

TADS Phase II Review Comments – Hydro One Networks Inc.
June 6, 2008

Response to Questions from NERC and Additional Comments

Reference.: Letter from NERC dated April 30, 2008, “Request for Public Comment on Phase II TADS Preliminary Report and Manual”

Questions reproduced here in italic font were those stated in the NERC letter dated April 30, 2008. Responses are from Hydro One Networks Inc. (Hydro One)

Response to Questions from NERC

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. Hydro One collects Non-Automatic transmission outage data.

Hydro One collects outage events as automatic or manual forced and planned. “Non-Automatic” is equivalent to Hydro One’s manual forced and planned outage events.

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

For the most part, the data being requested is reasonable and obtainable. However, it is not clear why the collection of terminal station names is necessary. It should be sufficient to collect the number of station terminals associated with each circuit for the calculation of the metrics. This would add value to the metrics.

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.

The 30-minute exclusion is reasonable and appropriate. Reporting brief outages required for preparation or restoration of a planned outage is not recommended.

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?

No. Work methods, switching steps, communication protocols and safety steps or procedures may differ between TOs based on their own philosophies and practices. NERC should not get involved in this and such outage times should not be recorded. Further, it would be onerous to provide supporting data where the exclusions occur.

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

Yes. The 30-minute exclusion will minimize the reporting burden. See above.

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

The metrics are appropriate, particularly that which determines the median outage time since the average outage time value can be heavily skewed by long duration outages and thereby produce a result that is atypical of the utility performance.

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. Agree that this is reasonable.

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.

Yes. Agree that this timeline is reasonable.

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

The term “advance notice” in the definition of a planned outage is somewhat ambiguous. Perhaps a specific lead time should be considered.

Additional Comments and Questions

(a) Will event data from Hydro One along with those of other Canadian utility participants be excluded from reporting to FERC and EIA?

Reference: TADS Phase II Preliminary Report (page 10).

(b) The TADS Phase II Preliminary Report recommends that planned outage performance not be compared among utilities. Does NERC intend to apply this approach to metrics that include the planned outage data? Reference: TADS Phase II Preliminary Report (pages 16 and 17)

(c) Can NERC provide an example of how human error would be the cause for a planned outage or operational outage? Reference: TADS Phase II Preliminary Report, Appendix 2 - Transmission Availability Data System (TADS) Definitions Section G. Planned Outage Causes (page 16) and Operational Outage Causes (page 17)

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