

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

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| <b>Commission Information Collection</b> | ) |                               |
| <b>Activities (FERC—922); Comment</b>    | ) | <b>Docket No. AD19-16-000</b> |
| <b>Request</b>                           | ) |                               |

**COMMENTS OF THE ISO/RTO COUNCIL**

The ISO/RTO Council (“IRC”)<sup>1</sup> respectfully submits these comments in response to the Federal Energy Regulatory Commission’s (“FERC” or “Commission”) notice of information collection and request for comments, which proposes to modify the Commission Staff’s Common Metrics information collection (“Notice”).<sup>2</sup>

The IRC generally supports the Commission Staff’s proposed approach to the Common Metrics information collection. Commission Staff engaged the IRC on numerous occasions to review the proposed process for data collection as well as the specific metrics that Commission Staff intends to collect. The IRC commends Commission Staff for developing a standardized information collection spreadsheet, a user guide, definitions and descriptions of the metrics, and a set of metrics that concurrently meet the needs of

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<sup>1</sup> The IRC comprises the Alberta Electric System Operator (“AESO”), the California Independent System Operator Corporation (“CAISO”), the Electric Reliability Council of Texas, Inc. (“ERCOT”), the Independent Electricity System Operator (“IESO”), ISO New England Inc. (“ISO-NE”), the Midcontinent Independent System Operator, Inc. (“MISO”), the New York Independent System Operator, Inc. (“NYISO”), PJM Interconnection, L.L.C. (“PJM”), and the Southwest Power Pool, Inc. (“SPP”). AESO, ERCOT, and IESO are not subject to the Commission’s jurisdiction. Therefore, AESO, ERCOT, and IESO are not joining these comments. Individual IRC members may also file separate comments.

<sup>2</sup> *Commission Information Collection Activities (FERC—922); Comment Request*, Notice of information collection and request for comments, 84 Fed. Reg. 32908 (July 10, 2019), Docket No. AD19-16-000 (2019).

Commission Staff and the various ISOs/RTOs.<sup>3</sup> The IRC respectfully urges the Commission to provide the ISOs/RTOs a reasonable period of time to submit information under the amended Common Metrics once the Commission finalizes the information collection activities described in the Notice.

The Common Metrics proposed by Commission Staff will provide a meaningful complement to the other data that ISOs/RTOs make available in various forums. Currently, the ISOs/RTOs make voluminous amounts of data available to FERC, other agencies and the public. In addition to various other information submittal obligations, data delivered on a routine basis to FERC includes the ISOs/RTOs ongoing delivery of confidential data pursuant to FERC Order No. 760, and publicly-available data in the form of Electric Quarterly Reports under FERC Order No. 2001. At varying levels of granularity, including hourly and daily, the ISOs/RTOs also provide publicly available data through their websites and to the U.S. Energy Information Administration. Accordingly, the IRC does not believe that expansion of the metrics beyond the Commission Staff proposal is warranted.

## **I. COMMENTS**

The IRC offers one comment on Commission Staff's description of administrative costs. "The administrative costs metric examines the total financial cost of operating the

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<sup>3</sup> In some cases, ISOs/RTOs may need to submit information which varies from the Common Metrics Commission Staff have identified. By way of example, the CAISO does not calculate Equivalent Forced Outage Rate demand information identified by the Metric # 7, and did not do so for the proposed reporting period 2014-2018. In prior common metric reports, the CAISO reported average annual generator availability based on the total generation MW unavailable due to forced outages for the year compared to the maximum generation capacity within the CAISO. The CAISO is exploring how to report similar information by the resource types identified in Metric #7. Additional variances in reported data for defined metrics may also exist and individual ISOs/RTOs will explain any such variances.

RTO/ISO and measures the ability of RTOs/ISOs to manage the growth rate of administrative costs commensurate with the growth rate of system load.”<sup>4</sup> The IRC does not agree that the growth rate of ISO/RTO administrative costs will be commensurate with the growth rate of system load. In fact, the ISOs/RTOs incur costs to implement and administer demand response programs that are specifically designed to reduce system load.

## **II. CONCLUSION**

The IRC respectfully requests the Commission give due consideration to the foregoing comments regarding information collection.

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<sup>4</sup> See Metric # 17 of the Federal Energy Regulatory Commission STAFF DRAFT Common Metrics 2020 (Authorization: FERC-922 OMB Control No. 1902-0262).

Respectfully submitted,

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