



Federal Energy Regulatory Commission

# **Welcome to the Electric Quarterly Report Users Group Meeting February 14, 2019**

**Office of Enforcement  
Division of Energy Market Oversight**





# Agenda

Federal Energy Regulatory Commission

1:00 – 1:15 p.m.	Welcome and Logistics
1:15 – 1:45 p.m.	Updates Since Last Meeting
1:45 – 2:15 p.m.	Discussion on EQR Product Fields
2:15 – 2:45 p.m.	Large Data Files
2:45 – 3:00 p.m.	Break
3:00 – 3:30 p.m.	EQR Self-Reports
3:30 – 4:30 p.m.	EQR Reassessment Project
4:30 – 5:00 p.m.	Open Discussion



# EQR Users Group Meeting

Federal Energy Regulatory Commission

Washington D.C.



**Webcast Participants  
Please Send Your  
Questions To:**

**[eqrusersgroup@ferc.gov](mailto:eqrusersgroup@ferc.gov)**



# EQR Users Group Meeting

**Federal Energy Regulatory Commission**

Washington D.C.



**Discussion of Data Reported in  
Certain EQR Fields**



# Background

- Part of DEMO's function is to review reported EQR data to determine whether just and reasonable prices were charged.
- Data reported in certain fields can be unclear and/or inconsistent between filers. Some examples include:
  - Point of delivery locations
  - Hubs
  - RTO/ISO transactions
  - Affiliate transactions



## Different Ways Hub Sales are Reported in the EQR

- Point of Delivery Specific Location (PODSL) is defined in the EQR Data Dictionary as “The specific location at which the product is delivered. If receipt occurs at a trading hub, a standardized hub name must be used.”
- However, FERC staff have seen different ways EQR filers report hub sales.
  - Some filers use a non-standardized hub name under PODSL and choose one of the allowable entries for Balancing Authorities under Point of Delivery Balancing Authority (PODBA).
  - Others filers select “Hub” under PODBAs and a standardized hub name as PODSL.



## Example: Four Corners

Point of Delivery Balancing Authority (PODBA)	Point of Delivery Specific Location (PODSL)	Volume (MWh)
HUB	Four Corners	270,224
AZPS	FOURCORNE345 (AZPS) POR/POD	635,655
AZPS	Fourcorners	2,230
AZPS	FOUR CORNERS	220
AZPS	FOURCORNE345	15
EPE	FOUR CORNERS	43
PACE	FOURCORNE345 (PPW) POR/POD	100,162
PACE	FOURCORNE345	4,478
PACE	FOUR CORNERS	95
PNM	FOURCORNE345	2,756
PNM	FOUR CORNERS	1,403
PNM	FOUR CRNRE345	1,016
PSCO	Fourcorners345	1,009
PSCO	Four Corners 345	70
WACM	FOUR CORNERS	121,300
WACM	FOURCORNE345	28,150
WACM	FOURCORNE345 (CRCM) POR/POD	1,156

\*For Hourly energy from Q2 2016 to Q3 2018



## Example: Palo Verde

Point of Delivery Balancing Authority (PODBA)	Point of Delivery Specific Location (PODSL)	Volume (MWh)
HUB	Palo Verde	2,012,218
SRP	Palo Verde/Hassayampa common bus	419,541
SRP	PALOVRDE_5_N101	3,484
AZPS	PALOVERDE500 (AZPS) POR/POD	2,983
AZPS	PALO VERDE	1,487
SRP	PALO_VERDE	958
HGMA	PALO VERDE	890
SRP	PALO VERDE	290
AZPS	PaloVerde500	144
AZPS	PALO	57
AZPS	PALOVERDE	50
WAUW	BPALOAD	28
PSCO	PALOVERDE	26

\*For Hourly energy from Q2 2016 to Q3 2018





# Hubs

- The EQR Data Dictionary provides: “If receipt occurs at a trading hub, a standardized hub name must be used” for Field 58 or Point of Delivery Specific Location (PODSL)
- List of allowable trading hubs is provided
- Are there improvements that could be made to how hubs are currently being reported based on the list of available hubs?
- Do the hub reporting options leave too many options or too few?
  - For example PODBA = SOCO vs (PODBA = Hub and PODSL = SOCO(into))
  - Another example: PODBA = NWMT vs (PODBA = Hub and PODSL = NWMT)

