

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.

Yes, but the actual times of the outages are not tracked past the clearance paperwork. This requires procedural and software implementation.

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

Yes with procedural and software implementation.

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.

All planned outages, regardless of duration, above 200kV should be included if the outages impact/interrupt transmission flows. This will increase the reporting burden, but it may explain system power flow changes.

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

In time this information may be useful, but currently not sure how this would be utilized.

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, but this will require procedural and software implementation, as well as training and review time for TO’s.

Comments submitted on June 13, 2008 by Paula Hammersley, Northern Indiana Public Service Company (NIPSCO)

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.

Schedule seems reasonable, but internal procedures and software implementation need to be implemented and validated.

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

No.

Comments are due on June 16, 2008 and must be submitted in a Word document to tadscomments@nerc.net. If you have any questions, please contact John Seelke at (609) 452-

8060 or by e-mail at john.seelke@nerc.net.

Sincerely,

Senior Vice President and

Director of Reliability Assessment & Performance Analysis