Comments submitted on June 13, 2008 by Chris Scanlon of Exelon

B. Comment Questions

While comments are not restricted in the format, we would appreciate your answers to the following 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.

Yes, as a PJM member, TO non-automatic outage data is collected. PJM collects non-automatic transmission outage data via their EDART (electronic dispatcher analysis reporting tool). This is a web-based tool with possible conversion capability to the NERC TADS template. Specifically, the cause or type code for each outage is not presently collected.

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

The data can be collected but will still require significant operational resources to filter, especially if various exclusions are developed. Collecting the data on the timetable requested would not be reasonable, due to the volume of data and the requirement to make system changes to the EDART tool.

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.

If NERC will be requesting the inclusion of interim switching and set up outages to take the element out of service, this will SIGNIFICANTLY add to data collection requirements.
If a TADS element is out of service < 30 minutes to setup for an outage or restoration on a non-TADS element, the TADS element should **not** be included in reporting criteria. See also comment in 2.

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

The metrics are appropriate given the data being collected, however we fail to see the value in all of the metrics. In other words, we do not feel that the TADS team has provided an adequate basis as to the purpose for collecting this data and for the

potential benefits. Additionally we believe extreme care should be taken in developing metrics, so as not to create (directly or in-directly) a behavior that may result in an entity impacting reliability, in order to improve their performance on a metric.
Specific concerns with the metrics include:

- Durations can change significantly depending on the reason for the outage.
- Different transmission owners may bundle their work differently causing outage durations to be significantly different.
- Multiple facilities out of service in a transmission owner zone may be easily accommodated in certain conditions.
- Simultaneous outages can be both a good thing and a bad thing. We don't understand the value of the metric which seeks to either minimize risk and constrain outage planners from accomplishing critical maintenance and capital work or seeks to encourage simultaneous outage risks.
- Transmission Planners look at instantaneous system snapshots. It is not clear how providing planners a mountain of historical simultaneous outage data facilitates their discrete snapshot planning.
- Economic planning should be based on forward looking production cost software, using contingency analysis, rather than historical simultaneous outage data that may bear no relevance to future reality.

Overall it seems that these metrics will drive more questions than answers. If the data is dissected, many discrepancies in work bundling, particular equipment issues, system configuration due to capital capacity expansion work, and seasonal loading will probably be identified that explain the differences.

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.

Yes but **not** in the proposed time frame. Infrastructure would have to be developed and tested to collect and retain the data; this would include changes to business processes, hardware, software, procedures and training. Additional IT and Business Unit personnel resources would be required for development and continuing support.
To start collecting 2009 data, the above-mentioned Business process changes would be required to be in place in less than 5 months.
Data retention requirement of 5 years would add additional complexity to infrastructure.

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.

No, see answers to # 1, 2, and 5

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

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Yes. As noted previously, there are ambiguities and questions as to the purpose and value of reporting and collecting the data.

The task force should provide further justification for the purpose of collecting the data.

- Is the data useful?
- What are the proposed output metrics?
- Is the data appropriate for the intended uses?
- How do the proposed metrics serve NERC's mission to improve reliability?

Has an assessment been done concerning the amount of data being requested?

- Are the tools in place at NERC to collect, store, analyze and make use of the data?
- For any particular company there will be large amounts of planned maintenance each year. Using PECO, a moderately sized TO in PJM, and ComEd, a large TO in PJM as examples, there were an average of 1924 planned outages per year for the years 2003-2007 in PECO and an average of 5216 planned outages per year in ComEd.

Much of the data in the requested form may not be available at this time. Some RTO's / TOP's may collect the data in existing software. It is unknown if the current format can be modified to report TADS II information in the time frame specified.

Construction and maintenance practices vary between utilities due to many factors, making data comparisons and metric development difficult.

What is the impact of non-TADS reportable work? Planned outage data does not capture the amount of work undertaken for outage.

Will NERC be collecting just "end state" planned outages or will this include the interim switching and set up outages to take the requested element out of service?

If NERC will be requesting the inclusion of interim switching and set up outages to take the element out of service, this will SIGNIFICANTLY add to data collection requirements.

Comments are due on June 16, 2008 and must be submitted in a Word document to tadscomments@nerc.net.