

From: Schnapp, Robert [mailto:Robert.Schnapp@eia.doe.gov]
Sent: Monday, June 16, 2008 11:21 AM
To: Dave Nevius
Cc: Sitzer, Scott; Leckey, Thomas; Makens, John
Subject: RE: REMINDER: Phase II TADS Request for Comments DUE JUNE 16

Dear Dave:

The Energy Information Administration (EIA) appreciates the opportunity to comment on the proposed Phase II of the North American Electric Reliability Corporation (NERC) Transmission Availability Database System (TADS). The recent data additions and instructional upgrades represent positive changes and have shifted the documentation towards a full set of clear and unambiguous definitions. Our response to your questions is preceded by two general comments.

- Research done by the Power Engineering Committee on IEEE Standard Terms for *Reporting and Analyzing Outage Occurrences and Outages States of Electrical Transmission Facilities*¹ identifies a variety of areas not covered in either phase of TADS. These include an expanded coverage of single stages, multiple event, and related outages occurrences, wider coverage of system components, and defining other indices for use in transmission system reliability evaluations. These are important reliability indicators, and should be considered for inclusion. In addition, the cost of the outages would also be a good addition to TADS.

EIA agrees with NERC that distribution facilities should be excluded from the TADS data base. However, TADS should be strengthened by including AC Circuits less than 200 kV (overhead and underground) that are above distribution level voltages as part of the data collection. In the past, the voluntary North American Electric Reliability Council only looked at selected aspects of the extra-high transmission voltage levels. Now as the mandatory electricity reliability organization, coverage should be extended to cover all of the high transmission voltage levels and the upper part of the medium transmission voltages.² Adding these voltage levels will provide correlating data on all bulk power transmission outages and allow complete studies of the changes in status for all transmission lines within the Eastern, Texas, and Western Interconnections.

Here are our specific responses to the questions which appear on page 5 of the April 30 request:

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.*
Does not apply to EIA.
2. *Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the Phase II Report. If "no," please explain.*
EIA considers the requested data reasonable and obtainable, except as listed above.

¹ Power System Engineering Committee of the Power Engineering Society, *Standards Board 859-1987*, Institute of Electrical and Electronics Engineers, Inc. (New York, NY 1988).

² The transmission system is divided into the following categories based on voltage levels as defined by the American National Standards Institute (ANSI) and the Institute of Electrical and Electronics Engineers (IEEE) standards: Extra High Voltage (EHV) of 240 kV and higher (ANSI/IEEE Std. 49); High Voltage (HV) which includes 100 kV to 230 kV (ANSI/IEEE Std. 260); and Medium Voltage, which is less than 1 kV to 72.5 kV (ANSI/IEEE Std. 49).

3. *Is the Planned Outages 30-minute outage exclusion appropriate?*
EIA believes the proposed 30-minute exclusion for NERC oversight and usage is appropriate for industry reliability practices, given the need to establish these informational collection and processing systems. EIA set a 1-hour reporting period on the Form EIA-411 to give the broadest burden reduction for collection of information about issues that would impact end-use customers. Industry standards should be tighter.

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

EIA believes some of the metrics could be improved. The starting point for developing TADS was transmission outage information. However, the use of the word availability in the title suggests that the system might include additional information. This would include such metrics on both outage and equipment failure rates (protective system failure to open, to close, to operate, and protective system false operation rates). Other key information that needs to be linked with these metrics deal with the exposure (time and operations) associated with weather; that is, normal, adverse, and major storm disasters. In addition, EIA hopes that the restriction of only tracking events impacting power flows through designated points in the Phase II TADS will be expanded to address individual components or equipment that are outside of the set parameters of Phase II TADS, but which are linked into the high voltage transmission systems.

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.*

EIA recommends extending the period of historic period beyond 5 years. For example, the age of many types of installed equipment or components on the bulk power systems could easily be described as mature. Failure rates attributed to age and their associated failure trends are best observed over a wider base of years.

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.*

EIA believes that the implementation schedule is appropriate.

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

EIA finds no ambiguities in the manual.

Thank you for the opportunity to comment on your proposal. We look forward to continuing our working relationship in this area.

Sincerely,

Robert Schnapp, Director
Electric Power Division
Energy Information Administration