



**Department of Energy**  
Western Area Power Administration  
Sierra Nevada Region  
114 Parkshore Dr.  
Folsom, CA 95630-4710

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. WASN Outage Coordinating is done using the Transmission Outage Application and Logging Program (TOA). However, the information as formatted must be manually input to the TADS system.

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

Yes, the TOA program stores a complete database for all outage requests and system / equipment interruptions, Automatic or Non-Automatic (Planned / Unplanned).

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.*

This is a reasonable exclusion time, do not remove. To consider the inclusion of outages that are currently classified as non-reportable will inherently increase the reporting burden upon each entity on a national scale.

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

The metrics are self explanatory and meet the statistical criteria for reporting outage duration inclusive of the Mean and Median for each element category.

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. As a Federal entity, this meets the minimal maintenance records storage criteria. However, depending on how the system has changed this data may no longer be meaningful.

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.*

Yes. However, for those personnel who will be preparing for an on-site compliance audit, the November-December 2008 timeframe for TADS web-based training and workshops may present a conflict. Accordingly, will additional (later) dates/times be scheduled?

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

No, the manual is self-explanatory providing sufficient information as needed.