

August 2007  
Georgia Transmission Corporation  
Comments to NERC regarding TADS outage reporting  
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**PART ONE: GTC COMMENTS**

- 1- The Georgia Integrated Transmission System owners practice deferred restoration of non-critical lines. The TADS information and definitions do not mention how to handle outage duration statistics and data for this type situation. It would seem inappropriate to compare regions and companies that practice deferred restoration to those that do not.
  
- 2- GTC did not see any mention of exclusions for major storms or any definition for a “major event day”. The benchmarking consultant used by GTC indicates that without excluding major storms or setting a limit on duration: that comparisons are next to worthless.
  
- 3- The collection of “forced outage” data on both momentary and sustained outages seems reasonable. GTC will do what it can to defeat the efforts to collect planned outage data. Collecting and publishing planned outage data seems to categorize “planned outages” as “bad”: when the opposite is true. The Georgia ITS does lots of maintenance and capital additions to bulk lines that require planned outages.
  
- 4- GTC participates in benchmarking studies that specifically deal with line performance. We can easily compare our performance and know which lines need improvement and which lines to leave as is. All the efforts that will go into TADS reporting will be a waste of effort for an individual transmission owner. We will do lots of work, we will not have any control of how the data is used, we will risk having the results used against us, and we will get nothing useful out of the finished product. The resources used for all this reporting could be used for productive work eliminating or reducing outages on our system.

- 5- GTC did not see any provisions for different operating practices:  
For example: reclosing on 500 kV lines varies widely
- Some utilities do not automatically reclose on 500 lines
  - Other utilities do automatically reclose on 500 kV
  - Some utilities have single pole reclosing on 500 kV lines
- 6- GTC believes that the use of “FOHMY” statistics is not appropriate. The statistical professionals we use can only find a minor correlation between line length and the number of forced outages. If the “ERO” starts to collect and publish statistics based on outages per hundred miles per year: the “ERO” will be perpetuating the use of these misleading and useless statistics. GTC’s Member Systems expect reliability improvements when a line is out multiple times and do not care what the FOHMY stats are. GTC has seen too many problems go unfixed because another utility chose to use FOHMY as an excuse not to fix bad performing lines.

## **PART TWO: Responses to NERC Questions**

1. If you are a transmission owner: do you currently collect transmission outage data similar to TADS?
  - 1A. GTC collects similar but less detailed data on bulk system outages. Additional work will be required to gather and store the additional data. Even more additional work will be needed to reformat the data to the NERC forms.
2. Is the data being requested reasonable and obtainable?
  - 2A. Phase one with only bulk system – forced outages is reasonable.
  - 2B. Phase two plans that include planned outage data are not very reasonable. Planned outages are granted very carefully so as to not impact reliability. The Georgia ITS does lots of maintenance and upgrades that require planned outages. Reporting planned outages will give some one or some organization the misconception that planned outages are “bad”.

3. Are the metrics appropriate?

3A. – NO!! – The use of FOHMY – “forced outages per hundred miles per year “ is a terrible choice. See GTC response above in Item #6 in Part One. There is very poor statistical correlation between line length and number of outages.

3B. The proposed metrics of mean and median repair time will not be appropriate unless deferred restoration is accounted for.

4. Is the reporting process reasonable?

4A. GTC believes it will take time to determine if the process is reasonable. This will depend on our Regional Entity and how well they perform and as long as they do not make unnecessary additional requirements and as long as the process is consistent from year to year.

5. Is the implementation schedule for Phase I reasonable?

5A. Overall the schedule seems reasonable once established.

5B. Having a new requirement show up in March 2007 with implementation to start the next year is a problem. The software systems will have to be written and tested in 2007 to ensure they will function correctly in 2008. Resources were not planned for or budgeted for in 2007. Waiting to start in 2008 is too late to take a chance on missing the deadlines. The only way to meet the initial requirements was to re-allocate resources and start working on this in 2007.

6. Are there ambiguities in the “manual” ?

6A. None noted at this time – when the software is developed this FALL, the manual will be more thoroughly examined.