Appendix D

EIA Letter to OMB
Documenting August 18, 2010 Meeting and
Giving EIA's Recommendations on the Comments Received
In Response to *Federal Register* Notice
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Department of Energy
Washington, DC 20585

AUG 26 2010

Ms. Christine Kymn
Desk Officer for DOE
Office of Information and Regulatory Affairs
Office of Management and Budget
725 17th Street, NW
Washington, DC 20503

RE: Clearance of EIA's 2011 Electric Power Survey Forms

Dear Ms. Kymn:

This letter documents our August 18, 2010 meeting. In that meeting we reviewed with OMB the comments it received on the 2011 clearance of the U.S. Energy Information Administration's (EIA) electric power survey forms. The letter covers the same ground as our meeting, except that it provides more detail and includes EIA's response to the comments from CenterPoint Energy (which EIA did not receive until August 23).

The letter is divided into two parts. The first part provides EIA's response to the comments received by OMB. The second part discusses other changes EIA would like to make to the surveys.

EIA's Recommendations on the Comments Received by OMB

Five sets of comments were received by OMB: From the Edison Electric Institute (EEI), the Northeast Energy Efficiency Partnership (NEEP), the Consortium for Energy Efficiency (CEE), CenterPoint Energy, and the U.S. Geological Survey (USGS). Each set of comments is addressed below except for the NEEP submission, which was simply a statement supporting the CEE comments.

In addition to responding to comments, we also discuss the impact of EIA's recommended responses on respondent burden. This discussion is framed in terms of any change from the burden estimate specified in our original submission to OMB.

Comments from EEI and EIA Response

Several of the comments from EEI and other parties relate to the EIA-411 survey. Note that EIA does not directly collect the EIA-411 data. The information is collected from its members by the North American Electric Reliability Corp. (NERC), the official FERC-designated "electric reliability organization." NERC reviews the data and then completes the EIA-411 survey on behalf of its members. The data submitted on the EIA-411 by NERC also includes information from its new Transmission Availability Data System (TADS), which collects data on transmission system outages.

Comment: *OMB should delay lowering the EIA-411 reporting thresholds for transmission facilities and require additional justification for any change.*

Current EIA Proposal: This comment relates to collection of transmission system maps (Schedule 5 of the EIA-411 survey), information on existing and planned transmission lines (Schedule 6), data on transmission line outages (Schedule 7), and power flow cases (Schedule 8). The current reporting threshold is all transmission facilities with a capacity of 230 kilovolts (kV) or greater. The new threshold would be 100 kV and greater.

Under EIA's original proposal to OMB, the new reporting thresholds for Schedules 5, 6, and 8 would be effective in 2011. In the case of Schedule 7, the change in the reporting threshold would be delayed until 2014 for alternating current (AC) facilities (which constitute the vast majority of the transmission system) to give respondents time to update their data collection and reporting systems. The change would be effective in 2011 for the small direct current (DC) component of the transmission system.

EIA Response: EIA recommends no change to its current proposal, with the one exception noted below. The information in Schedules 5 through 8 is needed to characterize the national transmission system and measure its reliability. Lowering the threshold to 100 kV as proposed by EIA will bring the data collection into line with current regulatory trends and the actual operational characteristics of the transmission system. Many key transmission facilities have capacities lower than the current threshold of 230 kV. Indicative of this, on March 18, 2010, FERC issued a Notice of Proposed Rulemaking, proposing to include all electric transmission facilities 100kV and above in the definition of the "bulk electric system" over which FERC exercises reliability oversight. Also note that utilities filing the annual Form 1 report with FERC routinely identify as "necessary for wholesale transmission service" facilities with capacities below 230 kV and in some cases as low as 69 kV.

Transmission maps, power flow cases, and data on existing and planned transmission system projects are already collected by NERC for facilities below 200 kV. No additional burden is imposed by formalizing the submission of that data to EIA. In fact, an earlier commenter noted that since NERC already collects transmission data at the 100 kV level, this should not pose any extra burden to Form EIA-411 filers.

For Schedule 7 (outage data), EIA recognizes that including transmission lines from 100 to 230 kV will create additional burden on respondents because this information is not currently included in TADS. However, many transmission facilities have capacities in that range and EIA cannot effectively characterize the full bulk power system without gathering data on those facilities. As already proposed to OMB, EIA is willing to delay mandatory Schedule 7 data collection for AC facilities from 100 to 230 kV until the next forms clearance cycle. This would allow NERC time to adjust its TADS data collection to include facilities below 230 kV.

