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To: [FRN Comments](#)
Cc: [Stephen Pelcher](#); [Megan Driggers](#)
Subject: [EXTERNAL] OMB Control No. 1905-0129 – Comment on EIA-861 Schedule 3, Part B
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Thank you for the opportunity to provide comments on the proposed extension of the Electric Power Surveys under OMB Control No. 1905-0129. I am writing specifically with regard to **EIA-861 Schedule 3, Part B (Distribution System Reliability Information)**.

In EIA-861 Schedule 3, Part B (Line 4), the instructions use two phrases that become contradictory when read together:

- “the Annual Distribution SAIDI Including Major Event Days excluding events where the reliability event was initiated from loss of supply”
- “the Annual Distribution SAIDI Excluding Major Event Days excluding events where the reliability event was initiated from loss of supply”

Standing alone, each phrase may be understood, but placed side by side they create conflicting direction and make it unclear what exactly should be reported. This risks inconsistent reporting across utilities. I recommend that EIA clarify and simplify the language so that the inclusion/exclusion rules are stated unambiguously. A similar situation occurs in Line 6 for SAIFI data collection.

Additionally, I recommend that EIA add a fourth reporting requirement: indices that exclude both Major Event Days and loss-of-supply events. This would give a more accurate view of “everyday” distribution system reliability by filtering out both extraordinary events and upstream supply issues.

I appreciate EIA’s efforts to continually improve the clarity and usefulness of the Electric Power Surveys. Clearer instructions and the addition of a fourth reporting category would help ensure more consistent and reliable data across all respondents.

Sincerely,

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