

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

Commission Information	)	
Collection Activities (FERC-715);	)	Docket No. IC19-13-000
Comment Request; Extension	)	

**COMMENTS OF THE AMERICAN PUBLIC POWER ASSOCIATION**

Pursuant to the December 19, 2018 Notice of Information Collection and Request for Comments (“Notice”) issued by the Federal Energy Regulatory Commission (“Commission” or “FERC”) in the above-captioned docket, as published in the Federal Register on December 27, 2018,<sup>1</sup> the American Public Power Association (“APPA”) provides these comments on the currently approved information collection, FERC Form No. 715 (Annual Transmission Planning and Evaluation Report).

FERC Form No. 715 collects transmission planning-related information from transmitting utilities (including public power utilities) that operate integrated transmission facilities at or above 100 kilovolts.<sup>2</sup> The form is divided into six parts, with each part collecting a different category of information.<sup>3</sup> The Commission considers information collected by FERC Form No. 715 to be critical energy/electric infrastructure information (“CEII”).

The Notice invites comments on “ways to enhance the quality, utility and clarity of the information collection.”<sup>4</sup> The FERC Form No. 715 could be enhanced by allowing the different parts of the form to be segregated from each another, which APPA understands is currently not

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<sup>1</sup> 83 Fed. Reg. 66,697 (Dec. 27, 2018).

<sup>2</sup> See 18 C.F.R. § 141.300 (2018).

<sup>3</sup> The six parts are: (1) respondent identification and certification; (2) power flow base cases; (3) transmitting utility maps and diagrams; (4) transmission planning reliability criteria; (5) transmission planning assessment practices; and (6) evaluation of transmission system performance.

<sup>4</sup> Notice at p. 5.

feasible. The inability to isolate different parts of the form can be problematic when the Commission responds to requests for release of FERC Form No. 715 information under its CEII regulations.<sup>5</sup> If the Commission's CEII Coordinator determines it is appropriate to release Form No. 715 information requested by a third party, the entire form generally must be provided, even if the requester only sought a part of the report. APPA has previously raised concerns with the Commission about its policies and procedures for releasing CEII collected in FERC Form No. 715 information to third parties, and these concerns are exacerbated by the Commission's current inability to release only the discrete parts of the form responsive to particular requests.

Further, if the Commission had the ability to segregate the different parts of FERC Form No. 715, it could calibrate its CEII procedures and release conditions to the individual parts of Form No. 715 in response to third-party requests. A greater showing of need and/or stricter release conditions could be applied to requests for highly sensitive parts of Form No. 715 (*e.g.*, power flow base cases and system maps and diagrams) than to requests for relatively less sensitive information collected in the form.

For the foregoing reasons, APPA submits that FERC Form No. 715 could be enhanced by allowing the different parts of the form to be segregated from each another.

Respectfully submitted,

**AMERICAN PUBLIC POWER ASSOCIATION**

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<sup>5</sup> See 18 C.F.R. § 388.113 (2018).