

**Electricity and Natural Gas Data Collection
Emailed Comments from Interested Companies on
Draft Forms and Instructions**

DOCKET	
05-DATA-1	
DATE	DEC 10 2007
RECD	JAN 08 2008

From: Bill Wood
To: Andrea Gough
Date: 12/10/2007 3:31 PM
Subject: 1309.xls
Attachments: 1309.xls

Andrea,

I have had some confusion with some of the pipelines (mainly Mojave) what is to reported in each of the Schedules. So I have taken the liberty to suggest a few changes to the forms that hopefully would clear up the misunderstandings. I would guess the instructions should incorporate some of this in the discussion for each form.

By the way, I rally appreciate your handling of this new reporting requirements. I am not certain how well the response will be from the interstate pipeline companies.

bill

* * *

From: "Phyllis Hansen" <Phyllis.Hansen@questar.com>
To: <Agough@energy.state.ca.us>
CC: "Mark Petersen" <Mark.Petersen@questar.com>
Date: 12/10/2007 3:06 PM
Subject: FW: CEC-1309
Attachments: 1309.xls; 1309 Instructions.pdf

I would like to discuss this form CEC-1309 with you at your convenience.
I can help with this form, but am not familiar with this new requirement.

Thank you.

Phyllis W. Hansen
Regulatory Affairs Analyst
Questar Pipeline Company
801-324-2442
801-324-5834 (Fax)
phyllis.hansen@questar.com

* * *

>>> "Karen Duncan" <kduncan@ebresources.com> 12/10/2007 8:08 AM >>>
I went to the link in your e-mail dated December 7, 2007 and was unable to see anything. Is this the correct link
<http://www.energy.ca.gov/forms/cec-1308.html> ?

Karen Duncan
E & B Natural Resources
661-766-2501 - office
661-619-5667 - cell
661-766-2348 - fax

* * *

>>> "Overturf, Billie J." <BOverturf@semprautilities.com> 12/7/2007 10:38 AM >>>
the tab marked "General Instructions" does not print out, nor is it recognized when you go to set the print parameters.

Billie Overturf
Regulatory Affairs
Information Group Manager
San Diego Gas & Electric Company
Southern California Gas Company
CP31E
858.654.1779 (Office)
619.743.1311 (Cell)
858.654.1789 (Fax)
Boverturf@semprautilities.com

* * *

>>> "Ann Hendrickson" <AHendrickson@commerceenergy.com> 12/11/2007 6:36 AM >>>

Mr. Steve Fosnaugh:

IMPORTANT – Commerce Energy, Inc., (a natural gas and electricity retailer) should be added to your email distribution list for the CEC Data Collection Forms. Perhaps, we are on your list – but the emails are being sent to a departed employee. Therefore, please add the following names:

Delete: llund@commerceenergy.com

Add: ahendrickson@commerceenergy.com

Add: cweddington@commerceenergy.com

Also, we have <200 MW of retail load in California market, therefore are we exempt from data-reporting – as is true for your IEPR forms?

Ann Hendrickson
Director, Regulatory Affairs
Commerce Energy, Inc.
(214) 296-5407
ahendrickson@commerceenergy.com

* * *

>>> "Dean Cooley" <DeanC@calpine.com> 12/11/2007 11:25 AM >>>

Gentlemen

In looking through the Form 1304 Summary of Changes and posted new form, it appears that Schedule 1 shows "No change" but that the new posted form includes several lines that we haven't had on the forms we've submitted each quarter. Specifically, the "Operating Mode" and "Interconnection Agreement Type" in Part A4 are new to us, and we don't see definitions of either in the draft Instructions.

Can you comment on if we have been using an outdated form, or if I am missing something?

Dean Cooley
Director, Asset Management
Telephone: 707-431-6077
FAX: 707-431-6286

* * *

From: Michael Nyberg
To: Andrea Gough
CC: Daryl Metz
Date: 12/13/2007 2:33 PM
Subject: form revision...

Daryl Metz and I had a call from a cogeneration association regarding the split for fuel use in the generation of useful thermal and electricity. In speaking with her, we realized the CEC Form 1304 Sched. 2, Part A has an incorrect labeling: All instances of "Fuel Attributable to Cogeneration" should really state "Fuel Attributable to Useful Thermal."

Also, the foot note (1) should have an additional sentence added to it: "Useful thermal output is equal to fuel attributed to useful thermal." It states the obvious but I think it would help.

