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January 23, 2014

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DOE Desk Officer
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Office of Management and Budget
New Executive Office Building, Room 10102
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Washington, DC 20503

Ms. Rebecca Peterson
U.S. Energy Information Administration
U.S. Department of Energy
Forrestal Building, Mail Stop EI-23
1000 Independence Avenue, SW
Washington, DC 20585

Submitted by email to Chad_S_Whiteman@omb.eop.gov and erus2014@eia.gov

RE: Proposed Agency Information Collection Extension with Changes

Please accept these comments by the American Public Power Association (APPA) in response to the proposed agency information collection extension with changes, published in Vol. 78, No. 247 of the *Federal Register*, on December 24, 2013. The Energy Information Administration (EIA) has asked the Office of Management and Budget (OMB) to renew approval of survey forms EIA-63B, EIA-411, EIA-826, EIA-860, EIA-860M, EIA-861, EIA-861S, and EIA-923, and to approve the creation of form EIA-930.

APPA represents the interests of the nation's approximately 2,000 not-for-profit, publicly owned electric utilities. APPA member systems file many of the forms listed in the *Federal Register* notice. Several larger public power systems must file the monthly EIA-826, "Monthly Electric Utility Sales and Revenue Report with State Distributions." All public power systems file sales and revenue information, either on form EIA-861, "Annual Electric Power Industry Report," or the short form, EIA-861S. Publicly owned utilities that operate generating capacity are required to supply information on EIA-860, "Annual Electric Generator Report," and EIA-923, "Power Plant Operations Report." Additionally, 36 public power systems serve as Balancing Authorities and would therefore have to complete the new form EIA-930, "Balancing Authority Operations Report."

APPA's comments are directed principally at those forms that most directly impact its members. As such, APPA does not address the changes to forms EIA-63B, EIA-411, EIA-826, or EIA-

860M. Additionally, APPA does not offer further comment on EIA-860 and EIA-923, as the proposed changes do not constitute a substantial burden to filers.

EIA-861

APPA generally supports the proposed changes to form EIA-861, and as such encourages OMB to accept these changes, with some modifications noted below.

APPA appreciates the revisions that EIA has made since its initial proposal. EIA has proposed adding new schedules dealing with distribution system information and system reliability. As originally proposed, these new schedules would have posed a potential time burden for many utilities as the questions were either duplicative or unclear. EIA listened to the concerns expressed by several within the industry and has substantially altered its original proposal. EIA eliminated several unnecessary questions from these schedules. Additionally, EIA re-organized the schedules, greatly increasing the clarity of the instructions and improving the overall layout. However, some of the remaining questions would cause confusion, additional burden, and bad data if they are not deleted from the form.

APPA agrees with the comments filed by the IEEE Working Group on Distribution Reliability (DRWG) that Schedule 3, Part A: Distribution System Information needs to be revised, particularly those questions containing any references to "distribution automation." For question 4, "number of customers served by distribution circuits with automation," EIA defines automation as the number of customers that are delivered energy that travels from the transmission system to the end-use customer through a distribution circuit (or distribution transformer or substation) that uses any form of automation. In spite of the definition provided for automation, there are not consistent and easily accessed methods for calculating the number of customers that may somehow be affected by automation. Further, automation should include non-communicating technologies such as line reclosers or other similar devices that attempt to restore the flow of electricity to the customer. This makes calculating an answer to this question nearly impossible and guarantees that it will not be the same calculation from one utility to the next.

Similarly, there is no standardized way to calculate question 3, "Load served by distribution circuits with automation (MWh)." In addition, most companies do not aggregate energy by circuit, though in some cases companies may be able to set up special calculations to do this. APPA also recommends deleting question 2, "Number of Distribution Circuits applying distribution automation technology," as again, there is no standardized formula for such a calculation. Due to the lack of standardization for questions related to automation, the information collected by these questions would be of no statistical use and would consume additional reporting time and effort.

EIA-861S

The overwhelming majority of respondents to form EIA-861S are public power systems, and a slight majority of public power systems are now eligible to complete this shorter form in lieu of the longer EIA-861. This has led to the loss of sector-specific data for many APPA members, and the diminishment of APPA's ability to fully assess the public power sector.

APPA understands EIA's desire to minimize both the reporting burden for smaller entities and its own burden in collecting information from utilities that comprise a relatively small share of the electric industry; however, a small amount of additional information would be of great use in adequately analyzing the reach of these smaller systems.

APPA recommends that OMB urge EIA to add fields for respondents to provide the number of customers for each sector (residential, commercial, and industrial). This is readily available information that should not add any time burden. This information would allow industry analysts to observe any notable changes in the size and makeup of smaller utilities without waiting five years for these utilities to report their complete information. It would also enable EIA and other analysts to make better use of the other survey data being collected on EIA-861S. For example, on Schedules 6C and 6D respondents are asked to provide information about the number of customers served by dynamic pricing and advanced metering in each sector. The absence of general sector-specific customer information on the EIA-861S makes doing any sort of baseline comparison much more difficult as one cannot measure the ratio of overall customers in each sector on dynamic pricing programs or with advanced metering installed.

EIA-930

EIA has proposed the creation of a new survey of hourly electric power operating data from Balancing Authorities (BA). As APPA and other industry trade associations have stated previously in filed comments and in discussions with EIA, this proposal would create an excessive time burden for BAs and would make sensitive information publicly available in near real-time.

Balancing Authorities would be required to submit hourly demand data on a web portal within ten minutes of the end of the reporting hour, and they would have to post other hourly information by 7:00 a.m. the business day after. Posting this hourly information in near real-time poses serious data confidentiality concerns and may also lead to the exercise of market power against small load serving BAs. For example, suppliers would be able to use the interchange data to become aware of BAs that have lost a generating unit or fuel supply. If these suppliers do not have to offer cost-based rates, then they could potentially exert market power in their pricing to the BA. EIA correctly observes that FERC has enforcement power over anti-competitive behavior, but this does not justify EIA enabling such anti-competitive behavior in the interest of providing information of questionable utility.

EIA also contends in its Supporting Statement that many existing resources already make much of this data available, listing some of the firms that provide such information. That other businesses track down this information does not alleviate EIA of the responsibility of reasonably protecting the confidentiality of electric power systems. If a private organization publicly released certain individual tax returns, it would not then be permissible for the Internal Revenue Service to also make all individual tax returns publicly available on its website.

EIA has offered an accommodation to BAs with only one or two interconnections. Hourly demand for these entities would be aggregated and not made publicly available at the BA level for two days. Though APPA appreciates EIA's efforts to address the concerns of these smaller BAs, EIA's proposed accommodation does little to assuage security and market power issues. It

does not address the issue of smaller BAs with more than two interconnections. And it still leaves even those BAs with aggregated data vulnerable since the data for each of the larger BAs to which the smaller BAs are connected would still be made publicly available in near real-time. In other words, for every import into a BA, there is a corresponding export from another BA.

No business case has been made to justify the release of this information in real-time or near real-time. EIA argues that it needs this data to help policymakers and others develop innovative demand response and variable energy resource policies. Setting aside the question of whether these data are necessary for this purpose, APPA does not see why it is necessary to have this data published publicly in near real-time. Even if EIA were to collect the information on an hourly basis, it could share the data with select interested parties and other key policy makers without revealing all of the data to the wide world. Think tanks, academic institutions, and other analysts could then have access to the data after an appropriate period of time has elapsed.

Despite EIA's assertions to the contrary, there would be a substantial time and budget burden associated with this survey. Though some larger BAs do generate much of this data as a necessary business function and have the systems already in place to comply with this survey, many BAs do not currently collect, report, or post this information. The up-front costs for developing an automatic system to support hourly and daily reporting would be quite substantial, especially for many APPA member utilities that do not have significant operating budgets.

If OMB grants EIA approval to move ahead with this form, EIA has suggested that it would move the effective start date of the form to March 1, 2014. Considering that OMB will not be able to grant approval for this form until almost this exact date, this is a preposterously short time frame for would-be filers to implement their systems. Most entities would not want to devote time and resources to developing a reporting system until they have confirmation that the survey will indeed go into effect, thus leaving them almost no time between OMB approval and the start date of this survey.

By way of comparison, the Federal Energy Regulatory Commission (FERC) recently expanded the number of utilities subject to the filing requirements of the Electric Quarterly Report (EQR), a quarterly survey similar in many respects to the EIA-930. FERC waited almost a full year before mandating that these utilities comply with the filing requirement. FERC also allowed these utilities to test the new reporting software before the requirement went into full effect. If this survey is granted approval, there should be a much wider window for BAs to prepare and test the filing software.

Conclusion

APPA appreciates the opportunity to comment on these proposed changes. APPA also thanks EIA for its willingness to listen to industry input, and to make revisions to its proposals where necessary. APPA and other industry trade associations have met with EIA multiples times over the past eighteen months, specifically with regards to the EIA-930, and EIA has been diligent in communicating its plans with us.

APPA here affirms its general support for most of the revisions to the existing survey forms, but reiterates its great concern with the creation of the new form EIA-930. OMB should deny approval for this form and encourage EIA to convene industry-wide working sessions to identify data that are most likely to be useful, less burdensome alternatives for collecting the data, and ways to address commercial and security concerns.

Thank you for the opportunity to comment. Should you have any questions concerning these comments, please do not hesitate to contact me. I may be reached at (202) 467-2969 or pzummo@publicpower.org.

Respectfully submitted,

/s/ Paul Zummo

Paul Zummo
Manager of Policy Research and Analysis
American Public Power Association

BEFORE THE ENERGY INFORMATION ADMINISTRATION

Agency Information Collection Extension with Changes	))	Proposed at 78 Fed. Reg. 77667

COMMENTS OF THE BONNEVILLE POWER ADMINISTRATION

In March 2013 the Energy Information Administration ("EIA") proposed to modify its reporting requirements,[1] and in May Bonneville submitted comments on the newly proposed Form EIA-930, "Balancing Authority Operations Report". EIA responded to comments from Bonneville and other organizations, and EIA is soliciting further comment on its proposals.[2]

Bonneville appreciates EIA's review and consideration of Bonneville's comments. Bonneville understands EIA's goals for this collection, and EIA's clarification on the data collection protocols alleviates Bonneville's original concerns about web form submissions. Bonneville looks forward to working with EIA to harmonize the proposed data collection with NERC CIP compliance obligations and the underlying principle of protecting reliability.

January 23, 2014

Respectfully submitted,

/s/ Robert D. Davis, Jr.

