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BEFORE THE

UNITED STATES OF AMERICA

FEDERAL ENERGY REGULATORY COMMISSION

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In the matter of: :

ELECTRICITY MARKET : Docket Number

TRANSPARENCY PROVISIONS : RM10-12-000

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Hearing Room 2C

Federal Energy Regulatory Commission

888 First Street, Northeast

Washington, D.C. 20426

Wednesday, December 12, 2012

The technical conference was convened, pursuant  
to notice, at 1:00 p.m.

FERC STAFF:

JEROME PEDERSON, Director, Energy Market Oversight

STEVEN REICH, Branch Chief, Analytics and Surveillance

WINDI SWINSON, Energy Market Oversight

MARIA VOURAS, Energy Market Oversight

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Court Reporter: Jane W. Beach, Ace-Federal Reporters

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P R O C E E D I N G S

(1:00 p.m.)

MR. PEDERSON: Okay. Let's go ahead and get started. Let's get the afternoon session started. Thank you again for coming. Just a couple of notes. And over the break I was informed that on the webcast towards the end of the morning session there was apparently a technical issue and a technical glitch.

So those of you listening and watching on the webcast, I apologize for that. We're trying to figure out what that technical issue. I will note that these two sessions of today's conference is being transcribed, and the transcripts would be available in a day or two.

I would also note that the presentations, today's presentations are also available online at [www.ferc.gov](http://www.ferc.gov). If you just go in through the events calendar, you should be able to access them pretty easily. If you have trouble getting them, just let us know and we will help you through that.

Similar to this morning's session, let me say that what we're--we do have a staff presentation. We are going to be walking through the new fields of Order 768. This is kind of a conversational structure we have for this session. We do have some questions in advance, and we will, as we go through our presentation, try to answer those as

1 best we can.

2 For those questions that we do not answer  
3 directly or are still thinking about the response to that,  
4 we will be posting FAQs on the website. So keep and so that  
5 we will be following up on those. Also, for those of you  
6 that do raise questions throughout this afternoon's session,  
7 we do ask that you follow up by email, so that we have that,  
8 we can close that loop in terms of putting on the FAQ.

9 Lastly, and we had mentioned this this morning,  
10 this is to talk about the new fields for 768. We're not  
11 talking about rehearing. We are talking about it from the  
12 EQR perspective, and also with regard to Order 770. And for  
13 those of you who are not familiar with Order 770, Order 770  
14 deals with the process of how you file EQRs.

15 That will be part of a separate technical  
16 conference, where we'll get into the process and the  
17 mechanics and how we file EQRs. Today, we're going to be  
18 talking about the new fields, and what are the requirements  
19 there.

20 Again, if you have a question, raise your hand.  
21 We have speakers on either side here. We also have the  
22 chairs up front. If you do come up with a question, please  
23 state your name and who you are representing. With that,  
24 anything else? I'll hand it over to staff. Mark  
25 Blazejowski will walk us through this afternoon's  
26

1 presentation.

2 MR. BLAZEJOWSKI: The first field, first new  
3 field that we're going to start collecting is whether or not  
4 you're reporting to an index publisher. It's Field No. 12.  
5 It's an ID data section, and it's a yes/no field.

6 So in the event that you select yes, there will  
7 be another table that you'll be able to fill out. We'll  
8 talk about that in a minute. In the event that you select  
9 no, then you're done with that for the filing quarter.

10 At one time, I think we were considering doing  
11 this at the transaction level. We determined it was too  
12 manual, too burdensome, rolled it up to the next level, two  
13 levels up.

14 We think it's going to provide greater  
15 transparency into the market, that it shows the forces that  
16 are affecting the index prices and the level of the  
17 company's sales that are being put into that index  
18 calculation.

19 In the event--Barbara has a question. Ready.

20 MS. BOURQUE: Hi. This is Barbara Bourque. In  
21 the event that you report to multiple index price  
22 publishers, would in the table in the file that you're going  
23 to upload, would each index publisher get a separate line?

24 So you'd have the FS number, the seller name and  
25 then the name of the index publisher, and if you had three  
26

1 publishers, then you'd do three lines for that seller?

2 MR. BLAZEJOWSKI: Yes.

3 MS. BOURQUE: Okay, thanks.

4 MR. REICH: And in fact, just to elaborate, but  
5 yes. I mean one of the reasons -- one of the reasons we  
6 created the new table for index publishers is to get  
7 ^^^^ and this gets to someone else's question, is to get to  
8 the many to one relationship between the number of index  
9 publishers.

10 So you only have to say your name once, and you  
11 identify each of the index publishers.

12 MS. BOURQUE: That's what I thought.

13 MR. SAUER: I just wanted to elaborat as well.  
14 Certainly, we've provided a drop-down list, and if there are  
15 --

16 COURT REPORTER: Turn your microphone on please.

17 MR. SAUER: It is on. I'll get closer.  
18 Certainly, we've provided a drop-down list. If there are  
19 index publishers that you report to that aren't on that  
20 list, contact us and let us know and we'll add that to the  
21 drop-down list.

22 MR. BLAZEJOWSKI: So in the event that -- I'm  
23 sorry, question.

24 MS. KEY: Hi. Jennifer Key from Steptoe again.  
25 I think I had the reverse question, and that's if you have

26

1 multiple sellers reporting on the same EQR, and let's say  
2 some of the sellers are reporting to an index, but some of  
3 the sellers aren't, you would just -- I'm just not sure how  
4 it would work. Would you report for each seller whether  
5 they're reporting under the index?