Michael Nyberg
Procurement Unit
Electricity Analysis Office
California Energy Commission
www.energy.ca.gov (<http://www.energy.ca.gov/>)
916-654-5968

* * *

>>> "Vina Maharaj" <VinaM@abag.ca.gov> 12/12/2007 9:33 AM >>>
Mr. Dang

For reporting to CEC, we, ABAG POWER, use CEC-1306, Schedules 1, 2 and the Declarations Page. It seems like there are several more changes being made to the current CEC-1306 forms, rather than just the change of "customer classification" column in place of NAICS code. We notice the following additional changes being made:
The Column "Fuel Type" is being eliminated
The Columns "Year", "Month", "Company Number" and "County Number" are being switched
The Column titled "Sales (MWh or million therms)" is being changed to "Sales/Delivery (therms)"
An additional Column is being added titled "Revenue (\$)"

Your email did not mention these changes, it only mentioned the customer classification column.

We would appreciate if all the changes are very clearly indicated. The column titled "Sales/Delivery (therms)" rather than "million therms" will impact our current calculating methods, therefore, we need to make sure that the titles are clearly worded.

Thanks for allowing us to comment on the changes.

Vina Maharaj
ABAG Publicly OWned Energy Resources (ABAG POWER)
Phone: (510) 464-7956
Fax: (510) 464-7979
Email: VinaM@abag.ca.gov

* * *

>>> Wade Broughton <Wade.Broughton@genmills.com> 12/12/2007 9:51 AM >>>

CEC-1304 Schedule 1 Part A Instructions

Numbers in the instructions do not correlate with the Line No. used in the Schedule. List 1, 2, 3a, 3b, 4, 4a, 4b, etc. Number the same way.

There are no instructions regarding Line 4h Operating Mode, or Line 4j Interconnections Agreement Type. Is Line 4h to be assumed to be the same as Operating Status on Schedule 1 Part B? Include instructions for Line 4h and Line 4j.

CEC-1304 Schedule 2 Part A Form

Identify the columns on the form to correspond to the numbers on the instructions. **Col. 1** Month,

Col. 2 Gross MWh, **Col. 3** New MWh, etc.

Mark with asterisks the column labeled Fuel Supplied by Tolling Agreement and indicate for units with nameplate capacity of 50 MW or more. (Like Fuel Cost column.)

Not consistent in method of marking footnotes. On this form asterisks are used, on Schedule 2 Part A Addendum Form numerical markers are used.

CEC-1304 Schedule 2 Part A Addendum Form

Number the columns on the form to correspond to the numbers on the instructions. **Col. 1** Month, **Col. 2** Fuel Attributable to Electric Generation, **Col. 3** New MWh, etc.

Not consistent in method of marking footnotes. On this form numerical markers are used, on Schedule 2 Part A Form asterisks are used.

CEC-1304 Schedule 2 Part B Instructions

Number the columns on the form to correspond to the numbers on the instructions. **Col. 1** Month, **Col. 2** Onsite Use (self-gen) MWh, **Col. 3** Sales for Resale MWh, etc.

Not consistent in method of marking footnotes. On this form asterisks are used, on Schedule 2 Part A Addendum Form numerical markers are used.

Instructions for End User NAICS Code is not consistent with labeling of the column on Schedule 2 Part B Form which says: Customer Classification Code End-User. Make instruction line and column label the same.

On the instructions it is not clear that the End User NAICS Code is to include customers only and not Onsite User NAICS Code.

I do not use the remaining forms or instructions so I did not review those portions. I hope that my comments are useful. I know that the changes would certainly benefit someone trying to complete the form for the first time.

For questions or comments, my contact information is listed below.

Wade Broughton, Energy Manager
General Mills
PO Box 3002
Lodi, CA 95241-1906
(209) 334-7090

* * *

>>> "Jerry Lahr" <JerryL@abag.ca.gov> 12/12/2007 10:19 AM >>>

Mr. Dang:

One additional comment regarding the "Revenue" item. This term needs to be clearly defined. That is, what is included in revenue?

For example, we implement what is know as "ESP Consolidated Billing," which means that we bill the end customer for PG&E transportation and other costs. These items are considered revenue to us, although they are offset by an equal expense when we pay it to PG&E. My concern is that if you also ask PG&E for their "revenue" you may double count these costs.

