EEI Views on the EIA Electric Survey Forms

Presentation by Henri Bartholomot, EEI Director, Regulatory Legal Issues

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• Edison Electric Institute (EEI) is the association of U.S. shareholder-owned electric utilities

• Our members serve about 67 percent of end-use electricity customers nationwide and generate almost 60 percent of the electricity generated in the U.S.
Several other types of entities also provide electricity in the U.S.

- Municipally owned electric utilities
- Rural electric cooperatives
- Co-generation industrial facilities
- Federal power marketing administrations
Electric Companies Use A Diverse Mix Of Fuels To Generate Electricity

- **Coal**: 49.0%
- **Natural Gas**: 19.9%
- **Nuclear**: 19.4%
- **Fuel Oil**: 6.9%
- **Non-Hydro Renewables and Other**: 3.1%

**Note**: Sum of components do not add to 100.0% due to independent rounding.

"Non-Hydro Renewables and Other" includes generation from solar, wind, geothermal, biomass (agricultural waste, municipal solid waste, landfill gas recovery, wood, pitch), hydrogen, batteries, chemicals, non-wood waste, purchased steam, sulfur and miscellaneous technologies.


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Electric Companies Rely on a Complex Array of Generation, Transmission, and Distribution Facilities to Serve Their Customers
• EEI members operate in competitive energy and financial markets
  - Wholesale electricity markets
    • RTOs and ISOs
    • Bilateral contracts
    • Hedging
  - Retail markets competitive in some areas
  - Stock and bond markets
EEI members are subject to extensive federal and state regulation

- Siting and operating facilities
  - Clean air, water, and solid waste permits
  - Land use authorizations, wetlands permits
  - Endangered species, historic preservation

- Energy and financial markets
  - Competitive bids for generation
  - Wholesale and retail rate approval
  - Financial disclosures to investors
Furthermore, EEI members collect and report large volumes of information to a variety of federal and state agencies:

- Energy Information Administration (EIA)
- Federal Energy Regulatory Commission (FERC)
- Environmental Protection Agency (EPA)
- Securities and Exchange Commission (SEC)
- State utility commissions
# EIA Electric Power Survey Forms Filed by EEI Members

