



July 18, 2016

**VIA E-MAIL**

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

**Re: Comments on Proposed Revisions to Form EIA-930, Balancing Authority Operations Report**

Dear Ms. Peterson:

ISO New England Inc. (“ISO-NE”), the New York Independent System Operator (“NYISO”), the Electric Reliability Council of Texas (“ERCOT”), Midcontinent Independent System Operator, Inc. (“MISO”), and Southwest Power Pool, Inc. (“SPP” and, together with ISO-NE, NYISO, ERCOT, and MISO the “Indicated ISOs”) respectfully submit these joint comments in response to the notice issued in the Federal Register on May 19, 2016. The notice stated that, pursuant to the Paperwork Reduction Act of 1995 and with the approval of the Office of Management and Budget, the Energy Information Administration (“EIA”) intends to extend certain EIA forms, including Form EIA-930, Balancing Authority Operations Report, for three years, with changes. The notice also stated that EIA expects the changes to be effective beginning in January 2017. Because the proposed changes may require the Indicated ISOs to make significant modifications to their software, the Indicated ISOs may not be able to meet EIA’s implementation timeline. The Indicated ISOs request that EIA provide flexibility and extensions of time as needed for balancing authorities to be able to implement the proposed changes, and where necessary, to obtain regulatory approval of budget items needed to implement the proposed changes.

The current Form EIA-930 collects hourly electric power operating data from balancing authorities in the contiguous United States. The data include: hourly demand, hourly next-day demand forecast, hourly net generation, and hourly actual interchange with each interconnected balancing authority. In addition to requesting an extension of the currently approved collection, EIA proposes to make changes to Form EIA-930. Below are each of the proposed changes, followed by the Indicated ISOs’ comments on each of them, as well as an additional comment on language included in the proposed EIA-930 Instructions.

- 1. Change the amount of time within which the respondents must report. Currently respondents must submit their data within 60 minutes of the end of the data hour. The proposal is to change that to within 30 minutes of the end of the data hour. This change would be consistent with the observed reporting capabilities of the respondents.**

The Indicated ISOs are able to produce the required data within 30 minutes of the end of the data hour.

**2. Require respondents to report hourly sub-regional actual demand when these values are produced in the normal course of business within a month of the operating day.**

The proposed EIA-930 Instructions state that “[r]espondents [who] calculate in the normal course of business within a month of the operating day hourly actual demand values for sub-regions (local balancing authorities, areas, zones, operating companies, etc.) within the tie line boundaries of their system are required to report these values.” The Indicated ISOs calculate these values in the normal course of business. For example, ISO-NE, NYISO and SPP calculate these values by load zones,<sup>1</sup> ERCOT calculates these values by weather zones, and MISO reports this data on a Local Balancing Authority basis, all which roll up to MISO’s Local Resource Zones.<sup>2</sup> However, the proposed change would require architectural and publishing modifications at each of the Indicated ISOs. Upon reaching the trigger (*i.e.*, when all of the settlements are complete for a prior month), software would need to run to summarize the data and route it to the external storage location (*e.g.* ISO-NE’s PUBDBP), which needs to be architected to receive the data). Web services and accompanying documentation would also need to be written. Thus, the Indicated ISOs may not be able to meet EIA’s implementation timeline and respectfully request that EIA provide flexibility and extensions of time as needed for balancing authorities to be able to implement the proposed changes.

In addition, while the hourly system demand data that the Indicated ISOs currently provide is based on real-time telemetered load, the sub-regional actual demand data that would be provided under the proposed change would be based on revenue quality metering. Real-time telemetered load data accounts for settlement-only generators (*i.e.* generators without telemetry that the ISO does not dispatch) on the demand side. This means that, if a settlement-only generator is generating more power, then there is a decrease in telemetered load, and if a settlement-only generator is generating less power, then there is an increase in telemetered load. On the other hand, revenue quality metering accounts for settlement-only generators on the supply side. Therefore, the data provided under the proposed change will not match the data that is currently provided. The software modifications needed to provide sub-regional actual demand data without taking settlement-only generators into account on the supply side (so that the data matches the hourly system demand data) would be time consuming and expensive, and, even if those changes were made, the hourly system data currently provided and the sub-regional actual demand data would still not match because real-time telemetered load and revenue quality metering provide data of different quality.

**3. Require respondents to report hourly net generation by standard fuel type categories.**

The list of fuel type categories included in the proposed EIA-930 Instructions contains the following categories: coal fired generators, natural gas-fired generators, nuclear, petroleum products, hydro and

---

<sup>1</sup> The eight currently-defined load zones in ISO-NE are: Maine, New Hampshire, Vermont, Connecticut, Rhode Island, Western/Central Massachusetts, Northeast Massachusetts and Boston, and Southeast Massachusetts. The eleven currently-defined load zones in NYISO are: (A) West, (B) Genesee, (C) Central, (D) North, (E) Mohawk Valley, (F) Capital, (G) Hudson valley, (H) Millwood, (I) Dunwoodie, (J) New York City, and (K) Long Island.

