

**Staff Notes on:  
Technical Workshop on the Draft Data Dictionary Attached to the Data Collection For  
Analytics and Surveillance and Market-Based Rate Purposes Notice of Proposed Rulemaking  
(RM16-17)**

August 11, 2016, 9-4pm  
Commission Meeting Room  
FERC, 888 1st St. NE  
Washington, DC

Commission Staff held a Technical Workshop on August 11, 2016, to discuss the Draft Data Dictionary included in the [Notice of Proposed Rulemaking on Data Collection for Analytics and Surveillance and Market-Based Rate Purposes \(NOPR\)](#) (Docket No. RM16-17). The NOPR proposes to revise the Commission's regulations to collect certain data for analytics and surveillance purposes from market-based rate (MBR) sellers and virtual/FTR participants and to change certain aspects of the substance and format of information submitted for MBR purposes. The Commission proposed to collect currently-submitted MBR information and the new analytics and surveillance information in a consolidated and streamlined manner. In the NOPR, the Commission also states that a data dictionary posted to the Commission's website will define the framework to be followed by users in preparing their submittal and that Staff will hold technical workshops on the data dictionary and the submission process.

A [Notice for the Workshop](#) to review the draft data dictionary attached to the NOPR was issued July 21, 2016. The Notice included an agenda for the workshop.

Approximately 45 members of the public registered for the Workshop, with approximately 25 attending in person. A video of the entire Workshop is available [here](#) (until three months from August 11, 2016).

Under the Workshop's Agenda, Commission Staff facilitated and participated in a table-by-table discussion of the Draft Data Dictionary. The notes below provide Staff's summary of those discussions. These notes are an informal summary of the key points from the workshop and are not intended to be an official transcript of the proceedings.

Staff set forth certain "ground rules," such as considering questions about aspects of the NOPR that were not about the Data Dictionary as beyond the scope of this workshop. As such, these notes do not contain details on any topics raised which were reasonably considered to be beyond the scope of the workshop.

## **Session I**

### **Fact and Dimensions Tables**

#### 1) Submission Information Table

##### a) Discussion Items

- i) A request was made for a drop-down menu for submitter/entity names to ensure consistency within and between submissions. Since the submission is done in the text-based, extensible markup language (XML), there is no way to have drop-down menus. However, validating certain fields against a permitted list of entries may be an option in the

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XML development process and third-party developers would be able to implement this as a drop-down menu.

- ii) A concern was raised regarding the appropriate docket number to be used by submitters in the docket number field (i.e., how to populate this field if a sub-docket or root docket has not yet been assigned). Staff responded that this is a process question and that existing processes would be used where possible and further clarified that Staff expects that the metadata would include the docket of the most recent tariff.

b) Questions

- i) Would a submitter be able to make a single submission on behalf of multiple submitters? What if some of the information being submitted (e.g., trader information) does not relate to all of the entities?
  - (a) We anticipate that a single submission for multiple submitters can be made, provided that the contents of the submittal apply to all the entities in the submittal (as is appropriate). Staff will consider what modifications would be required to allow for a more flexible, multi-submitter submission.
- (2) Will Staff validate company names and other information between submissions?
  - (a) Yes, Staff may validate information between submissions.
- (3) Do changes to a particular field in a table require an entity to resubmit its entire submittal?
  - (a) When changes to a particular entry occur (e.g. a generator is no longer owned by an entity) submitters would only be required to submit the XML related to that entry and would not have to resubmit their entire XML.

2) Natural Persons Table

a) Discussion

- i) There was a brief discussion about how to identify traders in the case of a PPA. Since PPAs generally do not have traders associated with them there is no field on the table to associate a PPA with a trader.

b) Questions

- i) Participants raised several questions pertaining to the topic of multiple submissions and requested clarification of how trader information will be entered.
  - (1) Submissions would only be needed when changes occur.
  - (2) Staff would validate information when it is submitted multiple times.
- ii) If a submitting entity has five traders and one trader leaves, would the company have to resubmit all of their trader information in its entirety?
  - (1) Each trader's information would occupy a row in a table in the database, so a change in one trader's status can be addressed without resubmitting all trader information. As discussed below, a company would update that trader's row in the "traders to entities" table with an end date.
- iii) How would traders be distinguished, especially if traders share a common name? Will there be a unique identifier?

