



## MACQUARIE ENERGY LLC

David Louw Presentation to the  
Federal Energy Regulatory Commission

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Collection of Connected Entity Data  
From Regional Transmission Organizations and  
Independent System Operators

# MACQUARIE ENERGY LLC



4th largest marketer of wholesale gas in the United States and a firm and interruptible shipper on numerous interstate and intrastate natural gas pipelines in every major market;

Active market participant in the organized electric power markets operated by NYISO, ISO New England, PJM, MISO, SPP, CAISO, and ERCOT, as well in the West and Southeast regions outside of ISO/RTOs; and

Registered Swap Dealer with the Commodity Futures Trading Commission.

# Legal Entity Identifiers (LEIs)



## Global standard

Replace FERC, ISO identifiers and DUNS numbers with LEIs

Potential benefit in cost reduction from simplification

Use LEI rather than DUNS in all FERC filings

LEIs are already used by many market participants, including those that participate in swaps

Data that FERC receives from CFTC could already have LEIs

- (NOPR ¶ 25-28)

# Obligations on Non-Jurisdictional Counterparties



## The impact and cost extends beyond the market participants

Open-ended definition in NOPR ¶ 23(c) and (d) of connected entities.

Existing contracts will need to be amended and could open door to lengthy renegotiations.

Renegotiating ISDAs for Dodd Frank requirements took many months. Agreements impacted by the NOPR could be highly structured and complex.

Reduced participation in markets - particularly for market participants who are price takers and all those for whom the sale of electricity at wholesale is not part of their core business.

Additional requirements will at minimum increase cost many jurisdictional companies.

Safe Harbor. Any final rule should include a safe harbor where there is a credible demonstration of a good faith effort to comply (even if there are omissions/mistakes).

# One place-one format

## Efficient data collection

Requiring consistent format for information across all ISO/RTO would be significant step forward.

Market participants active across multiple markets would be providing the same information to each ISO/RTO.

Consider establishing a **single repository** for Connected Entity information, rather than separate reporting to each ISO/RTO, that the ISO/RTOs access as needed.

- Data can be validated centrally rather than by each ISO/RTO.
- FERC can collect data centrally similar to EQR, or
- work with 3<sup>rd</sup> party similar to CFTC OCR.

Data quality - data to be collected should be defined very specific and eliminate “free text” fields.

(NOPR ¶ 30 - 35)



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