

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Data Collection for Analytics and
Surveillance and Market-Based Rate
Purposes

Docket No. RM16-17-000

**REQUEST FOR LEAVE TO SUBMIT LIMITED FOLLOW-UP COMMENTS
TO THE FEBRUARY 27, 2020 TECHNICAL WORKSHOP AND
COMMENTS OF TRANSMISSION ACCESS POLICY STUDY GROUP
REQUESTING AN ADDITIONAL TECHNICAL WORKSHOP**

On February 27, 2020, Federal Energy Regulatory Commission (“Commission”) Staff hosted a Technical Workshop on the Commission’s implementation of the relational database for analytics and surveillance and market-based rate (“MBR”) purposes established in Order Nos. 860 and 860-A.¹ The Transmission Access Policy Study Group (“TAPS”), which previously submitted comments in this proceeding,² greatly appreciates Staff’s openness in explaining the design and development of this new MBR reporting regime. TAPS requests leave to submit limited follow-up comments to request that an additional Technical Workshop be convened before the relational database becomes effective, so that the public can have confidence that the database will be implemented in a manner that supports the ability of the Commission to fulfill its statutory obligations.³

TAPS has supported the transition to a relational database system, which should make MBR-related data more accessible and useable for the Commission and the public.

¹ *Data Collection for Analytics and Surveillance and Market-Based Rate Purposes*, Order No. 860, 168 FERC ¶ 61,039 (2019), *on reh’g and clarification*, Order No. 860-A, 170 FERC ¶ 61,129 (2020).

² TAPS, Request for Clarification, or, in the Alternative, Rehearing and Request for Rehearing (Aug. 19, 2019), eLibrary No. 20190819-5133; TAPS, Comments (Sept. 19, 2016), eLibrary No. 20160919-5115.

³ TAPS’ request could also be satisfied by a “virtual” Technical Workshop, as appropriate.

To achieve these improvements, however, the database must be properly designed and receive accurate information from MBR filers. TAPS requests that Commission Staff continue its transparency in implementing this new MBR reporting regime and hold an additional Technical Workshop on how it is addressing the unresolved concerns discussed at the February 27, 2020 Technical Workshop, as well as other implementation issues as may arise.

In particular, Staff highlighted at the February 27, 2020 Technical Workshop the concern that MBR filers may create duplicative identification numbers for the same affiliated entity. Because the database depends upon linking MBR sellers through their common ultimate upstream affiliate(s), this problem threatens the database's ability to connect related entities and provide an accurate and comprehensive picture of MBR sellers' market power. This and other known issues must be resolved before the relational database goes into effect so that the Commission and public can have confidence that the database will function as intended, and thereby provide a sound foundation that the Commission can use in fulfilling its Federal Power Act obligations.

Given the central nature of this multiple identifier issue, as well as the potential that other implementation issues may prevent the relational database from functioning as intended on the date it goes into effect, TAPS urges that another Technical Workshop be held once Commission Staff has made substantial progress on developing a plan to resolve the multiple identifier issue and other outstanding issues. Another pre-implementation Technical Workshop will provide an important opportunity to explain and explore the solution(s), so that the public can have confidence in the accuracy of the

relational database and the Commission's ability to fulfill its statutory obligations to evaluate whether MBR rates are just and reasonable.

Respectfully submitted,

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April 3, 2020

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused the foregoing document to be served upon each person designated on the official service list compiled by the Secretary in this proceeding.

Dated on this 3rd day of April, 2020.

/s/ Cynthia S. Bogorad

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