

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Notice of Information Collections and
Request for Comments

Docket No. IC25-7-000

**COMMENTS OF
THE AMERICAN PUBLIC POWER ASSOCIATION
AND THE TRANSMISSION ACCESS POLICY STUDY GROUP**

The American Public Power Association (“APPA”) and Transmission Access Policy Study Group (“TAPS”) submit these comments in support of the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) June 16, 2025 notice of information collection requesting three-year extensions of FERC Form Nos. 1, 1-F, and 3-Q with no changes to the current reporting requirement.¹

I. INTERESTS OF APPA AND TAPS

APPA is the voice of not-for-profit, community-owned utilities that power 2,000 towns and cities nationwide. Public power utilities are in every state except Hawaii. They collectively serve over 55 million people in 49 states and five U.S. territories, and account for 15 percent of all sales of electric energy (kilowatt-hours) to end-use consumers.

TAPS is an association of transmission-dependent utilities in thirty-five states promoting open and non-discriminatory transmission access.² As municipal, cooperative, and investor-owned load-serving entities, TAPS members are responsible for providing reliable and affordable service to the consumers and businesses that rely on them and their members. TAPS members regularly intervene in Commission proceedings that establish transmission rates. Many

¹ FERC, Commission Information Collection Activities (FERC Form Nos. 1, 1-F, and 3-Q); Comment Request; Extensions (June 16, 2025), eLibrary No. 20250616-3024.

² See TAPS, *About Us*, <https://www.tapsgroup.org/about-us/> (last visited July 21, 2025). Jane Cirrincione, Northern California Power Agency, is the TAPS Chair; Kevin Gaden, Illinois Municipal Electric Agency, is the Vice Chair. Tom Heller is TAPS’s Executive Director.

TAPS members also pay formula transmission rates which have annual update processes. In all these proceedings, TAPS members require a broad array of data to ensure that rates remain just and reasonable.

Communications regarding these proceedings should be directed to:³

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II. COMMENTS

APPA and TAPS support the continuation of information collected in FERC Form Nos. 1, 1-F, and 3-Q with no changes to the reporting requirements. FERC Form No. 1 is the bedrock financial report used by the Commission and the public to ensure that FERC-jurisdictional rates are just and reasonable as required by the Federal Power Act. Information from FERC Form No. 1 is used as a direct input to calculating the rates charged by jurisdictional

³ APPA and TAPS requests that the Commission waive Rule 203(b)(3) of its Rules of Practice and Procedure, 18 C.F.R. § 385.203(b)(3), to allow each of the individuals listed below to be placed on the official FERC service list to avoid delays in receipt of notices and responses to pleadings.

utilities. Members of APPA and TAPS that pay those rates regularly scrutinize the information collected in FERC Form No. 1 to assess whether the rates by demanded by jurisdictional utilities are just and reasonable.

FERC Form No. 3-Q is a quarterly financial report that supplements FERC Form No. 1. As with FERC Form No. 1, information from FERC Form No. 3-Q is used by the Commission and the public to ensure that FERC-jurisdictional rates are just and reasonable. While the information from FERC Form No. 3-Q is not used as a *direct* input to calculating electric rates, electric transmission and wholesale power customers can use the quarterly information to gain greater insight into the annual data that is used to calculate the rates. In addition, in proceedings in which a utility seeks approval of a stated rate or revenue requirement, Form No. 3-Q can provide more recent data than would otherwise be available. Furthermore, the quarterly information from FERC Form No. 3-Q can be used by customers to forecast rate changes and corroborate utility data that is directly relevant to FERC-jurisdictional rates.

CONCLUSION

As described above, FERC Form Nos. 1 and 3-Q provide valuable information to the Commission for carrying out its statutory obligations and to electric customers for conducting scrutiny and oversight into the rates that they pay for Commission-jurisdictional services. APPA and TAPS, who have many members who are customers of jurisdictional electric utilities, therefore support the Commission's proposal to continue collecting this information.

Respectfully submitted,

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