

Progress Energy – Carolinas Comments to the North American Electric Reliability Corporation (NERC) on its Request for Public Comment on its Phase II Transmission Availability Data System (TADS) Report and Manual

Comments submitted June 16, 2008 by Mark Matthews of Progress Energy - Carolinas

Submitted to: tadscomments@nerc.net.

Comments to TADS Phase II – Progress Energy - Carolinas:

Responses to Comment Questions from Section B of the Request for Public Comment:

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.

Answer: We currently collect some of the data being requested as a part of TADS Phase II but not all of it. We use an in house transmission outage management system (TOMS) to collect some of the data as well as TOA, a vendor provided tool for scheduling outages and clearances. Neither tool collects all of the data being requested nor in the format requested. We could perhaps modify TOMS or work with the vendor to modify TOA in order to facilitate TADS Phase II. As more and more data requests are being made there needs to be an automatic way in which to extract the data which we currently do not have. Any changes to existing systems will require programming changes on the part of either the vendor or our in-house IT department. Without these changes, many man-hours will be spent in order to manually manipulate the data or manually add data that is currently not being captured automatically.

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

Answer: Yes and No. The data is obtainable but at a cost. Additional programming and resources will be required in order to facilitate Tads Phase II. Automatic outages \geq 230 kV are very manageable because of the low number of these that occur, however planned outages could be very numerous. If the threshold for reporting outages were to be changed to \geq 100 kV then the magnitude of the effort would grow exponentially for both TADS Phase I and II.

As to the reasonableness of the request, this all depends on how the data is being used and how it might be interpreted. Planned outages are a normal part of doing business and conducting required maintenance on the system, it is therefore unclear how any metric based on planned outage frequency or duration could reveal anything meaningful with respect to reliability and could be prone to misinterpretation.

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.”

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Please comment on the appropriateness of this exclusion. 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? Should a TO's supporting data for determining exclusions be part of NERC's data review? Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.

Answer: The 30 minute exclusion is appropriate. All outage times would have to be recorded internally by the TO to determine if the outage meets the exclusion criteria. However, requiring a TO to maintain supporting data for determining exclusions will increase the burden of tracking TADS Phase II data. Requiring a TO to preserve supporting data for these exclusions defeats the purpose of having the exclusion in the firstplace (*comment provided by Mike Heitkamper from Progress Energy – Florida*).

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

Answer: Planned outages are a normal part of doing business and conducting required maintenance on the system, it is therefore unclear how any metric based on planned outage frequency or duration could reveal anything meaningful with respect to reliability.

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.

Answer: Yes. The systems we currently use contain historical data going back over 5 years.

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.

Answer: No. As our systems are currently designed and based on the fact that we do not have the additional manpower required to manually collect and report TADS Phase II data, we do not feel that the implementation schedule is reasonable. Modifications of current system, either TOA or TOMS, would require extensive programming changes and in some cases changes to the underlying data structure for the facility and equipment database in PassPort, our current asset management tool.

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

Answer: No.

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