

Comments submitted on June 16, 2008 by Kevin Luke of
Georgia Transmission Corporation

Georgia Transmission Corporation (GTC)
Comments on Phase II TADS

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, GTC started capturing the data in late 2007 to prepare for the Phase II TADS requirements.

2. Is the data being requested reasonable and obtainable?

Yes, the data is reasonable and obtainable. GTC does raise concerns about the aggregate data, comparisons, and assumptions derived from the data. GTC has reservations about the value of the data and its impact on day-to-day reliable operation of the transmission system.

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?

The exclusion is appropriate and only the outages exceeding the exclusion require recording. GTC recommends increasing the 30-minute limit to 1-hour limit as required by EIA Form 411 Schedule 7.

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

No, adds reporting burden and increases documentation between TO and NERC.

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

The exclusion will have a minor impact on reporting burden.

4. Are the metrics appropriate?

The metrics seem appropriate. See response for questions 2.

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.

Seems reasonable, GTC’s new software system will maintain historical data as per five-year retention requirement starting in 2009.

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.

The implementation schedule is reasonable. GTC is developing new software to capture the data and meet the reporting requirements.

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

The manual seems to be concise and detailed. No, recommendations at this time.