

**Comments submitted on June 16, 2008 by Robert Gibbs of
Entergy Services Inc. (ESI)**

**Entergy Services Inc.
Comments on Phase II TADS**

A general comment on the TADSTF recommendation for Phase II of TADS follows these brief comments to questions posed in Dave Nevius letter on TADS Phase II comment instructions.

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. Our current automated outage system called TCOS (Transmission Consolidated Outage System) captures both automatic and non-automatic outages. Since May 2007, we have invested substantial time and IT resources to modify our system to comply with the NERC TADS Phase I data requirements and have implemented various process changes in the field to accommodate collecting the requested data attributes of our outage events for TADS.

2. *Is the data being requested reasonable and obtainable?*

While the non-automatic outage data is currently collected, it is the additional data attributes such as the outage types (planning versus operational), planning outage cause codes and operational cause codes that will require additional time and IT resources to extract this data from another system or incorporate them. Weighing these requests with other SERC, NERC and FERC compliance efforts that use these same IT resources is definitely challenging and problematic in the short run. Thus, the reasonableness of this request has to be viewed in that context and also from a value added perspective. The final comments that follow these questions will conclude my comments on the reasonableness of this request from a value added perspective.

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?

This exclusion appears reasonable for the outages you are intending to screen if the TO has not already screened such switching events from their outage systems. Typically the numbers of outages 30 minutes or less are about 3% or lower of the non-automatic outages in the 200 kV and above voltage class. Thus a substantial number of outages with their related attributes may still have to be reported.

Should a TO's supporting data for determining exclusions be part of NERC's data review?

No. Such a review would not reveal anything that is relevant to reliability nor add to the quality of the data that needs to be the center of a reliability focused effort. A confirmation statement or attestation statement on webTADS would be sufficient

Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.

Not necessarily as my comments above references our case where the reporting burden would not be significantly reduced by merely using this exclusion criterion..

3. *Are the metrics appropriate?*

The metrics for non-automatic outages assumes some significant correlation between the number of outages in these categories (e.g. planned and operational) and past performance/reliability and or future performance/reliability. Perhaps taking these outages in the current period or recent years may indicate the TO is following a plan to assure the reliability of the system over time. A TO can conceivably be on either end of this spectrum and this mean there are no reliability issues. Does the collection by others such as ECAR shown any value in this data as a precursor to specific reliability issues? Certainly this depository of historical data could be used to uncover any relevant predictive patterns inherent in non-automatic outage data.

5. *Are the data review process and the requirements that TO's maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data?*

Yes. Both the data review and the supporting document period are reasonable but guidelines on acceptable documentation would be helpful in assuring no efforts are put into going overboard in this effort.

6. *Is the implementation schedule for Phase II TADS for 2009 reasonable?*

Yes. The timeframe of 2010 to submit 2009 data is reasonable.

7. *Are their ambiguities in the Manual that need clarification?*

Examples would help clarify the operational outage cause code area especially where there is more than one reason for the outage because it is being requested by two different parties for different reasons.

General Comments:

More time should be taken to explore if including non-automatic outages to TADS adds value to explaining reliability or being a precursor to reliability issues. These outages have value on an individual TO level but what does it mean on an RE level or beyond. There is a danger that these metrics may produce or incent the wrong behavior by TOs.