

Mr. David R. Nevius
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Of Reliability Assessments and
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North American Electric Reliability
Corporation
116-390 Village Boulevard
Princeton, New Jersey 08540-5721

Subject: Request for Public Comment on TADS Report and Manual
ATTN: Mr. John Seelke

Dear Mr. Nevius:

The purpose of this letter is to respond to the North American Electric Reliability Corporation's (NERC) request for public comments of June 28, 2007, on the Transmission Availability Data System (TADS). The following comments represent the views of the Energy Information Administration (EIA), U.S. Department of Energy (DOE).

Planning Data

Planning information is inherent in determining the adequacy of supply and the security of operations. The information is needed to understand the supply and demand requirements and ensure that the current and future needs of the Nation can be met. The EIA expects to work with other Federal agencies to continue to determine the set of core data requirements to meet those needs. The EIA welcomes input from the industry's electricity reliability organization throughout this development and review process. We view the TADS as the continuation, though not the end, of that process.

Sensitive Business Data (formerly called Confidential)

Granting general protection (i.e., declaring the data to be sensitive and not releasable to the public) to all individually identifiable data associated with an individual transmission owner is of major concern to the EIA. Access by Federal agencies to that detailed data may be a necessity. Until discussions are completed within the DOE and with other Federal agencies, the EIA cannot give any endorsement to this declaration should TADS become a vehicle for providing data to the EIA. The EIA does withhold or suppress certain data in its publications where those protections have been publicly commented upon and the justification has been reviewed and approved by the Office of Management and Budget. A similar examination will have to be done for any data elements proposed to be placed in this category, if EIA is to use TADS in lieu of our own data collection.

Timely Receipt of Data

As part of its response to the findings from the Federal governments of Canadian and United States in their 2003 Blackout report, the EIA established a transmission outage reporting requirement on the Form EIA-411, "Coordinated Bulk Power Supply Program Report." As part of the process to establish that reporting system, a 1-year delay was

granted to allow the regional Councils in 2004 to establish their reporting systems. The EIA expects full reporting of outage information from all NERC regions.

Although the issue of replacing that reporting requirement with the TADS has been raised by the NERC, TADS is neither fully designed nor in production at this time. Therefore, the EIA will continue to expect the NERC to report its members' outage data on the Form EIA-411 for the foreseeable future.

NERC Requested Comments on TADS and Manual

Question 1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS?

Not applicable.

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

The EIA has been in discussions with other DOE offices having policy responsibility about the TADS approach and how this would support their work Federal. Our general perception is that the NERC has made a good start in establishing a common basis of reporting given the dispersed range of practices and preferences present in the electric power industry. However, it may be too early to tell if they meet all of the needs of the Federal government.

Question 3. Are the metrics appropriate?

The EIA sees this as a good starting point from which the industry will continue to expand and promote the quality practices inherent in the responsibilities of the industry's electricity reliability organization. In terms of addressing the needs of the Federal government, the approach looks promising for addressing part of the Federal informational needs. The EIA reiterates our request that the NERC continue to participate in briefings and discussions with the EIA, the DOE and other Federal agencies as we coordinate the national informational requirements for electricity reliability.

Question 4. Is the data reporting process reasonable?

The EIA has signed memorandums-of-agreement with the predecessor NERC organization for using the NERC to collect data and information on the Form EIA-411, "Coordinated Bulk Power Supply Program Report," and Form EIA-860, "Annual Generator Report," from the Councils (now Regions) and would consider that approach in the future. As noted above, the EIA has some basic concerns about classifying all of the detailed information as confidential (sensitive) data. There may be certain needs of the Federal government to access the detailed information which will have to be determined later.

Question 5. Is the implementation schedule for Phase I TADS for 2008 reasonable?

No, it does not meet the needs of the Federal government for timely delivery of transmission outage data. The reporting of the data on the Form EIA-411 is still needed. We have stated that improvements in the definitions can be made to the form to assist NERC and its members to more easily comply with the survey requirements. The EIA has also stated that when the TADS development process comes closer to a final business

model, that the EIA and DOE will review the process. Our hope is for common data elements, so that one reporting format can be used to keep the reporting burden on industry to a minimum.

Question 6. Are there ambiguities in the Manual that need clarification?

Some definitions and data categories differ with that of the Form EIA-411. However, these issues can be resolved as the TADS moves towards a fully functional system and the Federal agencies determine the requirements for reliability information.

We will continue to work with the NERC to review the TADS system as part of the general examination of data sources that would address the Federal requirements for reliability information. We look forward to working with the NERC on this extremely important subject.

Sincerely,

Robert Schnapp, Director
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Energy Information Administration
U.S. Department of Energy