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Northeast Utilities Service

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June 16, 2008

RE: Request for Public Comment on Phase II TADS Preliminary Report and Manual

Dear Mr. David Nevius:

Northeast Utilities (NU) is pleased to provide you with its comments relative to Phase II TADS. In accordance with your request, NU followed the format for comments as noted below.

Overall, NU believes the TADS Phase II reporting would:

- Prove burdensome to the TO's and TOP's.
- Distract resources that should be focused on reliability.
- Appear to have no obvious benefit due to the amount and diversity of data.

The Phase II preliminary report alludes to the data collection effort eventually encompassing 115 kV lines as well. This will require additional time, cost, and resource impact aggravating an already questionable Industry Cost/Benefit analysis.

However, if the industry decides to proceed with this initiative as described, NU will certainly comply with the data request.

Northeast Utilities Comments – Phase II TADS

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.

We schedule all planned outages and submit our schedules to our Regional Entity for outage planning purposes to ensure outages are taken to minimize system risk.

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

We believe that the data is obtainable with a cost and resource impact to NU, but it is not clear that the request is reasonable. NERC does not present a convincing case as to the benefits of this data collection effort. In other words, the Cost/Benefit is poor at best.

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.

If TADS, Phase II is implemented, the 30 minute exclusion should definitely be maintained. Otherwise, additional effort would need to be expended beyond outage scheduling issues to obtain data from our EMS system to track all of the switching impacts further aggravating any Cost/Benefit calculations. The impact of these times affecting any metric calculation is minimal.

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

No, it is not clear as to how these metrics will be used to improve system reliability.

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.

Five years of data retention does not appear to be unreasonable, although many of the NERC standards seem to rely on a three year look-back. Don't know if there is much benefit to the additional two years.

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.

NERC should allow at least one year after the BOT would approve Phase II since most Utilities would probably need to implement or modify software for capturing all of this outage data.

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

The manual appears to be well written. However, under Phase I, the changes seemed to occur continuously without any notification of changes.

William J. Temple
William J Temple

6/14/08
Date