



November 30, 2016

VIA E-MAIL

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

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 DOE Desk Officer and 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") (together, the "Indicated ISOs"), respectfully submit these joint comments in response to the notice issued in the Federal Register on October 21, 2016. The notice stated that, the Energy Information Administration ("EIA") has submitted an information collection request to the Office of Management and Budget ("OMB"), under the provisions of the Paperwork Reduction Act of 1995, for the Electric Power and Renewable Electricity Surveys (OMB Control Number 1905-0129) information collection. EIA requests a three-year clearance with changes for several forms, including Form EIA-930, Balancing Authority Operations Report.

On July 18, 2016, the Indicated ISOs provided their comments to EIA. While some of those comments have been addressed, the Indicated ISOs continue to have concerns with both the timeline for implementation of the changes to Form EIA-930, and one of the requirements of the proposed instructions for the form. Those concerns are detailed in the comments below.

First, 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 and NYISO calculate these values by load zones,¹ 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.² 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, 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 for implementation on July 1, 2018 and respectfully request that OMB provide flexibility and extensions of time as needed for balancing authorities to be able to implement the proposed changes.

Second, 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, certain ISOs compare actual interchange with neighboring control areas but do 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. Significant process changes and costly software modifications would be needed to make the values match within the timeframe proposed by EIA.

Additionally, requiring that interchange values match would inappropriately allow a sanction to be imposed against a balancing authority submitting correct interchange data in the event its neighboring balancing authority submitted incorrect data. A balancing authority has no authority to control the actions of any other balancing authority and should not be subjected to compliance risk for actions that are beyond its control. The Indicated ISOs therefore suggest that OMB strike the matching requirement.

¹ 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.

² MISO separately filed comments with EIA explaining that EIA’s proposed reporting requirement by LBA would violate the MISO Tariff, on file with the Federal Energy Regulatory Commission.

In conclusion, the Indicated ISOs respectfully request that OMB consider their 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