

## B. Comment Questions

While commenter's are not restricted in the format of their comments, we would appreciate our answers to the following questions:

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, we collect Non-Automatic and Automatic transmission outage data in our Transmission Interruption Reporting System (TIRS) database.**

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

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? **Oncor would prefer to exclude all outages equal to or**

**less than 30 minutes without any additional analysis.**

Should a TO's supporting data for determining exclusions be part of NERC's data review? **No**

Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.

**If the exclusion is based on 30 minutes or less it will reduce our reporting burden.**

**If the exclusion is based on 30 minutes or less and also based on the circumstances regarding the event, it will increase our reporting burden since each individual outage event equal to or less than 30 minutes cause will need to be analyzed further before exclusion.**

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

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? **Yes.** If "no," please explain.

6. Is the implementation schedule for Phase II TADS for 2009 reasonable? See Section 6

of the Phase II Report, Table 3. **Yes.** If "no," please explain.

7. Are there ambiguities in the Manual that need clarification? **No.** If "yes," please explain.

Comments are due on June 16, 2008 and must be submitted in a Word document to [tadscomments@nerc.net](mailto:tadscomments@nerc.net). If you have any questions, please contact John Seelke at (609) 4528060 or by e-mail at [john.seelke@nerc.net](mailto:john.seelke@nerc.net).

Sincerely,

Senior Vice President and  
Director of Reliability Assessment & Performance Analysis