

From: [FRN Comments](#)
To: [FRN Comments](#); [Gregg Turbeville](#)
Cc: [Stephen Pelcher](#); [Megan Driggers](#)
Subject: RE: OMB Control No. 1905-0129 – Comment on EIA-861 Schedule 3, Part B
Date: Monday, January 26, 2026 7:48:53 AM

Hi Greg,

EIA appreciates the comments from Santee Cooper that recommend improvements to reliability data collected on Form EIA-861. EIA has reviewed the comments and recognizes that improvements to the instructions would be helpful. EIA will adjust the instructions on Form EIA-861 as follows:

*Report the Annual Distribution SAIDI Including Major Event Days on line 3,
Report the Annual Distribution SAIDI Excluding Major Event Days on line 3
Report the Annual Distribution SAIDI Including Major Event Days but excluding
events that were initiated by a loss of supply from the high-voltage system on line
4*

*Report the Annual Distribution SAIFI Including Major Event Days on line 5
Report the Annual Distribution SAIFI Excluding Major Event Days on line 5
Report the Annual Distribution SAIFI Including Major Event Days but excluding
events that were initiated by a loss of supply from the high-voltage system on line
6.*

With respect to the recommendation to add the fourth reliability value that excludes both major event days and loss of supply from the high-voltage system, EIA previously considered that data element during the initial cognitive testing effort. While recognizing there is some merit in that particular metric, EIA determined that on balance the additional respondent burden exceeded the value gained from collecting the data. EIA receives significant feedback and inquiries regarding the SAIDI/SAIFI data. However, the omission of this particular data element has not been among the comments we have received. EIA will continue to monitor the industry to determine if the value of this element has increased since our original assessment.

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.

Regards,
Glenn McGrath

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From: FRN Comments <EIA-FRNcomments@eia.gov>
Sent: Tuesday, September 2, 2025 9:30 AM
To: Gregg Turbeville <gregg.turbeville@santeecooper.com>; FRN Comments <EIA-FRNcomments@eia.gov>
Cc: Stephen Pelcher <stephen.pelcher@santeecooper.com>; Megan Driggers <MEGAN.DRIGGERS@santeecooper.com>
Subject: RE: OMB Control No. 1905-0129 – Comment on EIA-861 Schedule 3, Part B

Hi Greg,

Thanks for your comment. We will continue to receive comments over the 60-day period at which time we'll respond directly to you or, if we receive multiple comments of the same nature, provide a broader response. Please feel free to contact us with additional comments or questions about the status of the reclearance.

Regards,
Glenn McGrath
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From: Gregg Turbeville <gregg.turbeville@santeecooper.com>
Sent: Friday, August 29, 2025 9:15 AM
To: FRN Comments <EIA-FRNcomments@eia.gov>
Cc: Stephen Pelcher <stephen.pelcher@santeecooper.com>; Megan Driggers <MEGAN.DRIGGERS@santeecooper.com>
Subject: [EXTERNAL] OMB Control No. 1905-0129 – Comment on EIA-861 Schedule 3, Part B

You don't often get email from gregg.turbeville@santeecooper.com. [Learn why this is important](#)

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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