

CenterPoint Energy Houston Electric, LLC Comments to the North American Electric Reliability Corporation (NERC) on its Request for Public Comment on its Phase II Transmission Availability Data System (TADS) Report and Manual

Submitted on June 16, 2008 by Michael Pakeltis

Submitted to: tadscomments@nerc.net.

Comments to TADS Phase II Preliminary Report (Phase II Report) dated March 13, 2008:

CenterPoint Energy strongly disagrees with the NERC Phase II TADS proposal to add the mandatory collection of non-automatic outages (i.e. planned and operational outages initiated by operator intervention). CenterPoint Energy supported the recommended metrics from the July 2006 *Electric Power Research Institute (EPRI) Transmission Grid Reliability Performance Metrics Final Report* for the analysis of automatic outages that for the most part have been adopted by NERC TADS. However, the collection of non-automatic outages for external benchmarking or regulatory purposes was not recommended in that EPRI report, yet in opposition to this industry research, NERC Phase II TADS proposes to do just that. Additionally, the Phase II Report does not outline any known uses for the data by either federal entities or the electric industry to improve bulk power system reliability. Therefore, there is no need to collect non-automatic outage data as proposed.

CenterPoint Energy believes that the collection of planned outage data will not improve the reliability and performance of the transmission grid, nor will it provide an indication of the level of necessary maintenance being performed. Planned outage reporting does not quantify or measure system performance and reliability. Planned outages are usually granted based on the ability to maintain system reliability and when system demand conditions permit secure operation. The risk to system reliability is controlled. Also, planned outages are taken for preventative reasons to improve reliability. The number and duration of planned outages will vary from year to year based on system growth, equipment type, equipment age, major projects by utilities, projects involving the highway department, Coast Guard or other governmental agencies, varying maintenance and rehab programs, the number and size of large industrial customers, etc. Trending the frequency of planned outages alone is not sufficient to make a determination of the amount of maintenance being performed on the bulk electric system. Additionally, live-line maintenance work, which is an important factor in assessing the amount of system maintenance being performed annually, is not captured in planned outage data collection.

The Phase II Report states that “Phase II was added as a result of discussions with officials of the U.S. Energy Information Administration (EIA) on May 16, 2007, and we are recommending it in order to have TADS serve as a single source to NERC and EIA for transmission outage data.” CenterPoint Energy disagrees that TADS must ultimately serve the purposes of the EIA, especially where NERC’s intended purpose to quantify system performance and reliability is not served. The Phase II TADS data request is more detailed than the EIA data request, and it is, therefore, a greater reporting burden on

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the electric utilities with no identified benefits to the electric industry or the reliability of the transmission grid.

CenterPoint Energy recommends 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. The TADS Task Force should continue to monitor the data collection efforts of the EIA regarding the collection of scheduled outages, and at a minimum, the TADS Task Force should demonstrate to the NERC Planning Committee how the collection of non-automatic outage data will support decisions with respect to improving the reliability and performance of the transmission grid before recommending a data request for Phase II TADS.

Should the Planning Committee decide to proceed, CenterPoint Energy recommends that the implementation of NERC Phase II TADS be delayed for at least 5 years to allow complete focus on the NERC Phase I TADS implementation and reporting process where the value is already evident from years of prior electric industry benchmarking and the recent reliability performance metrics research by EPRI, completed in July 2006.

Comments to Data Reporting Instruction Manual (Manual) dated April 4, 2008:

CenterPoint Energy finds the Manual for the most part to be helpful, and the examples included provide the necessary details for making determinations and calculations in order to complete the required forms.

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: No. CenterPoint Energy reports all outages to ERCOT in a less detailed format than that of Phase II TADS. Start and end times for non-automatic outages are available in various data systems and logs, but it is not consolidated in the same historical database format as that for automatic outages, nor is the outage type and outage cause categorized as is recommended in Phase II TADS. CenterPoint Energy will have to make changes to its automatic outage database system to capture the relevant non-automatic outage data, and formulate a new internal review process for the determination of reportable non-automatic outages.

2. Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the

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Phase II Report. If “no,” please explain.

