**From:** Magruder, Kathleen

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**To:** naesb  
**Subject:** FERC Forms Subcommittee

Below, please find answers to questions posed in advance of the Monday, June 18, 2018, conference call regarding  the XML development for FERC Forms.  These responses are submitted by an industry participant that files EQR and other FERC reports regularly.   The original questions are copied and answers are in bold type.

1.       What would be the difference in burden to your organization between implementing an XBRL data collection standard versus a custom XML solution?  **In current reporting projects, we have several CSV and XML outputs.  We currently don’t have XBRL output implementation which is more complex than other 2 formats.  It probably is also lot more expensive to code and less flexible.  We would recommend sticking with an XML based approach as we do with others like EQR as it works and easier to code.  We have current expertise to handle XML reports without any training or re-tooling.**

2.       From your experience, is one solution significantly easier/less burdensome to implement and maintain than the other? Why (e.g., open source tools, resource availability, etc.)?  **We have no experience with XBRL but based on online research, XBRL has lot more upfront work on schema definition to conform with International standards for financial reporting like currency, units, etc.  In XML there are no universal standards, only the ones defined by the subscriber of the data.**

3.       Are there efficiency gains if your organization already uses XBRL to report data to other agencies or organizations? **We have no such experience.**

4.       What are the short-term and long-term benefits of one solution over the other?  Which benefits are most valuable to your organization?  What would be the biggest challenge to implementing either solution?  **XML definitions have a lot more flexibility and can changed as needed basis.  The standards are internally defined.  Switching would require massive amounts of resources – time and money – to implement.**

5.       Do you prefer to implement an XBRL standard or a custom XML solution and why?  **We definitely prefer XML due to in house expertise.  Other FERC reports, like EQR, follow similar format.  To change would be very burdensome.**

If you are able to estimate costs for a switch from XML to XBRL, please do so.  **We cannot provide such an estimate.**

Please let me know if you have any questions.

Kathleen

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