

**Appendix A
(to Supporting Statement Part A)**

Form EIA-111

QUARTERLY ELECTRICITY IMPORTS AND EXPORTS REPORT

OMB NUMBER 1905-0208

**Summary of Comments Received in Response to the
Federal Register Notice (Vol. 80. No. 23)
Published February 4, 2015
(With EIA Responses)**

Introduction

On February 4, 2015, a request for comments from interested persons was solicited in the Federal Register Notice that proposed approval for a three year collection for Form EIA-111, “Quarterly Electricity Imports and Exports Report.” The comments received and EIA’s responses are summarized below.

Table A 1. List of Entities Providing Comments

Name of Respondents

Avista Corporation
Intercom Energy, Inc.
New York Independent System Operator (NYISO)

Comments provided to EIA are grouped into the following categories:

- Whether the proposed collection of information is necessary for the proper performance of the functions of the agency, including whether the information shall have practical utility
- The accuracy of the agency’s estimate of the burden of the proposed collection of information, including the validity of the methodology and assumptions used
- Ways to enhance the quality, utility, and clarity of the information to be collected
- Ways to minimize the burden of the collection of information on respondents, including through the use of automated collection techniques or other forms of information technology

The comments shown below incorporate minor editing for clarity.

Necessity of the proposed information collection

Comments:

We found the new form EIA-111 very appropriate for the 2015 survey purposes.

EIA Response:

None

The accuracy of the agency’s burden estimate

Comments:

None

Ways to enhance the information collection

Comment:

Why is it that the survey asks for the transfer facility for [Implemented Interchange] but only asks for a lump sum for Actuals? After all, Balancing Authorities have at their disposal (for NERC reporting purposes) the metered data for each of the tie lines. You can’t necessarily designate the transfer facility for a transaction schedule (as we know with the NY>Ontario interface) but you can get a clear picture of what is actually flowing over each of the tie lines to that Balancing Authority.

EIA Response:

The proposed change to this information collection of adding a new schedule: **Metered Flow on Transfer Facilities** will allow the collection of metered flow data over each tie line.

Comment:

In section “Exports from the U.S. to Canada or Mexico” your question says: “Did the entity have any IMPORTS this quarter?” We believe it should say EXPORTS.

EIA Response:

EIA has made this correction to the web form.

Comment:

The EIA should allow CSV files, in addition to the XML file format, for upload to the Portal to provide enhanced utility for respondents.

EIA Response:

Currently, the EIA-111 survey can only be submitted via web form. EIA plans in the future to allow respondents to submit the EIA-111 survey electronically using xml and csv file formats.

Comment:

The EIA should allow more than one individual with access to the Portal to enter data for an open campaign to enhance the utility of the submission process.

EIA Response:

Currently, once one individual starts entering data for an open campaign they are the only one that can continue and complete entering data. This is a limitation of the software we are using for the web form. EIA will investigate ways to provide the requested functionality.

Comment:

The EIA should allow individuals within the same organization the ability to view the submission data for that organization within the Portal.

EIA Response:

EIA is working to enhance the reporting capability of its collection web portal to allow multiple contacts within a company to view and print submitted forms.

Comments:

There should be an option for the user to print a copy of the report which was submitted. The Campaign Member Detail page in the portal should allow the user to view the reports which were previously submitted. Currently, there is no option that I can find, which allows previously submitted reports to be viewed by the user. This becomes troublesome if you haven't taken screen shots of the report as you are entering it prior to submission.

The EIA should configure the reports available within the Portal in a transactional format to increase the usefulness and clarity of the reports. The EIA should allow selection of the reporting period as a report parameter to enhance the usefulness and clarity of the reports. The EIA should allow submissions made in error to be deleted by the respondent to increase the clarity and quality of the reports.

EIA Response:

EIA is working to enhance the reporting capability of its collection web portal to increase the usefulness and clarity of the reports.

Ways to minimize burden**Comment:**

There really needs to be some type of mechanism to allow the individual filing the report to edit their data for any given campaign up to the point of the deadline. Having to submit a case and then re-enter all values for the entire quarter is quite time consuming if you simply needed to correct one data entry. Every effort is made to have the data verified but mistakes do occur.

EIA Response:

The ability to save a data entry session and return to it later is a functionality on our list of improvements.

Comment:

The emails and phone calls from EIA regarding the upcoming deadlines are time consuming. Each time we receive a phone call, we have to go back and double check that the report was in fact submitted. This takes unnecessary time. I guess I could liken it to filing your taxes, you as the individual are aware of the deadline and the assumption should be made that you will adhere to it without the reminders....or the reminders of the upcoming deadline after you have already submitted the campaign in question.

EIA Response:

EIA will review its communications procedures.