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- (1) Regulations over the collection of Personally Identifying Information (PII) by the Government make it difficult to collect uniquely identifying information (e.g. social security number) so there will not be a unique identifier and traders may have the same name.
  - iv) How would a company indicate trader severance?
    - (1) This is shown on the “traders to entities” table which will include start and end dates. When a trader leaves a company, the “traders to entities” table would be updated to reflect the end date of the relationship.
    - (2) A company would not be responsible for tracking traders who are no longer affiliated with the company.
- 3) Entities Table
- a) Discussion
    - i) Regarding identifiers, Staff stated that the LEI is the preferred identifier and will be required in the submissions of MBR Sellers or FTR/Virtual Participants. However, CIDs and FERC generated IDs are also options for entities that are not MBR Sellers or FTR/Virtual Participants. Staff clarified that entities can have any combination of CID, FERC generated ID, and LEI simultaneously.
  - b) Questions
    - i) How would a FERC generated ID be created given that it appears necessary to have one before the initial submission?
      - (1) For submissions requiring a FERC generated ID, an automated assignment could be made at the time of the submission (similar to the assignment of docket numbers to new submissions). However, an alternative option would be to generate the ID prior to submission.
    - ii) How is the LEI different than the DUNS Number?
      - (1) Staff responded that there are two things which make the LEI more suitable than DUNS:
        - (a) The LEI database and associated standards are publicly available.
        - (b) The governance surrounding LEI assignments is more robust.
- 4) Generation Assets Table
- a) Discussion
    - i) Because EIA only collects information on generators with 1MW or greater capacity, some generators participating in an ISO may not meet the reporting threshold and therefore lack an EIA number. Staff will consider changes to accommodate this possibility.
    - ii) General comments were made regarding concerns over and the benefits of reconciling EIA data and FERC reported data where there may be variances.
    - iii) A clarification was requested for the definition of geographic region because the data dictionary allows multiple entries. Multiple regions are allowed to accommodate generation units that are dual-interconnected. For example, a plant may be interconnected to both

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PJM and MISO. PJM is in the FERC defined Northeast region, and MISO is in the FERC defined Central region.

- iv) How should MBR Sellers reflect assets that were acquired, for example, after the study period required for triennial purposes?
  - (a) MBR Sellers should submit updates to reflect changes in their assets as required. In Order No. 816 the Commission discussed how MBR Sellers could reconcile the differences between the data used in the historical time period in their study year and their asset appendices. For purposes of the initial baseline submission, assets should be reported as of the date of the submittal, not the study period.

5) Dimensions Tables

a) Discussion

- i) A request was made to include Commission approved sub-markets as part of these tables.

**Session II**

**Market-Based Rate Tables**

6) MBR Authorizations, Category Status, Limitations, and Mitigations Tables

a) Discussion

- i) Staff specified a preference for using an MBR Seller's original docket number (i.e., the docket number in which MBR authorization was initially granted, which is not necessarily the baseline docket number).
- ii) The 'Docket of cancellation' field was marked as not nullable when it should be nullable
- iii) As per existing policy, category status defaults to Category 2 unless the submitter explicitly states that they meet the requirements for Category 1 status.
- iv) 'Mitigation region' may be redundant because there are currently no BAAs that exist in multiple regions, FERC has a BAA to regions mapping table, and mitigations do not occur on a regional basis.

7) Indicative Screens Table

a) Discussion

- i) Some participants expressed interest in preserving the current electronic spreadsheet-template. Other participants noted that Staff is moving in the right direction by switching to XML. Staff responded that the proposal to use XML was designed to ensure a consistent, enforceable standard across all submissions.
- ii) One participant raised concerns that an XML document is larger in size than a comparable electronic spreadsheet file. Staff responded that, while that might be true in some cases, the submission size will be small enough that this should not be a pressing concern.
- iii) There was discussion of the formatting of the tables for the screens. Staff laid out three options: the current electronic spreadsheet template, the version proposed in the data dictionary where each cell in the existing template is mapped to a column, and an

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intermediate option where aspects of the current template are normalized (extracted into an efficient format for storage) for seasonality or reporting field type. The structure of the table in the draft data dictionary was meant for explanatory purposes and likely does not reflect the structure in which the data would be stored.

- iv) Some attendees requested that FERC develop a compatible spreadsheet template for the indicative screens.

### **Contracts**

#### 8) Long-term Power Purchase Agreements (PPA) Table

##### a) Discussion

- i) Participants requested the default MBR data be set to "public."
- ii) Participants noted that there is not a perfect overlap with the universe of contracts and the information required to be reported between the proposed rule and what is currently required under EQR.
- iii) Participants requested more guidance on filling out the "amount" field, particularly in the case of requirements contracts.
- iv) Participants requested an open-ended end-date option/"not null" be taken out.
- v) There is no obligation to provide counterparty LEI, but Staff would encourage parties to provide the information if it is known.

