

September 16, 2011

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street, NE
Washington, DC 20426

RE: *Federal Register* notice of August 3, 2011, for FERC Financial Forms: Federal Energy Regulatory Commission (FERC) Form 1; Annual Report of Non-Major Public Utilities Form 1-F (Docket Numbers: IC11-1-000 and IC11-1F-000)

Dear Secretary of the Commission:

The Bureau of Economic Analysis (BEA) is writing on behalf of the *Federal Register* notice of August 3, 2011, requesting comments to FERC Forms 1 and 1F.

BEA uses FERC tabulations indirectly, as they are used to estimate the U.S. Census Bureau's Construction Value Put-In Place (VPIP) for electric utilities. Census VPIP serves a major source data input to the National Income and Product Account (NIPA) structures investment estimates. NIPA estimates for electric structures rely upon the VPIP source data. Estimates of utility industry structures investment for the BEA Fixed Assets Accounts rely in turn upon the NIPA structures estimates and also directly upon selected FERC data sets published by the Energy Information Administration. While BEA uses this information indirectly through the VPIP program, it is considered an indispensable data source to the NIPA estimates.

BEA would like to explore receiving line items from Forms 1 and 1F aggregated to industry totals, similar to the method and timing used to provide information to the Census Bureau. These tabulations would be used by BEA for, among other things, estimating industry gross output and changes in intermediate inputs. BEA would use the aggregated FERC data as well for the Fixed Asset Account nonresidential structure investment, capital stock, and ultimately for consumption of fixed capital (depreciation) estimates that depend upon the NIPA structures estimates.

BEA has in the past used items such as plant in service by type of utility¹; subsidiary and non-utility investments; allowance for funds used during construction; plant held for future use; plant leased to others; construction work in progress; depreciation; and other plant-related schedules -- as they are useful in estimating total industry plant-in-service. In general, income statement and

¹ Table C11, <http://www.eia.gov/cneaf/electricity/public/tc11p01p1.html>

balance sheet data² support utility industry investment by industry estimates. Tabulations by legal form of ownership are also useful in the estimation of investment by legal form of organization for utility industries. Also of interest to BEA is plant-in-service separately identified for electric generation (by type of generation – hydro, nuclear, etc.), transmission, and distribution.

BEA requests that FERC consider the inclusion of additional questions on the electric utility survey forms. Specifically, new questions that ask for capital expenditures -- for new versus replacement fixed assets, intangibles, and equipment and structures separately (excluding land). These questions would provide additional useful information to BEA that would lead to improved estimates of capital spending at BEA and for Census/VPIP.

Lastly, more detailed information about equipment and structures leased from others under operating leases would be useful to us for statistical purposes.

Given the significant requests above, a meeting between FERC and BEA would be most appropriate. This meeting would convey BEA needs and the feasibility of this request.

Please keep BEA informed of modifications to these forms. We are particularly interested in modifications that are proposed during the forms' approval process that might substantially affect our use of the data collected through these forms. For additional information, please contact Ruth Bramblett, Source Data Coordinator, at (202) 606-9653, or by e-mail at Ruth.Bramblett@bea.gov. Should you need assistance in justifying these forms to the Office of Management and Budget, please do not hesitate to contact BEA.

Sincerely,



Dennis J. Fixler
Chief Statistician

² Table C7, <http://www.eia.gov/cneaf/electricity/public/tc7p01p1.html>