6 MR. BLAZEJOWSKI: Yeah, and you can do that on  
7 this next table that we're going to talk about.

8 MS. KEY: Okay.

9 MR. BLAZEJOWSKI: So in the event that you  
10 select yes, you are reporting to an index and publisher, on  
11 the next table there will be four fields. There be a filer  
12 unique identifier and a seller company name. We're going to  
13 use those two fields to link that unique filer/seller  
14 combination to the index that's being reported to.

15 The third field, Field 72, will be a list of  
16 index publishers and it's provided in Appendix G of the EQR  
17 data dictionary, and the Commission will add index  
18 publishers as needed. If you need it, you know, let EQR at  
19 [ferc.gov](http://ferc.gov) know, and we'll get it into the list.

20 In the fourth field, Field 73, a short  
21 explanation of what type of transactions you're reporting.  
22 So I'm reporting energy, I'm reporting energy and capacity.  
23 So we hope that the combination of those four fields allows  
24 you to demonstrate which sellers are reporting to indices,  
25 and which types of products are being reported, and which  
26

1 indices are being reported to.

2 MR. REICH: And to sort of clarify, based on a  
3 question from Andrew Schmidt, there's going to be a separate  
4 line for each index publisher in this new table. So if  
5 you're reporting different kinds of transactions, that  
6 you're explaining what kind of transactions you're  
7 reporting, those will be free form in Field 73.

8 But you'll only have, you'll only report that  
9 you report to Dow Jones once. So I report all my energy to  
10 Dow Jones; I report energy and capacity to PowerEx, and so  
11 the match -there should be one record for each publisher per  
12 seller.

13 MR. BLAZEJOWSKI: Any questions on that field?

14 MR. REICH: Sorry, there was one other question.  
15 I'm sorry, one other question, and this I want to follow-up  
16 on, is Rebecca Bakkeys (phonetic) here?

17 (No response.)

18 MR. REICH: Okay. We got a question on the  
19 index publishing, and I think we have an answer. But I  
20 wanted to follow up a bit. Since she's not here, we'll  
21 follow up with her and do the FAQ.

22 But in the question where there's both a broker  
23 and an exchange in the process--oh sorry. Wrong issue.  
24 Sorry. Never mind. Go on, Mark.

25 (Laughter.)

26

1                   MR. BLAZEJOWSKI: Does anybody else have any  
2 questions about that field? We'll move on to the next. The  
3 next field is Trade Date, and this will be captured in the  
4 transaction file. It will be a new field, Field 52, and we  
5 hope that it's going to help us put price in better context  
6 when the deal was agreed to.

7                   Currently, when we look at the EQR transaction  
8 data, it's hard to tell when the price was agreed to. So  
9 it's really hard to group all prices agreed to within the  
10 same time. It's essential to assessing the significance of  
11 prices relative to market conditions, and we hope this is  
12 going to help us identify contemporaneous trades.

13                   I think at one time, we had talked about putting  
14 time of trade in there. That got dropped out, so good news.

15                   MR. REICH: There was a question on the date for  
16 uplift, and that's something that we're putting in the FAQ,  
17 because the way the uplift is calculated in the RTO. So  
18 that is something that we'll address when we get our FAQs.

19                   MR. BLAZEJOWSKI: Another field being added in  
20 the transaction section is Exchange Brokerage Service.  
21 We're going to have a list provided in Appendix H, a  
22 pull-down list.

23                   We'll add exchanges if needed. You don't need  
24 to specify the broker. You can just say it's a broker, and  
25 we believe it's going to add transparency in how the indexes  
26



1 are created, a better understanding of how index is arrived  
2 at, the prices, and provide greater public confidence in the  
3 indices.

4 MR. REICH: Okay. Now I'll answer the question  
5 that was asked about, or at least I'll identify it. There  
6 was a question asked about if there is some, in the new  
7 field, you can choose that it was done via broker or via  
8 exchange, or to indicate that.

9 There was a question as to if, you know, both a  
10 broker and exchange, how do you report it? That's something  
11 that we're putting in the FAQ, and I think I just said that.  
12 But now you know that it's associated with this field.

13 MR. BLAZEJOWSKI: Another field that we're  
14 adding in the transaction table is the Type of Rate. Is it  
15 fixed formula? Electric index? Or RTO/ISO?

16 For many transactions without detailed rate  
17 descriptions, this is going to help us understand what's  
18 going on with the current filings. It allows interested  
19 parties to better understand the market content of a  
20 transaction.

21 Fixed rate. No variables are used to determine  
22 the rate. RTO/ISO is the result in RTO/ISO market.  
23 Electric index. Use that if it's a base price or if you're  
24 pricing it off the electric index. And formula, if you're  
25 using some sort of a formula, but not an electric index

26

1 formula.

2 MR. REICH: And we got a question about this.  
3 Once again, I want to emphasize one of the things that we're  
4 looking for here, trade date, exchange/broker, index, all  
5 these kind of come together, in terms of identifying  
6 transparency, in terms of how prices are set in the market.

7 So we've discovered over the years, in terms of  
8 looking at the EQR data and analyzing the EQR data, it helps  
9 us better -- it would help us better understand the data  
10 that we're getting to have this information so that we can  
11 properly judge the timing of the pricing and then where--and  
12 I'll just leave it at that.