Additionally, and as a change to its original proposal to OMB, EIA will revisit the 100 kV threshold with stakeholders and OMB prior to 2014 if FERC decides not to adopt the 100 kV threshold for its definition of the bulk power system. For further discussion of this point, see EIA's response to the comments of CenterPoint Energy (below).

Comment: *OMB should not approve collecting transmission outage information on the EIA-411 (Schedule 7) which is duplicative of information collection on the OE-417 survey.*

Current EIA Proposal: The OE-417 survey, the "Electric Emergency Incident and Disturbance Report," collects data on major outages and other power system disturbances. The report is made to DOE's Office of Electricity Delivery and Energy Reliability (OE) within 1 to 6 hours of occurrence, depending on the type of incident, with a final report due to OE within 48 hours. (OE routinely forwards data received on the OE-417 to EIA.) In contrast to this emergency information, Schedule 7 of the EIA-411 would collect information on both routine and emergency situations, using a different set of criteria (consistent with NERC's TADS system) than the OE-417.

EIA Response: EIA recommends no change to its current proposal. The Form OE-417 serves a very different purpose, and covers a very different dataset, than Schedule 7 of the Form EIA-411:

- The OE-417 survey functions as a real-time notification to the Federal Government of electric emergencies, incidents, and disturbances, including ongoing updates until the incident has been resolved. Additionally, Form OE-417 is a regulatory requirement that obligates all respondents to provide information to DOE on an individually identifiable basis.
- In contrast, the Form EIA-411 is a statistical report that collects topically similar information, but at a different level of detail, and which covers the electric power industry at the regional and subregional levels. NERC completes Schedule 7 primarily by using its TADS database on transmission outages.

EEI's proposal would, in effect, require NERC to remove the OE-417 incident data from the standard TADS database before NERC completes Schedule 7. This would increase the respondent burden on NERC. Moreover, to create a complete national picture, EIA would then have to reintroduce the OE-417 data into the TADS data provided by NERC; this would be cumbersome and inefficient.

***Comment**: OMB should not approve duplicative reporting of green pricing and net metering data in the EIA-826 and EIA-861 surveys.*

Current EIA Proposal: The EIA-826 survey collects data on a electric power sales, revenues, and related topics from a sample of electric utilities and other market entities. The EIA-861 collects annual data from the firms in the sample plus the rest of the universe of respondents. Both surveys, as proposed, will collect information on green pricing and net metering activities.

EIA Response: EIA recognizes EEI's concern with duplicative reporting and recommends the following revised approach.

EIA has historically found that when EIA-826 monthly respondents re-submit sales and revenue data on the EIA-861 annual collection there are often significant revisions. Because the collection of monthly green pricing and net metering data on the EIA-826 will be new for 2011, EIA does not know whether or not similar revisions will occur with this data. Accordingly, when the revised surveys are launched in 2011, EIA proposes to collect the green pricing and net metering data on both surveys. If there are no significant differences between the green pricing and net metering data collected on the monthly and annual surveys EIA will cease the annual collection of this information for the monthly respondents. (We will not be able to complete this comparison until mid-2012 due to differences in the reporting cycles for the EIA-826 and

EIA-861 surveys.) Otherwise EIA will continue to collect these data on the monthly and annual forms.

***Comment**: OMB should not approve EIA's proposal to collect energy displaced by net metered customers on the EIA-826 and EIA-861 surveys.*

Current EIA Proposal: The data item at issue essentially asks the responding utility to provide the amount of electricity generated by the net metered facility (for example, solar panels on a residence).

EIA Response: EIA recognizes EEI's concern with the feasibility of respondents providing this data and recommends the following revised approach.

EEI's comment is well-founded because many net metered facilities, especially small ones, do not have the dual metering or advanced metering infrastructure (AMI, or "smart meters") needed to collect the generation from the facility. EIA's revised proposal is:

1. Rather than requesting displaced energy, the forms will be changed to request the amount of electricity sold by the net metered facility back to the utility *when such information is available* (i.e., the respondents who do not have these data will not be asked to develop new estimates to respond to this question). We believe that utilities are more likely to have this information than displaced energy.
2. This and the other net metered data will be requested only for facilities of 2 megawatt (MW) capacity and less, in order to focus the questions on small-scale self-generation. Other EIA surveys collect data on large-scale self-generation, such as industrial combined heat and power (CHP) plants.
3. We intend to review the categories of generation technologies used to collect net-metering data. For example, the currently proposed "CHP/Cogen" and "Biomass" categories overlap and need to be restated. We may also want to add "Wind" as a technology that is used fairly often in net metering applications.