#### 9) Contracts Table

##### a) Discussion

- i) A participant suggested limiting the responsibility to report contracts to the seller-side of the contract (i.e. the generation asset). Staff noted that requiring both sides of the contract to report allows for confirmation of the contract terms and the ability to link both sides of the contract to an LEI.

##### b) Question

- i) Does a reportable, control conferring PPA need to be reported on both the PPA table and the contracts table?
- ii) A participant asked if we could expand the source/sink location types to include nodes.
  - (a) Staff responded that it would add nodes as source/sink locations.

### **Session III**

#### **Linking tables**

#### 10) Entities to Entities Table

##### a) Discussion

- i) Participants asked how submitters can indicate that they are owned by other entities.
- ii) Questions were raised regarding to what extent affiliates that are neither owners/ownees need to be reported by a submitter.

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- iii) Participants wondered about the case where FTRs/Virtuals are traded in a back-to-back arrangement (e.g. if a submitter buys an FTR in a jurisdictional market and then sells an FTR or FTR-like contract bilaterally to a non-submitting counterparty) without a counterparty who is not otherwise required to report or be reported.
  - iv) Participants raised a concern that the description of the relationship field was too narrowly focused on ownership or control and may not adequately capture the relationships under the connected entities definition.
  - b) Questions
    - i) Participants wondered what identifier would be used for "Ultimate Affiliate Owners."
      - (a) Staff responded that it would prefer LEI if available and known. If not, submitters could use CID, and/or FERC generated ID
- 11) Natural Person Affiliates to Entities Table
- a) Discussion
    - i) There was some discussion as to whether organizational charts should be publicly available given that some are currently submitted non-publicly.
      - (1) Staff indicated that it did not expect that the organizational charts would be publicly available.
- 12) Entities to Generation Assets Table
- a) Discussion
    - i) Participants requested a method for seeing other submissions to enable them to improve and facilitate their own submissions.
    - ii) There was a discussion about the ownership end date, how long the assets with an end date would need to continue to be submitted, and the fact that submitters are now responsible for providing an end date to asset ownership.
  - b) Questions
    - i) Would a submitter report assets that are still owned but no longer in service (e.g. decommissioned coal or nuclear plants)
      - (1) The proposed rule does not change the existing reporting requirement for decommissioned facilities so if they are currently included they would continue to be included.
- 13) Seller Entities to Vertical Assets Table
- a) Discussion
    - i) There was a discussion of changes to transmission line reporting. In general, transmission line length would no longer be reported pursuant to P 39 of the proposed rule.
- 14) Entities to RTO/ISO Accounts Table
- a) Discussion

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- i) A request was made to set a default date if the start date was before a certain point because, if the actual date is significantly in the past, it may be difficult to determine a precise day, month, or even year.
- b) Questions
  - i) Is the "Start Date" supposed to represent when the account was set up or when it was first used?
    - (1) The start date is meant to reflect the date the submitter first used the account because the account creation date may be before the use of the account by the submitter.
  - c) Should traders that are substituting for others on an RTO/ISO account due to sick days or vacation be reported as linked to that RTO/ISO account?
    - i) Since the mapping of RTO/ISO accounts to traders is many-to-many, substitutions can be handled by submitting multiple traders for any account. The goal is to have the accounts to trader relationship mapped, not who is using what account on what day.
- 15) Traders to RTO/ISO Accounts Table
  - a) Discussion
    - i) While certain traders may have RTO/ISO accounts, others may trade through a platform that does not match trades to their specific RTO/ISO account (or they may not have a specific account).
    - ii) How should RTO/ISO sub-accounts (if they exist in a given RTO/ISO) be reported? There are accounts that are associated for billing purposes which are distinct from the accounts associated with individual entities or assets.
- 16) Entities to NAESB/OATI Purchaser Seller Entity ID Table
  - a) Discussion
    - i) Entities requested a default start date for when the actual date is significantly in the past and, for this reason, may be difficult to determine a precise day, month, or even year.
- 17) Traders to Entities Table
  - a) Discussion
    - i) A suggestion was made to add a date range to the trader to entities table.
- 18) Entities to CID Table
  - a) Discussion
    - i) A suggestion was made to include a table of FERC generated IDs in this table (or as a separate table) and on FERC.gov.

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**Broad Scope modifications**

- 19) Staff agreed with the Workshop participants that the data dictionary should explicitly indicate every field where nullable values are allowed.
- 20) Staff agreed to identify those places where it is appropriate to assign a default value.