13 And so there was a question that we got in,  
14 specifically asking if there's a--if you have a contract and  
15 the contract uses the value of an RTO/ISO pricing to  
16 determine the price of the power under your contract, do you  
17 report that as an index or as RTO/ISO?

18 The idea is that we want to identify, even if  
19 you're not selling power to the RTO, that the pricing is  
20 based on the RTO price. So you would use RTO/ISO, even if  
21 you're not selling to the RTO/ISO, if your contract uses the  
22 RTO/ISO price as the method of pricing.

23 MR. BLAZEJOWSKI: On to Standardized Quantity  
24 and Price, Fields 66 and 67 in the Transaction section  
25 again. The EQR, we get 14 to 16 million transactions per  
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1       quarter, and it's pretty clear that some of the transaction  
2       prices or quantities or something aren't being reported  
3       correctly.

4                 We'll see things, we'll see prices that look  
5       like in dollars per megawatt hour but are reported in  
6       dollars per kilowatt hour, or vice-versa. And we'll see  
7       capacity reported unit-of-one at a flat rate. And it's  
8       really hard for us to get our hands around some of these  
9       transactions.

10                And so we hope that by asking you or EQR filers  
11       to present it to us in a standardized format, energy in  
12       dollars per megawatt hour, capacity in dollars per megawatt  
13       month, that you can do the translation, the conversion and  
14       we'll have numbers that we can understand a little bit  
15       better.

16                MR. REICH: And there was a question regarding  
17       whether if you have capacity price at megawatt year, if it  
18       was appropriate to just divide the number by 12 and report  
19       that as the dollars per megawatt month in the standardized  
20       field.

21                We still want to discuss that a little bit, as  
22       opposed to, you know, for February it would be a different  
23       number than March, because one has 28 days and one has 31  
24       days.

25                We're pretty close on that, but we want to make  
26

1       sure that we're all on board, and we'll include that in the  
2       FAQ.

3                   MS. LEE:   Nancy Lee from Con Energy.   Similar to  
4       that about dollars per megawatt year, in PJM they do dollars  
5       per megawatt day.   So when you convert to the month, they're  
6       not quite the same, even though they are the same per day.  
7       So similar type issue.

8                   MR. REICH:   Okay, and we'll make sure we cover  
9       all that.

10                  MS. LEE:   Okay.

11                  MR. BLAZEJOWSKI:   And the one other piece of  
12       information that we're looking to collect is E-Tag Data.  
13       We're considering putting that into a new table, which  
14       allows one to many or many to one.

15                  There will be four fields in this new table,  
16       E-Tag ID field, a begin date, an end date and a transaction  
17       unique identifier that will allow us to tie that back to the  
18       transactions.   I think Will had a few questions.

19                  MR. SAUER:   Yes.   There are a couple of  
20       questions on the E-Tag ID portion of it.   There were a  
21       couple of questions that related to what guidance we can  
22       provide on the one to many, many to one, many to many  
23       relationships.   There's one from PowerEx, one from it's  
24       ASIS, right?   Yep.

25                  Those were, in my mind, those questions were  
26

1       pretty similar, so I'm going to read the shorter one, which  
2       is ASIS, and certainly if anybody wants to get that long  
3       question, particularly PowerEx wants to get the long  
4       question if they think it is different, we're happy to. But  
5       I'll just stick with the shorter question for the moment.

6                 That question, I'd just like to read it for  
7       everybody:

8                 What guidance can be provided on how to  
9       accomplish matching E-Tags with specific transactions, given  
10      the one to many, many to one and many to many relationships  
11      that currently exist between the two?

12                The main guidance that we can give right now is  
13      certainly adding the separate table, adding the E-Tag ID  
14      component to it, we certainly don't intend or wouldn't want  
15      that to change the manner in which you report your  
16      transactions. So say there's a many to one relationship, or  
17      say in this case a one to many relationship, one transaction  
18      between say four E-Tags, we'll want you to continue  
19      reporting that in the transaction section, that transaction  
20      that is, as one transaction.

21                We wouldn't want you to split out that  
22      transaction four different ways in the transaction section,  
23      which is why we've included a separate table to incorporate  
24      this one to many and many to many relationships.

25                So in that case, you would report that one  
26

1 transaction, as you currently do, in the Transaction  
2 section. And in the E-Tag table, you would essentially  
3 report the transaction ID with one of the E-Tag IDs  
4 associated with that Transaction section, and you would do  
5 that for all four. So you'd essentially have four entries  
6 in the E-Tag ID table.

7 Conversely, if it's a one to one, you'd do the  
8 same thing. You'd have one transaction. You have one  
9 transaction ID with one E-Tag ID in that other table.

10 Or if you have a many to many, it's the same  
11 type of logic. But the big thing that we wanted to get  
12 across is it certainly doesn't change any of the  
13 requirements for the manner in which you file transactions  
14 currently.

15 Another question, and then we'll open up or I'll  
16 turn it back to Jerry after this. Another question from  
17 ASIS, and I'll read this one out loud. It's long, so bear  
18 with me, but I think it's important to read the whole  
19 question:

20 Regarding E-Tag begin date and E-Tag end date on  
21 the Data Tab, if there is more than one transaction included  
22 on an E-Tag, and they have varying start/end date times,  
23 then the begin and end dates will not necessarily match up.

