

From: [FRN Comments](#)
To: [Weimer, Benjamin D: \(Constellation](#)
Cc: [FRN Comments](#)
Subject: RE: 1905-0129 EIA Survey Comments
Date: Monday, January 26, 2026 7:49:48 AM

Hi Benjamin,

We once again express appreciation for your meaningful comments. I have attempted to group your comments into four classifications and provide responses to them below.

Comment 1, outdated technology. The platform over which the data submitted to EIA which is technologically outdated and inefficient, which contribute to a cumbersome data submittal process. The use of an Application Programming Interface method of submitting the data is recommended.

EIA response: EIA is committed to ensuring the data collection process is minimally burdensome while collecting timely and accurate data. EIA will attempt to improve the user experience with future investments in the data collection system. Currently, EIA does not have an API-enabled data collection system for the electric data program surveys.

Comment 2, inflexible survey design. The survey data for Forms EIA-860 and EIA-923 entry is constrained by a rigid on-line data format. The system design is insufficiently flexible to accommodate the nature of the thermoelectric cooling system data. The ability to navigate around the form and enter data more freely is requested.

EIA response: EIA structured both Form EIA-860 and Form EIA-923 to accommodate both open loop and closed loop thermoelectric cooling system configurations. The specific example of the two cooling systems at the Dresden Generating Station is both unique and instructive. Both cooling systems at that facility can operate in either a closed loop or open loop configuration. The EIA-923 survey allows for the design type that was predominantly characteristic for a month to be selected and data quality checks are assigned based on that system type. However, since many plants do not separately meter their cooling systems, EIA allows a collective system identifier ("PLANT") to be used. Dresden Generating Station is one of just three plants in which the systems collectively reported under the PLANT identifier include both open loop and closed loop system types. EIA will assess whether this relatively unique situation can be

accommodated with a reasonable system modification.

Comment 3, redundant quality checks. In several cases, redundant explanations are required to address errors that recur month after month. The specific example cited is a discharge temperature that exceeds the inlet temperature. EIA confirms that this counterintuitive condition can be seen in several cooling systems.

EIA response: EIA continuously evaluates our edit schemes that are designed to ensure that respondents do not mistakenly enter incorrect data, yet are not unnecessarily burdened with the need to repeatedly explain that the values they have submitted, while seemingly counterintuitive, are in fact correct. Although there are cooling systems configurations in which the measured discharge temperatures are higher than the inlet temperatures, EIA believes that an edit that checks whether this situation is accurate is reasonable. In the case of the Dresden Generating Facility in 2024, in five of the twelve months, discharge temperatures exceeded the inlet temperatures. Although edits caught this condition and required explanatory overrides, EIA feels this edit design is reasonable. We regret the burden this edit causes facilities such as Dresden Generating Station, but this situation is relatively rare.

-
Comment 4, improper unit types. The data that are not well suited for the data, particularly for large cooling systems. The examples that were cited include chlorine usage provided in thousands of pounds and water consumption values reported in gallons per minute rather than gallons per day.

EIA response: In 2013, in response to stakeholder requests, EIA revised several of the units used in our thermoelectric cooling water system data collection. For water rates and volumes, EIA switched from cubic feet per second and cubic feet respectively to gallons per minute and gallons. EIA believes that gallons per minute is the industry standard for pumping system flow rates. While EIA appreciates that the large volumes and flow rates associated with some plants may make data submitted in gallons per day seem more appropriate, EIA's position is that for consistency across all respondents, the gallons per minute metric is the more appropriate option.

In terms of the units for chlorine use, EIA believes that "thousands of lbs." is the appropriate unit. On average across all respondents, the average monthly

chlorine use value is 9.6 thousand pounds, which would require a data entry of "9.6."

EIA remains available to discuss these comments and our responses to them. Please contact me directly, if we have not properly interpreted the comments or if our responses are not on point. EIA respects the time and effort Constellation has made in bringing these issues to our attention.

Regards,
Glenn McGrath
Team Lead, Electricity, Coal, Renewables, Nuclear Data Team
U.S. Energy Information Administration
202-586-4325
www.eia.gov

From: Weimer, Benjamin D: (Constellation) <Benjamin.Weimer@constellation.com>
Sent: Wednesday, December 17, 2025 9:21 AM
To: FRN Comments <EIA-FRNcomments@eia.gov>
Subject: [EXTERNAL] RE: 1905-0129 EIA Survey Comments

Hello Mr. McGrath,
Please see further detail on the issues we have identified related to comment #3 below. Thank you. Please reach out if you have any questions.

