

August 14, 2007

Mr. David R. Nevius
Senior Vice President Director of Reliability Assessments
North American Electric Reliability Corporation

Dear David:

Re: Request for Public Comment on TADS Report and Manual

The IESO appreciates the opportunity to provide comments in response to NERC's solicitation for public comments¹ to the Transmission Availability Data System (TADS) Final Report ("Report") that was approved by NERC's Planning Committee on June 7, 2007, and the Data Reporting Instruction Manual ("Manual"), dated June 29, 2007.

In the Report, the TADS Task Force explains that ["t]he legal basis in the United States for this data request is Section 39.2(d) of the FERC regulations and section 215 of the Federal Power Act". The Task Force further explains that its approach for requesting data is generally consistent with the approach outlined in NERC's proposed data rule, Section 1600, and is proceeding with the data request on the basis it will be approved by FERC, even though not likely in time for TADS 2008 implementation. The IESO submitted comments to NERC on July 3rd, 2007 in response to the May 21st request for comment on the proposed rule. In this submission, the IESO reminded NERC that requests for data or information from Ontario-based entities fall under the scope of the MOU signed in 2006 by the Ontario Energy Board (OEB) and NERC, and the MOU signed in 2006 by the IESO, NERC, NPCC CBRE and NPCC Inc. ("Ontario MOUs").

The Task Force explains that its objective was to define a uniform approach to reporting and measuring transmission availability and performance. They further explain that with the implementation of TADS, they are hopeful that the need for reporting of similar data by US entities through the Energy Information Administration (EIA) 411 filings will be eliminated. In this regard, the IESO is supportive since duplicate reporting of the same data imposes a burden on Ontario transmission owners. As stated in our July 3, 2007 comments to NERC, the IESO will consider data requests but we will do so in consultation with our market participants including our transmission owners for this TADS request, where specifically requested for EIA reporting². Furthermore, as stated in our July 24, 2007 submission to NERC³ the IESO continues

¹ See NERC Request for Public Comment on TADS Report and Manual, dated June 28, 2007

² EIA indicated that TADS would need to provide comparable Schedule 7 data specifically the collection of scheduled (i.e., planned) outage data now required in Schedule 7 for TADS to substitute for EIA 411 filings. If this could be

to support an effective international ERO. In this regard, the IESO will continue to provide NERC with data and information required to improve the reliability of the bulk power system.

The IESO's main interest is our continued support for such similar data gathering designed to support the determination of credible contingencies and the work of the NERC Operating Limit Definitions Task Force (OLDTF).

Following are IESO responses to the specific questions posed.

1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes," please explain.

Although the IESO is not itself a physical owner of the transmission assets in Ontario, it will, in accordance with the above noted MOU, be the entity collecting the data from Ontario market participants and subsequently forwarding it to NERC.

2. Is the data being requested reasonable and obtainable? See Section 3 of the Report. If "no," please explain.

The IESO does not envisage any technical problems with providing the requested data, though we believe it will be relatively extensive and administratively burdensome for large transmission owners, especially when it comes to providing element inventory data as outlined in Section 3.2.

In addition, the definition of element in section 2.4.1 needs to be expanded to include busses and inadvertent breaker outages to properly assess the "credible contingency" one of the primary purposes of this data request. This is an area where there is a diverse range of views of what contingencies need to be observed.

We also wish to note transmission lengths from Canadian jurisdictions are in metric and will need to be converted to Imperial.

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

The metrics seem reasonable as an initial set provided the effort is considered a "work in progress" as characterized in the report and that the data and metrics can be modified as the industry gains knowledge from the data analysis. The metrics, as presented now, have a universal basis but might have to be modified in order to incorporate regional differences and practices. Additionally, it must be stressed to all participants that trend analysis of metrics would not be possible unless a few years worth of data has been collected.

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

The reporting process for entities appears reasonable, though further refinements on how the regional entities compile the information for reporting NERC may be warranted.

accomplished, the EIA Schedule 7 could be administratively amended *after* its approval in the fall of 2007 so that TADS data collected for calendar year 2008 could substitute for comparable data specified in Schedule 7.

³ NERC DRAFT Request for data to Fulfill FERC Oder No. 693 Requirements.

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. The two-part request provides for course corrections early on. However, NERC must provide a formal feedback on the data received, and any associated interpretations, after the first set of submissions.

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

The IESO suggest the TF consider modifying cause code 9 (Relay and/or Control Misoperation) and cause code 12 (Human Error). It is the IESO view that an incorrect relay setting be considered as a Human Error and not a relay misoperation, while mal-operations due to failure of a relay component, or incorrect operation classified as the true misoperation.

The IESO also notes that the definition of sustained outages with respect to vegetation outages is inconsistent to that used in NERC standard FAC-003 and will result in misleading information with reported to that reported with FAC-003.

Section 4b1 and 4b2 may be construed differently by the reader. For example, will element outages such as circuits reported, as described in 4b2 (frequency / 100 mi), be exclusive to outages reported in 4b1? If this is the case, we can neither get a true picture of the frequency of the number of times a circuit trips nor can we establish a comprehensive list of credible contingencies.

Section 5.2.2 states that NERC will check Regional Entity (RE) submitted data at a "high-level" whereas the flowchart on the next page suggests that NERC will "check RE data". NERC should not be spending time on rechecking data which would have already passed validity checks by the concerned TO's and RE's.

Respectfully Submitted,



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