24 For example, assume a 50 megawatt on peak, and  
25 this is hour 7 through 22 on December 1st, and a 50 megawatt

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1 off peak, hour ending 23 through 24 on December 1st, and  
2 hours ending 1 through 6 on December 2nd, but executed at  
3 two separate transactions, or sorry, executed as two  
4 separate transactions with different prices at two different  
5 times with the same counterparty, with the same transmission  
6 path source at sink.

7 Both transactions are tagged on one E-Tag as 50  
8 megawatts, beginning hours ending 7 on December 1st, and  
9 running through hours ending 6 on 12/2. The E-Tag begin  
10 date would be 12/1 for both transactions, with the on peak  
11 transaction starting hours ending 7, and the off peak  
12 transaction starting hours ending 23. But the E-Tag end  
13 date would be 12/2 for both transactions since they're  
14 tagged on the same E-Tag, and the TAG doesn't terminate  
15 until hours ending 6 on 12/2. The on peak transaction  
16 actually ends at 2200 on 12/1, but it was tagged on the  
17 E-Tag that ends on 12/2.

18 And finally -- sorry, bear with me here. The  
19 question is:

20 Is the Commission proposing that such  
21 transactions be tagged individually, to align the begin and  
22 end dates?

23 First of all, we want to make clear that this  
24 reporting requirement in EQR isn't--shouldn't have any  
25 bearing on how transactions are tagged. So certainly there  
26

1 is no requirement to change how you're tagging, assuming  
2 you're tagging correctly, based on this reporting  
3 requirement.

4 So to answer their question no, we aren't asking  
5 them to essentially tag a transaction with one tag anymore.  
6 Certainly, if there is a many to many relationship or one to  
7 many relationship, we aren't suggesting that that should be  
8 changed as part of this rule. We're just suggesting that,  
9 we're just saying that you should report the many E-Tags to  
10 one transaction or converse.

11 The begin date/end date issue as well, to give  
12 guidance on that. So certainly in this case, there's an on  
13 peak transaction that had the begin date/end date of  
14 December 1st both, and the off peak transaction had a begin  
15 date of December 1st and an end date of December 2nd.

16 Certainly for the E-Tag fields, for the E-Tag  
17 begin date and E-Tag end date, the way that we specified  
18 those fields in the rule is that the begin date must match  
19 or must not be before the transaction begin date specified  
20 in Field No. 51, and as far as the end date the end date  
21 must not be after the transaction end date specified in  
22 Field No. 52.

23 That's probably more than you need to know. But  
24 in this case, for the on peak transaction, since it has a  
25 December 1st begin and end date, the E-Tag begin and end  
26



1 date must be December 1st and 2nd in this case since it s a  
2 one day TAG.

3 Certainly for the off peak transaction, we would  
4 expect probably a December 1st begin date and a December 2nd  
5 end date for Fields 75 and 76 given that example.

6 There are some questions on clarification as to  
7 begin and end date, and certainly we'll address those as  
8 well, or those will be addressed at a later time as well.

9 MS. VANDERBERG: Vicki Vanderberg, Power Systems  
10 Operations. The question, and this may be just the  
11 documentation. You say that the E-Tag data will be in a  
12 separate file, but all the columns are listed in the  
13 transaction, as if they were in the transaction, or am I  
14 misunderstanding that?

15 So it says Column 74 in the Transaction section  
16 of the data dictionary, which makes me think that this data  
17 has to show up with the transactions.

18 MR. SAUER: No, if you look at the top of the  
19 page, EQR Data Dictionary E-Tag data, I think that's a  
20 different table.

21 MS. VANDERBERG: That's the page I'm looking at,  
22 E-Tag Data.

23 MR. SAUER: Right, and that's a different table.

24 MS. VANDERBERG: Okay. So it's a different file  
25 --because it says 74 as if it followed --

26

1                   MR. SAUER: The fields are numbered  
2 continuously. So the first --

3                   MS. VANDERBERG: But they're not in one file.

4                   MR. SAUER: Right. So the first 14 are Contact.  
5 First 13 are Contact. From 14 through 43 are Contract.  
6 From 44 through 69 are Transaction.

7                   MS. VANDERBERG: Okay. It was just confusing.  
8 Thank you.

9                   MR. REICH: And we're actually -- I mean one of  
10 the things that we're looking into is kind of the numbering  
11 system, because there is a numbering system that had worked  
12 for ten years, and because of the changes, there are changes  
13 in numbers, and we're trying to take care of it.

14                   MS. VANDERBERG: Well that made it seem like it  
15 was part of the same file. Thanks.

16                   MR. REICH: John.

17                   MR. BUSH: You can hear me? All right. John  
18 Bush with Iberdrola Renewables. I just want -- oh, John  
19 Bush, Iberdrola Renewables. So I want to get a  
20 clarification on this E-Tag, just to make sure. So on the  
21 two transactions, the begin date and the end date on both of  
22 those transactions in this E-Tag table would be the 1st and  
23 the 2nd?

24                   MR. SAUER: No. If the transaction reported in  
25 EQR for the on peak had a December 1st beginning and end,  
26

1 the way that the rule is currently set up is you can't  
2 report an E-Tag ID. So you report the E-Tag that's used to  
3 schedule the transaction, when it's scheduled, when it's  
4 used to schedule that transaction.

5 So we have a hard stop on it. It can't go  
6 beyond the end date of the transaction, or before the begin  
7 date of that transaction. So if you have a transaction  
8 that's only December 1st, we would -- the way the rule is  
9 currently set up is for that E-Tag ID begin and end date, it  
10 can only be a December 1st.

