

Subject: NERC TADS Phase II Comments.

CPS Energy welcomes the opportunity to comment on the proposed Phase II TADS reporting. In short, CPS Energy does not see any merit in the collection of this data; does not see any benefits in the metrics derived from such data; and recommends that Phase II not be implemented as proposed. Whereas the goal should focus on improved reliability of the Bulk Electric System (BES), it is unrealistic to suggest that such metrics will help move the system towards improved reliability. In fact, several of the proposed metrics could actually lead to decreased BES reliability.

For example, Non-automatic outages are primarily scheduled outages to perform maintenance to enhance reliability. It is unreasonable to suggest any meaningful metric will be maintained that results in the BES becoming more reliable. Worse, it would be easy to envision cases where reduced maintenance would actually result in improved metrics. Not only will this be counterproductive and detrimental to reliability, it will also be a huge waste of manpower, time, effort, and money.

In addition, scheduled outages are only taken after verifying that the system is within N-1 operating conditions & within reliability requirements. Thus again, any metric derived from this would not result in any improved reliability, but would result in waste of valuable manpower hours.

In the spirit of reliability, if the goal is to truly capture factual transmission line outages, a suggestion is to accomplish outage information directly from the Regional Entity Independent System Operator (ERCOT-ISO) Outage Scheduler. This system contains the specific facility outage scheduled, the time & duration of each outage. Utilizing the ISO's existing information will eliminate the need for duplicate work from multiple people from multiple Transmission Service Providers.

With a goal of TADS to consistently collect and report data to standardize at the National reporting level, as justified by TADS eliminating the need for EIA Form 411, Schedule 7 reporting requirements, it is not fully understood why the Phase II TADS requirements are more detailed than those of EIA Form 411. It is understood that NERC recognizes the shortcomings of EIA Form 411 and is therefore utilizing TADS Phase II to capture these shortcomings. However, it is not clear what value the proposed metrics regarding planned outages will generate.

Attached below are the "Comment Questions" NERC requested comment on regarding the request to collect additional transmission outage data (Phase II) for the NERC Transmission Availability Data System (TADS) in the letter from Dave Nevius (NERC) due June 16, 2008.

B. Comment Questions

While commenter's are not restricted in the format of their comments, we would appreciate your answers to the following questions:

1. If you are a Transmission Owner, do you currently collect Non-Automatic transmission

outage data similar to Phase II TADS? If “yes,” please explain. **No, CPS Energy does not collect such information. CPS Energy coordinates & schedules outages and enters them into the ERCOT Outage Scheduler.**

2. Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the Phase II Report. If “no,” please explain.

No, the data being requested is not reasonable, nor easily obtainable.

CPS Energy recommends not proceeding with Phase II & requests to reject Phase II proposed requirements.

If it is decided by NERC that the Phase II data must be collected, then CPS Energy recommends delaying the requirement by at least 1-year. In other words, the proposed data collection should not be done during the 2009 timeframe because such requirements are only reliably obtainable through efforts and manpower that are not available.

Collection of Non-Automatic Outage data that does not limit the ability of the system to perform at its full capacity does not allow for any improvements to reliability. Data should only be collected for Non-Automatic Outages that limit the system’s performance.

We recommend to delay Phase II data collection by another year (2010 data collection, submit in 2011). To support this request, as it is understood from the March 11, 2008 comments from NERC and EIA, both agreed to the following: EIA 411, Schedule 7 “should remain voluntary through 2010, with NERC providing EIA with the voluntary data it receives from the regions; mandating Schedule 7 will be re-addressed in the Electricity 2011 project, which will take up the reauthorization of EIA data collection forms, including Form 411.”

Since a main reason for implementing Phase II was to ‘replace’ Form 411 reporting, it seems reasonable to delay Phase II since Form 411 reporting is NOT mandatory and discussions in making it mandatory will be delayed to after 2011. Delaying Phase II data collection by another year (2010) will still allow reporting to be available in 2011.

3. Planned Outages have a 30-minute outage exclusion that is stated as follows:

“Outages of TADS Elements of 30 minutes or less duration resulting from switching steps or sequences that are performed in preparation or restoration of an outage of another TADS Element are not reportable.”

Please comment on the appropriateness of this exclusion.

The exclusion should be for outages less than 1 hour. This equals ERCOT’s limitation on outages. TSPs are allowed outages less than 1 hour, based upon their own analyses. Outages greater than 1 hour require coordination with ERCOT.

While the 30-minute exclusion will reduce the number of reported outages, should all outage times be recorded in order to determine which outages can be excluded based upon the 30-minute limit?

NO. All outages should not be recorded as this will result in too much detail that will not result in any meaningful reliability information or metrics (see comment section above for further detail).

*Should a TO's supporting data for determining exclusions be part of NERC's data review? **NO.***

Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.

30-minute exclusion should reduce actual reporting data. However, the burden of staffing, documenting, and maintaining outage information remains the same.

4. Are the metrics appropriate? See Section 4 the Phase II Report. If "no," please explain.

NO. The metrics are not appropriate, since many proposed metrics have no real relevance to the goal of improving the reliability of the Bulk Electric System (BES). While such metrics could be viewed as "nice" for reports, the fear that many misrepresented metrics may actually lead towards tendencies to "improve metrics" by reducing maintenance outages could actually occur to the detriment of the BES.

5. Are the data review process and the requirement that TOs maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data? If "no," please explain.

No comment.

6. Is the implementation schedule for Phase II TADS for 2009 reasonable? See Section 6 of the Phase II Report, Table 3. If "no," please explain.

NO. The implementation schedule for Phase II is not reasonable. Similar to the answer to number 2 above, the schedule is not reasonably obtainable through existing resources. (Appropriate manpower & tracking systems are not available).

7. Are there ambiguities in the Manual that need clarification? If "yes," please explain.

No comment.

Comments are due on June 16, 2008 and must be submitted in a Word document to: tadscomments@nerc.net. If you have any questions, please contact John Seelke at (609) 452-8060 or by e-mail at john.seelke@nerc.net.