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VIA E-MAIL

Dr. Sara Hoff
U.S. Energy Information Administration
Forrestal Building, U.S. Department of Energy
Mail Stop EI-23
1000 Independence Ave., SW
Washington, DC 20585
Electricity2023@eia.gov

Re: Comments on Electric Power Survey Form Changes Proposed for 2023

Dear Dr. Hoff:

The ISO/RTO Council ("IRC")[1] respectfully submits these comments in response to the notice and request for comments issued in the Federal Register on May 23, 2022. The notice explained that the Energy Information Administration ("EIA") invites public comment on the proposed three-year extension, with changes, to the Electric Power & Renewable Electricity Surveys ("EPRES") required under the Paperwork Reduction Act of 1995. EPRES consists of nine surveys, including annual, monthly, and one daily survey. These surveys collect data from entities involved in the production, transmission, delivery, and sale of electricity, and in maintaining the reliable operation of the power system. The EPRES include Form EIA-930 Hourly and Daily Balancing Authority Operations Report and Form EIA-930A Annual Balancing Authority Generator Inventory Report. The IRC respectfully submits comments on those two forms.

1. **EIA Should Clarify the Proposed Change to Form EIA-930 to Include "Yesterday's hourly demand response" in Daily Files**

EIA proposes to change Form EIA-930 so daily files contain "yesterday's hourly demand response." While some ISOs could provide that data, other ISOs do not have and cannot provide it. For instance, in PJM, ERCOT and CAISO, demand response resources providing energy do not provide real-time telemetry and, as a result, demand response data becomes available as part of the settlement process after the submission of meter data, which may be revised in subsequent settlement cycles.

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[1] The IRC comprises the following independent system operators ("ISOs") and regional transmission organization ("RTOs"): Alberta Electric System Operator ("AESO"); California Independent System Operator ("CAISO"); Electric Reliability Council of Texas, Inc. ("ERCOT"); the Independent Electricity System Operator of Ontario, Inc. ("IESO"); ISO New England Inc. ("ISO-NE"); Midcontinent Independent System Operator, Inc. ("MISO"); New York Independent System Operator, Inc. ("NYISO"); PJM Interconnection, L.L.C. ("PJM"); and Southwest Power Pool, Inc. ("SPP"). AESO and IESO are located in Canada and, as such, they are not subject to EIA requirements. For that reason, AESO and IESO do not join these comments.

In addition, some ISOs have different categories of demand response. For example, the CAISO has both proxy demand resources and reliability demand response resources. Dispatch of these resources occurs under different conditions. Moreover, there are utility-administered programs within the CAISO balancing authority area for which the CAISO does not have data. Similarly, MISO has several options for demand response participation, including Demand Response Type I (Regulation-only), Demand Response Type II, Load Modifying Resources, and Emergency Demand Response. PJM and ERCOT also have multiple demand response types. Specifically, in ERCOT, one group, those administered by ERCOT, includes Load Resources participating in ERCOT's Ancillary Service market, which include: (i) Controllable Load Resources (Load Resources capable of following Security Constrained Economic Dispatch base points (but not including Energy Storage); (ii) Non-Controllable Load Resources – Block loads with a ten minute ramp capability for manual deployments and automatic deployment through Under Frequency Relays (including offers + self-arranged and awards + self-arranged); and (iii) "Emergency Response Service (four service types - Non-Weather Sensitive-10 minute, Non-Weather Sensitive-30 minute, Weather Sensitive-10 minute, Weather Sensitive-30 minute). ERCOT also has demand response it does *not* administer, including Transmission/Distribution Service Provider load management programs (*e.g.*, Austin Energy's thermostat program), 4-Coincident Peak load reduction, price-responsive demand response and Distributed Generation price response. ERCOT does not have data for the programs it does not administer.

The IRC understands its members should provide all types of demand response data to EIA. Based on the foregoing, EIA should clarify the proposed requirement to require "yesterday's hourly demand response for all types of demand response, if available, or, if unavailable, the best available demand response data for all types of demand response."

2. **Data for Generator Types Should be Provided Only if Available**

As part of the changes to Form EIA-930, EIA proposes to add the following categories to the already existing generation by energy source categories:

- pumped storage[2]
- solar without integrated battery storage
- solar with integrated battery storage
- wind without integrated battery storage
- wind with integrated battery storage
- battery storage
- other energy storage
- geothermal
- unknown

In new Form EIA-930A, EIA proposes to require technologies describing how electricity is generated by the generator from the following categories:

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[2] Currently, pumped storage is included in the hydro category.

- Batteries
- Coal Integrated Gasification Combined Cycle
- Conventional Hydroelectric
- Conventional Steam Coal
- Fly wheels
- Geothermal
- Hydroelectric Pumped Storage
- Landfill Gas
- Municipal Solid Waste
- Natural Gas Fired Combined Cycle
- Natural Gas Fired Combustion Turbine
- Natural Gas Internal Combustion Engine
- Natural Gas Steam Turbine
- Natural Gas with Compressed Air Storage
- Nuclear
- Offshore Wind Turbine
- Onshore Wind Turbine
- Other Gases
- Other Natural Gas
- Other Waste Biomass
- Petroleum Coke
- Petroleum Liquids
- Solar Photovoltaic
- Solar Thermal with Energy Storage
- Solar Thermal without Energy Storage
- Wood/Wood Waste Biomass
- All Other

The ISOs do not have visibility into all the combinations listed in the proposal or the deployment of "behind the meter" hybrid resources. In addition, the ISOs do not track resource combinations. Accordingly, the ISOs respectfully request adding the following language in each form:

In Form EIA-930:
For Data Type "NG"
Use SYS" when reporting total generation
Use "ZZ[Z" codes below when reporting net generation by energy source. Provide data only for generator types for which data is already available in the balancing authority area.

