

*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.*

No, ITC does not collect the transmission data that is envisioned for Phase II TADS. ITC does maintain records on all of the planned outages on our system. The implementation of TADS II would require the addition of significant resources (personnel) and expenditures (programming) in order to put the unplanned outage data in the format NERC TADS II is requesting.

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

It is ITC’s position that the collection of this data has never been cost justified. There has been no direct demonstration of the benefits of collecting and maintaining this data. This type of data has been collected before (ECAR, MAIN, etc), but to ITC’s knowledge there were never any recommendations or useful reports that provided tangible results of how the collection of data could improve system reliability. The resources required to implement and maintain this reporting function will consume many existing resources for an intangible result. Prior to implementation, the benefits of TADS II should be clearly quantified and demonstrated on a cost/benefit basis.

*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.*

Recording outages of TADS Elements during switching will consume significant resources for undefined benefits

*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?*

Concluding that 30 minutes is adequate time to reduce the number of reported outages is an arbitrary assumption. Some circuits could take a couple of hours to completely de-energize. Each company has its own methodology of switching equipment and it cannot be arbitrarily assumed that most will fit inside a 30 minute window.

No, not all outage times should be recorded in order to determine which outages can be excluded. This would require a significant addition of resources and a major reorganization of internal ITC resources to collect all planned outage data. In addition, the prospect of recording all outage TADS Elements during switching would provide and additional burden. ITC would again challenge the usefulness of collecting that kind of data (see response to #2).

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

No. See response to #2.

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

It increases the burden due to the fact that the switching time will vary from outage-to-outage. For example, if it takes 50 minutes to switch a line out of service then ITC would have to be conscience of the fact that recording would begin 30 minutes into that outage. If NERC TADS Phase II should somehow move forward, it is strongly recommended that the elements outaged during switching not be required to be recorded. Phase II should only focus on the specific TADS Element that is being maintained.

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

No. Please see response to question 2. It is ITC's position that none of the metrics listed in section 4 will predict the future performance of a transmission line or reflect the efficacy of maintenance. It is unclear to ITC how the use of such metrics can be linked to improving system reliability.

*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.*

No. See response to #2. It appears that the choice of the 5 year retention period was arbitrary. Again the maintenance and archiving of such data will require additional resources for a yet to be determined benefit.

*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. Many market participants are struggling with the implementation of reporting requirements for TADS Phase I. The Phase II implementation comes too soon and does not provide sufficient time to acquire and align all the resources necessary to fulfill the reporting requirement.

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

Yes, please see response to question 2. It will take a considerable amount of time and resources necessary to implement TADS Phase II as written. Without adding the additional staff to satisfy this, TADS Phase II will be a distraction from performing the necessary work required to improving the reliability of the transmission system. Again, it is ITC's position that the report fails to identify how collecting planned outage data will

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impact the reliability of the transmission system. If this is not the intent of TADS Phase II, then why is NERC interested in pursuing this effort?