

Duke Energy Comments on TADS Report and Manual (8-15-07)

General Comments

1. We question whether or not a clear business case has been made that this outage data reporting process will lead to improved reliability.
2. Phase II reporting on planned/manual outages should be put on hold until it is established that Phase I reporting on automatic outages is worthwhile.
3. It's unclear that this will be an efficient process. It appears that Regional Entities will have latitude to increase the scope of the data request, which would eliminate the benefits of standardization. There should only be one standard data request, and it is unclear that having the Regional Entities in the data collection loop will be efficient.
4. Even if the data collection process is properly standardized and efficiently established so that it is not burdensome, we anticipate that follow-up inquiries and responses could become burdensome.
5. Finally, since this data will be intended to improve the performance of the power system by sharing outage cause information, the Transmission Owners and Operators Forum may be a better avenue for collecting and analyzing the data.

Response to Comment Questions

1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes," please explain.
Answer: In the Midwest, we collect Transmission data via an in-house written web-database system named OIS (Outage Information System), which is available at <http://web/outage/>. Transmission Outage data is then reported to Reliability First Corp (RFC) <http://www.rfirst.org/> on a yearly basis.
2. Is the data being requested reasonable and obtainable? See Section 3 of the Report. If "no," please explain.
Answer: The only unreasonable point about the data collection is that the Midwest currently reports the Outage data to Reliability First Corp (RFC) <http://www.rfirst.org/> on an Annual Basis and this would be a duplication of that reporting. RFC currently has the definition/names of the various Midwest Transmission Circuits, though we have not been required to report on Transformer Outages.
3. Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If "no," please explain.
Answer: No response

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

Answer: See the answer for #2.

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: The schedule of implementation is reasonable, though it's a duplication of our current reporting to RFC. If the final decision is that we must report to RFC and NERC, it would make sense that the reporting requirements for data and format be the same.

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

Answer: No response

Comments were submitted by Greg Rowland of Duke Energy on August 15, 2007.