

June 16, 2008

Mr. John Seelke
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, NJ 08540

Dear John,

KCP&L is pleased to provide comments on the proposed NERC Phase II Transmission Availability Database System (TADS) within the Request for Public Comments on TADS Report and Manual, dated April 30, 2008. KCPL supports the proposal for development and use of an effective tool that will provide performance measurement and reliability assessment of the transmission system. KCPL has taken an active role with EPRI in establishing transmission performance metrics and will continue to support NERC in their efforts for data collection and metrics establishment.

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.

KCP&L does not currently collect all non-automatic transmission outage data. Most are readily available through standard record keeping for all planned outages including switching, clearances and holds. These records are for the most part manual entries into logs and hold books that may be used as a basis for entering any data requests NERC would require to compile all non-automatic transmission outages.

2. Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the Phase II Report. If “no,” please explain.

KCP&L believes it is reasonable to provide this Phase II non-automatic transmission outage data for the voltage level of 200kV or greater. It would become a significant burden for lower voltages due to the high volume of planned system switching for routine maintenance work that has little or no effect on reliability for the greater bulk power system. KCP&L supports utilizing this 200kV system voltage threshold to ensure that this data collection has meaning toward creating metrics for reliability and deliverability measurements on the bulk power system.

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? Should a

TO's supporting data for determining exclusions be part of NERC's data review? Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.

KCP&L supports the use of minimum outage time exclusion, such as the 30 minute time, to prevent the compilation of non-sustained planned outages within the data set. Switching and clearance outages that are short in duration in order to prepare or provide short-term test switching should not be required in order to allow only those sustained clearances and outages that represent long-term system discontinuities.

The recording of times for these is potentially possible for most operations but should not be required. In some cases, switching times are recorded by the system operator and at other times, the field personnel have discretion to operate devices whereby only the EMS – SCADA records the open and close times. Entities should not be required to list all planned operations such as these by time of open and close to show they were less than the 30 minute window.

4. Are the metrics appropriate? See Section 4 the Phase II Report. If “no,” please explain.

Yes, the metrics are reasonable. KCP&L strongly recommends that NERC work toward similar goals and metrics developed within the EPRI Transmission Grid Reliability Performance Metrics work.

5. Are the data review process and the requirement that TOs maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data? If “no,” please explain.

Yes, KCP&L believes the five year period is reasonable.

6. Is the implementation schedule for Phase II TADS for 2009 reasonable? See Section 6 of the Phase II Report, Table 3. If “no,” please explain.

Yes, KCP&L believes it is.

7. Are there ambiguities in the Manual that need clarification? If “yes,” please explain.

No, KCP&L believes it is clearly written and communicated.

Sincerely,

Todd Fridley
Transmission Policy
Kansas City Power & Light Company
816-654-1214
todd.fridley@kcpl.com