The areas of net metering, green pricing, and other aspects of distributed and renewable generation are rapidly changing. EIA intends to conduct a thorough review of these topics and will propose changes as appropriate for the surveys for the next survey clearance cycle.

Impact on Respondent Burden of EIA's Recommended Responses to EEI's Comments: We believe that our recommended responses will cause no measurable increase in respondent burden and may in fact reduce burden. The change from collecting displaced energy to collecting energy sold by net metered systems (only when the information is available) may reduce respondent burden. If we are able to cease collecting net metering and green pricing information on the monthly forms the result will certainly be a reduction in burden from our original estimate for this clearance.

Comments from CEE and EIA Response

CEE provides a set of general comments ("Comment 1") which cover in brief the same ground as its more detailed comments. The following discussion addresses the detailed comments. The CEE comments are all on the EIA-861 survey, primarily Schedule 6 ("Demand-Side Management Information") and its instructions.

***CEE Comment 2**: EIA should define the term "DSM Program Manager" and use the term consistently.*

Current EIA Proposal: "DSM Program Manager" is a new term used for the first time in the 2011 survey. The term refers to non-utility providers of DSM programs.

EIA Response: EIA agrees with the comment and will modify the instructions accordingly.

***CEE Comment 3**: The collection of commercial and industrial information on the actual effects of DSM programs (Schedule 6A) should be merged into a single category. This is because "program administrators commonly have difficulty separating out the costs and savings of commercial and industrial programs."*

Current EIA Proposal: The current proposal continues the long-standing practice of collecting these data on the EIA-861 by utility customer class: Residential, Commercial, Industrial, and Transportation.

EIA Response: EIA recommends no change to its current proposal. DSM data have been collected and reported in these categories for many years. The categories are standard for use within the utility industry and by State utility regulators, and have been adopted by (not created by) EIA. Although there is admittedly some gray area between large commercial and small industrial establishments, these sectors primarily consist of establishments which can be clearly differentiated (e.g., a shopping center is clearly commercial and a refinery is industrial). Merging the industrial and commercial categories would unnecessarily eliminate data that policy makers and analysts need to be able to distinguish how DSM programs impact each customer class.

***CEE Comment 4**: Rename the header for Schedule 6A from "Actual Effects" to "Energy Savings." CEE believes the term "actual effects" is vague and misleading in respect to the reliability of the reported data.*

EIA Response: EIA recommends no change to its current proposal. The current heading has been used for many years without causing any apparent problems with data collection. If anything, changing the heading may create unnecessary ambiguity for some respondents.

***CEE Comments 5 and 6**:*

- *"Incremental effects" and "annual effects" should be defined as net savings and a definition of "net savings" added to the instructions. (CEE "Comment 5")*
- *EIA should add a question specifying whether the savings reported are net or gross, and a definition of gross savings should be added to the instructions. (CEE "Comment 6")*

Current EIA Proposal: The instructions (page 10) as proposed, and used in past surveys, provide detailed guidance on how respondents should answer the questions. Net effects are explicitly referenced in the instructions as written.

EIA Response: We believe the current instructions already adequately describe the information requested, and by accepting another CEE recommendation (see "Comment 8") the instructions will be improved. Moreover, the definitions suggested by CEE could add ambiguity to the

instructions rather than clarity; for example, the CEE-proposed definition of net savings includes terms (such as "the total change in load") which could be interpreted as an element of gross savings.

CEE Comment 7: *Add a question to the survey that will specify whether the data provided on energy savings are based on a forecast or on the report of one or more evaluators; delete the part of question 7B that asks for the name of independent evaluators.*

Current EIA Proposal: The survey as proposed asks whether savings estimates were verified by an independent evaluator, but does not directly address the issue of how the savings were estimated (Schedule 6A, question 7b). As noted above, when an independent evaluation has been performed the survey requests the name of the evaluator.

