

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

Commission Information Collection Activities) Docket No. RD23-6-000
(FERC-725A(1D) and FERC-725Z))

COMMENTS OF ARIZONA PUBLIC SERVICE COMPANY

Arizona Public Service Company (“APS”) respectfully submits comments to the Federal Energy Regulatory Commission’s (“FERC”) Notice of soliciting public comment on the currently approved information collections, FERC-725A(1D) (Mandatory Reliability Standards for the Bulk-Power System TOP-003-6.1) and FERC-725Z (Mandatory Reliability Standards for the Bulk-Power System IRO-010-5) issued on December 6, 2023, in the above captioned docket.

I. INTRODUCTION

APS, a wholly-owned subsidiary of Pinnacle West Capital Corporation (“PWCC”), is a vertically-integrated public utility doing business under the laws of the State of Arizona. APS is engaged in the business of generating, transmitting, and distributing electricity in eleven of Arizona’s fifteen counties. APS serves more than one million retail electric customers in Arizona and participates in wholesale markets throughout the West. APS is registered with the North American Electric Reliability Corporation (NERC) for

purposes of compliance with the Electric Reliability Standards and performs 10 of the registered NERC functions.¹

II. APS COMMENTS

1) Whether the collections of information are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility.

APS agrees that the collections of information for the proper performance of the functions are necessary. APS agrees that the practical utility of the data specifications is required in order for entities to perform their Operational Planning Analyses, Real-time monitoring, and Real-time Assessments.

2) The accuracy of the agency's estimate of the burdens and costs of the collections of information, including the validity of the methodology and assumptions used.

APS respectfully challenges the agency's estimate of average burdens and costs of the collection of information for TOP-003-6.1 and IRO-010-5 for Transmission Operators and Balancing Authorities of total hours each for years 1 and 2 (TOP-003-6.1 of total 43,440 hrs., and IRO-010-5 of total 25,392 hrs.). The agency's estimates appear to capture that of initial implementation only, within years 1 and 2, and does not capture efforts to implement data specification requirements beyond year 3 and forward. With a rapidly evolving resource mix, and an increase in new resource integrations or modifications to existing resources, functional entities may take longer than the total hours to implement functional data specification requirements for years 1, 2 and thereafter. Dependent upon an

¹ APS is currently registered with NERC as a Balancing Authority, Transmission Operator, Transmission Owner, Transmission Planner, Transmission System Provider, Planning Authority, Generation Operator, Generation Owner, Resource Planner, and Distribution Provider.

entity's resource portfolio, the agency's estimate may be accurate, however, from APS's experience in implementing data specification requirements for new resources, the total hours vary depending on multiple factors such as the type of Facility, personnel staffing and/or impacted systems. APS' process entails collaboration among multiple business areas to complete actions to ensure applicable data specification requirements are validated. To provide context, the RC West Data Specifications documented in RC0120A², includes ninety data items and approximately thirty additional other operational information as documented within "RC0130 Notification Requirements for Real-Time Events"³ and "RC0690 PRC-012 Remedial Action Schemes"⁴ California Independent System Operator ("CAISO") Guidance documents. The weight of experience implementing data specifications suggests that for every new Facility or modification to an existing Facility, entities are required to comply with and complete Reliability Coordinator and Transmission Operator's Data Specification requirements which extends beyond year 1 and 2 and will continue thereafter in an ongoing manner.

3) Ways to enhance the quality, utility, and clarity of the information collections.

APS supports the revisions documented FERC-725A(1D) (Mandatory Reliability Standards for the Bulk-Power System TOP-003-6.1) and FERC-725Z (Mandatory Reliability Standards for the Bulk-Power System IRO-010-5); as they provide further

² California Independent System Operator. (2023). *RC0120A RC West IRO-010 Data Specification* (Version No. 6.3). <https://www.caiso.com/rules/Pages/OperatingProcedures/Default.aspx#RCProcedures>

³ California Independent System Operator. (2023). *RC0130 Notification Requirements for Real-Time Events* (Version No. 1.7). <https://www.caiso.com/Documents/RC0130.pdf>

⁴ California Independent System Operator. (2023). *RC0690 PRC-012 Remedial Action Schemes* (Version No. 1). <https://www.caiso.com/Documents/RC0690.pdf>

clarification to the standards requirements by outlining that the Reliability Coordinator, Transmission Operator and Balancing Authority specify and require identification of the entity that is responsible for responding to the specifications deadlines or periodicity in which data and information is to be provided. These revisions are especially beneficial with jointly owned generating facilities, pseudo-tied generating facilities, and merchant generating facilities, to ensure entities responsible for responding to the specifications is clearly defined.

4) Ways to minimize the burden of the collections of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

APS supports and complies with the current methods of submitting and receiving data required for the data specifications. The current methods include ICCP, Email, Entity Model Management, FTP, Outage Scheduler, and web Interfaces. To the extent it does not create any other added burden to the existing multifarious process for submitting data according to the data specifications, to promote efficiencies in data transfer capabilities, APS would support the use of automated collection technologies or techniques.

III. CONCLUSION

APS appreciates the Commission's objective to solicit comments pertaining to the currently approved Reliability Standards TOP-003-6.1 (Transmission Operator and Balancing Authority Data and Information Specification and Collection) and IRO-010-5 (Reliability Coordinator Data Specification and Collection).

For the foregoing reasons, APS respectfully requests that any subsequent action taken by the Commission in this proceeding be consistent with the comments set forth herein.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon each person designated on the official service list compiled by the Secretary in this proceeding.
Dated at Phoenix, Arizona, this 12th day of February 2024.

/s/ Alyssa Koslow
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