

**Comments from ITC
to the North American Electric Reliability Corporation (NERC)
on its Request for Public Comment on the
Transmission Availability Data System (TADS) Report and Manual**

1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If “yes,” please explain.

The type of data being requested for TADS is different than what is currently being collected by ITC. There are some categories under Section 3.3 that would require several changes in the way outage events are recorded in the future. Below is a list of some data requirements that differ from our current process:

Section 3.3 Comments

AC Circuit Names - The way circuit names are entered into the “AC Circuit Sustained and Momentary Outage Data” is very different from our current process. TADS is requesting that we enter each station end in separate columns. Our current process is entering the circuit name in one column as one phrase with a hyphen. Another option may be to use the Circuit ID instead. The former outage report, TLOR (Transmission Line Outage Report), used to use Circuit IDs in identifying which circuit was outaged.

Fault Type – This type of data currently resides with our Relay department. The data are used to locate faults and assist field personnel in determining where to dispatch crews for a line patrol. This data is currently not being appended to our internal outage reporting and would require an increased effort by our Relay group in terms of reporting. The data TADS is asking for appears to question whether the relay equipment operated properly or if there was some sort of human factors type cause. The answers to these questions can be captured in the cause code section of the report.

Outage Initiation Code – This category attempts to capture where an outage event originated. This information should also be captured in the cause code section instead. The cause code section defined a cause as “Failed Equipment.” This covers both events on lines and in the substation. To be more consistent with some of the other benchmarking outfits, we recommend splitting this category into two sections, further distinguishing “Substation Equipment” events from “Line Equipment” events. This would pinpoint where an outage is initiated.

Outage Cause Codes (Sustained Outages) – Our current outage process tracks only the root cause of the sustained outage event. If a sustained outage is initiated by a lightning strike, and in responding to the initiating event a breaker fails, then the root cause of the sustained outage is the failed breaker. Had the breaker not failed, then the sustained outage would have not occurred. Recording the initiating event would introduce another category which will add to the amount of outage data we currently collect.

Other Comments (Cause Codes)

In the “Data Reporting Instruction Manual”, the cause code section has some ambiguities. The Foreign Interference category does not mention externally caused outages due to interconnected utilities. These events can occur a few different ways, either from a distribution through-fault or a fault on the portion of a tie-line that an interconnected utility owns. The term Foreign Interference suggests that some object has come into contact with the line. The externally caused outage events are mostly due to the way the Transmission system is designed to clear faults. Under the current cause codes for TADS, this would place all externally caused outages in the “Other” category. A suggestion would be to add another cause to the cause code table called “External” to further distinguish these events.

Finally, the Planned Outage Data contemplated for Phase 2, in the manner likely required by TADS, is not currently collected.

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

The data requested is reasonable and obtainable, but would require more resources organizing it in the TADS format.

3. Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If “no,” please explain.

The metrics are appropriate if each Transmission system reporting outages can be put on a “like” basis. It’s difficult to compare systems that experience completely different weather patterns based on their geographic location, e.g. hurricanes in the South, ice storms in the Midwest. There was no mention of running data filters to “clean-up” the data and make it more consistent. Some of the metrics TADS is calculating will be skewed if raw outage data is being used.

4. Is the data reporting process reasonable? See Section 5.2 of the Report. If “no,” please explain.

Yes.

5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If “no,” please explain.

Yes.

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

In Section 3.1 part c, who will determine the reporting duties for each tie-line and jointly-owned circuit? We suggest some consistent method such as percentage line ownership or which end of the line the revenue metering data is collected.

In Section 3.2 part c, the weighted average % of the year the added and retired elements are installed. Is this a calculated value that TADS will compute from the Circuit Inventory sheet or is this something the TO will submit? As long as the retirement and in-service dates are submitted, this number can be readily calculated.

In Section 3.2 part d, is this a value TADS will calculate from the data they collect or will the TO be required to submit this number? It appears this data can be calculated by TADS from the circuit inventory sheet and the outage data provided for the year.

Comments were submitted by Brian Thumm of ITC on August 15, 2007.