

## **Progress Energy Florida Comments on TADS Phase II**

### **B. Comment Questions**

While commenters are not restricted in the format of their comments, we would appreciate your answers to the following questions:

*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.*

Some but not all of the data required for TADS Phase II is collected in TOA and the FRCC FTMS Line Outage Report. It is entered in TOA in a format that would not be easily retrievable for TADS purposes. To comply with the TADS Phase II requirements we would require new software or modification of TOA. This also applies to the FRCC Line Outage Report. We believe TOA could be modified to include a tab for entering the TADS information for all 200KV and above Planned Outages. Operational Outages are not tracked in TOA and would have to be entered manually in a separate program. The information required for TADS is similar to the information that we are supplying in the FRCC Line Outage Report. This report would also have to be modified to fully comply with the data request.

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

All of the data being requested is obtainable and reasonable. It will require additional software and manpower to retrieve the information.

*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. 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.*

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 first place.

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

Yes.

*Comments submitted on June 12, 2008 by Dania Colón of Progress Energy Florida*

*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.*

If we decide to use TOA as a means of extracting the TADS data, maintaining the historical data for review is not a problem. We are already required to maintain historical data in TOA for a period of 6 years. If we opt to use a new program for logging TADS data the five year requirement is still reasonable.

*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.*

Yes, if we begin now. Once the data retrieval and storage questions are resolved we will require TADS training for the TSC office members and control room System Operators.

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

There are no clarifications needed at this time.