EIA Response: We agree that the survey should better differentiate the type of savings estimates provided. We will add an appropriate question, although the format may differ from that specifically suggested by CEE. (We believe the terminology suggested by CEE, referring to "ex-ante" and "ex-post" evaluations, may be unclear to some respondents.) We also agree that the part of question 7b requesting the name of evaluation company can be deleted.

CEE Comment 8: *The description of "Incremental Effects" in the instructions (page 10) contains a typographical error and can otherwise be simplified.*

EIA Response: We will adopt CEE's alternative language, which improves the readability of the instructions. The new language also fixes the typographical error.

CEE Comment 9*: Respondents should be instructed to use annualized incremental effects when calculating "Annual Effects."*

Current EIA Proposal: Schedule 6A collects data on the "Incremental Effects" and "Annual Effects" of DSM programs. "Incremental Effects" are the effects caused by new programs or new participants in existing programs. These effects are to be annualized; for example, if a program began in July, the savings should be annualized as though the program began on January 1 and continued for the entire year. The incremental effects are therefore *an estimate of how programs would have performed if they existed and had a full complement of participants for the full calendar year.*

The "Annual Effects" are to be computed without an annualization of part-year programs and participants. This data item is intended to *represent the actual impact of programs during a calendar year.*

EIA Response: EIA recommends no change to its current proposal. The CEE proposal would direct respondents to include the hypothetical annualized incremental effects of DSM in the "Annual Effects" calculation. This change would convert the Annual Effects value from an estimate of the *actual impact from DSM programs in a calendar year to an amalgam of actual and hypothetical values*. This is not the intent of the question, and would deprive policy makers and analysts of estimates of the real (rather than hypothetical) impact of DSM programs.

CEE Comment 10: *Respondents should be directed in the EIA-861 instructions to the definitions of actual and potential peak reduction in the EIA Glossary.*

EIA Response: We will make this change to the instructions.

CEE "Other" Comment: *EIA directs respondents to leave numeric data fields blank to indicate that the field is "not applicable" to the respondent. This is potentially ambiguous, and respondents should be directed to make an entry (e.g., "NA") that clearly indicates that a question is not applicable.*

EIA Response: Although EIA agrees with the comment, implementation will require changes to both the instructions and the Internet Data Collection system used by over 90 percent of EIA-861 respondents. A change may not be simple to implement because introducing a text response to a numeric data field can cause data processing problems, both for EIA and for outside analysts who use the data. If we cannot implement a solution in time for the 2011 launch of the survey we will do so by the time the survey is released in 2012.

Impact on Respondent Burden of EIA's Recommended Responses to CEE's Comments: We believe that our recommended responses will cause no measurable increase in respondent burden and may in fact reduce burden. Three recommended responses are aimed at clarifying instructions. The question we recommend adding – asking whether energy savings estimates are based on a forecast or an independent evaluation—requires no quantitative research or analysis by the respondent, and the information should be readily available to the staff that completes the surveys. Replacing blanks as an indication that a question is "not applicable" may reduce clarifying call-backs from survey staff to respondents.

Comments from USGS and EIA Response

As discussed below, EIA concurs with most of the comments made by USGS. In the following discussion we have addressed in detail only those comments where we are recommending an approach different from that of USGS.

USGS Comments Accepted in Whole by EIA

USGS Comment No.	Summary of Comment	EIA Response
1.	Respondents should be asked to specify the names of the source and receiving sources of cooling water when these are different (EIA-860 Schedule 6, Part F, line 5a).	We concur with this change.
2.	The term "Reclaimed Water (ex: treated wastewater effluent)" should be changed to alternative language proposed by USGS (EIA-860 Schedule 6, Part F, line 5c).	We concur with this change.
3.	USGS Comment 3: The note above the table on the form is different from the note in the instructions. Both should indicate that combined cycle plants and nuclear plants of greater than 100 MW nameplate capacity are included in the requirement to report cooling system data. (EIA-923, Schedule 8 Part D, Table of Cooling system information, annual operations).	We concur with this change.
5.	Add a feature to the cooling system annual operations table to explicitly assign plant-level data to the plant ID (EIA-923, Schedule 8 Part D, Cooling System I.D).	We concur with this change.
6.	"Average annual rate" needs an explicit definition for consistency of reporting, especially for plants which do not withdraw water all year (Form 923, Schedule 8, Part D, Average Annual Rate of Cooling Water).	This issue is obviated by EIA's agreement to collect monthly detail (see response to Comment 7, immediately below).
7.	Change from collection of annual averages for cooling water rates and temperatures to collection of monthly data annually (Form 923, Schedule 8, Part D, Average Annual Rate of Cooling Water and Maximum Cooling Water Temperature at Intake and Outlet).	We will make this change (i.e., as part of the annual data collection we will collect data for each month rather than the annual averages). We will also collect the number of hours each month a cooling system operates, so that rates can stated either in terms of total hours in a month or operating hours in a month.

