

Dynergy Arlington Valley, LLC (DYAV)
Comments on Phase II TADS

The following are DYAV's comments on Phase II TADS:

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.*

Yes. DYAV is a newly registered TO/TOP with one tie-line connecting Dynergy's generator to the transmission system. The Non-Automatic transmission outage data information being requested is currently available for the tie-line.

2. *Is the data being requested reasonable and obtainable?*

Yes. See answer to question 1. above.

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. 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?

The 30-minute or less outage exclusion seems reasonable.

Should a TO's supporting data for determining exclusions be part of NERC's data review?

No. It would create excessive paperwork flowing between the TO and NERC.

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

The 30-minute exclusion should reduce the reporting burden since it would result in a smaller population of outages to report.

4. *Are the metrics appropriate?*

The metrics appear reasonable with respect to providing information on an integrated transmission system; however, the inclusion of a generator's tie-line data into the integrated transmission system data would seem to "water down", small though it

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may be, the metrics associated with the integrated transmission system. Therefore, generator tie-line data should either be excluded altogether or gathered and tracked in its own database.

5. *Are the data review process and the requirements that TO's maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data?*

Yes. The data review process and historical supporting information period both seem reasonable.

6. *Is the implementation schedule for Phase II TADS for 2009 reasonable?*

Yes. The implementation schedule seems reasonable.

7. *Are their ambiguities in the Manual that need clarification?*

None were specifically noted.