

Phase II TADS Comments

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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.

Prior to the Phase II TADS initiative we did not collect non-automatic outage data. We have no formal process for recording non-automatic outages as we do automatic outages, however recently we have been recording our planned outages manually in a spreadsheet to gauge the time commitment required for this task in anticipation of Phase II TADS requirements. The process for recording planned outages is currently quite time consuming, particularly as spring/summer construction heats up.

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 requested data is minimal and reasonable, however, as stated previously, it is currently a time consuming process to accurately record the outage data requested. It will require significant changes to be able to simplify the process and incorporate it into our automatic outage recording system.

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.

A 30 minute exclusion seems appropriate however the times at which the various switching steps occur are not recorded in our online logbook which is consulted to determine planned outage durations. Times are recorded for when GOI’s are issued and returned which reflect when an element was switched in-to or out-of service. When recording planned outages we neglect any temporary outages that are as a result of the various switching steps. Including these short duration outages that occur as a result of the switching steps would certainly increase the burden of recording planned outages.

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

Yes.

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.

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.*

Somewhat. It will take some time to develop a formal process for recording non-automatic outages and incorporating it into our current automatic outage recording software. Due to budgetary and time constraints on account of the software changes required it is highly unlikely that a system will be in place by the beginning of 2009. Non-automatic outages will have to continue to be recorded manually, as is currently done, on an interim basis until a system is in place.

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

No.

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