11 MR. BUSH: Okay, all right. Thank you.

12 MR. SAUER: But again that's on -- there are  
13 some clarifications on that as well.

14 MR. REICH: That are part of the rehearing  
15 request.

16 MR. NORTON: Chris Norton, American Municipal  
17 Power. A question for a non-jurisdictional. So if a  
18 non-jurisdictional schedules into a balancing authority, it  
19 will have a piece of the transaction that will not be  
20 reportable, but the imbalance will be reportable.

21 Is it going to create an issue that we'll be  
22 giving you an E-Tag number and the profile that E-Tag is not  
23 going to match the profile that we're going to give you in  
24 the EQR, or is there some special way that we designate or  
25 take care of that issue?

26

1 MR. SAUER: I think, and let me state the  
2 question that I think you asked, just so we're on the same  
3 page. I think the ultimate question is are we going to be  
4 looking at E-Tag data and seeing say what the megawatts are  
5 on the E-Tag, and make sure that they match the megawatts or  
6 other descriptions that are reported in EQR?

7 We understand that there is, say a many to many  
8 relationship, and there may not always be a direct match.  
9 So we understand in many cases that there are issues.  
10 That's probably all that we should say right now.

11 MR. NORTON: Okay.

12 MR. PEDERSON: Do we have any other questions on  
13 E-Tag?

14 (No response.)

15 MR. PEDERSON: Okay. So do you have any other  
16 questions?

17 MR. REICH: Well, no, just the last page.

18 MR. PEDERSON: Okay. So at this point, what we  
19 did was we just walked you through the new fields in the EQR  
20 and tried to give you some background and understanding of  
21 that.

22 MR. REICH: I think we have a question.

23 MS. LOWE: This is Margaret Lowe from Consumers  
24 Energy. When we TAG, if you have an annual TAG from January  
25 1st to December 31st, and I have a transaction on January  
26

1 1st, it will clear in a market on December 31st.

2 So I have a TAG from the 1st of January through  
3 December 31st. My transaction date is December 31st of the  
4 previous year. But it doesn't line up with my start date  
5 for my TAG. So what do we do with that?

6 MR. SAUER: And I think that actually  
7 corresponds to a clarification question that we had, as part  
8 of the rehearing request, for how to report day-ahead  
9 transactions, whether it's that date or it's the actual flow  
10 date. We'll, if you email us that question, we're going to  
11 defer that answer until then, but please email us that  
12 question.

13 MS. LEE: Nancy Lee from Con Energy again. Way  
14 back when, and Barbara and some of the others will  
15 remember, we had a lot of assistance from staff to approach  
16 the ISOs, RTOs, to help write some of the reports that are  
17 currently being used by some of the market participants.

18 Is there any thought about going through that  
19 process, because some of these fields affect the ISO and the  
20 RTOs. Is there any thoughts of going in that direction  
21 again?

22 MR. PEDERSON: If you're asking are we open to  
23 talking with the RTOs to make it easier for filers to make  
24 their filings, I think the answer is yes.

25 I'm not sure where we'll end up with that, but  
26

1       certainly our goal is to make the filing of the EQR as easy  
2       as possible, and we do understand that sometimes getting  
3       that data is contingent upon getting it from the RTOs. We  
4       have a question over here.

5               MR. BUSH: John Bush, Iberdrola Renewables  
6       again. So can we go back to this E-Tag begin date/end date,  
7       because in the definitions you've got here, it says refers  
8       back to Field 51 for Field 75. You go back to Field 51,  
9       that's the Transaction End Date, right?

10              And then the next one, the end date is referring  
11      to Field No. 52, which is the Trade Date. Is that right?  
12      Shouldn't that line up begin date/begin date, end date/end  
13      date?

14              MR. SAUER: Yeah. From my reading or looking at  
15      it right now, you're right. Those numbers are referring to  
16      the wrong numbers. We'll look into that. I believe it  
17      should say Fields 50 and 51, rather than 50 and 52.  
18      Certainly, the names refer back to the correct names. But  
19      we'll take a look at that.

20              MR. BUSH: Yeah. 50 and 51 should be the  
21      references, right. Okay, thank you.

22              MS. SCHMIDT: JoAnn Schmidt from Xcel Energy.  
23      So on the E-Tag data, that's going to be a separate file, as  
24      I understand it. Are we--we're reporting our transactions  
25      in the transaction data file, and then if those same  
26

1 transactions have an E-Tag associated with them, we will  
2 report them again in this file, with the E-Tag information  
3 on it?

4 MR. SAUER: No. All that you'll do is match up  
5 the Transaction ID. In this case, and I hope I'm referring  
6 back to the right field here, it's Field No. 50. In this  
7 case, it's a transaction unique identifier, which actually  
8 looks like it's new Field 49. So that's something that  
9 we'll have to address as well.

10 But in this case, the new file, and this is the  
11 E-Tag ID file, just has four fields. One of them is that  
12 transaction unique identifier, which refers back to that  
13 transaction line in EQR, as well as the E-Tag ID and the  
14 E-Tag start/begin dates, for when an E-Tag was, that  
15 particular E-Tag was used to schedule that transaction. So  
16 you won't have to report the entire transaction again.

17 MS. SCHMIDT: Right. We won't have to report  
18 all of the columns across, but we'll be duplicating the same  
19 number of lines, if every transaction had an E-Tag. So if  
20 you're receiving 15 million lines of data --

21 MR. BLAZEJOWSKI: That's only if every E-Tag  
22 matches every transaction one to one, right?

23 MS. SCHMIDT: Right, yeah.

24 MR. BLAZEJOWSKI: But isn't it the case that  
25 you're going to have one to many, many to one. You're not

26

1 going to have a one to one match.

