



Electric Quarterly Report (EQR)
Wednesday, February 24, 2021

Technical Conference on Reassessment of the Electric Quarterly Report Requirements

Office of Enforcement, Division of Audits and Accounting,
EQR Administration Branch



Agenda

- Project overview
- Identification Data Fields (#2, 4-12)
- Location and Balancing Authority Fields (#39-42 and #57-58)
- 15 minute break
- Date Fields (#21-24)
- Lunch Break
- Product Name (Field #31 – “Other” category in Appendix A) – Bundled, Grandfathered Bundled, Requirements Service
- 10 minute break
- Product Name (Field #31 – “Other” category in Appendix A) – REC
- Product Name (Field #31 – “Other” category in Appendix A) – Ramping
- 10 minute break
- Discussion: additional products
- Closing remarks



EQR Reassessment Project Overview

Objective: Review and analyze reporting requirements, while improving the accuracy and integrity of the data for staff and public analysis.

The EQR Reassessment Project comprises two parts.

1. EQR Data Fields Assessment: analysis reassessing current EQR filing requirements, data collection, and validation rules
 - First of multiple technical conferences to discuss data fields and seek input and feedback from the industry
2. EQR Data Collection Method Assessment: Adoption of a single filing format to replace the three current EQR filing methods: manual entry, XML and CSV
 - Staff is considering the XBRL-CSV format



Reducing Redundant Data Collection (Fields #2, 4-12)

Most of the following Identification fields may be replaced by information from other FERC systems:

- Company Name (Field #2)
- Contact Name (Field #4)
- Contact Title (Field #5)
- Contact Address (Field #6)
- Contact City (Field #7)
- Contact State (Field #8)
- Contact Zip (Field #9)
- Contact Country Name (Field #10)
- Contact Phone (Field #11)
- Contact Email (Field #12)



Proposed Changes to Balancing Authority and Location Fields (Fields #39-42, and #57-58)

CONTRACTS: (Current Requirements)

Adding "Area"

PROPOSED CHANGES:

PORBA (#39) – Transmission or transmission-related jurisdictional sale, if specified in contract

PORBA^A

PORSL (#40) – all products, if specified in contract

PODBA (#41) – Transmission or transmission-related jurisdictional sale, if specified in contract

PODBA^A

PODSL (#42) – all products, if specified in contract

Only transmission or transmission-related products and only if specified in the contract

TRANSACTIONS: (Current Requirements)

PODBA (#57) – all products

PODBA^A

PODSL (#58) – all products

No change

Point of Receipt Balancing Authority - PORBA (Field #39)

Staff's proposed change to the definition of PORBA in the Contract section of EQR

Current Definition:

The registered Balancing Authority (formerly called NERC Control Area) where service begins for a transmission or transmission-related jurisdictional sale. The Balancing Authority will be identified with the abbreviation used in OASIS applications. If receipt occurs at a trading hub, the term “Hub” should be used.

Proposed Definition:

The registered Balancing Authority Area where **jurisdictional transmission or transmission-related product is received, if designated in the contract.** The Balancing Authority Area will be identified with the abbreviation used in OASIS applications. If receipt occurs at a trading hub, the term “Hub” should be used.



Point of Delivery Balancing Authority - PODBA (Field #41)

Staff's proposed change to the definition of PODBA in the Contract section of EQR:

Current Definition:

The registered Balancing Authority (formerly called NERC Control Area) where a jurisdictional product is delivered and/or service ends for a transmission or transmission-related jurisdictional **sale**. The Balancing Authority will be identified with the abbreviation used in OASIS applications. If delivery occurs at the interconnection of two control areas, the control area that the product is entering should be used. If delivery occurs at a trading hub, the term "Hub" should be used.

Proposed:

The registered Balancing Authority Area where a jurisdictional product is delivered and/or service ends for a transmission or transmission-related jurisdictional **product**. The Balancing Authority will be identified with the abbreviation used in OASIS applications. If delivery occurs at the interconnection of two control areas, the control area that the product is entering should be used. If delivery occurs at a trading hub, the term "Hub" should be used.



Point of Receipt Specific Location – PORSL (Field #40)

Proposed: Modify Definition of Field #40 in Contract Section.

PORSL Definition:

The specific location at which the **jurisdictional transmission or transmission-related** product is received if designated in the contract. If receipt occurs at a trading hub, a standardized hub name must be used. If more points of receipt are listed in the contract than can fit into the 50 character space, a description of the collection of points may be used. ‘Various,’ alone, is unacceptable unless the contract itself uses that terminology.



Point of Delivery Specific Location – PODSL (Field #42)

Proposed: Modify Definition of Field #42 in Contract Section only.

PODSL Definition:

The specific location at which the **jurisdictional transmission or transmission-related** product is delivered if designated in the contract. If receipt occurs at a trading hub, a standardized hub name must be used.



