

December 21, 2023



Federal Energy Regulatory Commission
Secretary of the Commission
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Washington, DC 20426

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27th Floor
New York, NY 10105
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RE: Docket No.RM23-9-000

Dear Secretary of the Commission:

Thank you for the opportunity to comment on the proposed rule change, *Revisions to the Filing Process and Data Collection for the Electric Quarterly Report*. We support the Commission's proposed rule to transition the data collection of the Electric Quarterly Report (EQR) to XBRL-CSV format. We agree with the Commission's assessment that XBRL-CSV reporting will make information easier for Sellers to submit and for data users to retrieve and will decrease the costs of preparing data and complying with future changes in requirements over time.

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 extensible Business Reporting Language (XBRL). XBRL is a free and open data standard widely used in the United States, and around the world, for reporting by public and private companies, as well as banks and government agencies.

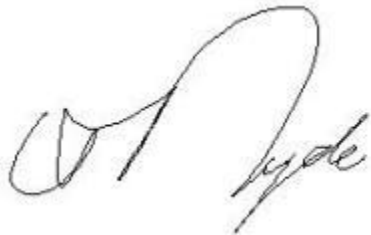
Please consider the following suggestions and requests as the Commission prepares the final rule:

- The proposal indicates that the Commission plans to migrate historical EQR data back to 2013 in XBRL-CSV format which will be beneficial for data users conducting research. We ask that the Commission consider transitioning data back as far as 2010 or 2011, so that the EQR data set aligns with data sets provided in XBRL format for Forms 1, 2, 6, 60, and 714 which date back to 2010.
- We agree with the approach to require greater standardization in identifiers for reporting entities and encourage the FERC to require the Legal Entity Identifier (LEI). This would significantly improve the usability of data reported as the LEI is a globally used standard and is currently under consideration for reporting by agencies that must comply with the Financial Data Transparency Act (FDTA).
- Clarification is needed in certain areas of the proposal, without which, it is difficult to effectively respond:

- We assume that the FERC templates described in the proposal refer to a pre-defined table template defined in the JSON metadata file¹. A more detailed explanation of the templates the FERC plans to provide would be helpful along with example templates.
- Timing for compliance and effective dates.
- When the rule is finalized, it is important that the Commission provide supporting materials as soon as possible so that reporting companies and vendors supporting the market can plan accordingly. Supporting materials should include the XBRL Taxonomy, technical guidance documentation, and sample reports covering multiple use cases. We also request that the Commission provide a draft taxonomy accompanied by a public exposure period so that the market can review the draft and provide feedback. Issuers and vendors would also benefit from the implementation of a BETA Test period to allow test submissions that can be evaluated and refined. This would greatly improve the efficiency of report submissions when compliance deadlines begin.
- We also recommend that the Commission ensure that vendors and reporting companies have more than six months before initial compliance dates to prepare after the final rule is published.

Thank you for the opportunity to provide our feedback. We would be happy to discuss these recommendations further if that would be of assistance. You can contact me at (917) 582-6159 or Campbell.Pryde@Xbrl.us.

Sincerely,

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

Campbell Pryde
President and CEO, XBRL US

¹ <https://www.xbrl.org/Specification/xbrl-csv/CR-2020-10-14/xbrl-csv-CR-2020-10-14.html#sec-json-metadata>