

UPDATES

Federal Energy Regulatory Commission Extends Deadlines for Order No. 860 Market Based Rate Database Requirements

May 21, 2020

On May 20, 2020, the Federal Energy Regulatory Commission (FERC) issued a **notice of extension of time** for compliance with FERC Order No. 860 and the deployment of the market-based rate (MBR) database. In response to a motion for extension by the Edison Electric Institute (EEI), FERC extended the effective date of Order No. 860 by six months to April 1, 2021, and extended the deadline for baseline MBR database submissions to August 2, 2021. EEI's motion cited the disruption caused by the COVID-19 pandemic as creating challenges in meeting the implementation schedule established in Order No. 860.

By way of background, FERC issued Order No. 860 on July 18, 2019. This order made significant changes to the types of information that entities with MBR authority and applying for MBR authority will be required to provide to FERC as well as the manner in which this information is submitted. Order No. 860 adopted a new relational database requiring submissions by all entities with MBR authorization from FERC. As part of these changes, FERC will begin collecting certain information from entities with MBR authority through a relational database, including: certain upstream ownership information, asset appendix information (including the new requirement to report long-term firm purchases and sales) for the MBR Seller and its affiliates that do not have market-based rate authority and indicative screen information. In addition, MBR Sellers will be required to update the database on a monthly basis to reflect any changes, and the change in status filing requirement is changed to a quarterly obligation.

The following revised deadlines will apply to MBR Sellers and applicants:

Spring 2021 — Obtain FERC-generated IDs for reportable entities that do not have company identifiers or legal entity identifier and asset IDs for reportable generation assets without an EIA code.

August 2, 2021 — Informational baseline submissions based on current information are due. These submissions to the MBR database involve general information regarding the Seller, the Seller's relationships and the Seller's horizontal market power screens.

August 31, 2021 — Notices for any changes in status that take place after April 1, 2020 are due.

Thereafter, future notice of change in status obligations will align with the timeline used for electric quarterly reports as described in the Ongoing Reporting Requirements section in Order No. 860.

The below Appendix provides this updated implementation schedule, based on FERC's six-month extension:

Activity	Order No. 860 Schedule	Revised, Six-month Extension Schedule
Testing Period for the MBR Database	Through Sept. 30, 2020	Through Mar. 31, 2021
Effective Date of Order No. 860	Oct. 1, 2020	Apr. 1, 2021
“Go-Live” Date of MBR Database	Oct. 1, 2020	Apr. 1, 2021
Sellers Should Create Needed Identifiers (FERC Generated IDs and Asset IDs) in the MBR Portal and Prepare Their Baseline Submissions	Oct. 1, 2020 – Dec. 31, 2020	Apr. 1, 2021 – June 30, 2021
Baseline Submissions are Due	By Feb. 1, 2021	By Aug. 2, 2021
First Change in Status Filings Under New Timelines Are Due	By Feb. 28, 2021	By Aug. 31, 2021

The MBR Database Test Environment is available on FERC's website. Within this test environment, entities can find the latest versions of the XML and XSD, the Data Dictionary and frequently asked questions, as well as additional resources.

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