Answer: No. In order to be “reasonable”, there needs to be real value from the data collection and reporting process. The Phase II Report fails to outline any known uses of the data by federal entities or the electric industry to improve bulk power system reliability.

The data, however, is attainable with additional investment in programming and operational resources. Furthermore, since FERC has suggested extending the voltage threshold below 200kV, the increased annual cost of additional reporting should be considered as the number of planned outages for review and reporting would be significantly increased by this action. NERC should carefully evaluate these start-up and ongoing costs to the industry when considering approval of the Phase II TADS data request.

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.

Answer: The 30 minute exclusion for “switching related outages” provides undue complexity to the determination of reportable planned outages and should be removed from the definition of planned outage and Appendix 10. In order to provide documentation that “switching related outages” may be excluded, all outages would have to be recorded and analyzed in order to make that determination.

A better alternative would be to add another flag for each reported outage to denote short term “switching related outages”. This would then capture both short term operational outages and short term planned outages without the need for an additional administrative process to determine and document the outage records for exclusion.

Ultimately, since the Phase II Report proposes an exclusion criterion, the accuracy of the proposed availability metrics is diminished and brings into question the underlying need

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for reporting any planned outages at all. Additionally, the EIA chose a 1-hour exclusion in its scheduled outage reporting, so it is apparent that the EIA itself did not put great importance on a complete outage record considering the effort to obtain the data.

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

Answer: No. The metrics will allow for trending of the values from year to year, but are not in themselves indicators of bulk power system reliability. There is also no indication within the Phase II Report if a directional change (up or down) in the trend of any of the Phase II TADS recommended planned outage metrics can indicate better or worse bulk power system reliability. EPRI did not recommend any metrics for planned outages for external benchmarking or regulatory purposes and specifically found no value in the total availability metric (APC) proposed in Phase II TADS. As indicated in the Phase II Report Section 2.3, the collection and trending of planned outage data for the last 20 years by Regional Entities has produced no recommendations, “Some regions, such as the former East Central Area Reliability (ECAR), Mid-America Interconnected Network (MAIN), and Mid-Continent Area Power Pool (MAPP) regions collected all transmission outages for over 20 years. However, no recommendations were made by them as a result of the collection and reporting of the planned outage data over that same period.”

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.

Answer: No. The data review process requirements for the Regional Entities and the webTADS error checking features implemented in Phase I should provide the necessary level of data validation. Data errors should be able to be corrected within the annual NERC reporting process. The webTADS database should serve as the historical repository for analytical purposes and replace the need for the proposed 5-year record retention and review process for the transmission owners.

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.

Answer: No. Should the Planning Committee decide to proceed with Phase II TADS, CenterPoint Energy recommends that the implementation of NERC Phase II TADS be delayed for at least 5 years to allow complete focus on the NERC Phase I TADS implementation and reporting process where the value is already evident from years of prior electric industry benchmarking and the recent reliability performance metrics research by EPRI, completed in July 2006.

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Should the Planning Committee decide on an expedited schedule, CenterPoint Energy recommends at least a one year delay for a 2010 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. Manual methods and workarounds would have to be used to capture the non-automatic data while the development work is being completed and tested. CenterPoint Energy anticipates a minimum of 10 weeks to develop and test systems. The data collection and evaluation process takes additional time to implement once systems are in place and will likely require an iterative process of testing and adjustment. Difficulty in the implementation of reporting planned outages was one of the issues identified by EPRI in its research which warrants consideration for a delayed implementation.

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

Answer: No. The Manual is suitable as is.

In summary, CenterPoint Energy does not support the Phase II TADS data request to collect non-automatic outage information on transmission elements $\geq 200\text{kV}$. CenterPoint Energy also recommends that before approving Phase II TADS, the NERC Planning Committee should demonstrate how the collection of planned outage data will be used to support decisions with respect to improving reliability and performance of the transmission grid. Without such specific demonstration of use, and considering that the prior collection and trending of planned outage data for the last 20 years by Regional Entities has produced no recommendations, Phase II TADS is paramount to a “make work” proposal.

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