

Subject: File Reference No. 2017-230

Hello,

Below you will find the comments from AES Corporation in relation to your Invitation to Comment on Efficiency & Effectiveness of GAAP Financial Reporting Taxonomy

Question 1: Should dimensions be used in tagging the primary financial statements? No, dimensions should not be used on the primary financial statements, as this would leave to difficulty with comparability of basic information across businesses.

Question 2: Should dimensions be primarily used for disaggregation, with a limited set of known exceptions? Yes, this allows preparers to more accurately tag data in footnotes, that will truly convey the purpose and meaning of amounts. This provides insight into the more broadly tagged numbers included in the primary financial statements.

Question 3: Would the completion of the reference project increase the efficiency and effectiveness of the GAAP Taxonomy? Given the existing resources, should the completion of the reference project be a high priority? Yes, the completion of the reference project would increase the effectiveness of the GAAP taxonomy. In the current state, it is very easy to select a concept or element that does not fit within the expected codification section. This would provide for a top down approach where the user would start with the related codification and more easily identify the associated XBRL tagging. While this would allow for more effective tagging we do not believe it should be set as a high priority as there are other areas that would be better areas to set as priorities, such as key elements missing from the current taxonomy. We believe the reference project should be more of a medium priority.

Question 4: Are there other methods to simplify element selection that you would suggest? N/A

Question 5: What types of implementation resources supporting registrant use of the GAAP Taxonomy are most efficient and effective? How would you prioritize registrant need for the types of implementation resources listed in paragraphs 1.54 and 1.55 (as well as any others that you think should be considered)? It would be very helpful to have an implementation guide that walks through the changes to the taxonomy and the expectations regarding any conceptual changes that led to depreciated tags.

Question 6: Questions 1–5 seek comments on specific areas described in Review Area 1. Do you have other suggestions that would improve the efficiency and effectiveness of the GAAP Taxonomy? Including tags for new ASU's that have been issued, even if they are not yet effective, since we tend to make reference this these accounting changes in our documents.

Question 7: Does issuing proposed changes to the GAAP Taxonomy concurrent with the FASB's proposed and final ASUs lessen the timing issues between a registrant's adoption of GAAP updates and consequential changes to the GAAP Taxonomy? Yes, we have experienced difficulties in the past with tagging items due to the adoption of new ASU's , that had not yet been included in the GAAP taxonomy.

Question 8: Should the FASB Taxonomy staff replace the current annual 60-day comment period for the proposed Taxonomy Update with an exposure process that corresponds with the required

adoption of GAAP improvements? Yes, the exposure process would allow for my timely update and communication of changes to the taxonomy.

Question 9: Do you have other suggestions related to the GAAP Taxonomy process that would improve the efficiency and effectiveness of the GAAP Taxonomy? Yes, there should be line item concepts for all required disclosure. (i.e. In the EPS section of the taxonomy there should be a tag for diluted income from continuing operation, currently there is only a tag for income from continuing operations, and you need to use an extension if you have any income/loss related to dilutive securities that would need to be included in your calculation of diluted EPS)

Thanks

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