

Response to Questions from NERC/TADSTF and additional comments

Reference: Letter from NERC dated 6/28/2007, "Request for Public Comment on TADS Report and Manual."

Responses are from JEA, Jacksonville, FL part of FRCC Region.

Q1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes," please explain.

Response to Q1:

Yes, JEA does collect transmission outage data somewhat similar to the proposed TADS. TADS proposed data includes additional fields and attributes that will require added labor, data collection system revisions, and revised procedures to properly collect these added items. JEA has collected transmission data for a number of years and has developed internal metrics that are used to gauge transmission system performance and best utilize transmission system infrastructure investments to continue to improve system performance. We would like to echo other comments made about the TADS system, that it be a "work in progress" and not a system that sets up any unfair comparative analysis between regions or misuse of the collected data. What is the "end in mind" for the use of the proposed TADS?

Q2. Is the data being requested reasonable and obtainable? See Section 3 of the report. If "no," please explain.

Response to Q2:

No, the data being requested in many cases is beyond reasonable and not obtainable in many cases. As an example, if our area experiences a severe lightning storm, a transmission line may experience multiple momentary operations due to lightning. Gathering each individual relay target for each momentary fault operation is not obtainable, especially if we have electromechanical targeting systems. Knowing the exact location of lightning flashover for each individual momentary fault under multiple operations may also be impossible to obtain. The causes and modes would also be difficult to obtain and unreasonable as data items, under these conditions. Even when a multiple momentary fault results in a sustained interruption, some of the requested data will be very hard to obtain. Transient events that restore to normal operation in less than 60 seconds are usually related to lightning surges that may not provide any visual or residual evidence for TADS reporting, and would require exhaustive field surveys that would be futile and distracting from the business at hand of promptly restoring service.

Response by Chuck Jensen, Manager, System Protection and Controls for JEA

Q3. Are the metrics appropriate? See Section 4.b and Appendix 4 of the Report. If ‘no,’ please explain.

Response to Q3:

The metrics may be okay. JEA has developed internal metrics to compare transmission system performance and to keep the system operating in a reliable method. The proposed TADS metrics do not mimic our internal metrics. We have tried in the past to use industry metrics to compare system performance and have found significant variability in design, geographic location, weather, etc. that have made these “across the industry” comparisons of smaller value than our own internal metrics.

Q4. Is the data reporting process reasonable? See Section 5.2 of the Report. If “no,” please explain.

The data reporting process appears to be reasonable.

Q5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the report. If “no,” please explain.

As stated in response to Q1 and Q2, there is a need to modify data collection processes, data collection systems, procedures and to provide additional training on the proposed TADS system in an accelerated time frame. The schedule can be met, but added resources and IT system modifications are required, making complete system functionality dependent on limited resource availability.

Q6. Are there ambiguities in the Manual that need clarification? If “yes,” please explain.

Yes, on pages 38 and 39 of TADS Data Reporting Instruction Manual, there is an error in the line distance shown for line AE. Line AE on page 38 shows 25 miles, while line AE on page 39 shows 30 miles. This should be corrected.

The Line outage with breaker failure shown on page 59 is shown as a relay misoperation. The middle diagram explanation may need to be modified to better explain how this is a relay misoperation. From reading this explanation, the breaker failed and the relays operated correctly to clear the bus, clearing the fault.

Response by Chuck Jensen, Manager, System Protection and Controls for JEA