

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

Revisions to the Filing Process and)	RM23-9-000
Data Collection for the Electric)	
Quarterly Report)	

**COMMENTS OF
THE CALIFORNIA INDEPENDENT SYSTEM OPERATOR
CORPORATION**

The California Independent System Operator Corporation (CAISO) submits these comments in response to the above-captioned Notice of Proposed Rulemaking (NOPR).¹

I. Introduction and Summary of Comments

On October 19, 2023, the Commission issued a NOPR that proposes various changes to current Electric Quarterly Report (EQR) filing requirements, including both the method of collection and the data being collected. The CAISO currently is an EQR filer and submits records reflecting Commission-jurisdictional agreements. The CAISO supports efforts to enhance the efficiency and reduce the burden of the EQR process. The NOPR also proposes to require Regional Transmission Organizations (RTOs) and Independent System Operators (ISOs) to prepare reports of market transactions for which the RTO/ISO is a counterparty to facilitate sellers' EQR filings. The CAISO is willing to explore how it can assist sellers meet their reporting obligations in an efficient manner and encourages the Commission to hold a technical workshop before it issues a

¹ *Revisions to the Filing Process and Data Collection for Electric Quarterly Report*, 185 FERC ¶ 61,043 (2023). On December 7, 2023, the Commission granted an extension of time up to and including February 26, 2024, to submit comments in this proceeding.

final rule adopting any requirement for RTOs and ISOs to develop reports of market transactions that map to EQR filing requirements.

II. Comments

In its NOPR, the Commission proposes a number of changes to its EQR program, which serves as the reporting mechanism for public utilities to fulfill their responsibility to have information relating to their rates, terms and conditions of service available for public inspection. The CAISO provides comments on some of these proposed changes. In particular, the CAISO generally supports the proposal to implement a new collection method for EQR reporting based on the XBRL-CSV standard. The CAISO believes the proposal to require RTOs and ISOs to produce reports containing market participant transaction data in XBRL-CSV format merits additional discussion regarding the effort involved and factors to consider in adopting any such requirement.

A. The CAISO supports the proposal to implement a new collection method for EQR based on the XBRL-CSV standard and deploy a coordinated implementation approach.

The NOPR identifies several benefits associated with migrating EQR to the XBRL-CSV standard, including supporting current CSV format and offering EQR filers greater flexibility in the preparation of their reports.² The CAISO agrees that use of XBRL-CSV standard for reporting supports the current CSV format and provides more flexibility in submitting large data sets.

The NOPR proposes to provide pre-formatted templates for the preparation of EQR submission files that would conform with the formatting

² NOPR at PP 5-9.

requirements of the proposed XBRL-CSV system.³ The CAISO supports this proposal. Such templates would benefit the CAISO's efforts to comply with the EQR filing process through examples and would also help with training new personnel responsible for completing EQR filings in the future. These templates would also help the CAISO to customize the development of queries of information from its internal databases.

The NOPR proposes to release draft FERC EQR taxonomies, and related documents, following the issuance of a final rule to allow for a review and to propose revisions to the draft taxonomies and related documents.⁴ Thereafter, the NOPR proposes Commission staff would convene a technical conference(s) and the Commission would issue an order adopting the FERC EQR taxonomies and other related documents, and establishing an implementation schedule.⁵

The CAISO supports the NOPR proposal to ensure a coordinated and collaborative implementation of any final rule. Implementation steps will require all entities, including the CAISO, sufficient time to undertake internal technical development of system changes, program them, and then test the outcome to ensure the new structure works properly. The process outlined in the NOPR will help support a thorough understanding of any changes to the data elements of the EQR program. The process must also provide time to perform testing of the upload process into the Commission's system and validate that process works as part of the implementation schedule.

³ NOPR at P 10.

⁴ NOPR at P 12.

⁵ *Id.*

The NOPR further proposes that, after the XBRL-CSV system launches, the Commission will migrate previously filed EQR data from the third quarter of 2013 through the quarter preceding the launch of the new XBRL-CSV system into the new system.⁶ If filers need to refile data that was previously filed using one of the current methods, such re-filings would need to be made in XBRL-CSV system. In theory, this process sounds reasonable, but if the new XBRL-CSV system requires filers to enter additional data with any resubmission of historical data, then this could present problems if the filer does not have that additional data for the historical period. In addition, the Commission will need to ensure that the translation of historical data into the new file format (XBRL-CSV) is feasible and not unduly burdensome from a resource or expense perspective. The Commission should complete this assessment before adopting any final rule and also adopt an exception process to address issues with the resubmission of historical data sets into the new XBRL-CSV system. The Commission might also want to consider developing a translation document from the current taxonomy to the new taxonomy in advance of the ruling to ensure all filers understand what is expected if historical data needs to be updated.

Finally, the NOPR proposes that notice of future minor or non-material changes to the proposed EQR data dictionary, taxonomies and related documents will be posted on the Commission's website.⁷ The CAISO encourages FERC to issue formal notices of any changes to proposed EQR data

⁶ NOPR at P 13.

⁷ NOPR at P 14.

dictionary, taxonomies and related documents. The Commission could issue the notice to entities on the service list of this docket as well as send to any distribution list used for EQR matters.