EIA Response to Other USGS Comments

***USGS Comment 4 and Last Part of Comment 8**: EIA should require the respondent to indicate whether a reported cooling water flow rate or temperature is measured, estimated, or a mix. (EIA-923, Schedule 8D)*

EIA Response: Requesting whether every data element is measured or estimated would be cumbersome to implement and burdensome on respondents. For example, if a power plant has 2 cooling systems (multiple systems at a plant are common) the respondent would have to make this indication for 16 data entries. Also, adding multiple estimation indicators would complicate the Internet Data Collection system response screen, perhaps to the point of confusion.

Our proposal is to ask whether the data was measured, estimated, or a mix for the cooling water flow rates measurements as a block (encompassing four data entries per cooling system). We would use the same approach for the block of water temperatures measurements (again encompassing four data entries per cooling system). For a plant with 2 cooling systems, this would reduce the number of measurement indicators from 16 to 4.

We will also ask the respondent to specify the type of measurement approach used. We will contact USGS for a list of options.

USGS Comment 8: This comment has three parts, all of which apply to Form EIA-923, Schedule 8D:

- *Replace the collection of seasonal peak intake and outlet water temperatures with monthly average temperatures.*
- *Request respondents to specify the points at which water temperatures are taken.*
- *Respondents should be directed to indicate whether temperatures are measured or estimated.*

EIA Response: With respect to the type of temperature data collected, we will either replace the peak temperatures with monthly averages or ask for both monthly peaks and averages. (We are currently trying to determine whether other respondents would want us to retain the peak temperature information.)

In respect to requesting measurement points, we recommend rejecting this addition to the survey. We believe it would be burdensome to respondents; that responses would likely be inconsistent; it would be difficult for EIA to provide consistent guidance to respondents; and we would have no effective way to edit the responses.

In respect to requesting whether temperatures are measured or estimated, see the response above to USGS Comment 4.

Impact on Respondent Burden of EIA's Recommended Responses to USGS Comments: We believe that our recommended responses to the comments of USGS may cause a small increase in respondent burden, on the order of 1 hour per typical respondent to the EIA-923 survey, Schedule 8D. This increase is attributable to: The recommendation that respondents be required to determine and specify whether cooling water flow rates and temperatures are measured or estimated; the requirement to specify both the source and receiving bodies for cooling water; the data entry time for providing monthly rather than annual data; and the possible requirement that respondents provide both peak and average temperatures rather than just one or the other.

As shown in Table 3 of the Supporting Statement for this clearance, 1,360 respondents are expected to reply to Schedules 6, 7, and 8 of the EIA-923 survey. The original burden estimate for these schedules assumed 3.4 hours per response for a total of 4,624 hours. If the burden increases by 1 hour per respondent (i.e., by 1,360 hours) the new total for these schedules will be 5,984 hours. The total burden hours for all surveys will increase from 145,429 hours to 146,789 (an increase of 0.9 percent).

Comments from CenterPoint Energy and EIA Response

Summary of CenterPoint Energy's Comments: CenterPoint's comments focus on differences between the transmission systems outage data collected on Schedule 7 of the EIA-411 survey and the NERC TADS system for collecting transmission outage data. These differences are:

- Inconsistencies between TADS instructions and definitions and the instructions for the EIA-411 survey.
- The EIA-411 collects information on planned ("non-automatic") and unplanned ("automatic") transmission system outages. TADS regularly collects data on automatic outages and is temporarily collecting data on non-automatic outages. TADS data collection on non-automatic outages is scheduled for re-evaluation by NERC in 2015.
- As discussed above, beginning in 2011 the EIA-411 survey will collect outage data for DC transmission facilities down to 100 kV, and the same threshold will apply to AC transmission facilities beginning in 2014. TADS collects data for facilities 200 kV and higher.

