

**Comments of the Bonneville Power Administration, US Dept of Energy  
Re. NERC Phase II TADS Proposal**

**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 Non-Automatic transmission outage data similar to Phase II TADS? If “yes,” please explain.

BPA is a large transmission operator in the Northwest US, with nearly 300 potentially reportable transmission lines, and more than 50 potentially reportable transformers. With such a large inventory, we therefore review very carefully any proposed data reporting requirement to assess potential work effort and cost to comply. We have been fully supportive of Phase I TADS efforts re. automatic outage reporting. However, in the case of the proposed Phase II TADS re. planned outage reporting, we believe the costs and effort highly outweigh any potential benefits.

The Western Electricity Coordinating Council (WECC) is our Designated Reporting Entity (DRE) for TADS. As such, we are in full agreement with the coordinated comments they will provide under separate cover. In summary, we recommend that Phase II TADS not be approved for implementation by the Planning Committee and not be submitted to the NERC Board of Trustees for approval. Additional comments are provided below.

BPA does collect and record outage information for after-the-fact planned outages for transmission lines, including outage start time, end time, duration, cause, and selected comments. But the cause code structure we use, and the logic behind those causes, are rather different from those of the TADS Phase II proposal. Also, we do not collect or record any planned outage information for transformers. This proposal would therefore require us to implement extensive and expensive modifications of our data collection and analysis processes.

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

We concur with the consolidated WECC comments that the data requests of Phase II are neither reasonable nor useful, given the wide variety of planned outage practices across the nation.

For example, one critical distinction is the degree to which a system is configured for redundant overlapping service. Systems with a large degree of redundancy might sustain high levels of planned outages. Systems with large volumes of radial service and less redundancy, for example, the more geographically diverse and sparsely settled areas of the West, might sustain fewer planned outages. Comparability across operators, and across the nation, will be limited.

Another critical distinction is the degree to which a given transmission operator makes use of bare-handing (live-line) maintenance methods. Such practices have a significant impact on the degree to which an operator needs to take, or not take, planned outages. Again, comparability across operators, and across the nation, will be limited.

And if comparability is limited, the data reporting burden of Phase II TADS is therefore unreasonable and unnecessary. Individual transmission operators can and do track their own planned outage patterns and trends in light of their own electrical configuration, geographic diversity, and planned outage practices.

Finally, we fully concur with the July 2006 Electric Power Research Institute (EPRI) Transmission Grid Reliability Performance Metrics Final Report which also recommended against using metrics or setting performance targets based upon planned outages.

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.

If data collection were to proceed for Phase II (not recommended), we believe that any outage “exclusions” must be completely non-arbitrary and non-ambiguous. For example, an exclusion of “all planned outages less than 30 minutes duration” would be clear and unequivocal. But do not add any further qualifiers such as “only resulting from...” or “only in preparation of...”, etc. Such escape clauses are ambiguous, often self-serving, and very likely to be applied in very different ways by different utilities. A clear, non-ambiguous, mathematically-defendable, standard of simply reporting ALL outages is far preferable, as NERC has specified for Phase I TADS. The 2006 EPRI Report cited in Q2 above also recommended No Data Exclusions. But if necessary, a non-arbitrary standard of exclusion of all planned outages less than 30 minutes duration might be analytically acceptable.

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

If data reporting were to proceed for Phase II (not recommended), the suggested metrics seem reasonable on the surface, but lack of comparability across the industry in planned outage definitions and processes will make any metrics of highly questionable value.

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.

If data reporting were to proceed for Phase II (not recommended), we believe a 5-year data retention requirement is acceptable. BPA has electronic records of all planned outages back to 1985.

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.

If data reporting were to proceed for Phase II (not recommended), the suggested timetable is much too aggressive, given that many utilities may not presently be collecting planned outage information at all, while others may not be collecting such information with a content or logic consistent with the Phase II proposal.

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

None immediately identified.

\* In summary, we recommend that the Phase II TADS proposal not be approved, and fully support the consolidated WECC comments to that same effect.

Thank you for the opportunity to comment.

Bonneville Power Administration/Transmission Technical Operations/TOT/11Jun08