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North American Electric Reliability Corporation
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Subject: Request for Public Comments on Proposed TADS Phase II Data Collection.

I would like to submit the following comments in response to NERC's request dated 4.30.2008. These comments apply to NERC's proposed TADS Phase II data collection.

- NERC has to be commended for developing the Transmission Availability Data Systems (TADS) Data reporting instruction manual. The manual is very exhaustive with very good illustrations.
- Some of these comments are general in nature and are not specific responses to the questions outlined in request letter.
- Tables 6.1 to 6.4 include various notes regarding Phase II data reporting. Suggest adding a note as to how to report end time if the outage continues into next year. "For outages that did not end in the reporting year the enter 12/31/yyyy 23:59 as the outage end time, where yyyy is the current reporting year".
- In Appendix 7 Section G "Planned Outage Cause Codes" suggests combining construction and maintenance outages into one category. In reality these can be different; it is quite possible that maintenance will be scheduled when a facility is removed from service for construction activities. It is suggested that these be reported as separate activities. It is suggested that 3 different codes are provided to report these outages.
 1. Planned outages - Construction.
 2. Planned outages – Maintenance.
 3. Planned outages – Maintenance and Construction.
- In Appendix 7 Section H.2 states "System Limit Mitigation" has to be used for Operational Outages taken to limit system voltages on the transmission system within desired levels (i.e., voltage control). Section H.3 "System Operating Limit Mitigation, excluding System Voltage Limit Mitigation". This section includes a bullet item 4 that deals with "System Voltage Limits" and a note at the bottom that instructs to exclude the last category. The last bullet and the note should be removed since they do not provide any useful purpose. The best approach would be to eliminate H.2 and create four outage codes to distinguish the 4 operating limits.
 1. Outages to mitigate Facility ratings.
 2. Outages to mitigate Transient Stability ratings.
 3. Outages to mitigate Voltage Stability ratings.
 4. Outages to mitigate System Voltage limits.

- **Question #3- 30 minute exclusion:** In Appendix 7 Section B.5 suggest that “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. This 30 minute exclusion will not capture all outages and will skew the metrics. However, I will support not reporting outages caused to system elements during switching steps. I suggest replacing this verbiage with “Outages caused to some TADS elements during switching steps or sequences that are performed in preparation and restoration of another TADS element need not be reported”. This requires modification of examples shown in Appendix 10.

Thank you very much for the opportunity to comment on this effort.

Sincerely,

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