

Duke Energy Comments on Phase II TADS Data Request (6/12/2008)

General Comments

Duke Energy is principally opposed to the changes proposed for Phase II of the TADS Data Request.

1. NERC is intent to use data around Non-Automatic outages to develop metrics for analyzing frequency, duration, and other factors. This mere tracking by a governmental agency can not help but to drive behavior.

Planned Outages are a benefit of a system that has redundancy built into it. A planned down time would not be an option to a utility that had not planned it into the overall system design.

To determine any real potential consequence of utilizing planned down time for a redundant transmission line would involve knowing the system and line capacity along with the demand of the system for the given time frame.

Opting to de-energize electrical equipment for maintenance or adjacent construction is an exercise in safety and reliability. Work done in close proximity of energized lines, which could have otherwise been de-energized, is fool-hearty.

2. NERC is mandated by the Federal Power Act to “Develop Standards.”

The gathering of this information has a high likelihood of being developed into a standard as this is a NERC mandate.

3. Additional labor hours will be required to keep up this added request.

All requests for data of this nature result in follow-up communications to question details and to synchronize data from adjoined transmission owners, as well as from the NERC staff. These all translate to committing personnel to this task.

4. Financial and customer accountabilities are primary drivers in our decidedly capitalized society.

Managing down time on network lines is the same as managing the use and availability of any other owned asset. If the asset isn't available when it is needed, a customer goes unfed and the revenue isn't taken in.

The investment in the system is also not realized if the asset isn't there for the need. Therefore, there are sufficient drivers naturally in place to discourage Non-Automatic Outages.

5. Data on Non-Automatic Outages is not readily available at this time.

Duke Energy is not currently collecting this information along with other outage data. Heretofore this type information has been managed as an equipment maintenance

Comments submitted on June 13, 2008 by James Wilson of Duke Energy

function. A new outage data collection program is to be in place before 2009, which ought to gather information much like that requested. This program has not been tested nor started at this time so the certainty of accurate data hasn't been determined.

Comment Questions

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.*

Duke is not collecting this information in the same format as our other outage data at this time.

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

As the Non-Automatic data is collected in 2008 the collection would be quite cumbersome, though it would be ultimately obtainable. In 2009 a program for gathering this data is to be rolled out.

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?

Limiting the reported outages to any time value ought to reduce the number submitted thereby reducing the reformatting and follow-up time needed.

Should a TO’s supporting data for determining exclusions be part of NERC’s data review? If this were to be a measure or a standard, perhaps reasons would merit the time to include. If this were in fact just additional data for an overall national utility glance, there wouldn’t need to be reasons submitted.

Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response. Reduce for reasons of sheer volume reduction if nothing else.

4. *Are the metrics appropriate? See Section 4 the Phase II Report. If “no,” please explain. The Mean nor Median Times calculated have almost no actionable value in either the Phase I or Phase II.*

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. Maintaining Outage information for five years is not unreasonable. In this industry trends seldom take less than five years to determine real affect of changes.*

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. If the roll out of our latest outage data collection program for our transmission system happens successfully and on schedule, 2009 would not be unattainable.*

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

The technical application as described in the manual seems clear, however it has obviously not been tried. The unclear part is largely in the questionable value of the exercise.