

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

Revisions to Electric Quarterly) Docket No. RM12-3-000
Report Filing Process)

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

The California Independent System Operator Corporation respectfully submits these comments in response to the Notice of Proposed Rulemaking (NOPR) issued by the Commission in the above-referenced proceeding on June 21, 2012.¹

I. Comments

In the NOPR, the Commission solicited comments on a proposed system to give filers of Electric Quarterly Reports (EQRs) two new options for filing EQR data directly through the Commission's website after the use of Microsoft's Visual FoxPro tool is discontinued following Q2 of 2013: (1) submission of data using a comma separated value (CSV) file or (2) submission of an Extensible Mark-Up Language (XML)-formatted file.² The Commission solicited comments on the proposals in the NOPR and any suggested methods for minimizing the burden on respondents of implementing the new EQR filing process.³

¹ 77 Fed. Reg. 39447 (July 3, 2012), 139 FERC ¶ 61,234.

² *Id.* at P 1.

³ *Id.* at P 13.

Based on the information provided by Commission staff at the July 11, 2012 technical conference regarding the NOPR proposals, and on the Frequently Asked Questions (FAQ) document posted on the Commission's EQR page and updated as of July 31, 2012,⁴ the ISO is still uncertain precisely what method the Commission envisions being used to transfer EQR data from the current Visual FoxPro-based reporting system that will be used through Q2 of 2013 to one of the two new reporting systems that will be required beginning with the reporting period for Q3 of 2013. While some of the questions submitted to the Commission and addressed in the FAQ concern this issue, the ISO cannot determine from the FAQ responses precisely how the Commission expects the requisite data to be transferred in the transition from the current filing process to the new filing process. In particular, it is unclear how much of the burden of this transitional data transfer will be borne by respondents rather than by the Commission.

For example, question 13 in the FAQ focuses squarely on the issue: "Will FERC populate the EQR database with filers' previous EQR filings in both the 'CSV web-interface' and the 'XML' filing options?" However, based on the FAQ response that "[p]revious EQR filings will be available for export from the web-based interface in either CSV or XML formats," it is unclear whether the actual transfer of the data from Q2 of 2013 is to be performed by respondents or by the Commission.

⁴ <http://www.ferc.gov/help/faqs/eqr-software.asp>.

The Commission will already possess of all of the data submitted by respondents for Q2 of 2013. Therefore, the ISO respectfully suggests that the Commission will be better situated than respondents to perform the necessary data transfer to the new system with maximum efficiency and minimal burden and delay. Commission transfer of the necessary data will also satisfy Order No. 2001, which implemented the EQR process. The Commission noted in the NOPR that one of the express purposes of the EQR filing requirements set forth in Order No. 2001 is to “obtain the full benefits of wholesale electric power markets while minimizing the reporting burden on public utilities.”⁵

Similarly to question 13, question 15 in the FAQ focuses on the issue of the transfer of legacy data: “Will legacy data be available in the new interface? If not, how will legacy data be re-filed if necessary?” The FAQ response read as follows:

Legacy data will be available when using the web-based interface, which users can use to export data to either a CSV or XML format. All re-filing will be done using the new system.

Users have the following options to re-file a prior filing period.

1. Download the CSV files from the EQR Viewer by utilizing the download function. Supply the company registration ID’s for the Respondents, Agents, and Sellers in the identity’s file and then upload them through the web interface.
2. Use the data entry option of the new web interface.
3. Use a 3rd party tool to utilize the legacy data and submit the data to FERC.

⁵ NOPR at P 2, quoting *Revised Public Utility Filing Requirements*, Order No. 2001, 67 Fed. Reg. 31043 (May 8, 2002), FERC Stats. & Regs. ¶ 31,127, at 30,116.

This response to question 15 does not provide sufficient detail for the ISO to be sure exactly how the transfer of legacy data is to be accomplished, but the response does seem to imply that respondents will bear the bulk of the burden of carrying out such a transfer.

The ISO suggests that it would be helpful for the Commission to provide further clarifying detail on implementation of the methods for transferring data required by the transition to the new filing system. And again, the ISO urges the Commission to remove as much of the burden of this transition from respondents as possible.

Removal of the burden should include the Commission's populating the database that underlies the new web-based interface with the data from the EQR respondents' reports for Q2 of 2013, so that respondents can employ a method as much like the current EQR "copy forward" option as possible in the compilation of the reports under the new system for Q3 of 2013. The ISO is concerned that requiring EQR filers to prepare, in effect, a comprehensive new "baseline" listing of data that has already been submitted to the EQR database could create an unnecessary burden that would strain the filers' time constraints and resources. The ISO is also concerned that, given the volume of data that would be entailed by such a baseline filing requirement, as well as the other burdens of the transition process acknowledged in the NOPR,⁶ errors may be introduced into the data if the process of incorporating previously submitted data

⁶ NOPR at P 16.

into the report for Q3 of 2013 is made more complicated than the current “copy forward” method.

II. Conclusion

The ISO requests that the Commission give full consideration to the comments presented herein in preparing the Final Rule to be issued in this proceeding.

Respectfully submitted,

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