## Allowable Trading Hubs

ADHUB
AEPGenHub
Arkansas Hub
Cinergy (into)
Cinergy Hub (MISO)
COB
Entergy (into)
Four Corners
ILLINOIS HUB (MISO)
Indiana Hub (MISO)
Louisiana Hub
MEAD
MICHIGAN HUB (MISO)
MID-COLUMBIA (MID-C)
MINNESOTA HUB (MISO)
NEPOOL (MASS HUB)
NIHUB
NOB
NP15
NWMT
PALO VERDE
PJM EAST HUB
PJM South Hub
PJM West Hub
SOCO (into)
SP15
Texas Hub
TVA (into)
ZP26



# Identifying RTO/ISO Sales

- How do you report sales to an RTO/ISO?
  - When buyer name = RTO/ISO and/or Type of Rate = RTO/ISO, how else are RTO sales reported?
  - Are sales where buyer name = RTO/ISO ever reported with a BAA other than the RTO/ISO, or at a hub?
- Are there changes that can be made to reporting instructions that may better distinguish these sales?



## Other Common Variations

- After reporting a PODBA, sellers are reporting a different BAA in the PODSL field. Delivery BAA and specific location are left unclear.
- For example, reported BAA is TVA and reported PODSL is SOCO.

Balancing Authority Name	Specific Location Name	Volume	Percent
TVA	TVA	5,448,232	18.5%
HUB	TVA (into)	5,044,543	17.1%
SOCO	TVA	255,949	0.9%
SOCO	TVA Colbert-Selmer 161kVln or intrcnctn process pt	177,952	0.6%
TVA	LGEE/TVA	77,695	0.3%
TVA	SMT TVA	73,028	0.2%
TVA	TVA/AEP	41,300	0.1%
TVA	TVA/DUK	20,600	0.1%
TVA	SOCO	18,271	0.1%

\*For Hourly energy from Q2 2016 to Q3 2018





# Possible Solutions

- Use standardized PODBA and PODSL names from external sources.
- Description field in addition to standardized PODBA and PODSL names
- Other suggestions?



# Fields Reported as N/A or Blank

In some instances, required fields are reported with data that is not clear.

Examples:

- Energy sales with N/A Increment Peaking Name (Field 62)
- Energy sales (to an RTO/ISO for organized market sales or for contracts dated after July 1, 2013 for bilateral contracts) with a blank Type of Rate (Field 55)

What could lead to a required field being reported as such?



## Affiliate Sales

“The customer is an affiliate if it controls, is controlled by, or is under common control with the seller. This includes a division that operates as a functional unit. A customer of a seller who is an Exempt Wholesale Generator may be defined as an affiliate under the Public Utility Holding Company Act and the FPA.”  
(EQR Data Dictionary, Field #15)

Sometimes sales are reported with a public utility as the Seller and a town/municipality as the Customer Company (Buyer) with the affiliate box checked.

What circumstances lead to reporting in this manner?





# Questions?

We invite you to submit written comments and answers to the questions we have raised here [equusersgroup@ferc.gov](mailto:equusersgroup@ferc.gov)

# CIO/SDE Submission Improvements for EQR

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February 14, 2019



# Agenda

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- Large XML File Issue
  - Performed assessment
  - Upgraded servers
- Unzip Issue
  - Upgrade zip software
- Large CSV File Issue
  - Upgrade software



# Large XML File Issue

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- EQR Assessment and Hardware Modernization
- Required upgrades to support increased file sizes, particularly as a result of markets transitioning to subhourly increments
- Completed upgrades to add greater Ram capacity and additional Processors: 12/9/18

# Unzip Issue

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- CIO/SDE ZIP file processing modernization
- Large CSV and XML Submissions required a new tool to execute the unzip to execute automated processing
- Production Ready by the end of March 2019

# Large CSV File Issue

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- CSV file processing
  - Upon submission, CSV files are converted to xml for processing and added to the EQR database
  - Currently unable to process CSV files exceeding 40MB  
Analysis/Design/Development in progress
  - The Commission is updating the CSV software code to address this issue



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# SELF REPORTING

## EQR Errors and Omissions

February 14, 2019

**Jay Matson**

Branch Chief

Office of Enforcement, Division of Investigations

Federal Energy Regulatory Commission

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# Disclaimer

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The views expressed in this presentation are those of the presenter and do not necessarily reflect the views of the Federal Energy Regulatory Commission, its Chairman, any individual Commissioner, or anyone else on staff.





