

## **General**

National Grid is happy to see TADS and other initiatives implemented that improve the operation of the Bulk Electricity System. We do have a number of generic issues / questions:

- Submitted data for 2008 data will not be available for review until mid 2009 and given NERC's comments about how the data will be used (such as not favoring region to region comparisons etc), without further context, initial data could misinform stakeholders / regulators of performance trends. Instead it would appear that it could take a number of years to draw appropriate trends and make meaningful comparisons. NERC should make the appropriate caveats on what the data represents (and does not represent) for at least the first 5 years of TADS data.
- Within the Control Areas within which National Grid operate, there are various mechanisms which the ISO can and does review the operation of protection systems. The fact that an independent third party has reviewed or has the ability to review all operations under NERC's locus may be a useful fact to capture in this data collation activity (since it directly addresses the correct operation of the BES within a region and from one Transmission Owner to the next).
- If new or additional data is required in future, it is unclear what will be the process to implement.
- Without very clear guidelines and much more work, it is very hard to envision how collecting planned outage data will be used to enhance the reliability of the system.

### **1. Transmission outage data similar to TADS**

- National Grid owns and operates transmission facilities principally in New York, Massachusetts and Rhode Island. We collect data on all outages initiated by automatic operations, forced outages as well as all scheduled work. All disturbances are reviewed and analyzed. We participate in an annual benchmarking survey conducted by SGS. We have participated in this survey for at least the last 8 years. Data is similar but slightly different than that required for TADS.
- At a high-level there are mechanisms and attributes within this third party benchmarking process that should be commended and which are not included within TADS. These include:
  - The SGS survey includes automatic and Emergency / Forced Outages only (it does not use Planned Outage data).
  - Considerable thought has been put into the output metrics (more detailed than considered for TADS so far).
  - A minimum of 5 years of data is used to develop key data points and develop trends.

- In terms of TADS, we strongly believe that consideration should be given to including Emergency / Forced Outage data in the initial data set, in addition to automatic operations, since that class of operations is highly indicative of asset related problems.
- We do not understand how collecting and analyzing planned outage data can be done in such a way that will improve the reliability of the system efficiently. We would observe that different transmission owners have different work practices, different load and sub transmission systems, different types of customers, use different maintenance and construction practices, use energized techniques to different extents etc. that without understanding all of this in more detail this data could not be used in a meaningful way. And even if it could, arguably this goes far beyond NERC's expectation or remit of improving bulk transmission performance.

**2. Is the data being requested reasonable and obtainable?**

- We believe that most of the data requested is reasonable and all of the data is obtainable.
- One significant failing is that the cause code for "failed equipment" is overly broad, and would benefit from line, substation and other facilities <200kV sub-categorization.

**3. Are the metrics appropriate?**

- Most of the metrics are fairly high level and it is not clear how useful they will be by themselves. They may also mask other important questions such as:
  - Is it important to count automatic operations or the number of operations that should have occurred automatically (perhaps both are required)?
- It is generally considered that some circuits may be more operationally significant than others. For example, the most important circuits / elements, outage duration time should be lower than others. The data does not differentiate importance.

**4. Is the data reporting process reasonable?**

- Yes, we believe that the process is reasonable.
- However we strongly believe that the use of GMT (or rather UTC) is unnecessary and could lead to unforced errors. We would propose that part of the inventory process should include time zone base.

**5. Is the implementation schedule for Phase I TADS for 2008 reasonable?**

- Yes, timescales are OK.

**6. Are there ambiguities in the Manual that need clarification?**

- It would be preferable that the definition of a momentary event be changed from “less than 60 seconds” to “less than or equal to 60 seconds”. This would align with other reliability definitions and mitigate some additional software expense.

*Comments were submitted by Julian Cox of National Grid on July 24, 2007.*