

Ameren's Comments on TADS Report and Manual

In response to the request, Ameren offers the following:

B. Comment Questions

While commenters are not restricted in the format of their comments, we would appreciate your answers to the following questions:

1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes," please explain.

Ameren collects data on forced transmission outages to evaluate for proper relaying. This data is kept in an Access database that contains similar data to what is being requested by TADS.

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

Yes, the data is reasonable and obtainable because the voltage level limits the data to a manageable level. It should also be understood that, with respect to tie lines and jointly-owned facilities, double-counting and missing facilities needs to be avoided. With this in mind, a particularly vulnerable point in the data collection process would seem to be for tie lines at regional boundaries. Vigilance will be needed at these boundaries to make sure that the data is correct.

3. Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If "no," please explain.

Generally the metrics are appropriate. However, Ameren is concerned how restoration time is defined for lines with more than two terminals, and how it will affect the analysis of the data. It is our understanding that the line is not considered restored until all terminals of the transmission voltage class being reported, are restored. For example, assume there are two 345 kv lines, one with a 138 kv transformer tapped for a third terminal and another with a 230 kv transformer tapped for a third terminal. Ameren understands that the first line would be considered restored when the two terminals at 345kv are restored, regardless of the status of the 138 kv transformer. The second line would not be considered restored until the 230 kv transformer is also restored. This seems to result in an odd, if not obtuse, portrayal of the two outages.

4. Is the data reporting process reasonable? See Section 5.2 of the Report. If "no," please explain.

The process documents are a good start but need much more guidance with many more examples. Since the reporting may be completed by many different individuals, most of whom will have other primary duties, a better reference and explanation or the required data would be beneficial. Specifically, and for example:

On form 4.2, what is the purpose of column 1, “Row No.”? If none, it should be removed or explained.

On form 4.2, the Event ID code should be easier to enter. If you want the year, it should be either a separate column or at the beginning of the code, to take advantage of dragging the cells and incrementing the ID code automatically. e.g. 2006-1; 2006-2; ...etc. This may be dependant on what format the final data submittal will be expected.

On form 4.2, if the secondary voltage at a terminal is reportable, but different than the primary voltage designation of the line, how is it designated?

On form 4.2, could the circuit name be the standard naming convention used by the TO, providing that the two primary terminals are identified? What if there are additional terminals? The instructions suggest the names used should come from the power flow case library used by the Regional Entity. If this is what you want, should it be stated that way?

On form 4.2, Start and End times of outages should have fields designed for easy entry (using current prevailing time) and the duration calculated.

In general, on form 4.2, pull down menus on the different data columns should be available on each field in that column.

5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If “no,” please explain.

Ameren believes the implementation schedule is reasonable as presented

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

It is stated in section 5.2.3 of the Report (Analysis & Reporting) that there will be two levels of reporting on metrics – each Transmission Owner will receive a confidential report covering data and metrics on their system, while a separate public report would be distributed to each Regional Entity. Presumably, the contents of each of these reports will differ, with considerably greater detail being presented in the reports given to each Transmission Owner, such as outage statistics related to specific transmission elements. However, it is not clearly stated in section 4 of the report where this breakpoint in detail level will be between the public report and confidential Transmission Owner reports.

Ameren comments compiled by:

Gerald D. Beckerle
Senior Transmission Operations Supervisor
Transmission Operations
Ameren Services
(314) 554-6413
gbeckerle@ameren.com

Submitted on 8/15/07