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[1] Agency Information Collection Extension with Changes, 78 Fed. Reg. 14521 (proposed Mar. 6, 2013).
[2] Agency Information Collection Extension with Changes, 78 Fed. Reg. 77667 (Dec. 24, 2013).

Proposed EIA Energy Data Collection

Bureau of Economic Analysis' Comments

Submitted: January 22, 2014

Summary: EIA is proposing to collect new data (including real-time collection of hourly load for the lower 48 states), for release to the public, on electric power and renewable electricity. This proposed data collection is of interest to the Bureau of Economic Analysis (BEA). Below are comments from the 3 national account areas within BEA, Industry, Regional, and National that would potentially use the new data.

Industry Account Comments:

- These new data will not directly impact Industry's estimation of annual or quarterly Input-Output or GDP-by-industry statistics for the energy sector, but may indirectly improve our understanding of the changing nature of the industry.
- The proposed changes do not seem to negatively impact our Annual, Quarterly, and Benchmark programs for Utilities. The new data collected is definitely welcomed.
- As for the terminated data, we don't think that will affect our programs either.

Regional Account Comments:

- Regional supports the EIA proposal and don't foresee any of these changes impeding our current uses or production. On the other hand, real-time collection may lead to a more timely release of the data.

National Account Comments:

- National relies on Census Construction spending data for investment estimates. This additional EIA data could potentially be useful to Census Construction Spending (VIP) staff in their work. In that sense, National supports this effort.

UNITED STATES OF AMERICA

ENERGY INFORMATION ADMINISTRATION,

U.S. DEPARTMENT OF ENERGY

Proposed Agency Information Collection)

Extensions With Changes)

COMMENTS OF THE CARNEGIE MELLON ELECTRICITY INDUSTRY CENTER ON PROPOSED ENERGY INFORMATION ADMINISTRATION COLLECTION EXTENSIONS WITH CHANGES

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Submitted: January 22, 2014

The Carnegie Mellon Electricity Industry Center (CEIC) submits these comments in support of several changes in its subjects and format of data collection and publication proposed by the U.S. Department of Energy's Energy Information Administration (EIA). CEIC and its students rely heavily on information provided by EIA for their research and other endeavors.

Description of CEIC

CEIC is a joint endeavor between Carnegie Mellon University (CMU)'s College of Engineering and its Tepper School of Business. Faculty affiliated with CEIC are drawn from eight academic units across the campus: Tepper, Engineering and Public Policy, Social and Decision Sciences, Civil and Environmental Engineering, Mechanical Engineering, Materials Science & Engineering, Electrical and Computer Engineering, and the School of Computer Science.

CEIC was established in August 2001 after an extended competition sponsored by the Alfred P. Sloan Foundation among a number of research universities. CEIC's primary mission is to work with industry, labor, government and all other relevant stakeholders to address the strategic problems of the electricity industry. While we work directly on identifying, addressing and solving important problems for the industry, more important is that the fact that CEIC produces a cadre of well-trained graduate student researchers. Many of these students continue to address the industry's problems in subsequent professional careers. In addition to doctoral education, CEIC has a broad educational mission that includes the development of university courses, special topic short-courses, and curricular advice for training programs.

CEIC's work is recognized by legislators and government executives as some of the best non-partisan analysis in the field. CEIC faculty have testified several times before Congress in recent years, chaired and participated in numerous National Academies panels, have briefed and subsequently been cited by the Federal Energy Regulatory Commission in its rulings, and served on a variety of advisory committees including the DOE's Electricity Committee.

CEIC faculty and PhD students have an active publication record, with 300 publications that have appeared in archival journals (as of October, 2013). While this high productivity is important, even more important is that fact that 40 CEIC students have received Ph.D.s (8 of these in the past year) and have taken positions in industry, universities, government, NGOs, and consulting, where they will influence the electricity industry through thoughtful high quality analysis for years to come. Most CEIC Ph.D. dissertations are available on the CEIC website (www.cmu.edu/electricity).

Researchers at the Carnegie Mellon Electricity Industry Center investigate pressing questions facing the electricity industry, including environmental issues, reliability, and technological change. We make extensive use of data collected by the EIA, both directly and indirectly through products such as EPA's eGRID that uses EIA data as one of its three data sources, in support of our research efforts. EIA's proposed changes to its electricity and renewable data collection for 2014 would enhance the ability of university, government, and industry researchers to conduct industry-relevant research.

Support for Specific EIA Changes

The EIA's decision to "Collect data on generator minimum load and minimum time required to reach full load from standby and shutdown" would aid modeling efforts in industry, government, and universities. These parameters are important inputs to unit commitment models of the electricity system. Researchers use these models to assess the costs and environmental impacts of changes to the power system. As was pointed out in the Federal Register notice, these parameters become more important as increasing amounts of variable renewable energy resources are added to electric power systems.

EIA's decision to "Collect the name of each plant's balancing authority…" will allow researchers to better incorporate the transmission constraints to which power systems are subject. This would help develop models that more accurately reflect real-world conditions.

EIA's decision to "Collect whether a combined-cycle unit can operate in simple-cycle mode by bypassing the heat recovery steam generator" is also a welcome improvement in principle. However, we note that the right question is not whether the heat recovery steam generator can be bypassed, but whether the steam turbine and gas turbine(s) can be operated independently of one another. As the agency points out, this information is important for reliability assessments. Therefore, we recommend that the EIA rephrase its question to ask whether combined-cycle units are capable of operating in simple-cycle mode due to a multi-shaft configuration or due to the presence of a clutch in a single-shaft configuration.

We also support EIA's proposal to collect more detailed information on the characteristics of renewable energy resources, and the construction and financing costs of new renewable generating plants. The renewable energy data would allow researchers to gain

greater insights into regional variations in renewable energy output. While we understand that information on financing and construction costs would not be available on a plant level for confidentiality and trade secret reasons, even aggregated data could provide researchers with insights into the factors causing changes in construction costs over time.

We believe that the EIA's proposed changes to data collection practices would facilitate efforts to conduct relevant research without unduly burdening industry. We thus express our strong support of these changes.

EISPC
EASTERN INTERCONNECTION STATES' PLANNING COUNCIL

January 14, 2014

Mr. Chad S. Whiteman, DOE Desk Officer
Office of Information and Regulatory Affairs
Office of Management and Budget
New Executive Office Building 7
35 17th Street NW. Washington, DC 20503

Dear Mr. Whiteman:

The Eastern Interconnection States' Planning Council[1] urges adoption of the Office of Energy Information Administration's (EIA) proposed enhancement to their data collection process by having the ability to make continual improvements to their survey instruments. The EISPC understands the proposal is for a new Form EIA-930 applicable to the 106 Balancing Authorities in the contiguous United States. The data to be collected include:

- Hourly demand
- Hourly next-day demand forecast
- Hourly net generation
- Hourly total net actual interchange
- Hourly net actual interchange with each interconnected Balancing Authority

EISPC's shares EIA's objective of improving data sources to improve the evaluation of renewable power, smart grid, and demand response and the resulting changes to the hourly demand for electricity. The proposed changes to Form EIA-930 will facilitate efforts by states, utilities, EIA and others to assess the effects of changes in wholesale power prices on retail electricity rates. Hourly data is needed to evaluate these developments.

The states, as part of their general statutory requirements to ensure a reliable power supply are increasingly interested in improving the resilience of the power system as part of a concerted effort to enhance reliability. The near real-time information would improve the processes for the recovery of the power system due to events such as snow / ice storms, hurricanes such as Katrina and Sandy, and blackouts from other causes.

EISPC members, consistent with their statutory charge to provide customers with an economical supply of power, believe the hourly information will facilitate the development of demand response and dynamic

[1] EISPC represents the 39 states, the District of Columbia, the City of New Orleans, and 8 Canadian Provinces located within the Eastern Interconnection electric transmission grid. This is the first time in the nation's history that these entities will be working together, supported by funding from the U.S. Department of Energy, to evaluate transmission development options throughout the eastern interconnection.

pricing programs that will reduce the cost of providing electricity and will help customers better control their electricity cost.

EISPC remains engaged in the analysis of long-term resource requirements of the Eastern Interconnection. We believe this information, and future enhancements will assist state policymakers with information necessary to better assess future technologies and their potential to improve the cost, reliability and resiliency of the bulk power and distribution systems. These technologies are likely to include, but not be limited to, demand response and improved rate structures, renewable resources – including roof top solar installations, other forms of customer-owned distributed generation, electricity storage, and the supply of quick response generators.

EISPC has worked extensively with experts from the National Laboratories and consultants. Throughout our collaborations with various experts, considerable effort was expended in assimilating data, working with the information to verify consistency, and developing new generation analytical tools that will require more data, improvements in the quality of data, and improved consistency. The EIA's request to improve EIA Form 930 should ease the burden of future research efforts and, hopefully, foster innovation.

On behalf of the Eastern Interconnection States' Planning Council, I appreciate your consideration of our support for the proposed modifications to EIA Form 930. Please feel free to contact me if you have any questions or need any additional information at 651-201-2220 or david.c.boyd@state.mn.us.

Sincerely,

Dr. David Boyd, EISPC President and
Vice Chair, Minnesota Public Utilities Commission

Copies: David Meyer, U.S. Department of Energy, Office of Electricity Delivery and Energy Reliability
Rebecca A. Peterson, U.S. Energy Information Administration

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Power by Association℠

Edison Electric Institute

Edward H. Comer
Vice President, General Counsel & Corporate Secretary

January 23, 2014

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Submitted by e-mail to Chad_S_Whiteman@omb.eop.gov and erus2014@eia.gov

Re: EIA electricity and renewable power survey forms – Triennial review –
OMB No. 1905-0129 – Comments requested at 78 Fed. Reg. 77667 (Dec. 24, 2013)

Dear Mr. Whiteman and Ms. Peterson:

The Edison Electric Institute (EEI) is filing these comments in response to the above-referenced *Federal Register* notice. In the notice, the Energy Information Administration (EIA) says that it has asked the Office of Management and Budget (OMB) to renew approval of EIA's existing electricity and renewable power survey forms EIA-63B, 411, 826, 860, 860M, 861, 861S, and 923 with changes, and to approve a new form EIA-930, under the Paperwork Reduction Act. Most of the existing forms appear to have expired last fall, and EIA is asking for a 3-year clearance for all the forms.

EEI is the association of the nation's investor-owned electric utilities, which bear a large share of the burden of filing the EIA electricity and renewable power survey forms. For more than a year and a half, EEI, several other electric industry trade associations, and a number of our members have been actively engaged in providing EIA with input on the proposed changes and, particularly, the new form. We have raised a number of substantial concerns, and we have sought to have meaningful dialogue with EIA in a search for solutions to address those concerns.