CenterPoint recommends that EIA either eliminate Schedule 7 altogether from the EIA-411 survey and rely on data provided by the TADS system, or modify Schedule 7 so it more precisely matches TADS. CenterPoint also recommends that EIA not collect information on non-automatic outages until NERC decides in 2015 whether or not to permanently add this information to TADS. CenterPoint also objects to reducing the collection threshold to 100 kV.

EIA Response: The purpose of the EIA-411, Schedule 7, is to collect critical data on the reliability of the nation's transmission system. We have attempted to the extent possible to synchronize

the EIA-411 with the TADS system, but in two important respects, as noted by CenterPoint, the EIA-411 and TADS differ. First, EIA believes it is essential to collect information on "non-automatic" transmission outages, such as planned outages for scheduled maintenance. This information is necessary to develop a complete picture of the availability of transmission lines and is also one indicator of the effort needed to keep the system operational.

Second, we believe that extending the collection of data down to the 100 kV threshold is necessary to encompass elements of the grid essential to the operation of the bulk power system. EIA recognizes this will create additional burden for the respondents who operate the large AC system, and we have therefore recommended delaying implementation of this part of the data collection until 2014 so that respondents can upgrade their data reporting systems.

Accordingly, EIA believes it would be imprudent to either eliminate Schedule 7 or rely entirely on the current version of TADS for reliability data. We do recommend to OMB the following changes to EIA's proposal in response to CenterPoint's comments:

- EIA will modify the instructions to the EIA-411 to eliminate all material differences with the TADS instructions and definitions. This may also involve some minor changes to the survey form. These steps will facilitate directly translating data for the TADS data system into a response to the EIA-411.
- EIA's proposal to collect data on the AC system down to 100 kV is predicated in part on FERC's recent indication that it will use this threshold to define what constitutes the bulk power system (i.e., the part of the transmission system over which FERC exercises Federal reliability oversight). However, FERC has not made a final decision on this threshold. EIA will therefore monitor FERC's decision making, and if FERC decides on a different threshold (or a different method altogether for defining the bulk power system), EIA will revisit with stakeholders and OMB the 100 kV threshold prior to 2014.

These changes would have no measurable impact on respondent burden.

Other EIA Recommendations

As discussed at our August 18, 2010 meeting, there are two additional changes EIA recommends be made to the surveys. These are discussed below.

Require Respondents to Provide the Regional Transmission Organization (RTO) Membership of Power Plants and Power Sales Entities: We received a request to add this data element during the first round of comments. The question would be added to the EIA-860 (power plants) and EIA-861 (power sales entities) surveys. We initially rejected this suggestion. However, after further review we believe RTO affiliation information should be added to the surveys due to the growing importance of RTOs in the operation of transmission systems (a reliability issue) and in establishing wholesale power prices.

The additional burden on respondents should be minimal. Respondents will typically know which if any RTO their organization belongs. Moreover, because RTOs have known geographic footprints we can restrict the choices available to the respondent through the Internet Data Collection system. For example, in States where no RTO operates the system will have a pre-loaded response of "none." In many other States only or three two responses are possible and these will be the only choices available to the respondent. For example, in New Jersey the only possible responses are "none" and "PJM Interconnection."

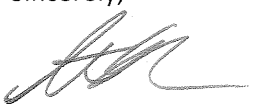
If approved, this new data item would be added to EIA-860 Schedule 2 and EIA-861 Schedule 2A.

Require Respondents to Provide the Planned Capacity of Repowered Generating Units: Generating units are sometimes "repowered" by replacing major equipment, such as the combustion system, with new equipment. Repowering projects are rare but do occur. The EIA-860 asks for data on these projects. However, due to an oversight, the proposed survey does not request the megawatt capacity of a repowered unit. This is an important piece of information and we recommend adding it to the survey. There should be no increase in burden to the respondent since this information should be immediately available to the staff that prepares the response.

If approved, this data item would be added to EIA-860 Schedule 3B, line 17d.

If you have any questions or need more information please contact either me (stan.kaplan@eia.gov or 202-586-5114) or Jason Worrall (jason.worrall@eia.gov or 202-586-6075).

Sincerely,



Stan Kaplan
Director, Electric Power Division
U.S. Energy Information Administration

cc: Scott Sitzer, Dean Fennell, Jim Diefenderfer,
Glenn McGrath, Jason Worrall, Renee Miller