

**UNITED STATES OF AMERICA  
BEFORE THE  
FEDERAL ENERGY REGULATORY COMMISSION**

**Commission Information Collection )  
Activities (FERC-922); Comment Request )**

**Docket No. AD14-15-000**

**COMMENTS OF THE  
ISO/RTO COUNCIL**

In accordance with the Federal Energy Regulatory Commission's ("Commission's") continued efforts to collect performance metric information from Independent System Operators ("ISOs"), Regional Transmission Organizations ("RTOs"), and public utilities in regions outside ISOs and RTOs, the ISO/RTO Council ("IRC")<sup>1</sup> respectfully submits these comments. The IRC is generally supportive of the 30 common metrics developed by Commission Staff for ISOs/RTOs and public utilities outside ISO and RTO regions.

The Commission has invited comments on the following questions:

- (1) whether the collection of information is necessary for the proper performance of the functions of the Commission, including whether the information will have practical utility;
- (2) the accuracy of the agency's estimate of the burden and cost of the collection of information, including the validity of the methodology and assumptions used;

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<sup>1</sup> The IRC is comprised of the Alberta Electric System Operator ("AESO"), the California Independent System Operator Corporation ("CAISO"), the Electric Reliability Council of Texas ("ERCOT"), the Independent Electricity System Operator of Ontario, Inc., ("IESO"), ISO New England, Inc. ("ISO-NE"), Midcontinent Independent System Operator, Inc., ("MISO"), New York Independent System Operator, Inc. ("NYISO"), PJM Interconnection, L.L.C. ("PJM"), and Southwest Power Pool, Inc. ("SPP"). The AESO and IESO are not subject to the Commission's jurisdiction, and are not joining in these comments. ERCOT is not joining in these comments for jurisdictional reasons. The IRC's mission is to work collaboratively to develop effective processes, tools, and standard methods for improving the competitive electricity markets across North America.

- (3) ways to enhance the quality, utility and clarity of the information collection; and
- (4) ways to minimize the burden of the collection of information on those who are to respond, including the use of automated collection techniques or other forms of information technology.

## **I. BACKGROUND**

In early 2009, in response to a prior U.S. Government Accountability Office (“GAO”) report to Congress directing the Commission to establish comparative metrics to identify the value of ISO/RTO markets versus non-ISO/RTO regions, Commission Staff engaged the members of the IRC to work together to develop such metrics. Following discussions with Commission Staff, the jurisdictional members of the IRC agreed to a set of 57 metrics and filed an initial metrics report with the Commission on December 6, 2010 for the time period 2005 through 2009. In April 2011, the Commission delivered a report to Congress summarizing the ISO/RTO metrics and indicating the Commission’s intent to expand this effort to public utilities in regions outside ISO/RTO regions in the future. At Commission Staff’s request, the IRC submitted an updated report on August 31, 2011 for the 2006 through 2010 time period.

On August 26, 2014, the Commission issued a Comment Request concurrently with the release of the Commission Staff Report on common metrics (“Metrics Report”).<sup>2</sup> The Metrics Report provided a summary of the information provided by the IRC jurisdictional members in December, 2010 as updated in August, 2011. The Metrics Report also included summaries of information provided by a diverse group of five utilities located in regions outside of ISO/RTO regions. In the Metrics Report, Commission Staff identified 30 metrics as applicable to both ISOs/RTOs and public utilities outside of ISO/RTO regions. These 30 metrics were designated

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<sup>2</sup> Both the Comment Request and Metrics Report were issued in the above referenced docket number.

as “Common Metrics.” Commission Staff also identified 23 Other Metrics for ISO/RTO regions and 9 for public utilities outside ISO/RTO regions.

The Metrics Report indicated the intent to undertake further data collection to account for the most recent information available, but did not suggest that any additional metrics were necessary for ISO/RTO regions or public utilities outside ISO/RTO regions. The Commission’s “Comment Request” cited the issuance of the Metrics Report and indicated that Commission Staff intends to collect information on the Common Metrics for the period 2008 through 2012 initially and for the 2010 through 2014 period “at a later time.” The Common Metrics data collection process would then be repeated every two years.

## **II. COMMENTS**

The IRC supports reporting on the 30 Common Metrics identified by Commission Staff in the Metrics Report and reiterated by the Commission in its Comment Request. The 30 Common Metrics were included in the original set of metrics identified by the Commission and the IRC to measure the performance of ISOs, RTOs, and utilities in regions outside ISO and RTO markets with respect to reliability, operations, and market performance. The IRC also does not oppose the collection and reporting on those metrics identified by the Commission as “Other Metrics” on a periodic basis.

The IRC recommends that the Commission continue to accept a coordinated response from the jurisdictional IRC members on a periodic basis. The IRC also recommends that the Commission not prescribe a specific format for the report. The IRC proposes to submit a coordinated response from the jurisdictional IRC members in the same format that has been used previously, *i.e.*, a single report for all the regions with separate sections to allow each ISO/RTO to highlight factors of importance to its respective region.

The IRC members and Commission Staff worked extensively over a two year period to agree on the metrics, the reporting format, and the reporting time frame. The IRC request to continue submitting reports on a periodic basis is supported by the statement in the Comment Request that “Commission Staff expects that respondents will submit performance information every two years.” The previously developed structure and timing worked well for the jurisdictional members of the IRC, and we believe Commission Staff. The IRC recommends that this approach continue in future efforts.

The IRC requests that the Commission accept the next IRC report from the jurisdictional IRC members as an update to prior submittals. As noted, these prior submittals addressed ISO and RTO performance data for the periods of 2005 through 2009 and 2006 through 2010. Given that the jurisdictional IRC members have previously submitted an updated report for the 2006-2010 period, a further report from the jurisdictional ISOs/RTOs for the 2008 through 2010 period is not needed and should not be required. The IRC proposes, instead, to provide data for the 2010-2014 period. The IRC proposes to submit such an update report in August, 2015.

Given the timing and nature of the IRC’s proposed single report, the jurisdictional IRC members would only submit one report during the three-year OMB approval period discussed in the Comment Request. The IRC requests confirmation that this approach and timing are acceptable to the Commission.

### III. CONCLUSION

The IRC respectfully asks that the Commission consider the suggestions and grant the requests included in these comments.

Respectfully submitted,

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