We appreciate that EIA has been willing to discuss our concerns, has acknowledged a lot of our input in its Supporting Statement to OMB, and has proposed some positive adjustments in the forms. However, EIA has proceeded to propose the forms without addressing several of our primary concerns. We request that EIA reconsider several aspects of its proposal, and we request that OMB ensure EIA has properly addressed our concerns before approving the forms.

We have four principal areas of concern about EIA's current proposal. These have to do with the proposed new form EIA-930, the proposed addition of a large number of new data elements to the existing EIA forms, the handling of confidentiality and security issues, and the timing of any changes OMB may approve in EIA's data collection.

Proposed new form EIA 930

EIA is proposing to collect and to publish a voluminous amount of hourly information in nearly real time in the proposed new form EIA-930. This vast new information collection project will require each of 77 balancing authorities (BAs) nationwide to report in near to real time demand, demand forecast, supply, and interchange data for each hour of the year, totaling more than 43,800 pieces of data per BA per year. These BAs range in size from large multistate Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) to small, single company entities. In turn, EIA plans to publish all of the data in near to real time, providing the general public with access to detailed information about the nation's entire electric grid operations.

Regretfully, we continue to have serious commercial and security concerns about publishing the data in close to real time, particularly information from the smaller balancing authorities as these data have the greatest likelihood of revealing site-specific confidential information.

EIA's Supporting Statement says that the data it proposes to collect will be useful for modeling the nation's electric system and seeing how new developments such as increased use of distributed generation (DG) resources and demand response (DR) interplay with the system. While we understand how such information could be useful to EIA and policy makers, the information need not be published in open, discrete, near to real time to accomplish these purposes. Its value will be in showing trends over time, not instantaneous developments, and it will need to be mined and evaluated to be useful for most policy purposes.

EIA also argues this information will be useful in providing near real time recovery information following system upsets and real time descriptions of changes in economic activity. Yet, no other government agency publishes economic or other data with such degree of real time detail. If making some near real time information public in an emergency were useful, EIA could certainly do so, discreetly and on an as-needed basis. But such emergencies are rare and scarcely justify a public dissemination of such a huge amount of information in near real time.

In its Supporting Statement, EIA says that the voluminous new hourly data can easily be provided automatically by each of the 77 BAs that would be required to provide it. EIA notes that a number of RTOs and ISOs, such as PJM here in the mid-Atlantic region, already collect and post some or all of the information EIA proposes to collect.

However, many of the nation's smaller BAs do not currently collect, report, or post this information on a real time basis, and even the ones that do will have to modify their data management systems, including metering, communication systems, and other equipment, to extract and to provide the data to EIA. At a minimum, there will be a substantial up-front burden on the BAs to mine their data systems to extract and to provide the information to EIA. Additionally, each BA will be required to create a communication link to the EIA to transmit the data and will need to ensure that this communication link is secure and reliable. This adds another costly and time consuming data link to an already long list of information exchanges required of BAs. Yet EIA has not recognized these burdens in its burden estimates.

In its Supporting Statement, EIA also says that it has seen no security problems with posting of similar information by RTOs and ISOs that currently do post some or all of the information. EIA says that even more detailed information is available for a fee through commercial services that monitor utility facilities and activities, often without consent or authentication.

However, as we have noted to EIA, the RTOs and ISOs that post some or all of the proposed information do so for large geographic areas, thus effectively masking operations at the individual utility and plant level and so minimizing commercial and security impacts. EIA is properly proposing to accept reporting at the RTO/ISO-level without requiring sub-RTO/ISO reporting for those larger BAs, specifically including MISO. Yet EIA has declined to adopt our industry's proposal to allow smaller BAs outside the RTOs and ISOs to group together in reporting the data, for example at a regional-coordinator level, to avoid causing commercial and security problems for the smaller BAs. Instead, EIA is proposing only to delay publishing the EIA-930 data for nine of the smallest BAs by a couple of days – a helpful but insufficient response.

EIA has not explained why it is satisfied with large-footprint reporting by the RTOs and ISOs, but is unwilling to accept similar large-footprint reporting elsewhere in the country. Also, the fact that a few commercial entities may undertake detective work to provide operational details to market participants about their competitors says nothing about the potential security implications of making near real time, unaggregated hourly information about the electric grid available to the public without any screening, such as occurs implicitly with the intervention of commercial information collectors.

As explained in detail in our May 2013 comments and our fall 2013 proposed solutions to EIA – both of which documents we incorporate here by reference – EIA's proposal to collect and to publish hourly, BA-level demand, supply, and interchange data raises substantial concerns, especially for the non-RTO/ISO BAs. Those concerns include impacts on operation of the markets, including bilateral purchases and sales of electricity and fuels, as well as potential impacts of highlighting key infrastructure from a security perspective.

In addition, much of the nation's electric grid is critical infrastructure, and it is important to protect it. While commercial firms may collect and sell sensitive information about utility operations, they still serve as a screen and potential impediment to those who seek this information for non-commercial and less savory purposes. A public website of near real time hourly information, particularly about the operations of the smaller BAs, can reveal information that terrorists or others would not otherwise be able to obtain easily. Consolidating the smaller

BA information or keeping this information confidential, at least for much longer periods than a few hours or a few days, would not undermine EIA's ability to conduct the analyses and studies it seeks nor prevent EIA from providing more consolidated data about economic activities.

We encourage OMB to take a hard look at the implications of publishing in near real time the data collected by the proposed new form and the burdens it will impose before approving the form. At a minimum, OMB should direct EIA either to aggregate the proposed new data or to give smaller BAs the option to group together in reporting the data up to the regional-coordinator level, and OMB should require EIA to allow more time to pass before the public dissemination of this information, to address commercial and security concerns. For security purposes, EIA also should screen persons who want access to the data and should require them to sign non-disclosure agreements, as the Federal Energy Regulatory Commission does for access to critical energy infrastructure information (CEII) in its data bases. Also, as discussed below, EIA should provide more time than March 1, 2014 for BAs to start reporting the data, to avoid inflating the burden.

Proposed changes to existing forms

EIA is proposing to collect significant amounts of new data in its existing electric survey forms. At the same time, EIA is generally declining to provide any reporting thresholds, other than in some cases as to the size of the reporting entity, thus imposing some burden at the margin that is likely to be out of line with incremental benefits.

EIA is proposing to modify its existing electric survey forms to collect new data on distribution systems, DR, energy efficiency, environmental controls, renewable energy, and the smart grid. For example, in the EIA-411, EIA proposes to start collecting information on the entire bulk electric system, even below the 200-kv level, a large expansion of detailed new data. Similarly, in the EIA-826, EIA proposes to start collecting new information on net metering and advanced metering infrastructure, without setting a threshold. And in the EIA-861, EIA proposes to start collecting new information on advanced metering, DR, distribution systems, dynamic pricing, energy efficiency, and net metering, including for some of these topics the actual numbers of customers involved.

While we understand the impetus for EIA wanting to collect new information in these areas, we encourage EIA and OMB to be sure that the level of information EIA is proposing to collect will yield benefits commensurate with costs. At a minimum, we encourage EIA to consider setting reasonable reporting thresholds for the new data that will avoid utilities having to report de minimis levels of data.

Companies are currently reporting net metering amounts for as few as one customer and as small as 1.5 MW in a month for a given customer class in the EIA-826. Establishing reasonable thresholds would help to reduce burden without significantly diminishing the value of the data collection.

Alternatively, EIA should consider implementing a few pilot programs to test exactly how much detail should be collected to support the type of analysis and study EIA and others contemplate. Pilot programs would help identify those data elements that are most useful as well as those that would be unnecessary.

We appreciate and support EIA's proposal to reduce the reporting time frame for non-coal, non-nuclear planned generation and retirements from ten to five years in the EIA-860. We encourage EIA to adopt the same time frame for coal and nuclear plants, both to reduce the reporting burden and to recognize that, in the current dynamic regulatory environment, plant decisions even for such plants will typically be made in relatively short time frames.

We also support EIA's proposal to delete data elements such as green pricing from the forms where those elements have not proved useful. And we support EIA's plans to allow electronic uploads of data as an option to manual data entry. We encourage EIA universally in its forms to require reporting only of information that the reporting utility has readily available in its data systems. Again, these steps will help to reduce burden without devaluing the data collection.

Confidentiality and Security

We appreciate and support that EIA plans to keep some data in the forms confidential or to delay the public release of the data. As indicated in Table 4 of the Supporting Statement, EIA plans to provide confidential treatment for non-institutional contact information in all the forms, photovoltaic information in the EIA-63B, bulk transmission power flow cases and system maps in the EIA-411, black-start and generator cost data in the EIA-860, and fuel delivered cost, commodity cost, and stock data in the EIA-923. EIA also plans to delay release of certain power marketer data in the EIA-826. These are positive steps.

At the same time, however, EIA is planning to stop statistically aggregating data, and EIA has no plans to aggregate data in the proposed new EIA-930. Statistical aggregation is important in protecting the confidentiality of data because it prevents the disclosure of individual utility and plant information. We encourage EIA to continue aggregating sensitive data in the electric survey forms as needed to avoid causing harm to individual utilities and plants. At a minimum, if a reporting utility requests confidential treatment of certain information beyond the protected categories discussed in the preceding paragraph, and explains how release of the information could harm the utility, EIA should either aggregate the information with that reported by others in the region, or treat the individual utility's information as confidential.

As we stated earlier, in terms of security there is a vast difference between purchasing information from commercial sellers and providing information to the public without any screening as to who is accessing the information or for what purpose. We urge EIA to reconsider when and how it makes information, in particular near real time information, available. Even a screening process would provide some greater confidence for security purposes.

Timing issues

EIA is proposing to have the proposed new form EIA-930 take effect March 1, 2014, and EIA reportedly plans to have changes to the other forms take effect as soon as possible following OMB approval, allowing time only for EIA to adjust its website and information collection system. However, as our industry has told EIA, it takes time for reporting utilities to adjust their data collection, verification, and reporting systems and processes in order to accommodate changes of the magnitude and sort EIA is proposing. It will be very difficult for many BAs that do not currently collect the proposed EIA-930 data to develop processes that will allow for the collection and disclosure of these data by March 1, 2014. We urge EIA and OMB to provide at least six months to make whichever of the proposed changes and new form OMB approves.