2 MR. SAUER: Regardless, you may have a one to one  
3 match. But you know, in this case, you're right. There can  
4 be many other lines here. Certainly we are -- the entire  
5 record for that transaction won't be duplicated in the  
6 database.

7 Those will be -- think of it as a relational  
8 database, in the sense that that transaction ID will tie  
9 back to the transaction data and will contain some other  
10 values, in this case an E-Tag ID and begin and end dates  
11 that refer back to it, that allow you to create this many to  
12 many relationship and whatever relationships you need.

13 But certainly, that data won't be duplicated in  
14 the database. I think that, was that -- did that answer it?

15 MS. SCHMIDT: Yes.

16 MR. SAUER: Okay.

17 MR. PEDERSON: Do we have other questions with  
18 regard to E-Tag, while we're on the subject?

19 (No response.)

20 MR. PEDERSON: Okay. Also, so what we've tried  
21 to do here is give you just an understanding and a  
22 background on each of the new fields. So let me just open  
23 it up to any other questions that you have on these new  
24 fields, that we can address here today.

25 (No response.)

26



1 MR. PEDERSON: I'm really surprised. We  
2 expected -- ahh, here we go. We expected lots of questions.  
3 This is a

4 (Laughter.)

5 MS. BOURQUE: A lot of the questions I would  
6 have relate to the rehearing, so I know the answer is going  
7 to be that you can't answer it, so I won't go there.

8 But just a follow-on, and I can't remember  
9 whether it was Nancy that asked about talking to the ISOs  
10 and your response was well, we ll be willing to talk to the  
11 ISOs, is there any chance that FERC is going to drive that  
12 ship? Or are you going to have to, the ISO's gonna to have  
13 to come to you to initiate it?

14 Because it's something that I know staff has put  
15 a lot of energy into but it s been at a standstill for quite  
16 a while, and in particular, CAL ISO, which has nothing, and  
17 then PJM, for instance, all the flat rate, the capacity one  
18 flat rate, that's all PJM. Or I shouldn't say it's all PJM,  
19 but it's primarily how PJM reports in the so-called FERC  
20 approved report.

21 So you know, if they're going to have to make  
22 some changes to comply with these new regulations, it would  
23 be helpful, I think to the industry, if FERC helped push  
24 that rather than just came along. So any thought to that?

25 MR. PEDERSON: No. It's a very good question.

26

1 I think that's a question that we are going to take to the  
2 Commission, and we're going to talk to them about that. I  
3 will say in the past that we have worked with the RTOs, and  
4 they've been very cooperative in getting together data.

5 So but again, we're going to have to run that up  
6 and talk to the Commission about how they would want to  
7 approach that issue.

8 MR. NORTON: This is Chris Norton from AMP. A  
9 question on reporting amendments and corrections. How far  
10 back do you go? This is a non-ever EQR filer standpoint.  
11 How far back do you do corrections? Also I noticed in the  
12 slide, catching up on the morning one, it said "material."  
13 Where do I find the definition of what's material ?

14 (Laughter.)

15 MR. REICH: Okay, let's see. That gets back to  
16 the balancing adjustment? Billing adjustment. There's a  
17 Billing Adjustment field that allows you to report material  
18 corrections. You saw that. Let's see. How far back?  
19 What's the -- well, why don't you handle that part?

20 MR. PEDERSON: Generally, the guidance that we  
21 have put out, from a staff perspective, was that going back  
22 12 quarters was typically where we would be looking for  
23 corrections. Now beyond that, the usefulness of the data  
24 becomes questionable. Certainly, if we had somebody come in  
25 and have a concern with that, we'd have to deal with it at

26

1 that point. But normally, we point to 12 quarters.

2 MR. REICH: And regarding the thorny question of  
3 what is material, that's actually an avenue that we've gone  
4 down in the past, and I think the traditional guidance we've  
5 given, because there's not a specific definition, is that if  
6 the change would alter how that data is viewed, you know, it  
7 changes kind of the -- what that data is saying is material.

8 So I think that's probably the best we can do in  
9 terms of kind of the guidance, and I think that's the  
10 guidance we've given in the past.

11 MS. LEE: Nancy Lee from Con Energy again. Just  
12 for those of you who are in New England and are market  
13 participants, there is a group or a forum there called "IRG  
14 Information Request Group," where you can submit request for  
15 changes.

16 So if anybody who is a market participant there  
17 would submit a request for change, plus also that group has  
18 an annual vote and the most number of votes for a particular  
19 change, they will move it up to the front of their list, to  
20 make things work.

21 So I would highly recommend that, and not just  
22 in New England, but New York and PJM too, to everybody to  
23 submit changes and requests for changes.

24 MR. PEDERSON: Thank you. I didn't hear a  
25 question there.

26

1 (Laughter.)

2 MR. PEDERSON: We'll go over here. Do you have  
3 a question?

4 MR. BUSH: I do. I have more clarification on  
5 the trade date. So the question I have on that is with the  
6 ISOs, we have these pull-in agreements, and they've been  
7 around for a long time.

8 What trade date do we put in here? Is it when  
9 we first signed the agreement with them long ago, or in here  
10 it says when you made the legally binding agreement on the  
11 price of a transaction. What trade date do we use?

