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February 20, 2024

Via E-Mail

Glenn McGrath
U.S. Energy Information Administration
Mail Stop EI-23
1000 Independence Avenue SW
Washington, DC 20585

EIA111@eia.gov

Re: Macquarie Energy LLC on EIA's Reclearance of the EIA-111; Docket No.2023-28142 (December 21, 2023)

Dear Mr. McGrath :

Macquarie Energy LLC ("Macquarie") respectfully submits these comments in response to the invitation extended by the United States Energy Information Administration ("EIA") on December 21, 2023 in Docket No. 2023-28142 on the proposed three-year extension, with change, of the Quarterly Electricity Imports and Exports Report ("EIA-111").

Macquarie supports the EIA's goal in the proposal to reduce the reporting burden to entities who are required to submit the EIA-111 under the Federal Energy Administration Act of 1974 (Public Law 93-275), while improving data quality and increasing market transparency for the EIA to conduct more robust analysis.

However, due to limitations on the EIA respondent portal form ("Web Form"), the EIA-111 can be burdensome to prepare, despite the best efforts of the EIA to provide guidance and the filers to apply that guidance.

Accordingly, Macquarie welcomes the opportunity to offer comments with the intent to further reduce the burden of the collection of information in the EIA-111 and improve the quality and clarity of the information.

in the number of survey respondents required to file EIA-111.

I. Comments

1. Macquarie recommends that the Web Form allows the filer to save its Department of Energy's ("DOE") export authorization or Presidential permit number in the EIA respondent portal.

If an entity had reportable physical electric energy exports from the US to either Canada or Mexico, or exceeded limit events during the reporting quarter, the filer needs to manually populate the DOE export authorization or Presidential permit number in each transaction line of the Web Form.

To avoid any material errors from this data entering process, Macquarie recommends that the EIA to allow each filer to be able to save its authorization or presidential permit number in the Web Form and select or auto-populate it while preparing its submission.

2. Macquarie recommends the EIA considers adding further options in the drop-down menu list for 'Foreign Source Balancing Authority' and 'Transmission provider/Transfer Facility(ies)' fields.

While preparing previous submissions, Macquarie has noticed that some foreign source balancing and transmission data are not listed in the dropdown menu. Thus, for example, if the foreign source balancing authority is Ontario IESO or the transmission provider is Hydro-Quebec Trans Energie, we select the option 'other' and provide explanations in the comment section accordingly. However, if the Web Form provides additional reporting options in these fields, the filer would be able to provide granular data to the EIA. To improve data quality and increase market transparency for the EIA to conduct more robust analysis, Macquarie recommends the EIA to consider adding further reporting options in these fields.

II. Conclusion

As outlined above, requiring 1) The Web Form to be able to save or auto-populate the filer's DOE export authorization or presidential permit number and 2) EIA to add further reporting options in the drop-down menu list for 'Foreign Source Balancing Authority' and 'Transmission provider/Transfer Facility(ies)' fields would ensure filers to submit the accurate data and limit the potential reporting errors.

Macquarie appreciates the opportunity to submit these comments and looks forward to providing any support or elaboration on its comments to aid the EIA in this rulemaking.

Sincerely,

A handwritten signature in black ink, appearing to read 'Katie Sul', with a long horizontal flourish extending to the right.

Katie Sul
Manager
Macquarie Energy LLC

From: [Brown, Tyson](#)
To: Katie.Sul@macquarie.com; Jeff.Harris@macquarie.com; Paul.Tramonte@macquarie.com
Cc: [EIA111](#); [McGrath, Glenn](#)
Subject: RE: Comments of Macquarie Energy LLC on the proposed three year extension with change of the Form EIA-111
Date: Tuesday, May 21, 2024 2:29:35 PM

Ms. Sul:

The U.S. Energy Information Administration (EIA) appreciates the thoughtful comments Macquarie submitted on February 20 regarding the re-clearance of Form EIA-111. Here are our responses to your comments.

Comment 1

You suggested that the Web Form should allow filers to save their Department of Energy Export Authorization and Presidential Permit Number in the EIA respondent portal. We appreciate the suggestion. We are assessing our ability to add the pre-population function to the data collection system for Form EIA-111.

Comment 2

You recommended we consider adding further options in the drop-down menu list for the "Foreign Source Balancing Authority" and the "Transmission Provider/Transfer Facility(ies)" fields.

We can add options to the drop-down menus for these two fields as needed. You can suggest options either in the comments section of the survey or through email (EIA4USA@eia.gov).

EIA is committed to ensuring respondents can submit timely and accurate data. If you need additional information regarding these comments, please contact Glenn McGrath (glenn.mcgrath@eia.gov).

Sincerely,
M. Tyson Brown
U.S. Energy Information Administration

From: EIA111
Sent: Wednesday, February 21, 2024 4:08 PM
To: Katie Sul (RMG) <Katie.Sul@macquarie.com>; EIA111 <EIA111@eia.gov>
Cc: Paul Tramonte (RMG) <Paul.Tramonte@macquarie.com>; Jeff Harris (RMG) <Jeff.Harris@macquarie.com>
Subject: RE: Comments of Macquarie Energy LLC on the proposed three year extension with change of the Form EIA-111

Hi Katie,

Thank you for the thoughtful comments. We will prepare a response and incorporate your comments with the others that we received, along with our responses, as we prepare the clearance package for the Office of Management Budget's consideration.

Regards,

Glenn McGrath
U.S. Energy Information Administration
glenn.mcgrath@eia.gov
202-586-4325

From: Katie Sul (RMG) <Katie.Sul@macquarie.com>
Sent: Tuesday, February 20, 2024 5:32 PM
To: EIA111 <EIA111@eia.gov>
Cc: Paul Tramonte (RMG) <Paul.Tramonte@macquarie.com>; Jeff Harris (RMG) <Jeff.Harris@macquarie.com>
Subject: [EXTERNAL] Comments of Macquarie Energy LLC on the proposed three year extension with change of the Form EIA-111

Hi Mr. McGrath and team,

Macquarie Energy LLC respectfully submits our comments in response to the invitation extended by the United States Energy Information Administration on December 21, 2023 in Docket No. 2023-28142 on the proposed three-year extension, with change, of the Quarterly Electricity Imports and Exports Report (EIA-111).

We appreciate the opportunity to submit the comments and look forward to providing any support or elaboration on its comments to aid the EIA in this rulemaking. Please review the attached document and let us know if you have any questions.

Many thanks,

Katie Sul

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