

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Performance Metrics for ISOs, RTOs,
and Regions Outside ISOs and RTOs

Docket No. AD19-16-000

**COMMENTS OF THE
TRANSMISSION ACCESS POLICY STUDY GROUP**

The Transmission Access Policy Study Group (“TAPS”) appreciates the opportunity to comment on the Federal Energy Regulatory Commission’s (the “Commission”) January 24, 2020 *Notice of Information Collection and Request for Comments regarding Performance Metrics for ISOs, RTOs, and Regions Outside ISOs and RTOs*,¹ which addresses comments from TAPS and others regarding the Commission’s July 3, 2019 Notice² and proposed information collection in the above-captioned docket.

TAPS applauds the Commission’s ongoing effort to develop standardized metrics to track the performance of the utilities it regulates. And it appreciates the decision in the January 24 Notice to adopt certain changes to Metric No. 16, Congestion Management, that TAPS had proposed in its September 19, 2019 Comments³ in this proceeding. Although not all of TAPS’ suggested changes were incorporated, we believe Metric No. 16, as updated and clarified by the January 24 Notice, should provide useful

¹ 85 Fed. Reg. 5418 (Jan. 30, 2020), eLibrary No. 20200124-3070 (“January 24 Notice”).

² *Notice of Information Collection and Request for Comments*, 85 Fed. Reg. 32,908 (July 10, 2019), eLibrary No. 20190703-3065 (“July 3 Notice”).

³ TAPS September 19, 2019 Comments (Sept. 19, 2019), eLibrary No. 20190909-5091.

information on congestion that can be compared both between RTOs and over time. This is an important step forward.

TAPS also appreciates Commission staff's commitment to continue to research and discuss additional metrics of interest to commenters, and to consider adding additional metrics to the next iteration of this information collection.⁴ Additions or refinements to the metrics contained in the January 24 Notice may well be appropriate in the future, after the Commission, RTOs, and stakeholders have had an opportunity to review and assess the data submitted in response to this proposed information collection. TAPS looks forward to continuing to engage and assist in the metrics development effort.

Respectfully submitted,

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⁴ See January 24 Notice at 16-18.