

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

Submitted to:

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Comments to TADS Final Report (Report) dated June 7, 2007:

Because of its long-term experience with collecting and analyzing automatic outage (i.e. unscheduled outage initiated without operator intervention) data for reliability performance improvement, CenterPoint Energy Houston Electric, LLC (CenterPoint Energy) agrees with the NERC TADS Phase I data request proposal to collect automatic outage information on transmission elements $\geq 200\text{kV}$ along with an inventory of the transmission elements for calculating availability metrics. CenterPoint also agrees with NERC that collecting automatic outage data will help quantify system performance and reliability and support decisions with respect to improving reliability and performance. The collection and analysis of automatic outage data has been a utility benchmarking standard for more than 10 years in such venues as the P.A. Consulting Group, the Electric Utility Cost Group, and others. 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, CenterPoint Energy does not agree with the NERC TADS Phase II proposal to add the mandatory collection of planned outages (i.e. scheduled outages initiated with operator intervention). The NERC TADS Task Force itself states in the Report that it “disagree[s] with [the U.S. Energy Information Administration] EIA on the need for scheduled and manual unscheduled outage data”, yet it is proposing the Phase II planned outage data collection requirement for the overriding purpose of having TADS serve as a single data source to NERC and the EIA. CenterPoint Energy disagrees that TADS must ultimately serve the purposes of the EIA, especially where the purpose of TADS to quantify system performance and reliability is not served.

CenterPoint Energy recommends that the Phase II proposal for scheduled outage and manual unscheduled outage data (i.e. planned outage data) collection be removed from the Report as a proposal for 2009 reporting. The Phase II proposal should be reformulated in the Report as a future role of the TADS Task Force to monitor the data collection efforts of the EIA regarding the collection of planned outages and to make a

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documented determination of the value of collecting such data for use by NERC. At a minimum, the TADS Task Force should demonstrate to the NERC Planning Committee how the collection of planned outage data will help to support decisions with respect to improving reliability and performance of the transmission grid before recommending a data requirement. It should be noted that the *EPRI Transmission Grid Reliability Performance Metrics Final Report*, dated July 2006 which is referenced in the Report and was given great weight in the determination of metrics for automatic outage analysis, does not recommend using planned outage data for external benchmarking purposes.

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, scheduled outages are taken for preventative reasons to improve reliability. The number and duration of scheduled outages will vary from year to year based 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, number and size of large industrial customers, etc. Trending the frequency of scheduled 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.

Comments to Data Reporting Instruction Manual (Manual) dated June 29, 2007:

CenterPoint Energy finds the Manual for the most part to be helpful, and the examples included to provide 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 transmission outage data similar to TADS? If “yes,” please explain.

Answer: Yes. CenterPoint Energy currently collects the vast majority of the Phase I automatic outage data in an automated database. The use of Greenwich Mean Time (GMT) for outage start time is not a current practice, however. CenterPoint Energy also maintains an asset database of its transmission elements. The calculation of “multi-circuit structure miles”, “equivalent circuits”, and “equivalent circuit miles” is not currently an automated reporting feature of our asset database and would require manual

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determination initially. The benchmarking industry typically uses year-end element asset inventories to simplify calculations. The TADS requirement for more detailed asset “partial-year” inventories will require additional data collection and automation process changes in order for CenterPoint Energy to report the requested data.

Regarding the proposed Phase II planned outage data request, CenterPoint Energy does not currently maintain an automated database for the purpose of collecting and reporting planned outages. If such a data request is implemented, CenterPoint Energy would be required to develop a new planned outage data collection system and a targeted planned outage data review process in order to meet the Phase II requirement on an ongoing basis. The Report states that the industry experiences a substantially higher volume of planned outages versus automatic outages. For the year 2006, the ratio was approximately 3 to 1 for CenterPoint Energy for planned versus all automatic outages on its bulk power $\geq 200\text{kV}$ transmission circuits. As stated in the Report it is also noteworthy that “the EPRI Grid Reliability project found that planned outages were reported as less attainable through participant surveys” than automatic outages. All of this indicates that start-up for the Phase II data request of planned outages would be substantially more difficult and costly than the Phase I data request for automatic outages. This is an additional dimension that the NERC Planning Committee should evaluate before proposing the Phase II data request for planned outage data.

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

Answer: Yes, the Phase I data request is reasonable and obtainable.

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

Answer: Yes, the Phase I metrics are appropriate.

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

Answer: Yes, the Phase I data reporting process is reasonable.

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

Answer: Yes, the Phase I schedule is reasonable.

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

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Answer: Yes, there are ambiguities in the Manual and the following items need further clarification or additional emphasis:

1. Regarding the reporting of tie lines on Form 2.1, it is unclear if tie lines with single ownership need to be listed or only those with joint ownership. CenterPoint Energy recommends that only those tie lines with joint ownership be listed on Form 2.1 for the purpose of determining which utility will have the reporting responsibility. This coincides with the same logic used on Form 2.2 for listing AC/DC Back-to-Back Converters.
2. Regarding disturbance reports reported on Form 5, it would be helpful to add the website references for determining the filing status of OE-417 and EOP-004 reports which can be found in the Report.
3. The requirement for using Greenwich Mean Time for the outage start time should be highlighted in the instructions text for Section 4 of the Manual since this is not likely an industry standard for outage data collection systems but critical to TADS data analysis.
4. The instructions to Section 3.1 and the TADS Definitions in Appendix 6 regarding Multi-circuit Structure Miles should highlight the fact that Multi-circuit Structure Miles excludes the use of multi-circuit towers with only one circuit installed to avoid confusion with the common industry term “structure miles”.

In summary, CenterPoint Energy supports the NERC TADS Phase I data request to collect automatic outage information on transmission elements $\geq 200\text{kV}$. CenterPoint Energy, however, does not support the Phase II proposal for reporting scheduled outage and manual unscheduled outage data (i.e. planned outage data) and recommends that before proposing a Phase II data request, the NERC Planning Committee demonstrate how the collection of planned outage data will help to support decisions with respect to improving reliability and performance of the transmission grid. The NERC Planning Committee should also assess the start-up impacts for implementation of such a data request on the transmission owners.

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