We believe that OMB authorization for most of the existing forms expired October 31, 2013, while authorization for the forms EIA-861, EIA-861S, and EIA-923 or certain changes to those forms will expire December 31, 2015. The OMB website shows the control number 1905-029 for this review as expiring December 31, 2015 (ICR Reference No. 201312-1905-001), and EIA has reflected that expiration date in the posted copies of its current electric survey forms on its website. But in fact OMB last approved all the forms as a package in 2010, with an expiration date of October 31, 2013 (ICR Reference No. 201112-1905-002). Though OMB approved certain changes to the forms EIA-861, EIA-861S, and EIA-923 in 2012, with an expiration date of December 31, 2015 (ICR Reference No. 201210-1905-001), OMB did not review the other forms in 2012, and their expiration date should still be October 31, 2013.

That said, we encourage OMB to reauthorize the existing forms without changes through December 31, 2014, and to authorize whichever of the proposed changes and the proposed new form OMB decides to approve for two years beyond that, from January 1, 2015 through December 31, 2016. Such phased approval would avoid disrupting the existing EIA surveys and would give EIA and reporting utilities adequate time to adjust their data gathering, verification, and reporting processes and systems. Such phased approval also would avoid imposing unnecessary extra burden on reporting utilities, which otherwise would have to expend significant resources trying to adopt the changes on a more accelerated schedule.

In fact, during the 2007 and 2010 review cycles, OMB approved changes to the electric survey forms at the end of the year as the forms were expiring. It took EIA and the industry months into the following years, 2008 and 2011 respectively, to adopt the changes and to catch up on backlogged reporting. We encourage OMB to avoid a repeat of that scenario, through careful staging of its approval and EIA's rollout of the modified forms package.

Contact Information

EEI appreciates the opportunity to provide these comments. We would be happy to meet with you to discuss our concerns. If you have any questions or need additional information, including copies of EEI's 2013 comments and the industry's proposed solutions to EIA, please contact

either Henri Bartholomot (hbartholomot@eei.org, 202.508.5622) or Steve Frauenheim (sfrauenheim@eei.org, 202.508.5580) here at EEI. Thank you.

Respectfully submitted,

Edward H. Comer

Energy Storage Association

January 23, 2014

Rebecca Peterson
U.S. Energy Information Administration
Mail Stop EI–23, Forrestal Building
1000 Independence Avenue SW.
Washington, DC 20585

RE: Proposed Agency Information Collection—Form EIA-930

Dear Ms. Peterson,

Thank you for the opportunity to formally comment on the proposal by the Energy Information Administration (EIA) to create Form EIA-930, "Balancing Authority Operations Report" that will collect hourly demand information from over 100 balancing authorities.

The Energy Storage Association (ESA) believes that the information the Agency proposes to collect will be generally helpful to the energy storage industry. The more granular the data, the more visibility we will have into the fluctuating demands on the grid and the opportunities presented by these for ancillary services, additional capacity, and more seamless integration of variable resources.

While fast-acting energy storage resources operate within fractions of seconds and use far more detailed data and signals from independent system operators to provide regulation and other ancillary services, details about how the grid is operating on an hourly basis would assist us in determining where the best opportunities are to deploy the full range of energy storage technologies and applications.

Advanced energy storage technologies can provide--in addition to frequency regulation--frequency response, ramping, peak shifting, renewables integration, flexible capacity, and other services based on the system requirements. This proposed data collation would support our efforts to define which set of applications might work best in any given part of the system.

We look forward to continuing to work with EIA to provide information about our deployments as they become more widespread. We think this hourly demand information will improve our ability to assess our market opportunities and reach full commercial scale for these U.C. innovations.

Should you have additional questions for the energy storage industry, feel free to contact me or the ESA Policy Director, Katherine Hamilton.

Sincerely,

Matt Roberts
Executive Director

1155 15th Street, NW, Suite 500 • Washington, DC 20005 • 202-293-0537 • info@energystorage.org
www.energystorage.org

From: Katie Marvin [marvin@evainc.com]
Sent: Tuesday, January 28, 2014 10:25 AM
To: Chad_S_Whiteman@omb.eop.gov
Cc: ERS2014; emedine@evainc.com
Subject: EIA-923 Coal Quality Fields

Follow Up Flag: Follow up
Flag Status: Flagged

To Whom It May Concern:

It has come to our attention that EIA will begin collecting new data for the EIA-923 Schedule 2. We are requesting clarification on the chloride content field. Chlorine content is measured in some coals, but we are unclear if there are other chlorides that the EIA expects to measure. Chlorine seems most logical to us, but we do not expect that there would be other chlorides commonly found in coal.

Regards-

Katie Marvin

Energy Ventures Analysis, Inc.
marvin@evainc.com
(703) 276-4017

Comments from the “IEEE Distribution Reliability Working Group”

SCHEDULE 3. PART A. DISTRIBUTION SYSTEM INFORMATION

SCHEDULE 3. Part B: SAIDI and SAIFI in accordance with IEEE 1366-2003 standard or IEEE 1366-2012 standard

Normal ranges for SAIDI should be low double digits (i.e. 50 minutes) up to a couple thousand minutes, in a utility that may have had significant damage during the year.
Normal ranges for SAIFI should be low decimal numbers (i.e. 0.3 events) up to low double digits (perhaps 10-12).
Major event SAIDI recorded in a given year can easily be small minutes (i.e. 10 or so, as well as 0) or to several hundred or a thousand. Major event SAIFI recorded in a given year can be low decimals, or 0, up to low single digits.

SCHEDULE 3: PART A. DISTRIBUTION SYSTEM INFORMATION

For purposes of this schedule, a distribution circuit is any circuit with a voltage of 34kV or below that emanate from a substation and that serves end use customers. Report this schedule if you own distribution lines.

Issue: “ … that emanate from a substation …”

Discussion: Are there distribution circuits that do not emanate from a substation? Perhaps directly from a generator?

Also, ’34 kV’ is not appropriate because 34.5 kV is a common distribution voltage.

Alternate wording: **For purposes of this schedule, a distribution circuit is any circuit with a voltage of 35kV or below that serves primarily end use customers.**

1. **Distribution automation** is a set of technologies providing sensing, communications, and control that enables an electric utility to remotely monitor and coordinate its distribution assets, and operate these assets in an optimal manner with or without manual intervention. Examples of distribution automation include automated feeder switches, automated capacitors and voltage regulators, and equipment monitoring.

2. **Automated feeder switching** is realized through automatic isolation and reconfiguration of faulted segments of distribution feeders via sensors, controls switches, and communications systems. These devices can operate autonomously in response to local events or in response to signals from a central control system.

3. **Automated Voltage & VAR Control** requires coordinated operation of reactive power resources such as capacitor banks, voltage regulators, and transformer load-tap changers, with sensors, controls, and communications systems. These devices could operate autonomously in response to local events or in response to signals from a central control system to actively manage voltage levels within feeders.

4. **Diagnosis and notification of equipment condition** is defined as on-line monitoring and analysis of equipment, its performance, and operating environment in order to monitor

the status of equipment and remotely communicate that status to operators, allowing operators to make decisions regarding operations or maintenance. Examples of equipment monitoring are remote fault indicators and transformer monitors that check pressure, temperature, oil or fluid level, and or chemical constituents.

5. **Load served by distribution circuits with automation (MWh)** is the amount of energy delivered to customers traveling from the transmission system to the end-use customer through a distribution circuit (or distribution transformer or substation) that uses any form of automation during the reporting year.

   Issue: Most companies do not aggregate energy by circuit. There is no standard way to estimate this value. Some companies may be able to set up special calculations to do this. Some may not. The reporting burden is excessive.

   Recommendation: Delete this question

6. **Number of customers served by distribution circuits with automation** is the number of customers that are delivered energy that travels from the transmission system to the end-use customer through a distribution circuit (or distribution transformer or substation) that uses any form of automation.

   Issue: In spite of the definition provided for automation, there are not necessarily consistent and easily accessed methods for calculating the number of customers that may somehow be affected by automation. Further, automation should include non-communicating technologies such as line reclosers or other similar devices that attempt to restore the flow of electricity to the customer.

   Recommendation: Delete this question

7. On line 1 enter the **Total Number of Distribution Circuits**.

8. On line 2 enter the **Total Number of Distribution Circuits applying any type of distribution automation**.

   Issue: Same comment as above. In spite of the definition provided for automation, there are not necessarily consistent and easily accessed methods for calculation the number of distribution circuits that may somehow be affected by automation. Further, automation should include non-communicating technologies such as line reclosers or other similar devices that attempt to restore the flow of electricity to the customer.

   Recommendation: Delete this question

9. On line 2a select “Y” or “N” for the question, **Do you employ automated feeder switches**?

10. On line 2b select “Y” or “N” for the question, **Do you employ automated voltage and VAR control?**

11. On line 2c select “Y” or “N” for the question, **Do you perform diagnosis and notification of equipment cognition with on-line monitoring?**

12. On line 3 enter **Load served by Distribution Circuits applying automation technology (MWhs)**.

    Issue: Most companies do not aggregate energy by circuit. There is no standard way to estimate this value. Some companies may be able to set up special calculations to do this. Some may not. The reporting burden is excessive.

    Recommendation: Delete this question

13. On line 4 enter the total number of customers served by Distribution Circuits applying automation technology.

    Issue: Same comment as above. In spite of the definition provided for automation, there are not necessarily consistent and easily accessed methods for calculation the number of customers that may somehow be affected by automation. Further, automation should include non-communicating technologies such as line reclosers or other similar devices that attempt to restore the flow of electricity to the customer.

    Recommendation: Delete this question

SCHEDULE 3. PART B. DISTRIBUTION SYSTEM RELIABILITY INFORMATION - IEEE

If your entity calculates system average interruption duration index (SAIDI) and system average interruption frequency index (SAIFI) and determines Major Event Days in accordance with the IEEE 1366-2003 or IEEE 1366-2012 standard, answer ‘yes’ to questions 1 and 2 and complete Part B. If your entity calculates SAIDI and SAIFI via another method answer ‘yes’ to question 1 and no to question 2 then skip Part B and complete Part C. If your entity does not calculate SAIDI and SAIFI answer ‘no’ to question 1 and go to Schedule 4A. For lines 3 through 6 complete all that you calculate, for example if you only calculate SAIDI and SAIFI without Major Event Days included, complete the area under the subtitle “Excluding Major Events” and do not complete the area under the subtitle “Including Major Events”

1. The **system average interruption frequency index, or SAIFI**, indicates how often the average customer experiences a sustained interruption (of over 5 minutes) over a predefined period of time. In this schedule report annual SAIFI, or the SAIFI resulting from all interruptions in the reporting year. SAIFI is calculated as the sum over the year of total number of customers that experiences an interruption of more than 5 minutes, divided by the total number of customers.

