

November 26, 2014

Mr. William Booth  
U.S. Energy Information Administration  
1000 Independence Ave., SW  
Washington, DC 20585

**VIA EMAIL**

RE: Extension Request regarding Form EIA-930, Hourly and Daily Balancing Authority Operations Reporting

Dear Mr. Booth:

The ISO/RTO Council (“IRC”)<sup>1</sup> thanks you for your time and assistance regarding the new Form EIA-930, Hourly and Daily Balancing Authority Operations Report (“Form EIA-930”). As discussed on November 24, 2014, the IRC appreciates the Energy Information Administration’s (“EIA”) provision of a “rolling” start to its data collection efforts under Form EIA-930, which provides entities from December 1, 2014 through March 1, 2015 to finalize data submissions. As requested by EIA via its website, the IRC is notifying EIA that some of the US ISOs/RTOs will be unable to begin data submissions by December 1, 2014, and requesting: (1) EIA’s approval for the US ISOs/RTOs to begin their data submissions no later than February 17, 2015, and (2) confirmation that US ISOs/RTOs will not be subject to penalties under Section 13(b) of the Federal Energy Administration Act of 1974 (FEAA) (Public Law 93-275) for initiating data submissions at a date subsequent to December 1, 2014 (but no later than February 17, 2015).

The IRC, on behalf of the US ISOs/RTOs, respectfully submits that, as a result of the publication of final data specifications and formats in late October, several ISOs/RTOs are unable to effect the necessary modifications to their software, data formats, web services, etc. by December 1, 2014 due to internal “release cycles” for software and/or the time necessary to design and test code changes prior to implementation in production. Further, to ensure that data submissions conform to the recently-released specifications, the IRC suggests the exchange of samples prior to placement of reporting functionality into production, which will require some additional time and coordination beyond December 1, 2014 prior to active reporting.

In summary, the IRC respectfully requests EIA’s approval for initiation of data submissions by the US ISOs/RTOs by February 17, 2015<sup>2</sup>, and confirmation that the US

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<sup>1</sup> The IRC is comprised of the Alberta Electric System Operator (“AESO”), California Independent System Operator Corporation, Electric Reliability Council of Texas, Independent Electricity System Operator of Ontario (“IESO”), Inc., ISO New England, Inc., Midcontinent Independent System Operator, Inc., New York Independent System Operator, Inc., PJM Interconnection, L.L.C., and Southwest Power Pool, Inc. AESO and IESO do not join these comments for jurisdictional reasons. All other ISO/RTOS hereinafter referred to as “US ISOs/RTOs.”

<sup>2</sup> The IRC recognizes EIA’s formal exception process under 10 CFR § 1003.20 for exceptions to its mandatory reporting requirements, but submits that such process need not be triggered due to the “rolling” start contemplated for Form EIA-930.

ISOs/RTOs will not be subject to penalties for not initiating data submissions prior to the requested February 17, 2015 date. While the IRC submits this letter on behalf of its participants, each US ISO/RTO looks forward to working with the EIA to begin data submissions in a timely manner. Please do not hesitate to contact any of the undersigned should you have questions or concerns regarding this request with regard to each relevant US ISO/RTO. Thank you for your attention and assistance in this matter.

Sincerely,

/s/ Matthew Morais

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