Discussion: PORBA/PODBA/PORSL/PODSL

CONTRACT SECTION

1. What feedback do you have for our proposed changes to PORBA/PODBA/PORSL/PODSL?
2. What are the challenges filers are having with reporting these fields currently?
3. Do you have improvements to the proposed definitions?
4. Data users: do you use these fields for your analysis? If so, how?

TRANSACTION SECTION

1. What feedback do you have about our proposed changes to PODBA and PODSL?
2. Do you have any comments for the staff on reporting or using PORBA and PORSL?



Break – 15 Minutes; Resuming @

Up Next: Contract Execution Date (Field #21)

- All callers will be muted upon joining the conference and cannot be unmuted by attendees.
- We encourage everyone to participate during the discussions. You'll need to press the hand icon and wait to be unmuted to speak.
- Chat box is turned on; please be respectful.



Contract Execution Date (Field #21)

- Recommendation #1: Modify the definition as follows...

Current Definition:

The date the contract was signed. If the parties signed on different dates, use the most recent date signed.

Proposed Definition:

The contract effective date granted by the Commission. If contract was not filed for Commission approval, then use the date the contract was signed. If the parties signed on different dates, use the most recent date signed.

- Recommendation #2: Modify the field name to “Contract Effective Date”



Discussion: Contract Execution Date (Field #21)

1. What are the challenges filers/data users have with this field?
2. What changes would filers/data users like to see with this field?
3. What considerations should staff be mindful of when making the proposed changes to this field?
4. Do you perceive an interdependence between the Contract Execution Date field and other fields that should be considered when making changes to this field?



Definition: Commencement Date of Contract Terms (Field #22)

- Proposed Definition: The date the terms of the contract reported in fields **17**, 18, 23 and 25 through 44 (as defined in the data dictionary) became effective. **If there are one or more amendments to those terms in one quarter, report the effective date of the most recent amendment.** ~~If those terms became effective on multiple dates (i.e., due to one or more amendments), the date to be reported in this field is the date the most recent amendment became effective.~~ If the contract or the most recent reported amendment does not have an effective date, the date when service began pursuant to the contract or most recent reported amendment may be used. If the terms reported in fields **17**, 18, 23 and 25 through 44 have not been amended since January 1, 2009, the initial date the contract became effective (or absent an effective date the initial date when service began) may be used.



Proposed Validations – Commencement Date of Contract Terms (Field #22)

Staff proposes to add a new validation to enforce an existing requirement:

- Commencement Date of Contract Terms (Field #22) would be required to be filled in when a significant field changes. Otherwise, filing would be rejected.

Proposed change: add new text field to list the “significant fields” that were modified.



Discussion: Commencement Date of Contract Terms (Field #22)

1. Is the proposed definition for this field unclear or confusing?
2. What are the challenges filers/data users have with this field?
3. What other changes would filers/data users like to see with this field to improve clarity?
4. What considerations should staff be mindful of when making the proposed changes to this field?
5. Do you perceive an interdependence between the Commencement Date of Contract Terms field and other fields that should be considered if we make changes to this field?



Contract Termination Date (Field #23)

Current definition: “The date that the contract expires.” Report if specified in the contract. If not, field should be blank.

Proposed recommendation is to modify the definition:

- “The termination date specified in the contract. If termination date is not specified, leave field blank. If actual termination date becomes known, it must be reported.”
- If amendment triggers a change in the termination date, then that amended date serves as the new contract termination date.



Actual Termination Date (Field #24)

- Current definition: “The date the contract actually terminates.”
- This field is required if the contract is terminated, but is often not reported and current system limitations prevent validation.
- Staff proposes to remove this field.
- Contract Termination Date (Field #23) captures whether the contract is still active.



Contract Termination Date (Field #23) (Cont'd)

Proposed modifications:

- Add a new option for “Term Name” = “Evergreen” if there’s no termination date in the contract. There should be a new validation to capture this.
 - Proposed definition for Evergreen: Contracts with unlimited duration
- Add new field for “Novation” = “Yes/No”.
 - This allows us to capture novation from the perspective of the current EQR filer. Once the contract is transferred to another party, the new party would report Novation = “No.”
 - Proposed definition of Novation: The substitution of a new contract for a previous contract with the consent of all parties, usually resulting in the transfer of rights and obligations of an original contracting party to a third party.
- If Contract Termination Date = Blank or “N/A” and Term Name = Evergreen, then validation is passed.
- If Contract Termination Date = Blank or “N/A” and “Novation” = “Yes” then validation is passed.



