 2022 2:51:36 PM

From: Electricity2023
Sent: Thursday, September 22, 2022 11:54 AM
To: Caley, Margoth <MCaley@iso-ne.com>; Electricity2023 <Electricity2023@eia.gov>
Subject: RE: Comments on Proposed Changes to Form EIA-930 and Form EIA-930A

Hello Ms. Caley,

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. Please see our responses below:

1. **ISO/RTO Council** - EIA Should Clarify the Proposed Change to Form EIA-930 to Include "Yesterday's hourly demand response" in Daily Files

   Response: 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.

2. **ISO/RTO Council** - Data for Generator Types Should be Provided Only if Available

   Response: On Form EIA-930, respondents should use energy source UNK (Unknown) if the energy source used to generate electricity is unknown. EIA has added an "Unknown" option to for Generator Technology on Form EIA-930A.

3. **ISO/RTO Council** - The Terms "planned generator" and "planned electric generator" in New Form EIA-930A should be Consolidated and Defined. … In addition, the IRC believes the definition should not refer to projects in interconnection queues because they include speculative projects….

   Response: EIA has revised the proposed instructions to use the more specific term "planned electric generator" rather than the term "planned generator." EIA has also clarified that respondents do not have to include planned electric generators that they are not aware of.

4. **ISO/RTO Council** - EIA Should Clarify the Timing for the First Submission of New Form EIA-930A and, in Setting a Date for that Submission, Should Consider the Submission

Format for Form EIA-930A

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Response: In order to give respondents time to prepare for the proposed Form EIA-930A data collection, the initial annual data collection will begin on the first business day of January 2024 and reflect the status of existing electric generators as of December 31, 2023.

5. **ISO/RTO Council** - EIA Should Clarify Whether to include Load Resources when Reporting "Generation"

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Response: EIA has clarified the EIA-930 instructions to clarify that load resources acting as "generation" by agreeing to reduce load in exchange for financial compensation should not be included in the reported net generation.

6. **ISO/RTO Council** - EIA Should Clarify the Meaning of "Net Generation"

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Response: EIA has added an example to clarify how to report "Net Generation" when energy storage is involved.

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

Sincerely,

Paul F. McArdle, Ph.D.
Economist, Office of Energy Production, Conversion and Distribution
Office of Energy Statistics
U.S. Energy Information Administration (EIA)
Paul.McArdle@eia.gov |202-586-4445
Visit us @ EIA.gov

From: Caley, Margoth [mailto:MCaley@iso-ne.com]
Sent: Friday, July 22, 2022 1:57 PM
To: Electricity2023 <Electricity2023@eia.gov>
Cc: 'Ulmer, Andrew' <aulmer@caiso.com>; Gallo, Andrew <Adam.Gallo@ercot.com>; Kurt W. Bilas - Midwest ISO (kbilas@misoenergy.org) <kbilas@misoenergy.org>; Sweeney, James H. <JSweeney@nyiso.com>; DeVita, Thomas, S <Thomas.DeVita@pjm.com>; Dillon, Richard <rdillon@spp.org>
Subject: [EXTERNAL] Comments on Proposed Changes to Form EIA-930 and Form EIA-930A

ISO-NE PUBLIC

Good afternoon,

Attached are the comments of the ISO/RTO Council on the proposed changes to Form EIA-930 and Form EIA-930A.

Respectfully submitted,

Margo Caley
Senior Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, MA 01040
Office: (413) 535-4045 Cell: (413) 387-2408
mcaley@iso-ne.com
she, her, hers

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