

General Comments

Dominion has maintained a process for collecting and analyzing automatic transmission outage data for many years. Dominion participates in multiple reliability benchmarking studies and uses reliability data to improve our system performance.

Dominion questions the premise that collecting and sending the Non-Automatic (planned outage) data to NERC will improve system reliability and performance. Dominion's system operators are trained and certified in managing our system, and as such control and mitigate the risks inherent in having the system abnormal for any amount of time. Collecting data on planned outages will not improve the operators' understanding of the system risk and will require operators to spend valuable time on data entry and other process changes which could distract their attention from real-time operations..

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.

Dominion maintains a computer-based switching request application (Advanced Switching Request or ASR) where switch operators submit switching requests for planned events. The ASR database includes information such as devices requested to be opened and dates requested to open the devices along with the estimated date for restoration to normal operating conditions.

The Systems Operations Center (SOC) then reviews the ASR requests from a system level perspective, taking into consideration the system's current and near-term future operating parameters, to ensure that Dominion is not creating an unacceptable operational risk by allowing this switching. Requests and their ultimate disposition (active, completed, cancelled, denied, etc.) are stored in the ASR database.

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

Since a strong business case has not yet been presented to explain how the Non-Automatic outage data will improve system reliability and performance, the data requested is not reasonable.

The complete set of requested data is not obtainable for Dominion at this time. Dates and times entered into the ASR system are approximate and indicate a window for switching to take place. The actual date/time for switching will vary depending upon the switchmen available, how quickly the work is completed, and other factors. A preliminary view indicates upwards of two dozen switching opportunities per day during peak construction season.

The ASR system is currently not equipped to capture exact dates and times of opening or closing of the devices. It would require a system change to prepare the ASR database to incorporate this information. Additionally, capturing exact time data would require a process change within the SOC. During peak construction season, multiple opportunities could exist at a given time, creating an opportunity for error in entering exact times. Erroneous data is at best misleading, at worst could lead to penalties for Dominion.

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.

A 30-minute exclusion increases the reporting burden for the reasons listed below. Limiting the requested data to voltages exceeding 200 kV for transmission lines and transformers already creates a manual intervention process to determine which data is appropriate for inclusion in the reports.

Adding a qualifier for non-automatic outage durations 30 minutes or less increases the level of scrutiny that the operators must place on the data. Additionally, limiting the exclusion to a thirty minute window places even more importance on inputting the exact times of devices opening and closing. This narrow bandwidth could be the difference between a switch operator's closing time and the SOC closing time and could mandate a process change that requires synchronization between the two parties every time a switching order is enacted in the field.

Submitting supporting data for determined exclusions further increases the amount of time employees will need to spend on this activity. If the 30 minute exclusion rule is determined to be appropriate to reduce numbers of entries, supporting data should be deemed unnecessary and its submittal simply results in an additional administrative burden that benefits neither party..

The exclusion applies to facilities that have to be switched out temporarily in order to take an outage on another facility or to restore another facility to service. The removal of these facilities from service for a switching event is ancillary to the planned outage. There should not be a time limit imposed on those switching activities. A 30 minute time line for exclusions could introduce an unnecessary element of haste to the switching procedure in order to avoid having to report an ancillary outage.

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

Again, Dominion does not see where this information will be useful in improving system reliability and performance, therefore do not agree with these metrics.

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.

Dominion maintains historical data for periods much longer than 5 years, so this retention period is a reasonable interval that is consistent with Dominion policies.

Dominion Position on TADS Phase II Implementation
Mary Bess Bolin, Manager Electric Transmission Reliability

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.

Due to the process and system changes that Dominion would need to undergo to present the data in the exact format requested, this proposal is not a reasonable schedule.

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

No.