

Manitoba Hydro submits the following comments in response to NERC's April 30, 2008 "Request for Public Comment on Phase II TADS Preliminary Report and Manual":

- There is a lack of clarity in the report regarding the voluntary nature of Phase II data submittals by non-jurisdictional entities, such as Canadian utilities.  
Page 1 - "Phase II would add a requirement that TOs report scheduled outages and manual unscheduled outage data beginning in calendar year 2009." This should refer only to US transmission owners.  
Page 4 - "Eventually all TOs would be reviewed." This should read as "submitting TOs."  
Page 8, 9 - NERC proposes collecting "almost all transmission outage data." Manitoba Hydro recommends revising these statements to clarify whether or not the mandatory nature of the Phase II request is limited to U.S TOs.
- There is inadequate consideration in the report regarding confidentiality of data submittals by non-jurisdictional entities, such as Canadian utilities.  
Page 11 - "... with NERC providing EIA with the voluntary data it receives from the regions..." It is unclear whether NERC would redact Canadian data from any submittal to FERC or EIA. The report does not describe how voluntarily submitted Canadian data is protected from release to a foreign government or regulatory bodies. Manitoba Hydro recommends revising the report to exclude Canadian data from the data provided to FERC or EIA.
- In general, Manitoba Hydro disagrees with the need to collect planned outage data. The resources required to collect the data are not proportionate to the value of the data. Planned outage statistics provide minimal value in improving the reliability of the transmission grid.