2. SAIFI = [Sum of total number of customers interrupted over the year] / [Total number of customers served]

    Issue: SAIFI calculation misquoted slightly as, “the sum over the year of total number of customers that experiences an interruption of more than 5 minutes, divided by the total number of customers” (underline added). This definition does not allow for more than one interruption for an individual customer.

Recommendation wording: **SAIFI is calculated as the sum over the year of total number of customers interrupted for more than 5 minutes, divided by the total number of customers.**

3. The **system average interruption duration index, or SAIDI**, indicates the total duration of interruption for the average customer over a predefined period of time. In this schedule report annual SAIDI, or the SAIDI resulting from all interruptions in the reporting year. SAIDI is calculated as the sum over the year of all customers interrupted for more than 5 minutes times the number of minutes they experienced an interruption, divided by total number of customers.

4. SAIDI = [Sum of customer minutes interrupted over the year] / [Total number of customers served]

5. On lines 3 through 6 report the values that you calculate. a. Report the Annual Distribution SAIDI Including Major Event Days on line 3,

b. Report the Annual Distribution SAIDI Excluding Major Event Days on line 3,

c. Report the Annual Distribution SAIDI Including Major Event Days excluding events where the reliability event was initiated from loss of supply (e.g. resulted from an event on the distribution system, not from the high-voltage system) on line 4.

Loss of supply

Discussion:
Question 4 asks for, “SAIDI Value: Major Event Days Included minus loss of supply”
The instructions say: “Report the Annual Distribution SAIDI Including Major Event Days excluding events where the reliability event was initiated from loss of supply (e.g. resulted from an event on the distribution system, not from the high-voltage system) on line 4.”

Question 6 asks for, “SAIFI Value: Major Event Days Included minus loss of supply”
The instructions say: “Report the Annual Distribution SAIFI Including Major Event Days excluding events where the reliability event was initiated from loss of supply on line 6.”

This section is predicated on compliance with IEEE 1366-2003 or IEEE 1366-2012. The section asks for SAIDI and SAIFI excluding loss of supply, which is not defined in either version of the 1366 standard. The only definition of loss of supply is that given in the instructions for Question 4; “…(e.g. resulted from an event on the distribution system, not from the high-voltage system) …”

Recommended wording for instructions for Question 4:
“**Report the Annual Distribution SAIDI Including Major Event Days excluding events where the reliability event was initiated from loss of supply (i.e. exclude interruptions caused by a failure in the transmission system, including the transmission portion of a substation, or the loss of a generation source) on line 4.**”

Recommended wording for instructions for Question 6:
“**Report the Annual Distribution SAIFI Including Major Event Days excluding events where the reliability event was initiated from loss of supply (i.e. exclude**

interruptions caused by a failure in the transmission system, including the transmission portion of a substation, or the loss of a generation source) on line 6.”

d. Report the Annual Distribution SAIFI Including Major Event Days on line 5,

e. Report the Annual Distribution SAIFI Excluding t Major Event Days on line 5,

f. Report the Annual Distribution SAIFI Including Major Event Days excluding events where the reliability event was initiated from loss of supply on line 6.

6. On line 7, enter the **Total number of customers used to calculate SAIDI and SAIFI**, as reported on this schedule. A customer is defined as a metered electrical service point for which an active bill account is established at a specific location (e.g., premise). *(IEEE 1366-2003 pg 2)*

7. On line 8, **indicate the voltage at which you distinguish the distribution system from the supply system**.

8. On line 9, indicate whether your company has an outage management system that detects loss of load or customer outages, answer “yes”, even if you also receive outage information manually via other methods.

SCHEDULE 3. PART C. DISTRIBUTION SYSTEM RELIABILITY

INFORMATION - OTHER

SAIDI and SAIFI calculations via other methods, calculated by state

1. On lines 10 through 11 report the values that you calculate.

a. Report the Annual Distribution SAIDI Including major events on line 10,

b. Report the Annual Distribution SAIDI Excluding major events on line 10,

c. Report the Annual Distribution SAIFI Including major events on line 11,

d. Report the Annual Distribution SAIFI Excluding major events on line 11.

2. On line 12, enter the total number of customers used to calculate SAIDI and SAIFI, as reported on this schedule.

3. On lines 13, indicate whether your utility includes inactive accounts in its definition of customers used to determine SAIDI and SAIFI.

4. On line 14, indicate how your utility defines momentary outages. (Less than how many minutes) Outages can be classified as either momentary or sustained. Momentary outages are not included in determining SAIDI and SAIFI.

5. On line 15, report the voltage that you use to distinguish the distribution system from the supply system.

Issue: A question asks, “At what voltage do you distinguish the distribution system from the supply system?” With this wording, it is unclear whether the distinguishing voltage belongs to the distribution system or the supply system.

Recommended wording: “**What is the highest voltage that you consider part of the distribution system, as opposed to the supply system?**”

6. On line 16, indicate whether your company has an outage management system that detects loss of load or customer outages, answer “yes”, even if you also receive outage information manually via other methods.

UNITED STATES OF AMERICA
BEFORE THE
DEPARTMENT OF ENERGY

	)
Energy Information Administration	)
Form EIA–930, ‘‘Balancing Authority Operations Report’’	)
	)

COMMENTS OF THE ISO-RTO COUNCIL

Pursuant to the Federal Register Notice ("Notice")[1] issued by the Department of Energy, the ISO-RTO Council ("IRC")[2] submits the following comments on the proposed new EIA reporting obligation that would be required pursuant to proposed Form EIA-930 – "Balancing Authority Operations Report." The EIA proposal was published on December 24, 2013, and public comments were requested by January 23, 2014.

Form EIA–930 is a new survey that would require Balancing Authorities, such as the IRC members, to provide hourly electric power operating data, including:

- Hourly demand;
- Hourly next-day demand forecast;
- Hourly net generation;
- Hourly total net actual interchange; and
- Hourly actual interchange with each interconnected Balancing Authority.

These comments will address the EIA's instructions for the data posting format and timing for the provision of data requested in the form. The IRC members also take this opportunity to thank EIA for addressing prior comments in the most recent proposed Form EIA-930.

[1] Notices, 78 Fed. Reg. 77667 (December 24, 2013).

[2] The IRC is comprised of the Alberta Electric System Operator, the California Independent System Operator Corporation, the Electric Reliability Council of Texas, Inc. the Independent Electricity System Operator, ISO New England, Inc., the Midcontinent Independent System Operator, Inc., the New York Independent System Operator, Inc., PJM Interconnection, L.L.C. and the Southwest Power Pool, Inc. The Alberta Electric System Operator and Independent Electricity System Operator are not subject to EIA reporting obligations and are not joining these comments.

I. Issues Concerning the Data Format

The IRC members respectfully request that EIA accept the data in either XML or CSV format to accommodate the varying data collection and formatting practices that exist among the ISOs, RTOs and Balancing Authorities. EIA's reporting proposal specifies that "the posting files are to be in XML format,"[3] however, the option to post data (or make it available for download) in either XML or CSV format will help "minimize burden on electric system operators" by allowing each entity to leverage its existing tools. According to the EIA's Supporting Statement Part A,[4] "[t]he surveyed data are typically produced in the normal course of business by Balancing Authority energy management systems" and the formatting option will facilitate the use of these existing practices. The XML *or* CSV posting format options will further align EIA's request with the normal course of business for the reporting entities.

II. Proposed Timeline for Commencing Provision of Data

The IRC members respectfully request that EIA activate the EIA-930 survey on or after October 1, 2014. Activation before the summer of 2014 is unrealistic because EIA will continue to refine the EIA-930 survey this winter and spring in response to comments. All of the Balancing Authorities will need time to develop and implement automated collection and posting mechanisms for the Form EIA-930 data specified in the instructions posted with the December 24, 2013 Federal Register Notice. Any substantive modifications to the instructions or discussions in Supporting Statement Part A will require additional time to develop by the IRC members.

While the data requested in Form EIA-930 is available and used by the IRC members, the entities must develop additional data collection and formatting tools to satisfy the specific requirements of EIA-930. This effort cannot take place until the EIA-930 survey form is finalized and will require several months to complete and test due to other commitments underway by the entities. The IRC members are opposed to activating the EIA-930 survey during the peak summer period when the potential for high load conditions render system operating conditions unfavorable for implementation on new processes or systems.

III. Miscellaneous Issues

The IRC members appreciate EIA's expectation that the proposed data be posted in 'as is' form using an automated system without any involvement by real-time system operators. We also acknowledge EIA's willingness to attach a corresponding disclaimer to all data products. Supporting Statement Part A provides that the disclaimer will have language similar to the

[3] *See Form EIA-930 Hourly and Daily Balancing Authority Operations Report Instructions* at p. 4.

[4] *Supporting Statement for Survey Clearance: Electric Power & Renewable Electricity Surveys, Part A: Justification*, OMB Number 1905-0129 at p. 22, December 5, 2013.

following: "EIA acknowledges that the information submitted by reporting entities is preliminary data. This preliminary data is made available 'as-is' by EIA and neither EIA nor reporting entities are responsible for reliance on the data for any specific use."[5] The IRC supports the inclusion of this disclaimer. The data is preliminary and, accordingly, the disclaimer is necessary.

The IRC members also support the EIA proposal to "sweep posted data" from websites maintained and controlled by the Balancing Authorities making the data available. The IRC members believe that this approach is the best default option for all parties involved.

IV. Conclusion

The IRC respectfully requests that EIA give due consideration to these comments and further consider the proposed EIA-930 process in light of these comments.

Respectfully submitted,

/s/ Craig Glazer
Craig Glazer
Vice President – Federal Government Policy
Robert Eckenrod
Senior Counsel
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/s/ Theodore J. Paradise
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Carmel, Indiana 46082-4202

[5] *See Supporting Statement Part A* at p. 27.

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/s/ Paul Suskie
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/s/ Matthew Morais
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Electric Reliability Council of Texas, Inc.
2705 West Lake Drive
Taylor, Texas 76574

Date: January 23, 2014

From: Oliphint, Bob
Sent: Friday, January 24, 2014 1:57 PM
To: Chad_S_Whiteman@omb.eop.gov.; erus2014@eia.gov.
Cc: Oliphint, Bob
Subject: Comments on EIA report revisions

Mr. Chad S Whiteman
DOE Desk Officer, Office of
Information and Regulatory Affairs,
Office of Management and Budget, New
Executive Office Building, Room 10102,
735 17th Street NW., Washington, DC
20503,

Ms. Rebecca Peterson, U.S. Energy
Information Administration, Mail Stop
EI–23, Forrestal Building, 1000
Independence Avenue SW.,
Washington, DC 20585

Mr. Whiteman and Ms. Peterson,

In the Federal Register /Vol. 78, No. 247 /Tuesday, December 24, 2013, the U.S. Energy Information Administration (EIA) requests OMB review and comment on modifications to a number of EIA forms used in collecting information on various aspects of the electric utility industry. Luminant appreciates the opportunity to provide comments on the proposed changes.

