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Kimberly D. Bose, Secretary  
Federal Energy Regulatory Commission  
888 First Street, N.E.  
Washington, DC 20426

**Re: Docket No. IC19-45-000**

Dear Secretary Bose,

On September 25, 2019, the Federal Energy Regulatory Commission (“Commission”) issued a Comment Request on Form 580 in compliance with the requirements of the Paperwork Reduction Act of 1995. American Electric Power Service Commission (“AEPSC”) hereby offers the following comments on the topics noticed by the Commission:

**(1) Whether the collection of information are necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility**

AEPSC understands that the collection of the information provided on Form 580 may be necessary to review utility purchase and cost recovery practices through automatic adjustment clauses (“AACs”) in order to ensure efficient use of resources, and to evaluate costs in individual rate filings and to supplement periodic utility audits. The Commission’s Comment Request in this docket clarifies that “a jurisdictional utility without a cost-based tariff on file with the Commission is not required to file the form,” as does the FERC Form 580 Desk Reference. However, the Commission should further clarify the scope of necessary respondents. For example, given the stated purpose of the information collection, only jurisdictional utilities with cost-based tariffs on file *that contain AACs* should be required to submit Form 580. It also should be clarified that contracts entered into pursuant to a utility’s market-based rate authority (regardless of whether such contract happens to be cost-based and contain an AAC) are outside the scope of the necessary reporting. The form itself indicates that such scope limitations are intended, but the Desk Reference is less clear.

**(2) The accuracy of the agency’s estimates of the burden and cost of the collection of information, including the validity of the methodology and assumptions used**

While AEPSC has not estimated the time it spends on each form, the Commission’s estimate of the time spent collecting the information and completing the form appears to be

understated. Please see AEPSC's comments in response to item number 4, below, for suggestions for minimizing the burden on respondents.

**(3) Ways to enhance the quality, utility and clarity of the information collection**

The Commission should consider clarifying the instructions for the completion of the form. There are differences in the manner in which similar terms are used on different forms. Consistency in directions across forms, where appropriate, would enhance the quality of information reported and consistency among respondents.

**(4) Ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.**

The Commission should consider ways to improve the functionality of Form 580 to minimize the burden on respondents. Specifically, inserting information into the form is not user friendly. For example, a respondent must manually insert information in each field – it cannot tab across data entries, and there are few drop down options to respond to questions. Additionally, when adding a new fuel supply contract under Question 6, the form automatically inserts a new entry at the top of the section, rather than sequentially at the bottom of the section which must then be corrected. Implementing new software that would address these items would significantly improve the process for completing the form.

Thank you for the opportunity to provide these comments.

Sincerely,

s/ Jessica A. Cano

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