In Form EIA-930A:
(Column 5) Generator Technology: Select one of the following technologies that describe how electricity is expected to be generated by this planned generator (provide data only for generator technologies for which data is already available in the balancing authority area):

In addition, the IRC notes that the ISOs' available data will most likely not match the data provided through Form EIA-860. For example, the New England balancing area has approximately 1,800 resources reported through Form EIA-860, but ISO-NE only has data for approximately 400 resources.

3. **The Terms "planned generator" and "planned electric generator" in New Form EIA-930A should be Consolidated and Defined**

New Form EIA-930A requires respondents to provide the details about any "planned electric generators" expected to be located physically within the tie line boundary of their balancing authority in the coming year, or any "planned electric generators" which their balancing authorities expect to own, operate, or dispatch in the coming year. The term "electric generator," however, is in the subtitle for this section of the form. The IRC respectfully submits that EIA should consolidate the terms "planned generator" and "planned electric generator" into one term, and clearly define the term. A lack of definition will create inconsistencies in data reporting. In addition, the IRC believes the definition should not refer to projects in interconnection queues because they include speculative projects. Moreover, generators' planned commercial operation dates do not always match their actual commercial operation dates. Lastly, most new generation projects begin operating long before the commercial operation date (due to testing, *etc*.) and may continue to operate in that mode before an "official" commercial operation date.

4. **EIA Should Clarify the Timing for the First Submission of New Form EIA-930A and, in Setting a Date for that Submission, Should Consider the Submission Format for Form EIA-930A**

EIA has indicated that, if approved, it expects its proposed changes to the EPRES to take effect in January 2023. However, the date for the first submission of new Form EIA-930A remains unclear. Therefore, the IRC respectfully requests that EIA provide a specific date for that first submission. In setting that date, EIA should consider the submission format for EIA-930A. Specifically, if the format is anything other than the spreadsheet EIA provided as part of the information related to its proposed changes, the ISOs will need many months to effect software changes to provide the requested data.

5. **EIA Should Clarify Whether to include Load Resources when Reporting "Generation"**

EIA requests information on "generation." The IRC respectfully requests that EIA clarify whether respondents should include Load Resources *acting* as "generation." For example, in the ERCOT Region, load serving entities may agree to reduce load in exchange for financial compensation. In those instances, ERCOT compensates those load resources *as if* they were generation. Without clarity regarding whether to include loads acting as resources, EIA may receive inconsistent information depending on how each filing entity interprets the term.

6. **EIA Should Clarify the Meaning of "Net Generation"**

EIA requests information on "net generation." The IRC respectfully requests the EIA define "net generation." For example, if total system load is 60,000 MW but 20,000 MWs is being used, for example, to charge battery storage facilities, do entities report only 40,000 MWs? Alternatively, does EIA define "net

generation" simply as the amount of generation in a balancing authority area after subtracting MWs exported to another balancing authority area? Without a clear definition, EIA may receive inconsistent information depending on how each filing entity interprets the term.

The IRC appreciates the opportunity to provide these comments, and requests that EIA work with affected balancing authorities to develop a realistic schedule to implement Form EIA-930A and the changes to Form EIA-930. This schedule may extend beyond January 1, 2023.

Respectfully submitted,

/s/ Margoth Caley
Maria Gulluni
Vice President & General Counsel
Margoth Caley
Senior Regulatory Counsel
ISO New England Inc.
One Sullivan Road
Holyoke, Massachusetts 01040
mcaley@iso-ne.com

/s/ Thomas DeVita
Craig Glazer
Vice President-Federal Government Policy
Thomas DeVita
Assistant General Counsel
PJM Interconnection, L.L.C.
2750 Monroe Boulevard
Audubon, Pennsylvania 19403
thomas.devita@pjm.com

/s/ Andrew Ulmer
Roger E. Collanton, General Counsel
Andrew Ulmer, Assistant General Counsel
California Independent System Operator Corporation
250 Outcropping Way
Folsom, California 95630
aulmer@caiso.com

/s/ James Sweeney
Robert E. Fernandez, General Counsel
Raymond Stalter
Director of Regulatory Affairs
James Sweeney
Senior Attorney
Christopher R. Sharp
Senior Compliance Attorney
New York Independent System Operator, Inc.
10 Krey Boulevard
Rensselaer, NY 12144
cpatka@nyiso.com

/s/ Mary-James Young

Mary-James Young
**Midcontinent Independent
System Operator, Inc.**
720 City Center Drive
Carmel, IN 46082-4202
Telephone: 317.249.5400
myoung@misoenergy.org

/s/ Paul Suskie

Paul Suskie
Executive Vice President & General Counsel
Mike Riley
Associate General Counsel
Southwest Power Pool, Inc.
201 Worthen Drive
Little Rock, Arkansas 72223-4936
psuskie@spp.org

/s/ A. Andrew Gallo

Chad V. Seely
Vice President and General Counsel
Nathan Bigbee
Deputy General Counsel
A. Andrew Gallo
Assistant General Counsel
Electric Reliability Council of Texas, Inc.
8000 Metropolis Drive, Building E, Suite 100
Austin, Texas 78744
Andrew.Gallo@ercot.com