



June 16, 2008

VIA EMAIL TO tadscomments@nerc.net

Mr. David R. Nevius
Senior Vice President & Director
North American Electric Reliability Corporation
1120 G Street, NW, Suite 990
Washington, DC 20005

Subject: NEMA Comments on NERC TADS Phase II

Dear Mr. Nevius,

The National Electrical Manufacturers Association welcomes the opportunity to comment on the NERC Transmission Availability Data System Phase II. The outage data will not only help grid operators improve reliability, it can help manufacturers design and produce more robust power equipment. To this end we have specific comments regarding the most recent revision of the TADS manual. In these comments we respond directly to the questions outlined in the data request.

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.

NEMA and its member companies are not Transmission Owners.

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

NEMA believes the requested data is reasonable and obtainable, and would find additional detail on equipment characteristics beneficial. For a given outage, a unique element identifier is already reported. NEMA would find it particularly useful to also record the date of manufacture or in-service date of that transmission element, either through the same form or through a separate table linking the transmission element to its nameplate characteristics. For transformers, other nameplate information would also include power rating, voltage rating, BIL rating, insulation class, cooling class, temperature class, impedance, frequency and presence of a load tap changer.

**National Electrical
Manufacturers Association**
www.nema.org

1300 North 17th Street, Suite 1752
Rosslyn, VA 22209
703.841.3200
Fax 703.841.5900

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.

NEMA has no basis to dispute the appropriateness of this exclusion.

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

NEMA requests that the outage metrics presented in Section 4 also be broken out by equipment age. For example, a potential metric would provide “Mean Non-Automatic Outage Time due to Lightning for Transformers installed between 5 and 10 years ago.”

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.*

NEMA has no basis to believe that the data retention requirement is unreasonable.

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.*

NEMA has no basis to believe that the implementation schedule is unreasonable.

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

NEMA has not found ambiguities that require clarification.

Thank you again for the opportunity to improve the reliability of our electricity infrastructure. If you have any further questions, please contact Eric Hsieh (eric.hsieh@nema.org, 703-841-3265).

Sincerely,



Kyle Pitsor
Vice President, Government Relations