April 22, 2026

VIA EMAIL

U.S. Energy Information Administration (EIA)
EIAFRNcomments@eia.gov

Re: ISOs/RTOs Joint Comments on New Questions for EIA-930A, Schedule 5

Dear EIA:

ISO New England Inc. (ISO-NE), Electric Reliability Council of Texas, Inc. (ERCOT), California Independent System Operator Corp. (CAISO), New York Independent System Operator, Inc. (NYISO), PJM Interconnection, L.L.C. (PJM), and Midcontinent Independent System Operator, Inc. (MISO) (collectively, ISOs/RTOs), respectfully submit these joint comments in response to the notice issued in the Federal Register on March 23, 2026, involving EIA's information collection data request related to EIA-930A.

The notice states that EIA submitted an information collection request for extension as required by the Paperwork Reduction Act of 1995. The information collection requests a three-year extension with changes to the Electric Power Surveys (EPS), which consists of ten surveys, including annual, monthly, and one daily survey. The notice also indicates that EIA is adding five questions on spinning reserves to EIA-930A, Schedule 5.[1]

[1] Note that these comments are limited to Questions 2, 3, 4, and 5 in the EIA notice.

The definition of spinning reserves, procurement targets for spinning reserves, and deployment practices vary across Balancing Authorities (BAs) across the United States. Absent a recognition of these variations, any data request risks generating non-comparable, ambiguous, and/or misleading data. Consequently, EIA should provide clear definitions of relevant terms to specify what it is asking entities to provide with respect to spinning reserves. In addition, any data request should avoid the need for BAs to develop explanations to respond to or interpret the data request in developing a response.

Question 2. "What is the spinning reserve target?", provide your answer in megawatts (MW). If your BA is part of a reserve sharing group (RSG), then provide your BA's portion of your RSG's Spinning Reserve Target.

This question seems to ask for a specific MW value. However, some BAs dynamically determine their spinning reserve targets based on a calculation (instead of a static MW value). For instance, ISO-NE's calculation is a percentage of the total ten-minute reserve requirement and it varies every 4 seconds for operational purposes, and every 5 minutes for market settlement purposes. The CAISO day-ahead market currently procures contingency reserves across all hours based on changing operating conditions. Required contingency reserves will change across the hours of an operating day based on various factors, including load, generation, and most severe single contingency. The CAISO establishes a procurement target of spinning reserves as a percentage of required contingency reserves. The CAISO can relax or change this procurement target. The CAISO's real-time market will procure incremental contingency reserves, as necessary, which may or may not include spinning reserves. ERCOT spinning reserve targets likewise vary by hour based on a variety of factors. The NYISO expects to implement revised operating reserves requirements later this year that will result in spinning reserves requirements varying each hour. Therefore, the question should be clarified to ensure that BAs provide what EIA is looking for at the desired granularity (*e.g.*, time-series data for the entire calendar year or an annual average value).

Question 3. "Over the past calendar year, how many hours did your system operate with spinning reserves below your target level?", specify the number of hours (HH:00–HH:59) that experienced a moment when your system operated with spinning below your target level. If your BA is part of a Reserve Sharing Group (RSG), this question only applies to the portion of the spinning reserve target allocated to your BA and the portion of spinning reserves managed by your BA.

There are different ways that answers to this question can be determined and, as a result, collecting information about operating hours in which BAs operated their systems with spinning reserve below a target level may result in generating data or analysis that is misleading or non-comparable.

For example, at ISO-NE, it could be based on 4-second operational data or it could be based on 5-minute settlement data. Also, it could include time periods immediately after a contingency has occurred when spinning reserves have been deployed for contingency response and not yet

replenished, or it could exclude those time periods since that is the intended purpose of spinning reserves, and not considered a spinning reserve deficiency (in other words, the target level is not applicable in those temporary conditions). Therefore, the question should be clarified to state how EIA expects the number of hours to be calculated and/or whether more than one determination should be included. Moreover, the question should acknowledge that in some cases there is no reliability requirement to maintain spinning reserves. For example, in the Western Interconnection there is no requirement to maintain a specific amount of spinning reserve as part of contingency reserve requirements.

Question 4. "What was the minimum spinning reserve actually held during the past calendar year?", provide your answer in megawatts (MW). If your BA is part of a reserve sharing group (RSG), this question only applies to the portion of the spinning reserves managed by your BA.

As noted elsewhere in these comments, clear definitions of key terms and additional clarification from EIA is needed to ensure BAs can provide consistent, useful data in response to this question. Determining the minimum spinning reserve actually held can vary depending on how *spinning reserve* is defined, what data intervals are used, and whether operational data or settlement data is used. Results will also vary depending on whether entities include or exclude time periods immediately after a contingency has occurred when spinning reserves have been deployed for contingency response and not yet replenished.

Question 5. "How many times were spinning reserves deployed during the past calendar year?", if your BA is part of a reserve sharing group (RSG), this question only applies to the portion of the spinning reserves managed by your BA.

Different BAs manage and deploy spinning reserves using different mechanisms, which leaves the answer to this question open to interpretation. For example, at ISO-NE and ERCOT the real time reserve market is co-optimized with the real time energy market. As a result, spinning reserves can be considered as being deployed every few minutes when an online unit providing reserves gets dispatched to a higher MW output. However, if looked at differently, online reserves are only really deployed *for their intended purpose* (contingency response) when operators intentionally approve a post-contingency dispatch. The question should also recognize that spinning reserve, if designated as non-contingent, may be dispatched for reasons other than a real-time contingency. Therefore, the question should be clarified to state that it applies to instances when online reserves were deployed for contingency response.

Comment on Hours to Complete Survey

EIA-930A indicates the survey should take approximately 36 burden hours to complete. However, this estimate seems to presume that respondents already have all the information needed to complete the form, including, but not limited to, EIA Plant Names, EIA Plant IDs, and EIA Generator IDs for all generators in their inventory. To the extent a respondent does not have this

information, preparing a response to EIA-930A can take significantly longer than 36 hours due to the time needed to manually map internal generator data to EIA identifiers. EIA should consider recalculating the burden hour estimate to more accurately account for the impact to entities that need to manually map internal generator data to EIA identifiers in order to prepare a response to EIA-930A or, in the alternative, limiting the obligation to respond to the information that an ISO/RTO already has in its databases.

The ISOs/RTOs respectfully request that EIA consider these comments on Questions 2, 3, 4, and 5 for EIA-930A Schedule 5, and the overall burden hours for EIA-930A. The ISOs/RTOs also request that EIA consider hosting a virtual workshop or technical conference to allow all BAs the opportunity to assist EIA in refining the data request in order to maximize its utility.

Respectfully submitted,

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