Luminant is the largest competitive power generation company in Texas. It operates lignite mines and generates electricity at 13 solid fuel-fired units, in addition to natural gas fired and nuclear units. Luminant has over 15,400 megawatts ("MW") of generation capacity including 8,017 MW fueled by lignite and subbituminous coal. Luminant's generation capacity is made up of 72% coal, 26% nuclear, and 2% natural gas. In addition to power generation, Luminant is involved in wholesale marketing and trading and in the construction and development of new power plants.

To comply with only environmental reporting regulations, Luminant prepares and submits over 5,000 state and federal reports annually. This and reporting on other business activities requires coordination of manpower .

While the EIA-923 has clearly been streamlined and improved overall, the changes are not such that they warrant moving the filing date by a month. Previously, the EIA-923 filing date was approximately 45 calendar days after the form opened for data entry, following the end of the reporting year, which was usually around March 31. As it is written in the proposed instructions, the EIA-923 is now due on or about the last day of February following the end of the reporting year. This change places an undue burden on reporting entities that also must change their reporting procedure to accommodate numerous other report updates.

A similar filing date change on the EIA-860 included a note that allowed for the filing date to be moved back day-for-day if for some reason the EIA was late in opening its Internet Data Collection system. The EIA-923 should include a similar note regarding the filing date.

Again, Luminant appreciated the opportunity to comment. For further information regarding Luminant's comments, please contact me at (214) 875-8382 or Kimberly.Mireles@luminant.com

Sincerely,
Kim Mireles
Vice President, Environmental Services
Luminant
Dallas, Texas

Transmitted by:
Bob Oliphint
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NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

John N. Moura
Director, Reliability Assessment
NERC

January 23, 2014

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DOE Desk Officer
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Ms. Rebecca Peterson
U. S. Energy Information Administration
U. S. Department of Energy
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1000 Independence Avenue SW
Washington, DC 20585

Submitted by e-mail to Chad_S_Whiteman@omb.eop.gov and erus2014@eia.gov.

Re: EIA electricity survey forms – 2014 triennial review –
Comments requested at 78 Fed. Reg. 77667 (Dec. 24, 2013)

Dear Mr. Whiteman and Ms. Peterson:

The North American Electric Reliability Corporation (NERC) is filing these final comments in response to the above-referenced Federal Register notice. We appreciates this opportunity to provide final comments to support the development of the 2014 Form EIA-411 "Coordinated Bulk Power Supply Program Report." We also recognizes that EIA has modified the EIA-411 in response to NERC's preliminary comments, submitted on May 6, 2013 (see attached letter).

Coordinated activity between NERC and electric industry stakeholders has continued since the initial comments were submitted. These activities have resulted in additional modifications had enhancements to NERC's data request for the annual development of the Long-Term Reliability Assessment (LTRA). A majority of the LTRA data is used to populate the EIA-411, as prescribed in an existing Memorandum of Understanding (MOU) between NERC, the eight Regional Entities, and EIA. Therefore, it is important to strive for consistency.

Accordingly, NERC's final comments are intended to address some remaining inconsistencies between the EIA-411 and NERC's LTRA data request. Specifically, it is important to incorporate the enhanced LTRA supply category definitions, which were approved by NERC's Planning Committee in December, 2013. These enhancements will yield more accurate and consistent resource adequacy projections. Additional comments provide more clarification to certain data definitions and instructions, while also providing important distinctions between actual and projected

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data. Comments and redlines for both the data form and corresponding instructions are included in the attached file package. Please direct any questions regarding these comments to Elliott Nethercutt (elliott.nethercutt@nerc.net).

Sincerely,

John N. Moura
Director, Reliability Assessment
North American Electric Reliability Corporation

CC: Mr. Stan Kaplan, Director, Office of Electricity, Renewables, and Uranium Statistics, EIA
Mr. Jonathan DeVilbiss, Survey Manager, EIA
Mr. Elliott Nethercutt, Senior Technical Analyst, NERC
Mr. Thomas Burgess, Vice President and Director of Reliability Assessment and Performance Analysis, NERC

ERS2014@eia.gov

Department of Energy
Washington, DC 20585

January 31, 2014

MEMORANDUM FOR: REBECCA PETERSON
U.S ENERGY INFORMATION ADMINISTRATION (EIA)

FROM: PATRICIA A. HOFFMAN PH
ASSISTANT SECRETARY
OFFICE OF ELECTRICITY DELIVERY AND ENERGY RELIABILITY

SUBJECT: **OE Comments on proposed EIA data collection forms**

Thank you for the opportunity to provide additional comments on the forms EIA proposes to put into effect in 2014. The comments we submit today supplement the comments OE provided on May 13, 2013 in the first round of comments concerning creation of EIA-930, Balancing Authority Operations Report. We also offer new comments in support of the proposed revisions to EIA-861.

EIA-930

OE's support for EIA's plan to collect and make publicly available hourly information from Balancing Authorities (EIA-930) is unchanged in light of comments received by EIA from other sources.

The information collected through EIA-930 will enhance OE's ability to respond to congressional direction to prepare triennial National Electricity Transmission Congestion studies. It will do so by ensuring that important data on electricity flows are collected consistently across the entire nation and made publicly available.

EIA-861

OE supports EIA's proposal to collect information on distribution reliability through EIA-861. OE needs consistently defined and publicly available annual statistics on distribution reliability in order to perform its mission to conduct policy analysis and technology R&D to maintain and improve electricity reliability.

OE stresses that EIA's plan to have utilities report contributions to annual SAIDI and SAIFI due to loss of supply is especially needed in order to measure and track transmission and distribution system reliability separately.

OE requests that EIA further revise data collection on distribution reliability to ensure that information on transmission and distribution reliability is collected consistently. Specifically, OE requests that EIA's plans to collect information on SAIDI and SAIFI due to loss of supply should be extended to collection of these data when they are defined by means other than IEEE Std. 1366.

Black Start Units

The information on blackstart capability being proposed for the EIA-860 survey would be useful for DOE/OE, and in particular ISER. ISER is involved in mitigation, protection, response, and recovery activities. Information about blackstart capability (and dual fuel capability) is important to gauging the ability of an area to recover or come back on line quickly after a voltage collapse or blackout. These units would be the building blocks of a restart of a collapsed portion of the grid. Obviously from a resilience perspective it is critical that there be enough of these units located in the right places to enable a quick restart of the system. At present we have no information on where these units are or how many of them there are. The details of this information must be closely held, as it is sensitive, perhaps even national security sensitive, or classified.

When ISER funds reports, studies, mitigation efforts, etc., regarding preparedness of substations or generating units, it would be important to know if a unit has blackstart capability. We have a project ongoing now which is looking at technologies to protect a critical asset or assets from EMP or GMD effects. If limited funds are available to protect critical generation assets, the blackstart units are important ones to protect.

January 23, 2014

DOE Desk Officer
Office of Information and Regulatory Affairs
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Rebecca A. Peterson
U. S. Energy Information Administration
Mail Stop EI-23, Forrestal Building
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Washington, DC 20585
ERS2014@eia.gov

SUBMITTED VIA EMAIL

RE: ELECTRICITY AND RENEWABLE (PHOTOVOLTAIC) SURVEY FORM CHANGES PROPOSED FOR 2014

The Solar Energy Industries Association (SEIA) and its 1,000 member companies[1] across the solar value chain appreciate the Energy Information Administration's (EIA) proposals to improve collection of data on electricity and renewable energy.[2] SEIA believes that the changes proposed will provide more accurate and complete data on the contribution of solar energy to the nation's energy supply and believes there are additional opportunities to 1) improve data with minimal burden and 2) reduce burden without harming data value.

About SEIA

Solar Energy Industries Association® is the national trade association of the U.S. solar energy industry. Through advocacy and education, SEIA® is building a strong solar industry to power America. As the voice of the industry, SEIA works with its 1,000 member companies to champion the use of clean, affordable solar in America by expanding markets, removing market barriers, strengthening the industry and educating the public on the benefits of solar energy.

SEIA Comments on Proposed Changes

EIA-63B Annual Photovoltaic Cell/Module Shipments Report

Suggestion:

Consider discontinuing this survey and report.

Justification:

This report places an unnecessary reporting burden on certain parts of the solar industry. At the same time the results are of minimal value because the data it collects is incomplete and outdated by the time it is released. Other sources of information on manufacturing activities and employment levels are

[1] The positions expressed herein are the views of SEIA and not those of any individual member company.
[2] http://www.eia.gov/survey/changes/electricity/

already available. These provide more comprehensive and timely views of industry activity. It is not clear that anyone currently uses data from form 63B. SEIA believes EIA's resources would be better spent elsewhere.

EIA-826: Monthly Electric Utility Sales and Revenue Report with State Distributions

SEIA supports the proposed changes to this form. In particular, SEIA supports the removal of the 2 MW cap on systems counted toward net-metered PV capacity as it will allow for a more complete picture of the importance of net-metering policies to the deployment of solar energy systems. To help ensure an even more complete and timely view of net-metered solar energy capacity expansion SEIA also makes the following suggestions.

1. **Suggestion:**
   Expand the sample size of the survey to include more utilities with a focus on utilities that have demonstrated significant net-metered solar activity through their reporting on EIA-861.
   Justification:
   Current form 826 data appears to miss some utilities with significant net-metered solar capacity. Given the rapid developments of customer-sited solar energy, only capturing data for these utilities in the annual 861 data collection does not provide sufficient granularity or timeliness for tracking activity.

2. **Suggestion:**
   For PV and other net energy metering (NEM) customers, in addition to continuing the collection of data on "electric energy sold back (MWh)," begin collecting data on both total energy delivered to NEM customers and *net* energy sold to NEM customers (this value could be negative if NEM customers are net exporters instead of net importers of electricity). Further, also collect data on *net* sales (dollars) to NEM customers excluding any payments for renewable energy credits.
   Justification:
   There is currently significant debate on the impact of NEM policies on ratepayers. This data would provide an important metric for determining the value and impact of NEM policies. As it stands, collecting only data on "electric energy sold back" leaves many holes as many utilities are not able to collect this data with their current metering infrastructure. Nearly every utility should be able to provide data on both net sales and net disposition to NEM customers.