Jerry Lahr
Association of Bay Area Governments
510-464-7908

* * *

>>> "Michael Rochman" <rochmanm@spurr.org> 12/13/2007 9:14 PM >>>

Dear Sir or Madam,

We have the following questions regarding draft form CEC-1308C and instructions, as posted here: www.energy.ca.gov/forms/cec-1308.html

1. Reporting is to include Customer Groups, which are listed in the instructions as --
Residential - customers consuming natural gas for residential purposes

Commercial - customers consuming natural gas for commercial purposes

Industrial - customers consuming natural gas for industrial purposes

TEOR – thermally enhanced oil recovery

UEG – utility electric generation (including cogeneration)

Other - customers consuming natural gas for other purposes

PG&E does not currently provide this information to us for each account, but they do provide NAICS codes. Are we obligated to assign certain NAICS-coded accounts to certain Customer Groups? If so, where can we obtain the appropriate cross-reference table from NAICS codes to Customer Groups? Or are we to make our own Customer Group determinations?

2. Reporting is to include Revenue, which is defined in the instructions as "Revenue expressed in dollars, including commodity charges, adjustments, and any other charges billed for gas sold or delivered."

Please confirm that Revenue does not include PG&E local distribution charges, which we collect as a convenience to our customers on our bills and remit to PG&E. Please confirm that Revenue does not include taxes.

FYI, we currently file form CEC-1306.

Thank you,
Michael Rochman
Managing Director
School Project for Utility Rate Reduction
925-609-1140

* * *

>>> Bill Wood 12/18/2007 12:52 PM >>>

What is happening with the data filed in 1310. Isn't that the processing report? Who files it and I guess you are getting the form as I haven't seen one in a long time.

Are you the one that should handle a questions? Jim Mosher at 661-665-5671 from EIA called with some questions. Leon took the call so am uncertain what the nature of the questions were.

bill

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>>> "Tom Fischbach" <TFischb@smud.org> 12/18/2007 1:08 PM >>>

I don't see a column for "Available MW @ System Peak", has this been discontinued from reporting in 1304?

* * *

From: "Mosher JP (Jim) at Aera" <jpmosher@aeraenergy.com>
To: <qfercom@energy.state.ca.us>
CC: "Eckels DJ (Donna) at Aera" <djeckels@aeraenergy.com>, "Phillips PJ (Jan...
Date: 12/19/2007 7:38 AM
Subject: Comments of Aera Energy LLC - Draft Electricity and Gas Data Collection Forms and Instructions

Dear CEC Staff:

Aera Energy LLC hereby submits the following comments for your consideration in developing the subject data collection forms: (Note: All page numbers reference pages of the Draft.)

1. Add a form of Declaration for attestation regarding confidentiality of data, similar to the Sample Declaration provided as Appendix D (page D-1). Declaration should include blanks for declarant to specify the category of information that is entitled to be designated as confidential (e.g. fuel cost data for individual electric generators), and a statement that information has not been previously released.

(Reference "Release of Data" criteria on page 8 of Draft.)

2. FORM CEC-1304, Schedule 2, Part A Addendum: Cogeneration and Fuel Use by Generator Quarterly Report Correct the sixth column subheading as follows:

"Fuel Attributable to Cogeneration" should be corrected to read "Fuel Attributable to Useful Thermal Output"

Correct the twelfth column subheading as follows:

"Fuel Attributable to Cogeneration" should be corrected to read "Fuel Attributable to Useful Thermal Output"

Replace the phrase "physical units" in Instruction No. 1 (page 21) and Instruction No. 2 (page 21) with the phrase "MCF."

Replace the word "amount" in Instruction No. 4 (page 21) and Instruction No. 8 (page 22) with the word "portion."

Replace the word "Cogeneration" in the header to Instruction No. 8 (page 22) with the phrase "Useful Thermal Output."

3. FORM CEC-1304, Schedule 3, Part A: Water Supply and Water/Wastewater Discharge Annual Report

Amend table in Instruction No. 1.a to add the following cooling technology: "EOR-NC" "Enhanced Oil Recovery, No Cooling"

Amend table in Instruction No. 1.c to add the following cooling technology: "EOR-NC" "Enhanced Oil Recovery, No Cooling"

4. FORM CEC-1308C: Gas Retailer Quarterly Report

Amend Instruction No. 8 to state that if gas is delivered and consumed for own use, and not sold to third parties, that retailer should enter "Own-Use" in the "Revenue" column.

Should you have any questions regarding these comments, please do not hesitate to contact me.

Very Truly Yours,
James P. Mosher
Director - Energy
Office (661) 665-5671
Cell (661) 477-5303
Fax (661) 665-5327

* * *

From: "Dean Cooley" <DeanC@calpine.com>
To: "QFERGEN QFERGEN" <QFERGEN@energy.state.ca.us>
CC: "Andrea Gough" <Agough@energy.state.ca.us>, "Daryl Metz" <Dmetz@energy.s...>
Date: 12/19/2007 10:17 AM
Subject: RE: Proposed changes to Electricity and Natural Gas Data Collection Forms and Instructions
Attachments: DOC121907.pdf

Per your email below, Geysers Power Company LLC submits the attached comments relating to the proposed changes and instructions to Power

Plant Owners' Form CEC-1304.

