

MANITOBA HYDRO COMMENTS ON TADS REPORT

RESPONSE TO QUESTIONS IN THE REQUEST FOR COMMENT LETTER:

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

Manitoba Hydro collects some but not all of the data identified in the TADS report. In general, the data resides in disparate systems that do not easily talk to each other. As a result, current data collection processes are manual and labour intensive.

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

For utilities with limited automation in existing data collection practices, the data requested by the TADS Report is an onerous challenge.

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

The metrics are an appropriate starting place.

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

The data reporting process is reasonable. However, one noticeable omission is observed in Figure 5.0 (page 18) where the DOE and/or FERC roles are not clearly identified in the process chart. From this diagram, one would mistakenly assume that the raw data will never pass to any other hands.

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

For those entities with sophisticated data collection and reporting systems, this request seems reasonable. However, for those entities with limited IT infrastructure and automation, this request will likely strain existing resources and affect the quality of data submitted to NERC.

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

This report must be seen as a work in progress. Without going through the process of data collection at least once, it is hard to identify ambiguities or shortcomings in the manual. For most common outage events, the definitions in the manual are likely appropriate to facilitate data collection. Unusual events or exceptions will test the robustness of the manual definitions. NERC must solicit feedback from data collectors after the initial data collection period and revise the manual accordingly.

OTHER COMMENTS:

- While FERC can request data from American entities, Canadian entities are not FERC-jurisdictional. The current TADS report does not address how NERC will deal with Canadian data. In its role as ERO, it is reasonable for Canadian entities to provide transmission data to NERC. On the other hand, it is inappropriate for NERC to submit Canadian data to FERC. Transmission data should only be provided to the appropriate regulatory body in each jurisdiction upon request. An explicit statement to that effect is required in the TADS Report.
- Manitoba Hydro disagrees with the need for a second phase of the TADS Project. Planned outage statistics provide little value in assessing the reliability of the transmission system. First, planned outages are reviewed and approved by the Reliability Coordinator. We must assume that RC-approved outages do not risk the reliability of the electrical grid. Secondly, utilities manage the reliability of aging infrastructure through a number of means such as increased maintenance (both energized and de-energized) and capital replacement. These strategies will impact planned outages metrics. Without the proper context, planned outage metrics can be easily misinterpreted and reinforce the wrong behaviour.

Comments were submitted by Michelle Rheault of Manitoba Hydro on August 15, 2007.