3. **Suggestion:**
   Create a standard and mandatory reporting process to describe all rate structures offered by each utility surveyed. Collect number of customers, sales (dollars) and disposition (MWh) data for each component of each rate structure separately.
   Justification:
   The current collection of sales and disposition by customer class provides limited detail about the nature of electricity consumption decisions. This greater level of detail (especially after a decent amount of time series data is available) would allow for a much greater understanding of

how rate structures impact electricity consumption.

EIA-860: Annual Electric Generator Report

SEIA supports the proposed changes to this form and makes the following additional suggestions.

1. **Suggestion:**
   Consider adding a question for PV systems that asks about the array configuration for each array configuration at a site. If all arrays have the same configuration, then this need only consist of one response. For each array configuration, the survey should ask if the system is fixed, single-axis tracking or dual-axis tracking. For those systems with fixed and single-axis configurations, the survey should also ask for the tilt of the system. For fixed configurations, the survey should ask for the azimuth of the system. For each individual array configuration, the survey should also ask for the capacity of the facility as measured in kilowatts direct current under standard test conditions (kW_{dc} STC), a standard industry measure of PV capacity.
   Justification:
   This information will allow for more accurate estimation of system production and generation profile. This will help inform analysis of how solar capacity interacts with the grid. It will also help improve EIA estimates of capacity cost by controlling for cost drivers such as tracking and DC field size. A better understanding of production levels, generation profiles and cost drivers will greatly improve EIA's levelized cost of energy (LCOE) estimates for solar and provide better inputs for Annual Energy Outlook modeling and more accurately represent the economic potential of solar energy to meet our energy needs.

2. **Suggestion:**
   Make a question about whether the plant is net-metered one of the first questions in the survey to quickly eliminate most of the questions that are not relevant to NEM systems and change some questions to attain data comparable to that attained for wholesale power generators (see suggestion 4 below).
   Justification:
   Some questions asked early in this form are not easily answered by those completing this form for net-metered PV systems and alternate questions could provide the same information to EIA with less burden on the respondent. Further, because this form will likely be completed for net-metered PV systems more often than for any other plant type, this could greatly reduce the overall reporting burden for the overall report.

3. **Suggestions for PV system question refinement:**
   The suggestions below are meant to ease reporting burden and increase accuracy of data collected. These suggestions reference page numbers and question numbers of the PDF form[3] for ease of identification but largely comment on how to streamline the online data collection process.

[3] http://www.eia.gov/survey/form/eia_860/proposed/2013/form.pdf

a. Schedule 2, page 3, question 1: Do not ask for the "plant name" for net -metered PV systems as these plants are typically not named. Instead, consider automatically generating a name based on the plant's street address.

b. Schedule 2, page 3, question 2: Make the answer for question three auto-populate by geo-coding the address information supplied in question 2 of schedule 2.

c. Schedule 2, page 3, questions 4 and 5: the owners/operators of net-metered PV systems may not know the answer to these questions. Instead as a single question. That is, ask only what distribution utility serves the customer hosting the PV system in question.

d. Schedule 2, page 4, questions 8a and 8b: Question 8a seems unnecessary and should be removed to reduce burden. Question 8b should be reworded to accommodate removal of question 8a and moved to the beginning of schedule 2 as noted in suggestion 2 above.

e. Schedule 3, part B, page 7, questions 1a, 1b and 2: remove these questions for net-metered PV systems and specifically ask about both AC and DC ratings and other system configuration characteristics as described in suggestion 1 above.

f. Schedule 3, part B, page 9, question 2: Break this question into three questions: 1) what is the maximum discharge rate of the energy storage in kW 2) what is the maximum charge rate of the energy storage system (kW) and 3) what is the total energy storage capacity of the system in kWh. (Additional questions, including questions about the storage system's round trip efficiency, may be justified in future form updates.) As currently written, question 20 appears to assume that the storage system's the system's discharge rate is equal to the generator's capacity, otherwise, the "hours" metric is relatively meaningless.

g. Schedule 3, part B, page 11, questions 30, 31 and 32: See suggestion 1 above and note that suggestion number 1 means asking for the information requested in these questions for each different array configuration at the plant (though most will have only one array configuration) and suggests adding questions about the tilt and azimuth of each array configuration.

h. Schedule 3, part C: net-metered PV systems should be explicitly exempted from reporting as proposed generators because the development cycle of these plants may be only months and reporting proposed net-metered systems is not practical or useful given the timeframe of data publication for this survey.

i. Schedule 3, part C, page 16, question 11: Do not ask about the number of inverters for PV systems for proposed generators. This information would be of little value even if it were known well in advance since design may change.

j. Schedule 4: For net-meted PV systems, eliminate this detail and ask only if system is owned by the owner of the host site.

EIA-860M: Monthly Update to the Annual Electric Generator Report

Suggestion:

Exempt net-metered PV systems from this survey.

Justification:
The facilities that host net-metered PV systems are not primarily engaged in the electricity generation business and may not maintain the type of data collected in this report. Moreover, since NEM generators tend to be much smaller than the types of facilities for which this form was designed, the generation covered by such respondents would be relatively small relative the burden on the respondent when compared with respondents who are primarily engaged in the electricity generation business.

EIA-861: Annual Electric Power Industry Report

SEIA supports the removal of the 2-MW system size cap for reporting net metering statistics.

1. **Suggestion:**
   For PV and other net energy metering (NEM) customers, in addition to continuing the collection of data on "electric energy sold back (MWh)," begin collecting data on both total energy delivered to NEM customers and *net* energy sold to NEM customers (this value could be negative if NEM customers are net exporters instead of net importers of electricity). Further, also collect data on *net* sales (dollars) to NEM customers excluding any payments for renewable energy credits.
   Justification:
   There is currently significant debate on the impact of NEM policies on ratepayers. This data would provide an important metric for determining the value and impact of NEM policies. As it stands, collecting only data on "electric energy sold back" leaves many holes as many utilities are not able to collect this data with their current metering infrastructure. Nearly every utility should be able to provide data on both net sales and net disposition to NEM customers.

2. **Suggestion:**
   Create a standard and mandatory reporting process to describe all rate structures offered by each utility surveyed. Collect number of customers, sales (dollars) and disposition (MWh) data for each component of each rate structure separately.
   Justification:
   The current collection of sales and disposition by customer class provides limited detail about the nature of electricity consumption decisions. This greater level of detail (especially after a decent amount of time series data is available) would allow for a much greater understanding of how rate structures impact electricity consumption.

EIA-923: Power Plant Operations Report

Suggestion:
Exempt net-metered PV systems from this survey.
Justification:
The facilities that host net-metered PV systems are not primarily engaged in the electricity generation business and may not maintain the type of data collected in this report. Moreover, since NEM generators tend to be much smaller than the types of facilities for which this form was designed, the generation covered by such respondents would be relatively small relative the burden on the

respondent when compared with respondents who are primarily engaged in the electricity generation business. Data on solar generation may also be available from other sources and can be easily estimated based on system characteristics suggested in the comments for form 860 above.

EIA-930: Hourly and Daily Balancing Authority Operations Report

SEIA supports the creation of this new survey and data collection.

Suggestion:

Consider expanding the granularity of this survey to include additional detail. Additional detail could include sub-hourly data on load and data for every available node that includes price in addition to load data.

Justification:

This additional detail would help analyze areas of grid congestion and facilitate solutions such as solar energy and energy storage to help relieve that congestion and improve grid reliability.

SEIA looks forward to working with EIA and other stakeholders to further refine and streamline the collection of solar energy data. Many opportunities exist to reduce reporting burden on the solar industry and improving the quality and usefulness of the data by combining data collection efforts of different agencies (e.g. FERC form 556) and by tailoring forms to be consistent with standard solar industry metrics.

Thank you for your consideration of these comments.

Respectfully submitted,

/s/ Justin Baca

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THE SOLAR FOUNDATION®
Research and Education to Advance Solar Energy

MEMORANDUM

To: DOE Desk Officer
Office of Information and Regulatory Affairs, Office of Management and Budget
New Executive Office Building
735 17th Street NW
Washington, DC 20503
Chad_S_Whiteman@omb.eop.gov

From: Andrea Luecke, President and Executive Director
The Solar Foundation
505 9th Street NW, Suite 800
Washington, DC 20004

Date: January 22, 2014

RE: Electricity and Renewable (Photovoltaic) Survey Form Changes Proposed for 2014

The Solar Foundation welcomes the opportunity to submit comments on the proposed changes to the U.S. Energy Information Administration's electricity and renewable (photovoltaic) survey forms announced in 78 *Federal Register* 247 (24 December 2013), pp. 77667-77668. The Solar Foundation's role as a national 501(c)(3) nonprofit organization focused on solar industry research and education and expertise in survey-based data collection make us feel both compelled and qualified to comment on the proposed survey changes.

These comments are based on our understanding of the proposed changes as described in the *Supporting Statement for Survey Clearance: Electric Power & Renewable Electricity Surveys Part A* (OMB Number 1905-0129). For ease of understanding, comments are grouped according to the survey form to which they pertain.

- *FORM EIA-826*, Monthly Electric Utility Sales and Revenue Report with State Distributions
  - The quality of the data obtained through this survey could benefit from expanding the sample to include more electric utilities. Currently, some very large utilities are not included in the monthly sample.
  - For Schedule 3, Part B, *Net Metering*, it would be useful to have system DC ratings in addition to the AC ratings. Much of the solar industry measures installations by DC rating.
- *FORM EIA-860*, Annual Electric Generator Report
  - We feel that the proposed changes do not address the challenges of obtaining and maintaining data on small net metered systems where the system owner or host is not in the electric power business. For such systems/entities, the inclusion of simple questions aimed at determining whether the system is still in operation and whether any changes have occurred to the system would be helpful.
  - For Schedule 2, *Power Plant Data*,
    - It would be useful to have street addresses for each power plant in addition to the geographic coordinates.

