

Nova Scotia Power Inc.
June 16, 2008

Mr. John Seelke
Manager of Planning
North American Electric Reliability Corporation (NERC)

Reference: Letter from NERC to Transmission Owners dated April 30, 2008, "Request for Public Comment on Phase II TADS Preliminary Report and Manual"

Dear Mr. Seelke

As previously stated Nova Scotia Power Inc. agrees with NERC TADS Phase I data collection. However Nova Scotia Power Inc. disagrees with the TADS Phase II requirement for the recording of planned outages. Planned outage statistics provide little value in assessing the reliability of the transmission system. Planned outages follow a defined outage coordination process with reviews and approvals. The outage coordination process currently evaluates the reliability risks to the electrical system. Planned outages may be cancelled or rescheduled due to system conditions, weather, or crew availability. Since the process is manual, the data collection is complex and labor intensive.

Reliability of transmission infrastructure is managed through a number of strategies such as energized, de-energized line work, line segmentation through switching activities, and other capital replacement programs. These maintenance strategies will impact planned outage metrics. With various line maintenance strategies planned outage metrics could be misinterpreted.

NERC letter April 30, 2008 request for comments as stated and are reproduced here in bold italic font. Responses are included below in regular font.

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.

- No, this data is not collected similar to Phase II TADS. The Non-Automatic outage data is available through a number of separate systems: SCADA electronic logs, or operator manual logs, or outage coordinator manual logs. As a result, the data collection process would be manual and labor intensive.

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

No, this request is not reasonable to obtain. Planned outages can be cancelled due to system conditions, weather, or crew availability. NSPI currently has no single source to compile the completed planned outage data. Since the process is manual for NSPI, the data collection is complex and labor intensive.

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.

- NSPI does not support TADS Phase II data collection. Please refer to comments above.

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

- NSPI does not support TADS Phase II data collection. Please refer to comments above.

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.

- This is reasonable for TADS Phase I, however is not reasonable for TADS phase II.

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.

- NSPI does not support TADS Phase II data collection. Please refer to comments above.

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

- NSPI does not support TADS Phase II data collection. Please refer to comments above.

Respectfully,

Andrew Webb