<table>
<thead>
<tr>
<th>Form</th>
<th>Description</th>
<th>Estimated Reporting Burden</th>
<th>Confidential Data Elements</th>
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| EIA-411 [Annual] Coordinated Bulk Power Supply Program Report | • Peak demand and energy for the preceding year and 5 future years  
• Existing and planned generating capacity  
• Scheduled capacity purchases and sales  
• Bulk electric transmission system maps and power flow cases  
• Proposed transmission lines | 1,527 hours per regional response | • Bulk electric transmission maps  
• Bulk transmission facility power flow cases |
| OE-417 [Per Incident] Electric Emergency Incident and Disturbance Report | • Electric emergency incidents and disturbances  
• For DOE’s use in fulfilling its overall national security responsibilities | 5 minutes per initial response, 2 hours per explanation | • Utility contact information  
• Narrative description of incident |
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<tbody>
<tr>
<td>EIA-423 Monthly Cost and Quality of Fuels for Electric Plants Report</td>
<td>• Fuel quantity &lt;br&gt;• Fuel quality – Btu, sulfur, ash content &lt;br&gt;• Fuel purchase type, cost, contract expiration date, tolling agreements &lt;br&gt;• Fossil fuel supplier</td>
<td>1.3 hours per response</td>
<td>• Delivered fuel cost – plant purchase price</td>
</tr>
<tr>
<td>EIA-767 [Annual] Steam Electric Plant Operation and Design Report</td>
<td>• Plant design parameters and annual operations data for  &lt;br&gt;  - boilers  &lt;br&gt;  - generators  &lt;br&gt;  - cooling systems  &lt;br&gt;  - stacks  &lt;br&gt;  - flues  &lt;br&gt;  - flue gas particulate collectors  &lt;br&gt;  - flue gas desulfurization units</td>
<td>66.3 hours for plants &gt; 100 MW, 3.4 hours for plants &gt; 10 MW &lt; 100 MW</td>
<td>• Plant latitude and longitude</td>
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| EIA-826 Monthly Electric Sales and Revenue with State Distributions Report | • Revenue associated with the sale of electricity  
• Sales (MWh delivered)  
• Number of customers by end-use sector and state  
• Sample survey of 450 utilities and non-utilities selling to end use customers | 1.2 hours per response | • Energy only sales without delivery service  
• Bundled service by retail energy providers  
• Power marketers that provide bundled service |
| EIA-860 Annual Electric Generator Report | • Ownership and NAICS designation  
• Energy sources and prime mover  
• Nameplate capacity  
• Fuel switching capability  
• Operational and regulatory status  
• On-line dates and actual or planned retirement dates | 10.2 hours per electric utility, 5.1 hours per non-utility | • Plant latitude and longitude  
• Tested heat rate |
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| EIA-861 Annual Electric Power Industry Report | • Revenues associated with the sale of electricity  
• MWh sales delivered  
• Number of customers  
• Energy sources and disposition  
• Customer service programs  
• Electric operating revenue  
• DSM information  
• Distribution system information | 8.1 hours per response | None |
| EIA-906 [Monthly for Large Plants/ Annual for Others] Power Plant Report | • Electric power generation  
• Fuel consumption and heat content  
• Fossil fuel stocks | 1.3 hours monthly, 1.9 hours annually | • Stocks at end of reporting period |
EEI encourages all agencies to:
- Minimize the reporting burden
- Apply reporting provisions equitably across ownership type and energy sector
- Treat key commercial and security related information as confidential
• **Burden issues**
  
  - Reporting involves significant costs
    
      • Collecting, verifying, and analyzing data take substantial staff time, funds, and other resources
    
      • Multiple reports are often due at the same time
  
  - Paperwork Reduction Act aims to reduce these costs
    
      • Requires agencies to minimize the reporting burden and to avoid duplication
      
      • Requires triennial review by each agency and the Office of Management and Budget (OMB)
• **Burden recommendations**
  
  – Collect only information each agency truly needs
  
  – Collect the information only in the detail needed
  
  – Avoid duplication
  
  – Allow information to be filed in original or .pdf formats without re-entry of data
  
  – Provide reasonable reporting deadlines
• Equitability issues
  - Requiring only shareholder-owned electric companies and not others to report information can harm companies and undermine fair competition by
    • imposing higher costs on those companies
    • giving their competitors strategic advantage
• Equitability recommendations
  - Treat shareholder- and non-shareholder owned entities comparably
  - Treat energy sectors comparably
  - Collect less rather than more data when possible in search for common ground
• Confidentiality issues
  - Disclosing commercially sensitive information such as cost and operating data can harm companies
    • FOIA “b(4)” exemption applies
    • CIPSEA can apply
  - Disclosing information such as facility location, design, importance, and safeguards can increase security risks
    • Department of Homeland Security umbrella
    • DOE confidentiality efforts
    • FERC confidentiality efforts
• Confidentiality recommendations
  - Aggregate commercially sensitive information; do not disclose it at a plant or company level
  - Avoid disclosing security-related information such as facility location, design, importance, and safeguards
  - Ensure that information remains confidential when shared with others
  • Maintain protection across agencies
  • Disclose only to those who need the information
  • Use non-disclosure agreements
• Initial suggestions for EIA Electricity 2008 triennial review
  – Streamline the electric survey forms
    • Eliminate unnecessary detail
    • Consolidate EIA forms if that makes sense
  – Provide reasonable reporting deadlines
  – Protect sensitive information
    • Do not release latitude and longitude or other security sensitive information
    • Consolidate information about competitive operations and costs to avoid disclosing at a plant or company level