



July 1, 2020

Federal Energy Regulatory Commission
Secretary of the Commission
888 First Street NE
Washington, DC 20426

1211 Avenue of the Americas
19th Floor
New York, NY 10036
Phone: (202) 448-1985
Fax: (866) 516-6923

Dear Secretary:

RE: Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act [Docket No. RM20-10-000]

We appreciate the opportunity to provide input to the Federal Energy Regulatory Commission (FERC) proposal on Electric Transmission Incentives Policy Under Section 219 of the Federal Power Act. XBRL US is a nonprofit standards organization, with a mission to improve the efficiency and quality of reporting in the U.S. by promoting the adoption of business reporting standards. XBRL US is a jurisdiction of XBRL International, the nonprofit consortium responsible for developing and maintaining the technical specification for XBRL (a free and open data standard widely used around the world for reporting by public and private companies, as well as government agencies). Our members include accounting firms, public companies, software, data and service providers, as well as other nonprofits and standards organizations.

We support the use of the XBRL data standard for Form 730 as proposed, because the use of data standards will enable the reporting of comprehensive, consistent, interoperable data that allows industry and other data users to automate submission, extraction, and analysis. XBRL is the most appropriate data standard for this purpose because much of the data reported on Form 730 is financial in nature, and XBRL is the only data standard designed for, and capable of handling the complexity of financial information. Furthermore, XBRL has already been adopted for FERC Forms 1, 1-F, 2, 2-A, 3-Q electric, 3-Q natural gas, 6, 6-Q, 60 and 714, which will ensure a smooth transition to the proposed recommendation for the FERC, for public utilities required to report Form 730, and for consumers of public utilities data.

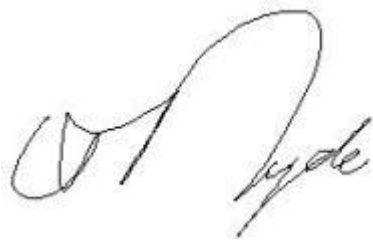
In its proposal, the Commission proposes expanding Form 730 in the following areas: require the reporting of project-by-project totals, rather than only aggregates; include project codes that can be used as a key for data consumers to connect data reported on Table 1 (Actual and Projected Electric Transmission Capital Spending) with data reported on Table 2 (Project Detail); require the inclusion of report year, aggregate actual and projected spending by project, notes, and project voltage data, among other changes.

These new reporting requirements will result in data that is more complex because of the increased dimensionality. To make this data machine-readable, it must be consistently captured in a structured manner. The XBRL standard is well suited to handle dimensional characteristics of data to ensure that it is unambiguously computer-readable. In addition, the XBRL standard can efficiently handle the text, boolean, and energy-related data types that must also be reported along with financial information.

We do not believe that the costs to prepare this data in XBRL format will be significant for utilities, as they will be preparing other financial data using XBRL. The strength of standards lies in the fact that the taxonomy serves as the single data model for the reporting requirements. Items that need to be reported for Form 730 can be added to the existing FERC XBRL Taxonomy. These new elements will then be automatically made available through the tools used by public utilities to prepare their Form 730; the FERC data collection system; and the consumption tools used by investors and others who access Form 730 data. This will ensure that the cost of reporting, data collection, and data use is low.

We would be happy to discuss our comments or respond to any questions you may have. I can be reached at (917) 582-6159 or email Campbell.Pryde@xbrl.us.

Regards,

A handwritten signature in black ink, appearing to read 'Campbell Pryde', written in a cursive style.

Campbell Pryde,
President and CEO