Should you have any questions regarding our comments, please let me know.

Dean Cooley
Director, Asset Management
Telephone: 707-431-6077

* * *

From: "Andy Brown" <abb@eslawfirm.com>
To: <qfercom@energy.state.ca.us>
CC: "Chen, Bill" <Bill.Chen@constellation.com>, "Oneill, Sara" <Sara.Oneill@...>
Date: 12/19/2007 6:00 PM
Subject: Comments on 1306B forms

On behalf of Constellation NewEnergy, Inc., below are some informal comments on the QFER forms for non-UDC LSEs.

Two comments on the 1306B forms:

(1) the "instruction" tab in the spreadsheet needs to be proofed. It looks like it may have references that should apply to the 1306A form and it does not line up well to the separate PDF "Instructions" document;

(2) what is the expected confidentiality treatment for the quarterly submission of information from EPS? Specifically, the CEC is asking for sales volume break out by geographic areas for each quarter, which can give very detailed market share info that is not otherwise publicly available. Additionally, the CEC is asking for company specific quarterly revenue information that is highly confidential and not disclosed. This data is very sensitive information and we're checking on whether it is required elsewhere, and if so, on what timeframes. While there may be some related information that is released by the EIA 13 months after reporting, my understanding is that data is annual, not quarterly, and it has a significant lag before release. (This was discussed last year.) It would be helpful to have some discussion about uniform confidentiality treatment for this information for the non-UDC LSEs, rather than an ad hoc policy development that tends to otherwise occur based upon individual applications for confidential treatment. CNE understands that the confidentiality regs were revised as well, and it will be prepared to support an application when filed, but our suggestion here is to have some advanced discussion, preferably informal, to address the legitimate expectation of confidentiality of market share and revenue data.

Thanks, Andy Brown
Andrew B. Brown
Ellison, Schneider & Harris, LLP
2015 H Street
Sacramento, CA 95811
T: (916) 447-2166
F: (916) 447-3512
C: (916) 849-2070

* * *

>>> "Chan, Alvin" <Alvin.Chan@ladwp.com> 12/21/2007 3:18 PM >>>
Hi Ted,

I am a little confused with the form 1304 reporting requirements. In the "Changes in Reporting Requirements", the column labeled "How often submitted?", I see nowhere that power plants greater or equal to 10 MW would be reported. However, page 17 of the draft instructions for schedule 1 and 2 indicate that these forms are used for all size of generation but only an annual reporting on Feb 15 are facilities of 1MW to 10MW reported (for this reporting I assume that solar panels that are less than 1MW aggregated at any site are not reported).

Please advise.

Thanx.

Alvin

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From: "Andy Brown" <abb@eslawfirm.com>
To: <qfercom@energy.state.ca.us>
Date: 12/21/2007 1:33 PM
Subject: typo in final draft

Page 44 for CEC-1306B form, under "purpose", typo: should be "Load Serving Entity" not "Local Serving Entities"

Andrew B. Brown
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mailto:abb@eslawfirm.com
http://www.eslawfirm.com

* * *

From: "Rubero, Elaine" <ExR4@pge.com>
To: "QFERCOM QFERCOM" <QFERCOM@energy.state.ca.us>
CC: "Andrea Gough" <Agough@energy.state.ca.us>, "Treleven, Kathleen" <KTT3@p...
Date: 1/2/2008 10:48 AM
Subject: RE: Proposed Changes to Electricity Data Collection Forms and Instructions

Andrea, Happy New Year!

Here are my comments regarding these new regulatory reporting requirements: CEC1306A schedules.

Schedule 1: Please change Rate Class to Revenue Class, this is the field that PG&E agreed to provide per previous discussions with CEC personnel.

Schedule 2: This schedule appears to repeat fields within Schedule 1 with the exception of the field DESCRIPTION. We will incorporate this field within Schedule 1.

Schedule 3: This schedule appears to ask us to provide data on our Electric Service Providers, Names, Addresses as well as DA sales amount.

Andrea, I'm not sure what department would not be responsible for providing this data, maybe Energy Services? Also being that ESP names/address information is confidential, proprietary data, I would think this needs to be discussed with Legal department. Please speak to Kathy Trevelan on this schedule and for data source.

Elaine Rubero
415-973-4762

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