

60 Day Comment for Form EIA-111

From: Avalos, Sal - Marketing [mailto:salvador.avalos@pse.com]

Sent: Wednesday, December 06, 2017 1:30 PM

To: Electricity2018 <Electricity2018@eia.gov>

Subject: Electricity Form Changes Proposed for 2018 - Comments are Due December 19, 2017

Puget Sound Energy appreciates the opportunity to comment on the FRN Electricity Form Changes Proposed for 2018.

Although the EIA is proposing no changes to its electricity data collection for 2018 for Form EIA-111, Puget Sound Energy respectfully requests that the EIA consider implementing in 2019 or after a business to business process that would allow Information Technology (IT) to securely interface directly with the EIA for the submittal of Form EIA-111.

This would reduce errors which could result from manual entry and reduce the effort spent manually entering data via the website.

Best Regards,

Sal Avalos

Consulting Energy Trader

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EIA Response

Dear Mr. Avalos,

Thank you for submitting comments on behalf of Puget Sound Energy. Our responses are below:

EIA agrees that a business to business process to interface directly for the submittal of Form EIA-111 would reduce errors and effort. EIA also believes that in general the functionality and “user experience” of the system should be improved. EIA has started a multi-year program to improve our data collection systems. This program will eventually include the electricity and solar renewable surveys, but the schedule for this work is not set.

We greatly appreciate your support for this survey and providing us with very valuable feedback on ways to improve it. If you have any questions about this response please let us know.

60 Day Comment for Form EIA-111

From: dave.l.smith@shell.com [mailto:dave.l.smith@shell.com]

Sent: Tuesday, December 19, 2017 10:40 AM

To: Electricity2018 <Electricity2018@eia.gov>

Subject: 2018 Clearance of Form EIA-111

Shell's comments are as follows"

- Data Upload functionality – it would be handy to have the ability to upload the data from a local file directly to the EIA system instead of manually entering the data. This would reduce potential errors and save time.
- Data includes Presidential Permits – Power transactions are generally not done by a specific facility or group of facilities when they cross borders. They are done across interfaces. As a trading entity, it is not realistic for us to say which facility power flowed across. Could the requirement of supplying a Presidential Permit be removed?
- Changing Password – changing one's password after it expires is easy. However, changing it before had requires an email. Couldn't this process be made simpler where the user can change their password ad hoc?

David L. Smith

Regulatory Reporting Specialist
Shell Energy North America
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EIA Response

Dear Mr. Smith,

Thank you for submitting comments on behalf of Shell Energy North America. Our responses are below:

EIA agrees that Data Upload capability should be made generally available and the process for Changing Passwords could be made much simpler. EIA also believes that in general the functionality and "user experience" of the system should be improved. EIA has started a multi-year program to improve our data collection systems. This program will eventually include the electricity and solar renewable surveys, but the schedule for this work is not set.

The Form EIA-111 requires the reporting of transfer facilities in order to allow DOE's Office of Electricity to verify that electricity is only exported over transmission facilities as specified in the exporter's Export Authorization order. Therefore, EIA will not remove the requirement to report the transfer facility.

The scheduling of international transfers between a U.S. and a foreign border balancing authority is over all the transmission facilities directly connecting the two balancing authorities collectively. If the facilities involved are covered under a single Presidential Permit, only the Presidential Permit needs to be reported using the picklist. If more than one presidential permit is involved in the transfer, appropriate picklist choices are available. Our understanding is that until recently Shell Energy was not aware that a picklist choice was available for their transfer across the New York - Ontario interface.

We greatly appreciate your support for this survey and providing us with very valuable feedback on ways to improve it. If you have any questions about this response please let us know.