<sup>2</sup> Concurrently with the comments of the Indicated ISOs, MISO separately has filed comments explaining that EIA’s proposed reporting requirement by LBA would violate the MISO Tariff, on file with the Federal Energy Regulatory Commission.

pumped storage, solar, wind, and all other types. The Indicated ISOs respectfully suggest that an additional category for dual-fuel generators be added. Some of the Indicated ISOs do not know which fuel is being used at what time for each of those units, and, as such, having a category for dual-fuel generators is appropriate. In addition, when there is only one unit or a small number of units in a category, the Indicated ISOs will have to include those units in the “all other types” category in order to comply with confidentiality requirements under their Tariffs.

In addition, under the current version of Form EIA-930, the Indicated ISOs provide, in near-real-time, the total telemetered generation in their footprints. The data requested under this proposed change, however, would reflect generation from the Indicated ISOs’ dispatch software. Thus, the data that EIA currently receives (and will continue to receive) may not match the summation of the data it receives under the proposed change. In addition, as is the case with the data that is already being provided, there might be a definitional issue with MW-hours generated by units that the Indicated ISOs do not dispatch (*i.e.*, settlement-only generators and behind the meter generators).

Finally, the proposed EIA-930 Instructions state that the energy values reported (actual demand, net generation by fuel type and total net metered tie line flow) are expected to balance hourly. This expectation cannot be met by using the Indicated ISOs’ current processes. Specifically, actual demand is calculated using a sum of all the net telemetered output of generators plus the sum of the tie lines. Net generation by fuel type is currently calculated as the fuel-type-aggregated dispatch of the units, which is close, but not exact, to actual demand. As a result, actual demand, net generation by fuel type, and total net metered tie line flow will not match if the current processes are used. Changing these processes so that the three energy values reported balance hourly would require additional time and expense.

**4. EIA also requests comments on whether it should continue its current policy of limited withholding of small balancing authority data for two days.**

The Indicated ISOs have no comment on this policy.

**5. Additional Comment on Language Included in Proposed EIA-930 Instructions**

While EIA’s request for comments is focused on the four issues included above, the Indicated ISOs respectfully submit the following additional comment on language that appears in the proposed EIA-930 Instructions.

The proposed EIA-930 Instructions state that “[r]eported net metered tie line flow with each directly, physically connected balancing authority is expected to match that reported by the corresponding balancing authority.” The current requirement is that the values be verified, but there is no requirement that the values match, and some of the Indicated ISOs cannot currently comply with the expectation that the values match in the timeframe allowed for EIA-930 posting. For example, ISO-NE compares actual interchange with neighboring control areas but does not change the values to match those of the neighboring control areas. The final actual interchange values are confirmed after-the-fact using revenue quality metering in order to account for inadvertent interchange, as part of a monthly North American Electric Reliability Corporation (“NERC”) process. This process is not completed during the next operating day. Rather, the process is completed 15 days after the end of each month (after NYISO provides its

values to ISO-NE). Significant process changes and software modifications would be needed to make the values match, requiring substantial additional time and expense.

In conclusion, the Indicated ISOs respectfully request that EIA consider its comments on the proposed changes to Form EIA-930, provide balancing authorities flexibility and additional time as necessary to implement any system changes needed to report requested data, and otherwise modify the data requested and timeframes as discussed herein.

Respectfully submitted,

/s/ Margoth Caley

Margoth Caley  
Regulatory Counsel  
**ISO New England Inc.**  
One Sullivan Road  
Holyoke, MA 01040-2841  
Tel: (413) 535-4045  
Fax: (413) 535-4379  
mcaley@iso-ne.com

/s/ Nathan Bigbee

Nathan Bigbee  
Assistant General Counsel  
**Electric Reliability Council of Texas, Inc.**  
7620 Metro Center Drive  
Austin, Texas 78744  
nathan.bigbee@ercot.com

/s/ Carl F. Patka

Robert E. Fernandez, General Counsel  
Raymond Stalter, Director of Regulatory Affairs  
Carl F. Patka, Assistant General Counsel  
James Sweeney, Attorney  
**New York Independent System Operator, Inc.**  
10 Krey Boulevard  
Rensselaer, NY 12144  
Tel: (518) 356-6000  
Fax: (518) 356-4702  
rfernandez@nyiso.com  
rstalter@nyiso.com  
cpatka@nyiso.com  
jsweeney@nyiso.com

/s/ Erin Murphy

Managing Assistant General Counsel  
Midcontinent Independent System Operator, Inc.  
720 City Center Drive  
Carmel, Indiana 46032  
Telephone: (317) 249-5400  
Fax: (317) 249-5912  
emurphy@misoenergy.org

/s/ Matt Morais

Paul Suskie  
Sr. VP Regulatory Policy & General Counsel  
Matt Morais  
Associate General Counsel, Markets & Regulatory Policy  
**Southwest Power Pool, Inc.**  
201 Worthen Drive  
Little Rock, AR 72223-4936  
mmorais@spp.org