12 MR. REICH: Could you explain a little more what  
13 exactly you're talking about?

14 MR. BUSH: Well so for instance, let's talk  
15 about California ISO. We push power into there, but then we  
16 have to pay balancing. We either over-generate or we  
17 under-generate. If we over-generate, we have sold power to  
18 them. So we have transactions in our system that we report  
19 to you, that we sold that power into California.

20 Well, it's a generic agreement that we have with  
21 them. So what's the trade date that we record on that?

22 MR. REICH: I think we'll deal with this -- I  
23 think we'll have to deal with this more specifically in the  
24 FAQ, but I mean the concept behind the trade date is the  
25 date on which the price is set.

26

1                   So it's not associated with contracting. It's  
2 associated with if you're selling into the RTO in the  
3 day-ahead market, then you're priced at the day-ahead LMP,  
4 and so that's the date.

5                   If you're getting the real-time price, because  
6 they're pulling the, they're getting the power and you're in  
7 part of the balancing market, then you report the date of  
8 the transaction, or the date of the trade, the real-time  
9 date, because that's, I mean those are the dates that the  
10 market sets the price.

11                  MR. BUSH: Okay. No, I didn't mean

12                   (Laughter.)

13                  MR. REICH: Please explain a little more.

14                  MR. BUSH: I'm an IT guy, so I'm trying to  
15 figure out in my head how to capture all this, so that I can  
16 present it to my users that send this into you guys, and  
17 this is going to be a challenge. So okay.

18                  MR. REICH: But I mean, if you can explain.  
19 Feel free to explain why.

20                  MR. BUSH: Well, so what you're saying is that  
21 for all of my ISO, and we're in all of the markets, ERCOT,  
22 CAISO, MISO, PJM, ISO New England. So every one of those  
23 transactions that I have out there, I'm going to have to go  
24 and flag those as capture the trade date as today, or as the  
25 day of flow basically, right?

26

1                   MR. REICH: Yeah. If they're real-time  
2 transactions.

3                   MR. BUSH: Yeah, and so but what I do, is I have  
4 a month-long deal that's sitting out there that's capturing  
5 every day of those. Well that trade date, I can't put. I  
6 only have one trade date on the deal. So I don't -- that's  
7 --

8                   MS. KEY: Well, can I ask a related question,  
9 that I think is going to have a different answer, and maybe  
10 we can get some of it sorted out, and that's this is ^^^^ if  
11 I on January 5th, 2013, enter into a long-term contract  
12 bilaterally and say, you know, we're going to settle at the  
13 ISO price in this ISO, that would have one single trade  
14 date, right, because the price you decided on is the ISO  
15 price, whatever it is? Which is different than selling just  
16 into the ISO market, where you're going to have a different,  
17 you know, a trade date every day for every transaction every  
18 day.

19                   But if you have a one-time formula rate that  
20 uses an electric index, you know, and it can be an ISO  
21 index, it can be, you know, a reported, you know, a  
22 broker-reported, if you have a formula, you know, an index  
23 rate that's determined on one day, and you know, let's say  
24 it's the effective date of that contract, all your  
25 transactions under that contract have that single trade  
26

1 date, right?

2 MR. REICH: Yeah. That's the intended purpose  
3 of that.

4 MS. KEY: Okay, which is very different from his  
5 example of if you're just selling into the market, and your  
6 price is going to change every hour, you know, you're going  
7 to have, you know--

8 MR. REICH: But if you make a commitment for --  
9 if you make a commitment for some kind of service, and that  
10 commitment is over the course of the month, and it's based  
11 on the RTO price, then I could conceive of and we'll go back  
12 on this, you know, but I could conceive of a case where the  
13 trade date is the date that you've, you know, made that  
14 commitment for the course of the month, but the, what's the  
15 field name, the one that has RTO? Sorry.

16 Yeah, but the type of rate would be RTO/ISO  
17 price. And so you'd still have to report the prices on an  
18 hourly basis. But if you've made the commitment, if you've  
19 said I'm going to be selling this service over the course of  
20 the month, and there's a specific type of service that  
21 you're selling over the course of the month, as opposed to  
22 the date, you know.

23 I'm going to back off and say we'll talk about  
24 this and address it in the FAQ. Sorry.

25 MR. BUSH: Okay, thank you.

26

1 MS. BOURQUE: Can I just to follow? I mean when  
2 I read the rule, what I thought it said was if you schedule  
3 day-ahead, your trade date is the day before the power  
4 flows, and I thought that's what I just heard you say. And  
5 if you schedule, if you are real-time power, then your trade  
6 date would be the day that power flowed, okay.

7 MR. REICH: Correct.

8 MS. BOURQUE: Okay. So I don't know if that  
9 helps. That's what I inferred. Now I don't know about  
10 making a commitment to an ISO for a long-term period. I  
11 mean even you scheduled day-ahead and you scheduled 24  
12 hours, that doesn't make it a daily deal, because the ISO  
13 sales seem to be discrete. You schedule in an hour at a  
14 time.

15 You may do 24 hours at once, but you're still,  
16 my understanding is, scheduling an hour at a time. So ISO  
17 energy sales are normally considered to be hourly  
18 transactions.

19 MR. REICH: Right, and I was understanding that  
20 he was talking, discussing something other than a straight  
21 ISO energy sale.

