

June 28, 2007

TO: INDUSTRY STAKEHOLDERS

Ladies and Gentlemen:

Request for Public Comment on TADS Report and Manual

The North American Electric Reliability Corporation (NERC) requests public comment by August 15, 2007 on its proposed Transmission Availability Data System (TADS). Comments must be submitted in a Word document to John Seelke (john.seelke@nerc.net).

TADS is described in the Transmission Availability Data System Final Report ("Report") that was approved by NERC's Planning Committee on June 7, 2007, as well as in the Data Reporting Instruction Manual ("Manual"), dated June 29, 2007. These documents may be downloaded at <http://www.nerc.com/~filez/tadstf.html>, and comments are requested on both documents.

TADS was developed over an eight-month period by a Planning Committee task force. It is a data request, not a standard. Therefore, we have provided summary information in Section A below about TADS in accordance with NERC's proposed rule on requests for data or information. The proposed data rule was posted on May 21, 2007, and may be downloaded at http://www.nerc.com/~filez/rules_of_procedure.html.

A. TADS Summary Information

The italicized language is information that must accompany a data request.

1. *A description of the data or information to be requested, how the data or information will be used, and how the availability of the data or information will foster NERC's ability to meet its obligations.*

Our response is provided in subparts. Capitalized terms are definitions that are contained in Appendix 1 of the Report.

- a. *A description of the data or information requested.*

Phase I TADS will be collecting Automatic Outage data for the transmission facilities listed below, beginning with data for the 2008 calendar year.

- AC Circuits \geq 200 kV (Overhead and Underground Circuits). Radial circuits are included.
- Transformers with \geq 200 kV low-side voltage
- AC/DC Back-to-Back Converters with \geq 200 kV AC voltage, both sides
- DC Circuits with \geq +/-200 kV DC voltage

The specific data that is being requested is described in Section 3 of the TADS Report as well as in the Manual.

A Phase II TADS for planned outages and unscheduled manual outages is under development, and that effort is not part of this data request.

b. How the data or information will be used.

NERC will use the information to develop transmission metrics that analyze outage frequency, duration, causes, and many other factors related to transmission outages. A description of these metrics is in Section 4 of the Report.

A public report showing common metrics for each NERC region will be prepared annually, and each Transmission Owner reporting TADS data will be provided a confidential copy of the same metrics for its facilities. This is discussed in Section 5.2.3 of the Report.

c. How the availability of the data or information will foster NERC's ability to meet its obligations.

We believe the greatest use of the data will be for outage-cause analysis and outage Event analysis. Event analysis will aid in the determination of credible contingencies and will result in better understanding, and this understanding should be used to improve planning and operations. Ultimately, these improvements should result in improved transmission system performance, which is consistent with NERC's obligations. Section 2.6 of the Report further describes the intended uses and limitations of the data.

2. A description of how the data or information will be collected and validated.

This information describes a coordinated effort between NERC and the Regional Entities. Data will be validated initially by the Regional Entities and finally by NERC. The data collection and validation process is described in Section 5.2 of the Report.

3. A description of the entities that will be required to provide the data or information ("reporting entities").

Transmission Owners registered with NERC will be required to report TADS data, as described in Section 5.1 of the Report.

4. The schedule or due date for the data or information.

For 2008, there are two data submission dates: May 30, 2008 (for data collected through March 31, 2008) and March 1, 2009 (for the balance of 2008 data). Since the start-up year will be 2008, we developed a timetable that would attempt to catch any fundamental design or implementation issues early rather than wait until year-end.

For 2009, data will be due on March 1, 2010. We expect this pattern to hold for subsequent years. A data collection timetable of 2008 and 2009 is provided in Section 5.3 of the Report.

5. A description of any restrictions on disseminating the data or information (e.g., "confidential," "critical energy infrastructure information," "aggregating" or "identity masking").

All Transmission Owner confidential information will be protected pursuant to NERC's confidential information policies in Section 1500 of its Rules of Procedures. In addition, TADS public reports will not inadvertently release confidential information by the display of regional or NERC information from which a Transmission Owner's confidential information could be ascertained. For example, if the Transmission Owner

in a region is the only owner of assets in a particular Voltage Class, the metrics on that data would not be released if the Transmission Owner's name and its confidential information could be identified. Section 2.4.7 of the Report addresses data confidentiality, while Section 5.4 addresses data access policies.

However, we do not believe that all the information to be submitted will be confidential information. Section 1.3 of the Manual provides our assessment of the confidentiality of data, broken down by the data requested on each data form

6. *An estimate of the relative burden imposed on the reporting entities to accommodate the data or information request.*

Many Transmission Owners already collect some type of transmission outage data, and these Transmission Owners will naturally be concerned with their ability to extract TADS data from existing data they now collect. Given the short start-up time associated with a 2008 implementation date, it may not be practical for Transmission Owners to modify their existing transmission outage data collection systems to extract TADS data.

Therefore, we fully expect that supplying 2008 data may require a manual collection and extraction process. Given that we are limiting our request to facilities ≥ 200 kV, we do not expect the burden of collection to be excessive. Using the Energy Information Administration's Form 411 Schedule 7 submittals for 2006 as a benchmark, we know that the number of Sustained Outages will not be large. For example, ERCOT reported 86 Sustained Outages for 2006 while Southwest Power Pool reported 101 outages.

B. Comment Questions

While commenters 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 transmission outage data similar to TADS? If "yes," please explain.*
2. *Is the data being requested reasonable and obtainable? See Section 3 of the Report. If "no," please explain.*
3. *Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If "no," please explain.*
4. *Is the data reporting process reasonable? See Section 5.2 of the Report. If "no," please explain.*
5. *Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If "no," please explain.*
6. *Are there ambiguities in the Manual that need clarification? If "yes," please explain.*

Comments are due August 15, 2007 and must be submitted in a Word document to John Seelke (john.seelke@nerc.net).

Sincerely,