# Who did you say you were?

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Division of  
Investigations  
(DOI)

Division of Analytics  
& Surveillance  
(DAS)

Division of Audits &  
Accounting  
(DAA)

**OE**

Division of Energy  
Market Oversight  
(DEMO)





# What is a self report?

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- An entity informing OE that it has failed or may have failed to comply with a requirement under Commission-related statutes, regulations, or orders
- NOT after OE has already been informed by another source that the entity committed or may have committed a violation
  - e.g. market monitor, Hotline tip, another market participant, another agency, another FERC office

“We place great importance on self-reporting. Companies are in the best position to detect and correct violations of our orders, rules, and regulations, both inadvertent and intentional, and should be proactive in doing so. When a company self-reports violations to the Commission it facilitates remedies to affected parties.”

- *Policy Statement on Enforcement*, 113 FERC ¶ 61,068 at P 24 (2005)





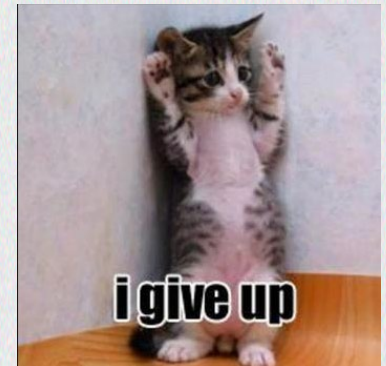
# Self Report Stats

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- FY2014-2018: received 498 self-reports
- FY 2018: received 137 self-reports  
closed 136 (including 14 carry-overs)

- Examples

- ISO/RTO issues
- Gas transportation
- Filing issues (e.g. failure to timely file)
- Electric Tariff (OATT) violations
- Standards of Conduct
- **EQR errors/omissions**



- See OE's Annual Report:

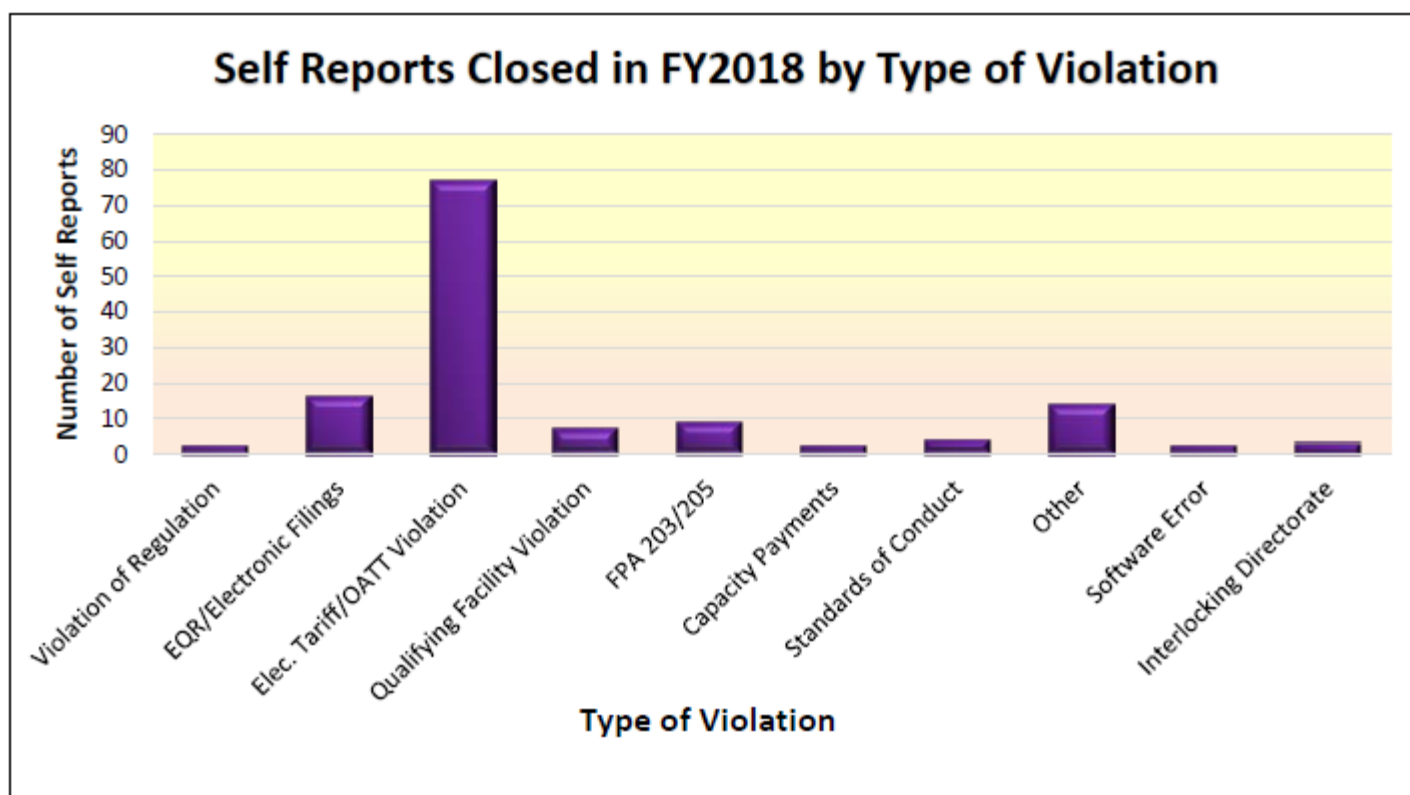
<https://www.ferc.gov/legal/staff-reports/2018/11-15-18-enforcement.pdf>





