

National Grid comments on NERC TADS Phase II

Summary

We welcome the opportunity to comment on the Transmission Availability Data System Phase II data collection proposal for Non-Automatic Outage Data. Although we recognize that a significant amount of time and thought has gone into this proposal, overall we do not believe that the benefits and uses of this proposed data collection for planned outages have been sufficiently articulated. We believe that the proposal should be deferred until such time that it can be clearly demonstrated that system reliability will be improved as a result of such data collection and analysis.

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.

Yes, we use this planned outage data to improve the efficiency of our business processes.

We have been collecting such data for nearly 10 years now and use it to continually improve coordination of our internal business processes and externally with other parties. The data that we collect is not categorized in the same way as that proposed for TADS2 and as such there would be an associated implementation cost.

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

In our view, the data that is being requested is not reasonable, but is obtainable.

Reasonableness: we believe that this request is unreasonable as:

- There is no clearly stated indication as to exactly how NERC will use this data to maintain or improve system reliability (e.g. are there any specific plans to change the Planning Standards based on this data or not?).
- It seems that a significant driver for NERC TADS2 proposal is to satisfy data requirements of the US Energy Information Administration (EIA) which are also unclear in nature.
- We have a significant number of planned outages and in order to capture the data we will need to make changes, at a cost, to our outage software system.
- It is our view that the requested data will not provide meaningful insight as to how we, or others, plan and operate our transmission systems. Our concerns include the facts that the requested data will not be able to differentiate between:
 - work practices (e.g. we do a significant amount of live line work in order to mitigate congestion exposure to customers, often with multiple crews working on equipment etc.)

- business practices (e.g. how well planned and coordinated are these outages and over what time frames)
- coordination of outages with other transmission owners and generators (whether those outages take place or not)
- coordination with both our lower voltage systems and with other parties
- impact of weather (actual and anticipated)

Given that there is no clear purpose or specified use of this data, and the costs that will be involved, it does not appear to be a reasonable request.

Obtainable?

- We would need to make a number of software changes to our outage data collection system, as well as to our business processes in order to capture the required information.
- We are currently exploring these potential changes with our software vendors. The incremental data will be obtainable but at a cost and, at this time, is unlikely to be fully available by January 2009.

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.

- We believe this would be a reasonable exclusion time, and would ask that this be maintained.

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?

- We do not believe it would make any material change to any availability calculations (and even if it did, it is unclear as to what that such an availability metric really means anyway). Without this exclusion, our outage data system would have to be significantly modified without any obvious benefit.

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

- No. This would create even more unnecessary reporting burden for the transmission owner, the RE and NERC.

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

- The proposed exclusion would certainly reduce our reporting burden. In the absence of this exclusion, we would probably need to refer to times / status indications in our EMS to identify such Element switching steps.

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

- No, as it is unclear how these metrics will be used to improve system reliability.
- As the data does not indicate the design or configuration of the system it is hard to see how it can be used to identify system reliability gaps or risks. Given that system elements are not defined (whether they be TADS Elements or not), it is a mystery to us as to how any conclusions can be drawn on a circuit level at least as to whether Elements have the “right number” of scheduled outages (or not). Alternatively, if it does not matter whether Elements have an appropriate number of outages each, it begs the question as to why data needs to be captured on that basis anyway.
- Instead of requesting data from individual transmission owners for all >200kV outages, an alternative approach might be to analyze and review a number of actual system-wide “risk” cases provided by Reliability Coordinators and perhaps do a “deep dive” on the more high-risk system conditions in order to identify reliability improvement opportunities.

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.

- As previously stated, we do not believe that the data request is reasonable; but if it were enforced, a 5 year period is acceptable.
- However, it should be recognized that often circuit configurations change; therefore reliance on this outdated information would not be beneficial or meaningful from either a performance or metrics standpoint.

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.

- We believe that the schedule is unreasonable as there is insufficient time from the Board of Trustees making a decision (anticipated October 2008) and implementation (January 2009).

- We believe that further work should be undertaken to clearly identify what questions this data might address (both by NERC as well as the EIA), and that implementation should be moved back to January 2010 at the very earliest.

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

- No, the Manual is generally well written.
- However, it is requested that future document change control be more formalized and that for any future Phase I (and Phase II if approved) TADS changes that NERC limits the frequency of updates, if any, to a quarterly basis.

General Comments:

- Planned outages are predicated that they can take place only when system conditions allow (and as the report and manual documentation indicates, by definition are always deferrable). Such outages are the result of considered system analysis and coordination by multiple parties (e.g. control centre, ISO etc) and self-evidently recognize the risk associated with each outage. It is unclear what, if any, benefit may be derived from further analysis of previously analyzed and approved outages.
- Given that FERC have made it clear that they prefer a wider definition of “transmission” (reflecting regional facilities that transmit bulk power, not just those >200kV), the design and capture of planned outage data in outage systems may need to reflect additional elements other than those >200kV in order to make sensible cost-efficient changes to our collection systems. This uncertainty or ambiguity in direction directly leads to further complexity and cost when changing processes and systems.
- UTC – For TADS1, and now intended for TADS2 as well, NERC has indicated that it intends to use UTC as the basis for all outage start and end times. However, as NERC subsequently selected OATI to provide the TADS1 application, and that the OATI tool has the proven in-built ability to accommodate local times to be used as the basis for time delineation, we now request that the TADS Task Force revisit the sole use of UTC for all outages. In discussions with other transmission owners, and certainly for ourselves, we would prefer to have the ability to provide any and all outage times in local time – as we believe that will reduce potential errors in time recording.