

**March 31, 2015**

**Via Email Only**

William Booth  
Energy Information Administration  
[William.booth@eia.gov](mailto:William.booth@eia.gov)

Re: Avista Corporation comments on Form EIA -111 Quarterly Electricity Imports and Exports Report

Dear Mr. Booth:

Pursuant to the Federal Register notice issued on February 4, 2015, 80 Fed. Reg. 6065 (2015), Avista Corporation ("Avista") respectfully submits these comments regarding the Energy Information Agency ("EIA") information collection activities. Specifically, Avista submits these comments on the process for submitting data, and the usability of the data that is submitted, on [Form EIA-111 regarding quarterly imports and exports of electricity](#). Avista appreciates the opportunity to comment on ways to enhance the quality, utility, and clarity of the information collection based on its experience with the Portal.

- **The EIA should allow CSV files, in addition to the XML file format, for upload to the Portal to provide enhanced utility for respondents.**

Some respondents do not have the data available in XML format and therefore must resort to manual data entry to submit the data through the EIA Data xChange Portal ("Portal"). The manual process within the Portal does not include a 'save' function. As a result, the quarterly report must be entered in one uninterrupted session. If a respondent cannot complete the submission in one session, the respondent is required to start over when returning to the Portal. Since CSV files are easily created in Microsoft Excel, having the option to upload a CSV file would be beneficial for manual filers by allowing them to compile their data and then quickly and easily upload the data into the Portal.

- **The EIA should allow more than one individual with access to the Portal to enter data for an open campaign to enhance the utility of the submission process.**

To ensure that there is adequate coverage for timely submissions, it is a best practice to identify both a primary and secondary individual with knowledge of the requirement and with the appropriate access to the Portal to make submissions on behalf of an organization. Currently only the primary individual appears to have the capability to manually enter the electricity import and export data in the Portal. In the event that the primary individual is unavailable, there is a risk that a submission may be entered late.

- **The EIA should allow individuals within the same organization the ability to view the submission data for that organization within the Portal.**

To provide redundancy, an organization may assign the submission requirement to two individuals with Portal access for EIA Form-111. Currently only the individual that made the submission can generate reports or view the details of an organization's data submission.

This practice limits the utility of the Portal for cross training purposes, review of prior submissions, and quality review of the current submission.

- **The EIA should configure the reports available within the Portal in a transactional format to increase the usefulness and clarity of the reports.**

The attached PDF of Avista's Campaign and Response History report illustrates that the data is displayed in a manner that is difficult to align by transaction. The information for the entire quarterly submission is presented vertically and is grouped by Question instead of being displayed horizontally by Transaction Line Number for the particular quarter. This format is unusable without considerable massaging in order to decipher the details for a particular import or export transaction.

- **The EIA should allow selection of the reporting period as a report parameter to enhance the usefulness and clarity of the reports.**

Currently the Campaign and Response History report returns all the data submitted by the particular respondent. The report user must rely on the "Month" Question or the Campaign Name to determine which reporting period data is being viewed. It would be more useful to have the option to select one quarter, several quarters, or the respondent's entire history depending on the need.

- **The EIA should allow submissions made in error to be deleted by the respondent to increase the clarity and quality of the reports.**

Currently the Campaign and Response History report returns all data submitted by the particular respondent, including submissions made in error. When working within the Portal in manual entry mode, if a respondent inadvertently submits the data before it is complete or correct, the campaign is considered accepted. The respondent must then contact the EIA to request re-deployment of the campaign to begin a new submission. The Campaign and Response History report includes the incorrect or incomplete data along with the corrected submission, and there is no indication that the incorrect data should be ignored. The incorrect submission is not useful to the EIA or to the respondent and should be deleted from the database.

Please consider these comments on the quality, utility, and clarity of the information collection process for the Form EIA-111 and contact me directly if you have any questions.

Lori Hamilton  
Avista Corporation  
FERC Compliance Manager  
MSC - 7  
P O Box 3727  
Spokane, WA 99220-3727  
509-495-4846  
[Lori.hamilton@avistacorp.com](mailto:Lori.hamilton@avistacorp.com)

Respectfully,

/s/ Lori Hamilton  
FERC Compliance Manager

Attachment