

## **Phase II TADS**

Response submitted 6-11-08 by Russell A. Noble, Cowlitz County PUD No. 1, Washington State:

*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.*

Yes, all operation actions are recorded in the District's *Daily Log of Operations/Switching/Alarms-Inquiry* computer database.

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

Yes, the request would not be a great burden to the District due to the limited transmission facilities above 200 kV the District owns and maintains. Manual entry of two radial circuits which are almost never taken out of service would be easily tracked for TADS II.

However, supposing a case where all of the District's non-automatic transmission outage information was requested regardless of transmission voltage, the existing database would need to be modified to allow automatic transfer of the information to the Phase II TADS format. With our current AS-400 system this would require about 5 days of programming. With the new PC based outage management system to be purchased I expect there would be no serious problems in obtaining and transferring the data.

*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 the information is automatically down loaded, then there is no huge advantage other than file size would be reduced. If manually entered, then yes it would reduce the reporting burden.

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

I defer comment to the BA and TP.

*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.*

I have not found any to date.

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