

Draft of FE Comments

FirstEnergy has reviewed the proposed data submittal information and process and has the following comments and suggestions:

Requested Question Responses

1. *If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes," please explain.* **Yes.** FirstEnergy annually provides a high level summary of transmission outage information to ReliabilityFirst. The table below reflects the data RFC requires:

SCHEDULE 7. PART A, ANNUAL DATA ON TRANSMISSION LINE OUTAGES FOR EHV A.C. LINES (Report following data for each applicable EHV Voltage Class)						
LINE NO.	THIS TABLE INCLUDES DATA REPORTABLE FOR FE IN 2006					
1	Applicable A.C. Voltage Class	230 kV (a)	345 kv (b)	500 kV (c)	765 kV (d)	Other (specify) (e) (none)
Scheduled Outages for Specified Voltage Class						
2	Number of Scheduled Outages					
3	Number of Circuits Involved					
4	Scheduled Circuit-Hours Out of Service					
Unscheduled Outages for Specified Voltage Class						
5	Number of Non-Momentary Unscheduled Outages					
6	Number of Circuits Involved					
7	Unscheduled Circuit-Hours Out of Service					
Causal Categories for Unscheduled Outages of Specified Voltage Class (Percent)						
8	Weather*					
9	Animals, Fire and Smoke, Human Accidents					
10	Vegetation					
11	Operator Action					
12	Equipment Failure					
13	Unknown					
14	Other					

*Weather includes- Lightning outages

**These percentages are based on the 6 non-momentary outages listed on line 5 above.

FirstEnergy currently collects the following data to compile the RFC report above.

Company
Report Number
Circuit Name/Number
Outage Start Date
Outage Start Time
Outage Start Time Zone
Outage End Date
Outage End Time
Outage End Time Zone
Outage Duration-HH:MM:SS
Outage Type Code
Non-Scheduled Outage Code
Weather Code
Equipment Damage Code

2. Is the data being requested reasonable and obtainable? See Section 3 of the Report. If "no," please explain. Yes, however may require some changes to existing databases to collect all of the data being requested.

3. Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If "no," please explain. Yes.

4. Is the data reporting process reasonable? See Section 5.2 of the Report. If "no," please explain. Yes.

5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If "no," please explain. Yes.

6. Are there ambiguities in the Manual that need clarification? If "yes," please explain. No.

1.1 Additional Comments

FirstEnergy supports the efforts by the task force team to consolidate NERC and EIA reporting and agree that mandatory EIA reporting for 2007 is burdensome and problematic. We agree the best course of action is to begin mandatory reporting as phased in by the TADS program.

It would be helpful if the TADS Final Report presented a compelling reason as to why this data must be collected by NERC. The report bases NERC's authority to require this data on FERC's ruling that states the ERO can collect information "as is necessary to implement section 215 of the Federal Power Act." In other words, as NERC finds a need for data in the performance of its role as the ERO.

However, this Final Report does not adequately address such need. This Final Report only says that "collecting data is done so for the overriding purpose of providing Transmission Owners and NERC with the information to support decisions with respect to improving reliability and performance," and, that TADS was to proceed "on the premise that transmission availability data will help quantify system performance and reliability." Through this report, NERC should more rigorously address the benefit of requiring the industry to

provide this data. Assuming this data is needed, it is unclear why it is limited to facilities greater than 200 kV when it appears the Reliability Standards apply or will apply at facilities greater than or equal to 100 kV. Furthermore, the report is open ended as to the how the data might be applied to developing future compliance and performance metrics.

In addition, the requirement to supply data should be housed in the NERC Standards whenever possible to allow for industry comment as a means of insuring the final product meets the need at hand and that all present and future uses of the data and resulting metrics or performance benchmarks are clearly delineated and properly subjected to the stakeholder input process. The TADS process should only be applied when there is a bona fide one time need for the data requested or only until the standards can be adjusted for data that is essential and needed immediately to ensure reliability of the BES.

The program should be adjusted to align with changes in the definition of the Bulk Electric System (facilities greater than or equal to 100 kV, etc.) when the definition work is completed and approved by FERC.

The program as outlined in this report is a very good start and could be enhanced by providing an opportunity for non-United States entities to report their information voluntarily to expand the area of coverage and further improve the richness of the data.

Comments were submitted by David Folk of FirstEnergy on August 15, 2007.