

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.*  
“Planned” outage data is collected, but not with all of the details that are requested in Phase II TADS. Emergency outages are collected in another part of the system. Entering the extra information would require software changes and additional training.
2. *Is the data being requested reasonable and obtainable? See Sections 2 and 3 of the Phase II Report. If “no,” please explain.*  
The information is obtainable, but will require additional resources to gather the information into the format being requested. Data was previously submitted to MAPP, as indicated in the statement below.

Some regions, such as the former East Central Area Reliability (ECAR), Mid-America Interconnected Network (MAIN), and Mid-Continent Area Power Pool (MAPP) regions collected all transmission outages for over 20 years. However, no recommendations were made by them as a result of the collection and reporting of the planned outage data over that same period. They did make formal observations in their summary reports as to outage duration and cause.

Was the experience of collecting and analyzing this old data looked at for TADS PH II development?

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. What is the basis for the 30-minute exclusion (instead of 60 or 45)? In some remote areas, it may take more than 30 minutes to perform the switching order, more time would seem reasonable in these instances.*
  - *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? Yes. If, for some reason, the 30-minute exclusion would need to be modified in the future, how would the historical data be modified from that point in time? Collecting and reporting all of the data would give end users the flexibility to select which data is included or excluded without the need to revise exclusion criteria for the TOs or obtain more data from the TOs. Eliminating an exclusion would reduce the amount of screening the TO must do but would increase the amount of data to be reported.*
  - *Should a TO’s supporting data for determining exclusions be part of NERC’s data review? NO, this would increase the amount of paperwork the TO would need to maintain.*
  - *Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.*  
The 30 minute exclusion will increase the burden on the TO. With the 30 minute exclusion, **all** the planned outage data must be collected and analyzed to determine what must be reported. Exclusion documentation and outage data must

be kept. With no 30 minute exclusion, **all** the planned outage data must be collected and reported, but no analysis is required to filter the data. Only data records must be kept.

- Other questions regarding data exclusion:
  - Can all outages less than 30 minutes be excluded, regardless of type or cause? Is there a lower exclusion duration that could apply to all outage types?
- *Are the metrics appropriate? See Section 4 the Phase II Report. If “no,” please explain.*

Operational outages that cannot be deferred more closely resemble automatic outages than non-automatic outages. Automatic outages and Non-Automatic Operational outages are unplanned and should be analyzed together. There are no metrics listed in Phase II section 4 that analyze the two together. Analyzing these together gives a complete summary of unplanned outages. All the other metrics seem appropriate.

4. *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. Five years seems to be reasonable.*
5. *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. Seems reasonable, will need to alter some of the current software used to track planned outages, train personnel, and set aside more time for someone to investigate and collect information.*
6. *Are there ambiguities in the Manual that need clarification? If “yes,” please explain. If a Third Party (for example: the department of roads or a house mover) requests an outage and the TO uses that outage opportunity to do maintenance to the line, does it still classify as a Third Party Outage or does it now become a Maintenance Outage? Are there any situations where a planned outage starts out as a Third Party outage, but then becomes a maintenance or operational or “other” type of outage?*

Can you provide examples of “Other” category outages?

If an operator opens the wrong breaker as part of a switching operation, is that a non-automatic outage and would that be an operational or planned outage? Would this fall into the “Other” category?

There is a column for only the Outage ID Code, not one for the Event ID Code (Appendix 6). What if a planned outage applies to multiple elements, how would this be reported? Multiple outages reported with simultaneous start times?

Do the RE planned outage definitions match up with the TADS planned outage definitions?

Why are Planned Outage and Operational Outage Definitions not subsets of Non-Automatic Outages as outlined on the definitions page (page 5, appendix 7)?