



June 7, 2021

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

Dear Secretary of the Commission:

RE: Data Collection for Analytics and Surveillance and Market-Based Rate Purposes, Docket No. RM16-17-000

We appreciate the opportunity to provide input to the Federal Energy Regulatory Commission (FERC) proposal to collect additional data from certain market-based rate sellers (Sellers) with upstream affiliates that have been granted blanket authorization. We are specifically responding to questions 9 and 10 of the proposal, that Sellers provide utility ID types and utility IDs of the upstream affiliates whose securities were acquired pursuant to the blanket authorization.

We support the inclusion of identifiers, however we urge the Commission to require the use of the Legal Entity Identifier (LEI) for all reporting entities; and we encourage the Commission to require that those entities that do not have an LEI, obtain one.

XBRL US is a nonprofit standards organization. Our members include public companies, accounting firms, software, data, and service providers, as well as other nonprofits and standards organizations. The mission of XBRL US is 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 XBRL specification, which is a free and open data standard widely used around the world for reporting by public and private companies, as well as government entities.

As a standards organization, we are strongly supportive of the LEI, which is open, nonproprietary, applicable to numerous reporting situations, and global. It is a 20-digit, alpha-numeric code based on the ISO 17442 standard developed by the International Organization for Standardization (ISO), which connects to reference information that enables consistent, unique identification of legal entities participating in financial transactions, including their ownership structure. As of June 5, 2021, there were 1,804,780 active LEIs worldwide, with 12.9% registered for entities based in the U.S. The LEI represents a critical opportunity to provide needed clarity around organizational provenance, with benefits to businesses, regulators, and investors alike. The LEI provides standardized information that helps businesses understand the origins of their clients, contractors, and suppliers; and allows investors to better understand the entities in which they invest.

The FERC proposal allows Sellers to select one of three identifier types for the reportable entity:

1. Company Identifier (CID) which would be required if it is available;
2. LEI which would be required if it is available, and if the CID is not available; or
3. FERC generated ID (GID), if the CID and the LEI are not available.

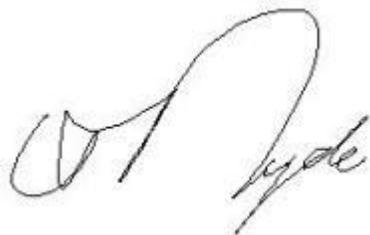
The CID is assigned by the FERC to companies that are required to submit periodic filings to the Commission. It can be compared to the Central Index Key (CIK) which the Securities and Exchange Commission (SEC) requires public companies to use, in that it is assigned by that regulator and only used for that reporting situation. For example, utilities that are publicly traded, and therefore report to the FERC and the SEC, must maintain *both a CID and a CIK*.

Other U.S. regulators use the Employer Identification Number (EIN), however the EIN does not allow the type of ownership structure tracking afforded by the LEI. The problem with multiple identifiers is that data reported by these entities cannot be easily commingled - mapping of differing identifiers must take place before information can be compared.

The SEC has incorporated the LEI into the XBRL US GAAP Financial Reporting Taxonomy which is used by every US listed company to prepare required disclosures. While public companies are not required to submit an LEI with their periodic filings, they have the option to do so. The FERC is supported by fees it levies on utilities. The cost of maintaining the CID identification structure therefore, represents an added cost that utilities must bear. If the Commission no longer had to maintain the CID framework, it could reduce the burden on utilities, and reporting entities could leverage the LEI, which many utilities already have.

We encourage all U.S. regulators to opt for the LEI as a replacement to the plethora of identifiers used today. Regulators in the U.S. and worldwide, could reduce the burden of data preparation by adopting consistent, nonproprietary, global, standardized identifiers. Please contact me with any questions. I can be reached at campbell.pryde@xbrl.us or by phone at (917) 582-6159.

Regards,

A handwritten signature in black ink, appearing to read 'Campbell Pryde', is positioned above the typed name.

Campbell Pryde,
President and CEO