# Self Report Stats II

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# Should I self report?

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## That's up to you . . . But . . .

The Commission **encourages self-reports** of possible violations, and in many cases, self-reported violations have resulted in **closure of the matter without sanctions.** In the cases where self-reports did result in enforcement action, the penalties reflected mitigation credit for the self-reporting that **substantially lowered the amount.**

FERC Web Site on Self Reports: <https://www.ferc.gov/enforcement/self-reports.asp>





# How do I self report?

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## First Call or Email



**Geof Hobday**

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# How do I self report?

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## Second Submit Written Material



- How/when the conduct was discovered
- What steps the company took upon discovery
- Sufficient information for staff to understand the circumstances of how and why the violation occurred
- Whether any harm resulted from the violation and, if so, the extent of the harm
- Key personnel involved in the violation
- Steps taken to cure the violation and to prevent any recurrence
- Documents relevant to the matter being reported





# What will OE do?

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- **It depends . . .**

- Did the company fail to file anything?
- Were there errors in the filing?
  - How many in a particular filing?
  - How many filings implicated?
- Is this the EQR-related first violation?
- Is this the first violation of any kind?
- Is the company transparent and cooperative?



- **DEMO and DOI will coordinate**

- Ultimately, DEMO is going to help you get the EQR situation fixed
- DOI could open an investigation, and possibly recommend that the Commission issue a penalty





# Questions

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# EQR Users Group Meeting

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Washington D.C.



**EQR Reassessment Project**

**February 14, 2019**



# Agenda

- Background
- Project Overview
- XML Based Solution
- Going Forward



# Background

- The EQR system requires filers to provide data in a prescribed manner.
- April 25, 2002: Order No. 2001- Established the requirement for Public Utilities to file EQRs.
- Over time, issuances of new orders, notices, and guidance documents, amended or added filing requirements.
- 2013 Q3: New EQR system was introduced.
- Changes in the markets: e.g., implementation of 5 and 15 minute markets and the Western Energy Imbalance Market (EIM).



# Project Overview

- Analysis of the current EQR filing requirements, data collections, and validation rules led to the EQR Reassessment Project.
- The EQR Reassessment project is designed to evaluate the EQR data fields and the collection method.



# Project Overview

- Reduce the burden on EQR filers by modifying certain data fields or processes.
  - e.g. Some data collected in the ID Data portion of the EQR is also collected in other Commission systems and may not need to be reported in the EQR
- Potential transition to solely an XML based format
- Long-term project





# XML Based Solution

- XML Based Solution
  - Evaluate the option to report EQRs in a new XML based format and eliminate manual entry and CSV
- Benefits
  - Reduce burden of error reconciliation
  - Improve system usability and data accessibility
  - Accommodate and support large files



# Going Forward

- This is a long-term project.
- In the initial phase we will solicit feedback during upcoming EQR Users Group Meetings.
- Host workshop(s)/technical conference(s) to collect industry feedback and address each section of the EQR (e.g. Identification (ID) Data, Contract Data, and Transaction Data).



# Questions?