Contract Termination Date (Field #23) (Cont'd)

Proposed options for reporting Novation:

1. Add new free form text field to describe which party is assuming responsibility for the contract
2. Use the Extension Provision Description (Field #25)



Discussion: Contract Termination Date (Field #23) and Actual Termination Date (Field #24)

1. How often have filers/data users seen a scenario where a contract is not evergreen and doesn't have a contract termination date?
2. How often are contracts novated (i.e. sold or transferred to another party with a different CID)? What types of novation are there? Is there a novation scenario that wouldn't be captured by our proposed changes?
3. Is there an interdependence between the Contract Termination Date and Actual Termination Date and other fields that should be considered when making changes to this field?
4. What are the challenges filers/data users have with these fields?
5. What changes would filers/data users like to see with these fields?
6. What other considerations should be kept in mind when proposing changes to these fields?



Lunch Break – 1 hour; Resuming @

Up Next: Product Name “Other” (Field #31)

- All callers will be muted upon joining the conference and cannot be unmuted by attendees.
- We encourage everyone to participate during the discussions. You'll need to press the hand icon and wait to be unmuted to speak.
- Chat box is turned on; please be respectful.



Product Name – “Other” (Field #31)

Staff proposes to modify the definition of “Other” and to make the rate description mandatory if filers select “Other.”

- Reason: “Other” is a commonly used option and it serves as a catch-all category.
- Current definition from Data Dictionary:
 - “Product name not otherwise included.”
- Staff’s proposed definition:
 - “Product name not otherwise listed in Appendix A of the EQR Data Dictionary. If product name “Other” is used, a Product Name Description (new field) is required, describing the products sold.” (no maximum character limit)
- Proposed: Create a new free form text field “Product Name Description,” and a new validation requiring a description be entered and not left blank if “Other” is selected.



Product Name “Other” (Field #31) (Cont’d)

Staff proposes creating the following new Product Names in Appendix A to reduce the number of “Other” entries.

- Bundled
- REC
- Ramping



New Option: “Bundled” in Product Name (Appendix A)

Proposed:

Filers should have the ability to select “Bundled” in Contracts and Transactions sections.

Proposed Definition for “Bundled”:

“Services provided for bundled transmission, ancillary services, Renewable Energy Certificates, and/or energy. If Bundled is selected, then identify the services being provided in Product Name Description (New Field).”



New Option: “Bundled” in Product Name (Appendix A)

- If filers choose "Bundled" in Product Name (Contracts Section, Field 31 – Appendix A), then they must select at least 2 product names.
 - To do this, we may create a new field where if "Bundled“ is selected, the products should be listed separately. Products must be separated by commas or semicolons.
- New option “Bundled” would also be required in the Transactions Section (pick "Bundled" again from Appendix A)
- Proposed Validations: If Field 31 = "Bundled" then it MUST also be "Bundled" in Field 63. Also, filers must use only Product Names in Appendix A when selecting “Bundled.”



Discussion: “Bundled” in Product Name (Appendix A)

1. Would adding “Bundled” to Appendix A be helpful?
2. Is the proposed definition clear and accurate?
3. What is captured when filers report “Bundled” in the Rate Description field to accompany Field #31, “Other?”



Discussion: Grandfathered Bundled and Requirements Service

- Based on the Data Dictionary, FERC staff considers that “Grandfathered Bundled” captures two or more of the three products: transmission, ancillary services, and energy, under contracts effective prior to Order No. 888. Are filers interpreting the “Grandfathered Bundled” definition the same as staff?
- What are the challenges filers face if reporting more than 1 product at the same time with an “all-in” price (under “Product Name” in Contracts – Field #31 or Transactions – Field #63)?
- What products are captured when filers report “Requirements Service” in Field #31?
- Are there any examples from filers where Requirements Service isn’t “bundled” with more than 1 product?
- Requirements Service: Do filers consider “load following” to be a requirement for this term, as defined in the data dictionary?



Discussion: Renewable Energy Certificates (REC)

1. Are filers able to separate out the “REC” portion of the price from the Energy portion of a sale?
2. What are your thoughts on staff’s proposal to add “REC” to Appendix A?



Break – 10 minutes; Resuming @

Up Next: Product Name “Other” – “Ramping” (Field #31)

- All callers will be muted upon joining the conference and cannot be unmuted by attendees.
- We encourage everyone to participate during the discussions. You'll need to press the hand icon and wait to be unmuted to speak.
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Discussion: Ramping

Ramping is often reported by filers in “Other” category.

1. What are your thoughts on staff’s proposal to add “Ramping” as a new Product Name in Appendix A?
2. Should other ramping-related products be added to Appendix A?



Any additional products?

1. What is difficult for filers to report in Appendix A?
2. For filers reporting “Other” and leaving the Rate Description blank, what products are you including in this field?
3. Are there any additional products that should be added to the Product Name list in Appendix A?



Closing Remarks

- Summary matrix
- Next steps: 2nd Technical Conference to be held in late spring/early summer
- eSubscribe to Docket No. AD21-8-000 for updates and notices
- Formal comments may be submitted in Docket No. AD21-8-000
- Questions can be emailed to EQR@ferc.gov; Subject line: “EQR Tech Conference”