B. The Commission should schedule a workshop regarding the NOPR proposal to require RTOs and ISOs produce reports containing market participant transaction data in XBRL-CSV format *before* adopting any such requirement.

The NOPR proposes to require each RTO and ISO to produce EQR transaction data reports for their market participants.⁸ The proposed EQR transaction data reports would reflect sellers' transactions within the relevant RTO/ISO market in which the RTO/ISO is the counterparty. Under this proposal, FERC would require RTOs/ISOs to conform the transaction data reports to the EQR filing requirements, including formatting the reports using adopted EQR taxonomies in the XBRL-CSV standard, and making the data reports available to sellers of power. The NOPR proposes that after issuance of a final rule Commission staff would work with RTOs/ISOs to help ensure that settlement billing elements are appropriately mapped to the standard set of EQR products and definitions and may hold technical conference(s) or in other similar forums to conform the various mapped RTO/ISO market products to the FERC EQR taxonomies that RTOs/ISOs can use to prepare transaction data reports.

The CAISO supports the stated objectives of the NOPR to promote data standardization, consistency and accuracy. However, it is premature to adopt a final rule mandating that RTOs/ISOs prepare transaction data reports to pursue

⁸ NOPR at PP 15-17.

these goals. The NOPR proposes to adopt a regulation, which states “each RTO/ISO must prepare and make available transaction data reports that adhere to the Commission’s filing and formatting requirements for use by its market participants in submitting their EQRs.”

The Commission staff should hold a workshop first to discuss the specifics of these reports and how to map RTO/ISO market products to the EQR taxonomies *before* and not *after* the issuance of any final rule.⁹ Such a workshop will help the CAISO determine whether it can utilize existing applications in any way to implement such transaction data reports and will inform the overall resource commitment necessary to produce these reports.

The CAISO does not provide this service today and will need to allocate resources to develop, test and implement a technology solution to develop a transaction data report for market participants. As the NOPR contemplates, outputs from the CAISO’s settlement system will serve as the inputs into the data transaction report. At present, the CAISO is transitioning to a new settlement system and ideally would scope any requirements and any data mapping exercise into that project or into a second phase of that project.

Moreover, the CAISO’s settlement timelines will inform the timing of any data transaction report and any subsequent updates to it for relevant trading days.¹⁰ The NOPR proposes to revise the Commission’s current policy to

⁹ Cf. NOPR at P 17. Holding a workshop before the issuance of a final rule could also provide an opportunity to assess implementation timelines for changes proposed by the NOPR to the EQR filing method and data to be collected.

¹⁰ CAISO tariff 11.29.7.1 describes the timing of the CAISO’s settlements process.

require EQR refilings when there are material corrections or material omissions to previously filed EQRs for either the prior 20 quarters (five years of data) or as far back as the error(s) occurred.¹¹ The CAISO's current settlement timeline extends 24 months from a trading day. Thereafter, settlement statements are final unless the CAISO Board of Governors or a Commission order directs an additional resettlement.¹² Any system designed by the CAISO to produce transaction data reports for sellers will need to align with the CAISO's timeline for settlement disputes and recalculations with the availability of revised transaction data reports for refiling purposes. A workshop would help the CAISO and Commission staff assess these factors in advance of adoption of a final rule and may help tailor any requirements for EQR transaction data reports that extend to periods prior to typical resettlement statement timelines.

Finally, the NOPR estimates the work involved for RTOs/ISOs that do not currently produce EQR transaction data reports for their market participants as approximately \$25,000 over a five year period.¹³ Respectfully, this estimate is does not accurately reflect the work that ISOs and RTOs would need to undertake to design, test, and implement data transaction reports or administer them on a going forward basis. The NOPR's estimate is likely off by an order of magnitude just to complete the initial work to design the transaction reports let alone begin to effect software design changes and undertake functional testing

¹¹ NOPR at P 24.

¹² CAISO tariff section 11.29.7.3.2

¹³ NOPR at PP 133 and Table 6.

and implementation. This still does not account for the on-going costs for the five year period.

IV. Conclusion

The CAISO encourages the Commission to schedule a workshop to discuss the NOPR's proposed requirement for RTOs/ISOs to prepare transaction data report for sellers in advance of issuing any final rule. The Commission should assess the work involved in this effort and provide an opportunity to discuss implementation factors that may inform the design of these reports.

Respectfully submitted,

/s/ Andrew Ulmer

Roger E. Collanton
General Counsel

John Anders
Deputy General Counsel

Andrew Ulmer
Assistant General Counsel
California Independent System
Operator Corporation
250 Outcropping Way
Folsom, CA 95630
(916) 608-7209
aulmer@caiso.com

Counsel for the California Independent
System Operator

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CERTIFICATE OF SERVICE

I certify that I have served the foregoing document upon the parties listed on the official service list in the captioned proceedings, in accordance with the requirements of Rule 2010 of the Commission's Rules of Practice and Procedure (18 C.F.R. § 385.2010).

Dated at Folsom, California this 26th day of February, 2024.

/s/ Ariana Rebancos

Ariana Rebancos