22 MS. BOURQUE: Okay. I know we're saying it was  
23 a sale to an ISO, so I just -- I wasn't familiar with that  
24 either, but I wanted to kind of make sure my initial  
25 reaction of if you're scheduling day-ahead, the trade date  
26



1 is the day before power flows, and if you're scheduling or  
2 if you're selling real time, it's the day the power flows?

3 MR. REICH: Right, right, and but I think, and  
4 Jennifer made a really good distinction.

5 MS. BOURQUE: If it's a bilateral. I'm talking  
6 about to the ISO.

7 MR. REICH: Exactly.

8 MS. BOURQUE: Okay.

9 MS. McDONALD: Renee McDonald, ASIS Power  
10 Marketing. In regard to what Barbara just said, where you  
11 pick the real time is the day of trade, what happens with  
12 hour ending 1?

13 MR. REICH: Let us think about that one.

14 MS. NEWMAN: Can I also just reiterate that for  
15 these particular questions, can you please send us an email  
16 to EQR at [ferc.gov](mailto:ferc.gov), with some detailed information, so we  
17 can think about it?

18 MR. PEDERSON: Anyone else? Barbara.

19 MS. BOURQUE: Just one more, and this came up in  
20 the meeting we were having yesterday. I know we're not  
21 going to get into the details of the software, so I'm not  
22 trying to take you all the way there. But for filers who  
23 have refilings, who've decided, you know, even if it's just  
24 because now they have complete data.

25 So next year, the price starts Q3. So for July  
26

1 through September, people will be filing in the new format  
2 with the new web interface or whatever. And but if at that  
3 time, their Q2 data, there have been changes or billing  
4 adjustments made, and they need to refile their Q2 data, are  
5 they going to be able to do that in the old format?

6 Are they going to -- because they won't have the  
7 data and won't have had a regulatory obligation to collect  
8 certain data, E-Tag, whatever, for the old data.

9 Is it either going to be able to go under the  
10 old system, or is the new system going to be, have sort of  
11 two faces. One, here's for the new stuff, and for older  
12 filings, refilings, we'll be allowed to just, I don't know,  
13 there will have to be an interface that allows that  
14 structure also?

15 Is that the plan?

16 MR. PEDERSON: My understanding is that the new  
17 interface will allow you to make revisions to old EQRs. So  
18 you would use the same web interface. But let me take that  
19 back to our IT folks, to make sure we can nail that down.

20 But my understanding is it will be the same  
21 process. So you would be going through the same. It  
22 wouldn't be two different interfaces. It would be the new  
23 one. You would just load--

24 MS. BOURQUE: What I heard at I think it was  
25 July's tech conference was the old data would be ported over

26

1 to the new interface. So you could go in and maybe tweak it  
2 on the screen. But if you're a filer that has 100, 200, 300  
3 thousand lines of data, you don't tweak. I mean it's  
4 usually -- you're pulling off lines there may be a whole  
5 group of transactions that you need to change. There may be  
6 a lot of stuff.

7 So, you know, I think it would be challenging,  
8 we'll say, to say that all those changes have to be made  
9 manually in the new system. So hopefully there's something  
10 that would allow them to either download CSV files or XML  
11 files from the new system where they would tweak it, but not  
12 have the same requirements to have formats and the new  
13 required fields. They wouldn't have that requirement. But  
14 you know, if they have something in a totally different  
15 format, it's going to be a bit of a challenge.

16 I mean the contract data is easy, because you  
17 just eliminate a couple of columns and you're done. But the  
18 transaction is a different story.

19 MR. PEDERSON: Yeah, and I appreciate that, and  
20 these are some of the transitional issues that we are  
21 working with, and trying to work our way through. So we  
22 understand that.

23 MS. BOURQUE: Okay. I'll put it on the table.

24 MR. PEDERSON: And again, we're trying to make  
25 it as easy as possible. So that's kind of our underlying

26

1 goal. Thanks, Barbara. Yes.

2 MS. VANDERBERG: Vicki Vanderburg, Power Systems  
3 Operations. I'd kind of like to be on the other side of  
4 that and say but for those of us who have a system that is  
5 designed to put the new data out, we'll be able to refile  
6 the old quarter in the new system. That is the intention,  
7 right?

8 MR. PEDERSON: Yeah. Again, without getting too  
9 much into the next technical conference, we're trying to  
10 make the transition seamless, and so that --

11 MS. VANDERBERG: Either way.

12 MR. PEDERSON: Either way would work, and again,  
13 we're working through those issues right now.

14 MS. VANDERBERG: Great. Thanks.

15 MR. PEDERSON: Does anyone else have questions,  
16 comments?

17 (No response.)

18 MR. PEDERSON: Okay. Thank you for coming.  
19 Again, what we tried to get out and reach out to you as soon  
20 as we could, to give as much information as we could, with  
21 the understanding that rehearing is pending, and there's  
22 certain areas we can't get into this.

23 The questions we've gotten are very good. A lot  
24 of times you're asking us some pretty specific nuanced  
25 questions that we do want to go back and think about. So we

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1       are giving you the right response, and we will do that, and  
2       we will go out and put them up as FAQs.

3                Again, if you have follow-ups when you get out  
4       of this conference, and you have questions you want to ask  
5       us, please use the email interface and let us know, and we  
6       will get to them and try to respond to them. Also again,  
7       there will be an additional conference on the 770, to start  
8       talking about the software. That will be coming some time  
9       next year, and with that, I will close the conference.

10      Thank you.

11               (Whereupon, at 1:55 p.m., the conference was  
12      adjourned.)

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