        - We support the proposed change to collect information on whether a plant that has a primary purpose other than electricity generation for sale is net metered.
    - For Schedule 3, Part A, *Generator Information – Generators,* instead of collecting information as to whether a combined-cycle unit is capable of operating in simple-cycle mode by bypassing the heat recovery steam generator, it may be more useful to ask directly about ramp rate capabilities.
    - For Schedule 3, Part B, *Generator Information – Existing Generators*,
        - It would be useful to ask for both DC STC array ratings for PV plants as well as the plant's AC rating.
        - We would like to point out that some plants may have multiple answers for questions on the characteristics of solar energy systems (tracking, technology, panel material). In addition, it may be useful to include tilt and azimuth among these characteristics.
    - For Schedule 5, *Generator Cost Information*, we agree with the proposal to include new questions on generator construction and financing costs, but feel care should be taken to differentiate here between those built under direct ownership versus third-party ownership.
- *FORM EIA-860M*, Monthly Update to the Annual Electric Generator Report
    - We feel the collection of data on the status of proposed new generators scheduled to begin commercial operation within the forward 12-month period is not practical for small solar projects.
- *FORM EIA-861*, Annual Electric Power Industry Report
    - For Schedule 4, Part A, *Sales to Ultimate Customers, Full Service*, it would be useful to also include mandatory reporting of all utility rate structures available.
    - For Schedule 7, Part A, *Net Metering,* it would be useful to have system DC ratings in addition to the AC ratings.
    - For Schedule 7, Part B, *Distributed and Dispersed Generation*, it Is unclear as to how each utility will know if a generator filed Form-860. If they are to only assume that all plants over 1 MWac have filed this form, what does the removal of the 2 MW limit from Schedule 7, Part A achieve?
    - For Schedule 6, Part C, *Dynamic Pricing Programs*, it would to ideal to ask for all available utility rate structures.

Copy: Rebecca A. Peterson
U.S. Energy Information Administration
Mail Stop EI-23, Forrestal Building
1000 Independence Avenue SW
Washington, DC 20585
ERUS2014@eia.gov

From: Edinger, Chad [CEdinger@ci.tacoma.wa.us]
Sent: Thursday, January 23, 2014 5:01 PM
To: Chad_S_Whiteman@omb.eop.gov
Cc: ERS2014
Subject: Tacoma Public Utilities Comments to OMB

Follow Up Flag: Follow up
Flag Status: Flagged

Mr. Whiteman,

As a Balancing Authority directly impacted by Form EIA-930 Tacoma Public Utilities has voiced to EIA our many concerns with the proposed Form. The most concerning today are the EIA's lack of technical information about the "EIA-specified xml schema" coupled with a short timeframe to implementation, continued lack of purpose for posting of granular data in near real time, EIA's assertion that commercial entities already provide such data, and EIA's assumption of reporting burden.

Regarding the lack of technical information about the "EIA-specified xml schema" and EIA's March 1, 2014 implementation date, Tacoma Public Utilities is very concerned. Tacoma cannot be expected to begin development to comply with Form 930 until such data and contact at EIA are made available. To date neither one has been provided by EIA and may not be until late February according to EIA email responses. It is estimated that this will take Tacoma at least 8 weeks to comply with Form 930. Tacoma proposes EIA require compliance with EIA Form-930 no earlier than 6 months after OMB approval.

Concerning the purposes for posting of granular data in near real time or within 24 hours, depending on the information, EIA has provided examples such as:

1) *Being able to evaluate the impact of demand response programs and increased use of intermittent renewable energy technology*. Good meaningful evaluations do not require such near term reporting of data. What is required is granular data over large periods of time. This may be provided within 2 months of actuals with no harm to proper, meaningful analytics.
2) *Provide near real-time information on the recovery of the power system in the wake of system upsets*. Today every electric utility in the country has an Emergency Response Plan in which local, state, and federal agencies are made aware of current conditions and the status of recovery efforts. Additionally Reliability Standards written by the North American Electric Reliability Corporation and approved by FERC require Balancing Authorities to report to the Reliability Coordinator real time disturbances to the Bulk Electric System and requires Reliability Coordinators to monitor system operations in real time to help Balancing Authorities recover from such disturbances.
3) *Provide State and local officials experimenting with or implementing demand response dynamic pricing programs information on the impact of these programs*. Again, good meaningful evaluations do not require such near term reporting of data. What is required is granular data over large periods of time. This may be provided within 2 months of actuals with no harm to proper, meaningful analytics.
4) *To provide a near real-time indicator of electricity-using economic activity*. This point is ambiguous and needs to be clarified, EIA references a Wall Street Journal article for this point. It would appear that electricity pricing information would be required for this point to be valid. However EIA will not collect pricing data via Form 930 nor do they collect or post pricing data at all.
5) *To provide information relevant to decisions by policy makers, researchers, market participants and entrepreneurs*. Again, good meaningful evaluations do not require such near term reporting of data. What is required is granular data over large periods of time. This may be provided within 2 months of actuals with no harm to proper, meaningful analytics. However, Tacoma does concede that entrepreneurs such as energy

marketers will benefit economically by posting data so quickly after the fact, but at the expense of Tacoma Power rate payers.

Regarding the EIA's assertion that commercial entities already provided this information in a more detailed and timelier fashion is false. Every example entity EIA provides uses infrared (IRR) technology and or modeling technics to predict what is occurring on the electric grid. The infrared information provided by IIR or Genscape is limited to only those lines which are monitored. It is generally limited to generators or transmission lines which are very large and are assumed to have a direct impact on real time/day ahead energy prices. Infrared technology is not being used today to monitor any Tacoma Public Utility facility but Tacoma would be required to start providing equivalent information via Form-930. Furthermore, infrared information is used to measure line heating and is then correlated to loading but it is not an exact match. Conductor physical characteristics and ambient temperatures contribute to line heating and therefore make the correlations to line loading inexact. Form EIA-930 would provide the exact loading information on lines. As for the modeling technics used by these companies, they are just that, a model. They are only as good as the person building the model and the actual information that is fed into the model. By providing the information closer to real time in Form 930, we will be providing information to these models which will make them more accurate in the near term. This only serves to benefit the model providers and those purchasing the models for economic gain, not the general public. In summary, this information when reported so closely after the fact is only beneficial when inputted into a modeling program which the general public and policy makers are likely not to have.

Concerning the reporting burden, Tacoma Public Utilities estimates approximately 300 hours to develop a website at a cost of approximately $29,000. As a utility that is owned by the citizens of Tacoma, we are concerned about the lack of clear benefit to our customers this investment provides.

Please feel free to contact me if you have any questions.

Regards,
Chad Edinger, PE
Tacoma Power
3628 S. 35th St
Tacoma, WA 98409
253-502-8447

From: Wade Schauer [wade.schauer@woodmac.com]
Sent: Thursday, January 09, 2014 1:23 PM
To: Kaplan, Stan; Chad_S_Whiteman@omb.eop.gov; ERS2014
Subject: RE: New EIA Data Proposal

Follow Up Flag: Follow up
Flag Status: Flagged

>> Real-time collection and of release to the public of hourly load from each of the 69 balancing authorities covering the lower 48 states (proposed EIA-930 survey). This is the biggest proposed change and a summary of this survey is attached.

Thank you for the opportunity to comment on the proposed EIA-930 survey data requirement.

The new EIA-930 survey should be further enhanced to require large ISOs/RTOs (in particular MISO and SPP) to file hourly load data for their internal "Local Balancing Authorities" (LBAs) and/or individual Transmission operators within their territories, and not only a single load value for the entire ISO footprint Balancing Authority.

For background, there used to be 20+ balancing Authorities within the MISO footprint, but once MISO became a Balancing Authority, they stopped reporting FERC 714 historical load data for those individual areas. Instead, MISO only reports 2 or 3 "Regional" load footprints whose definitions have changed over time including most recently in December when they stopped reporting three Midwest Regions (West, Central, East) with two (Central, North).

The hourly loads within each of MISO's different LBAs are dramatically different, so by blending them into these larger Regional loads (or even worse the EIA-930 requirement for the entire balancing authority), all of the hourly load diversity that influences transmission flows and generation dispatch within MISO is lost. This makes it impossible for any third-parties to do accurate power system analysis that helps utilities analyze future plans and the optimal outcome for utility ratepayers. With the addition of "MISO South" in December, the individual hourly load data for 6 transmission operators that used to report FERC 714 hourly load data (Entergy, CLECO, etc.) will be lost to a single MISO South hourly load report.

Conversely, the PJM RTO (also a balancing authority) publishes historical hourly demand data daily for each of the transmission operators/LBAs within their system (over 20 different load zones reported). The New York ISO publishes historical hourly loads for 11 different load zones within their footprint. Given the precedent that these other existing ISOs/RTOs have set, plus the more detailed requirements of the old FERC 714 filings that utilities had no problem in providing, it is reasonable that the EIA-930 survey requires the MISO and SPP RTOs to provide similarly detailed levels of historical load data (for each LBA or transmission operator within their territories). This should also include posting all historical hourly data since 2009 when MISO became the balancing authority for its footprint, which they almost certainly have stored on their internal computer systems.

We are less concerned about the "real-time" nature of the EIA-930 report. So for example, if the data was only reported once a month (for all hours of the previous month), that would be perfectly acceptable. However, there needs to be a reasonable level of detail for hourly load data to be of any use in power system analysis.

Thank you for your time.

Wade Schauer
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From: Kaplan, Stan [mailto:Stan.Kaplan@eia.gov]
Sent: Thursday, January 09, 2014 11:16 AM
To: Wade Schauer
Subject: New EIA Data Proposal

FYI, EIA is proposing to collect new data (including real-time collection of hourly load for the lower 48 states), for release to the public, on electric power and renewable electricity. If this is of interest to your organization you may want to file comments. Comments can be short and can be submitted via email. **Comments are due by January 23**.

Some of the new data includes:

- Real-time collection and of release to the public of hourly load from each of the 69 balancing authorities covering the lower 48 states (proposed EIA-930 survey). This is the biggest proposed change and a summary of this survey is attached.
- Costs of building power plants.
- Load-following capabilities of fossil plants.
- Names of the natural gas pipelines connecting to each power plant.
- Detailed information on the characteristics of solar and wind plants.
- Moisture and chloride content of coal deliveries.
- Reliability statistics for electric distribution companies.
- Revised questions relating to energy efficiency and demand response programs.

EIA is also proposing to stop collecting certain information, including data on green pricing programs and reactive power.

You can find more information at: http://www.eia.gov/survey/changes/electricity/

If your organization wants to support this proposal or portions of it, object to it, or propose changes, it is important that your voice be heard by filing comments. These comments do not have to be lengthy. A brief, concise statement is sufficient.

Comments should be sent by January 23 to:

At the Office of Management and Budget: **Chad_S_Whiteman@omb.eop.gov**

With a copy to:

At the U. S. Energy Information Administration: **ERS2014@eia.gov**

If you have questions let me know. Thanks.

Stan Kaplan
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