

## **ATC's comments on NERC's TADS II proposed data request**

### ***Responses to Comment Questions from Section B of the Request for Public Comment:***

***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.***

Answer: Yes,

ATC does collect some historical planned outage data in order to respond to EIA's data request. We do not collect the volume of planned outage data proposed in TADS's Phase II. In addition, we believe that the amount of data that is being proposed to be collected for Phase II will place a unreasonable burden on the industry.

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

Answer: No - "the request is unreasonable" /Yes - obtainable,

ATC believes that the proposed data request is unreasonable because the use of the data will not result; in greater reliability, better reliability standards or a greater understanding of the transmission system.

ATC believes that the data is obtainable but will require a number of process changes along with programming modifications.

***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.***

ATC believes that the exclusion provides greater complexity to the data request without providing any value.

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

ATC believes that the proposed metrics are appropriate for the proposed data request, but as we commented previously the date request it self is unreasonable.

***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.***

No Comment

***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.***

Should the Planning Committee decide to proceed with Phase II TADS, ATC recommends that the implementation of NERC Phase II TADS be delayed for several years. During that time the industry will be able to focus on the automatic outage data and determine the appropriate use of the data.

At a minimum ATC believe that a one year delay is needed for implementation. With the Board of Trustees decision slated for October 28, 2008, and the reporting requirement beginning on January 1, 2009, there is insufficient time (only 9 weeks) to put new data systems and validation processes in place.

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

Answer: No

The manual seems to identify the data to be collected.

ATC appreciates the efforts of the TADS Task Force and this opportunity to comment on their proposal.

Thanks,

Jason Shaver  
Reliability Standards and Performance Manager  
American Transmission Co.