

FERC Proposes Clarifications to EQR Requirements

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In its September 22 Open Meeting, the Federal Energy Regulatory Commission (Commission) issued a Notice Seeking Comments on Proposed Revisions to Electric Quarterly Report Reporting Requirements (in Docket No. RM01-8-000, *et al.*) as part of an ongoing effort to “provide for more accurate and consistent data in the EQR.”^[1]

Two proposed changes in the September 22 Notice are likely to be of significant interest:

- clarifications on reporting of booked out power and
- the increased ancillary services reporting obligations for transmission providers.

The Notice also seeks comment on other proposed clarification.

Reporting of Booked Out Power

“Booked Out Power” is defined in the EQR Data Dictionary as “[e]nergy or capacity contractually committed bilaterally for delivery but not delivered due to some offsetting or countervailing trade (Transaction only).”^[2] In its review of EQR data, Commission Staff found inconsistencies and inaccuracies in submissions related to booked out power. The Commission expressed concern that, “[w]ithout accurate reporting of booked out transactions, it is difficult to determine how much power is being traded compared to how much power is actually being delivered.”^[3] In addition, the Commission found that filers are unable to differentiate between energy and capacity book outs when filing in the current EQR database configuration.

Accordingly, the September 22 Notice offers clarification on how to report these transactions. One such clarification the Commission offers is that “booked out transactions must be reported in the

EQRs regardless of the number of parties involved in the transactions.”^[4] The Commission goes on to provide specific detailed examples for different reporting scenarios and seeks comment on whether the rules regarding which booked out transactions should be reported are sufficiently clear.^[5]

The Notice further proposes to replace the existing product name “Booked Out Power” with “Booked Out Energy” and “Booked Out Capacity.”^[6] The Commission proposes to add the following definitions to the EQR Data Dictionary:

- “Booked Out Energy”: “Energy contractually committed for delivery but not actually delivered due to some offsetting or countervailing trade (Transaction only).”
- “Booked Out Capacity”: “Capacity contractually committed for delivery but not actually delivered due to some offsetting or countervailing trade (Transaction only).”^[7]

Ancillary Services Reporting

Transmission providers are currently required to report information about ancillary services in only the Contract Data section of EQRs (contrast to the requirements for third-party providers of ancillary services, who must report information in both Contract and Transaction Data sections). Citing a need to “help the Commission, the public, and the industry determine the actual rates being charged for service under these agreements and to increase price transparency into the wholesale ancillary services markets,” the September 22 Notice proposes to “require transmission providers to report information about transactions made under their ancillary services agreements in the Transaction Data.”^[8]

Other Proposed Changes

In order to encourage greater consistency and accuracy with reported values in the “FERC Tariff Reference” fields and the corresponding tariffs, the Commission is also proposing to revise the FERC Tariff Reference definition to include four references currently submitted in the eTariff system: Tariff Identifier, Filing Identifier, Tariff Record Identifier, and Option Code. The Commission is also proposing to add time zone information back into the Contract Data Section (it had previously been eliminated by Order No. 768)^[9] as “it may be necessary for accurately reporting transmission capacity reassignment transactions.”^[10]

Commission Seeks Comment

These September 22 Notice follows the June 16, 2016 Order Clarifying Electric Quarterly Report Reporting Requirements and Updating Data Dictionary, which clarified certain EQR requirements, updated the EQR Data Dictionary, and, most significantly, created a new process to alert filers of “minor or non-material changes” to the EQR requirements and Data Dictionary. Unlike the changes detailed in the June 16 Order, the proposals in the September 22 Notice, according to the Commission, “may be more significant for EQR filers to implement.”^[11]

As detailed in the September 22 Notice, the Commission is seeking comments on “whether to: (a) require transmission providers to report ancillary services transaction data; (b) require filers to submit into the FERC Tariff Reference fields in the [Electric Quarterly Report (EQR)] certain tariff-related information that they currently submit in the e-Tariff system; and (c) require filers to submit time zone

information in connection with transmission capacity reassignment transactions,”^[12] as well as to its proposed clarifications on booked out transactions.

While the changes adopted in the June 16 Order are to be implemented with the 2016 Q4 filing, an implementation date for the changes discussed in the September 22 Notice has not been proposed.

Comments on the September 22 Notice will be due 60 days after publication in the Federal Register.

[1] Press Release.

[2] EQR Data Dictionary Appendix A.

[3] September 22 Notice at P 13.

[4] September 22 Notice at P 16.

[5] September 22 Notice at PP 16-21.

[6] September 22 Notice at P 14.

[7] September 22 Notice at P 14.

[8] September 22 Notice at P 8.

[9] See Order No. 768, FERC Stats. & Regs. ¶ 31,336 at P 121.

[10] September 22 Notice at P 11.

[11] September 22 Notice at P 4.

[12] September 22 Notice at 1.