



A Constellation Energy Company

June 16, 2008

BGE's comments in response to the April 30th letter requesting public comment on the **Phase II TADS Preliminary Report and Manual** are listed below.

***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.***

As part of the normal operation of the transmission system, BGE assembles and maintains Non-Automatic transmission outage data; however, this information is not currently in a format suitable for the proposed TADS Phase II effort. By accessing a combination of internal company and RTO required planned outage scheduling tools along with control room operational logs, this information is obtainable with some effort by BGE.

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

As noted above, with some effort, the data is obtainable for BGE.

BGE believes there is a reliability benefit which can be obtained by reviewing Emergency Operational Outages. These outages, by their definition, are unplanned and can potentially place the system in an at risk condition.

BGE does not feel collecting the other Non-Automatic planned outage data will lead to marked improvement in bulk electric system reliability or performance. The other Non-Automatic outages being requested are reviewed and implemented by the grid operator either to ensure and maintain system reliability (Operational Outage Codes 2 & 3), or to enable planned work to occur. Planned outages occur in accordance with established business rules which provide proper notification to market participants and occur only when operating reliability criteria can be maintained. Focusing on planned outages could potentially create a disincentive for transmission owners to take outages and perform needed maintenance activities, thus leading to degraded reliability. Also, intervals and work practices (including the ability to perform live line work as well as the scope

of work performed) vary among transmission owners, thus creating additional uncertainty in the usefulness of the planned outage data.

BGE does not feel the **Section 2.3 Intended Uses and Limitations of Non-Automatic Outage Data and Metrics** in the *Transmission Availability Data System Phase II Preliminary Report dated March 13, 2008* provides a sufficient explanation for the definitive use of this Non-Automatic data to justify the resources and effort required to provide this large volume of information.

**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.***

The 30 minute exclusion is appropriate. If the 30 minute exclusion remains, then TOs should not be required to provide all data that falls within this criteria and would eventually be excluded. TOs should not be required to provide supporting data to NERC for review since this effort will further increase the reporting burden. The 30 minute exclusion will not materially reduce or increase the reporting burden for BGE.

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

The metrics appear to be appropriate based on the data being requested. As stated above, BGE questions the benefits of reporting and developing metrics to track planned transmission outages.

**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.**

Yes

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

There is a need to further distinguish between Planned Outages and Operational Outages beyond the existing terminology which includes the phrase “...that cannot be deferred”. A clear time frame should be established to provide guidance to this phrase. Perhaps 1 hour would be a good demarcation. As an example, a situation in which equipment is on fire requiring immediate de-energizing is clearly an Emergency Operational Outage. A planned equipment outage in two months is clearly a Planned Outage. But a very real situation could entail a line or equipment condition requiring attention that can not be deferred for a long time but can be scheduled in the near term (1-2 hours, 4 hours, 12 hours, 24 hours, or even a few days). This time is often needed to align field resources, perform system studies, to coordinate with when generation adjustments are obtainable, and to meet overall load and reliability criteria. At what time in the above example would such an outage change from Emergency to Planned? Would it?

**Comments are due on June 16, 2008 and must be submitted in a Word document to [tadscomments@nerc.net](mailto:tadscomments@nerc.net).**