The reporting system for the annual 923S report incorporates several assumptions that are not always applicable to individual plants and cause errors and/or additional follow-up with the EIA during their data quality review. Here are some examples:

- *The cooling system type is not able to be updated and is based on standard definitions for a separate EIA report. Dresden Station (Plant Code 869) operates in closed-cycle mode part of the year and indirect open cycle the other part of the year. Each year, have had to submit this explanation to the EIA. We believe that it can't be changed due to how the data is set up in another EIA report.*
- *Another example of this is Calvert Cliffs, which utilizes more chlorine than fits into the 923S standard assumptions. We need to put error overrides and additional comments in every single month.*

- *The units used in the report are not aligned with standard environmental regulatory requirements and require additional conversion, which introduces more error. For example, chlorine has to be reported in 1000s of pounds. Cooling water rate is reported to the nearest 0.1 gallons per minute as opposed to millions of gallons per day.*
- *We have had various issues with cooling water volume reporting creating errors.*

From: Weimer, Benjamin D: (Constellation)
Sent: Thursday, December 4, 2025 9:46 AM
To: 'FRN Comments' <EIA-FRNcomments@eia.gov>
Subject: RE: 1905-0129 EIA Survey Comments

Hello Mr. McGrath,

Thank you for your response and your willingness to look for feedback from users on how to improve the EIA submittal process. It will likely be very difficult to get the group together for a call particularly this time of year but I have reached out to the individuals who brought my comment #3 to me to be able to get more detail on that concern and respond back to you with it. I hope that will suffice.

From: FRN Comments <EIA-FRNcomments@eia.gov>
Sent: Thursday, December 4, 2025 8:41 AM
To: Weimer, Benjamin D: (Constellation) <Benjamin.Weimer@constellation.com>; FRN Comments <EIA-FRNcomments@eia.gov>
Subject: RE: 1905-0129 EIA Survey Comments

You don't often get email from eia-frncomments@eia.gov. [Learn why this is important](#)

Hi Benjamin,

We are in the process of completing our review and disposition of the comments we received. While we will formally and publicly address your comments, I wanted to reach out and express appreciation for you taking the time to prepare and send them.

While we are not likely going to be able to make significant investments in the system to allow the functionality that you've suggested in the near term, EIA is aware of the need to upgrade our electricity data collection system.

In terms of the thermoelectric cooling water data, I have a few thoughts on your suggestion that might be better handled with a discussion. Cooling water system configurations vary widely. It is difficult to create a standardized survey format to accommodate the many different design and operating configurations. However, in order to assemble an informative and meaningful product with the data, we have to structure the survey with enough constraints. We do allow respondents to set up multiple systems and each system can have up to four design types. So even a single system may have closed loop and open loop design characteristics. Since your comment addresses survey design, I want to make sure I understand how the survey could be modified in order to be response.

Please let me know if you have availability in the next few days to discuss.

Thanks again for your comments,

Regards,

Glenn McGrath

Team Lead (Detail), Electricity, Coal, Renewables, Nuclear Data Team

U.S. Energy Information Administration

202-586-4325

www.eia.gov

From: Weimer, Benjamin D: (Constellation) <Benjamin.Weimer@constellation.com>

Sent: Wednesday, October 22, 2025 2:19 PM

To: FRN Comments <EIA-FRNcomments@eia.gov>

Subject: [EXTERNAL] 1905-0129 EIA Survey Comments

You don't often get email from benjamin.weimer@constellation.com. [Learn why this is important](#)

To whom it may concern:

Thank you for giving Constellation the opportunity to provide comments on potential improvements to the EIA survey submittal process. We appreciate you taking these into consideration.

1. EIA data submittal is currently an extremely manual process and in turn time intensive. We are requesting more of an automated/upload process via an API be given consideration. This will allow survey submitters to collect data internally in between due dates and then simply upload via the EIA portal. This would save submitters a tremendous amount of time.

2. The portal is very outdated utilizing a Java-based program. Being able to utilize “Enter” and “Tab” to move around the page would be a time-saver that generally cannot be utilized in the current platform.
3. The “rigidity” of the required responses does not always allow for the most accurate responses to be entered. We are requesting consideration into more “free form” responses/notes be permitted to allow for the most accurate data be entered. For example, we have a nuclear plant that operates in a “closed cycle mode” for part of the year and then in an “indirect open cycle mode”. There is no pre-formed cooling system type that allows for us to accurately reflect this. We receive an error every year that requires EIA outreach to us and then the same verbiage returned to EIA. Added flexibility in responses may save time for both parties in an example like this.

Thank you,

Benjamin Weimer
Principal Compliance and Training Specialist



Baltimore HQ
1310 Point St, Baltimore MD 21231
Office: 410-468-3750
Cell: 717-228-9887

This Email message and any attachment may contain information that is proprietary, legally privileged, confidential and/or subject to copyright belonging to Constellation Energy Corporation or its affiliates ("Constellation"). This Email is intended solely for the use of the person(s) to which it is addressed. If you are not an intended recipient, or the employee or agent responsible for delivery of this Email to the intended recipient(s), you are hereby notified that any dissemination, distribution or copying of this Email is strictly prohibited. If you have received this message in error, please immediately notify the sender and permanently delete this Email and any copies. Constellation policies expressly prohibit employees from making defamatory or offensive statements and infringing any copyright or any other legal right by Email communication. Constellation will not accept any liability in respect of such communications. -CEGIP

This message does not originate from a known Department of Energy email system. Use caution if this message contains attachments, links or requests for information.

This message does not originate from a known Department of Energy email system.
Use caution if this message contains attachments, links or requests for information.
