Comments submitted on June 18, 2008 by Sandra Schaffer of PacifiCorp

WECC Member Comments for NERC TADS Phase II

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.

No.

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

No. At this time the company does not capture such data. The system to be able to readily and consistently collect this information has not been contemplated within the company. However, the company is aware the Northwest Power Pool (NWPP) is intending on developing a system designed to capture planned outage events within the grid. As such the RRO would be in a prime position to be able to report such information. Only after this system has been up and running without issues would the company be in favor of extending the required outage reporting requirement. Absent a system that is able to collect such information efficiently, such a requirement would be onerous. Further, it is questionable what value could be obtained without further scoping of what the data is intended to answer.

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.

If collecting planned information it is necessary and reasonable to incorporate a time limit such as proposed. If such a limit were not utilized unnecessary tracking of operations that had little to no impact on the system would be required and needlessly complicate the operational function.

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

Metrics that have been developed for use with forced outages are sensible, however it is unclear exactly where these will take the TADS development effort and what their future application will be. Broadly applying these same metrics against planned outages makes no sense. It seems the two questions being asked are fundamentally different ones, yet there is an apparent desire to use the same dataset to answer the dissimilar questions. For

forced outages evaluation of outage rates per circuit and 100 miles makes sense, however when applied against planned outages it doesn't correlate that such a metric either high or low indicates anything about how effectively the system is being operated. As such, collection and calculation of this data doesn't appear relevant to determining what better operations could occur. Thus, no additional best practice information could be gleaned from the dataset, which appears to diminish any value.

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.

It is not reasonable to maintain TADS-quality data for an extended period of time. The further away the event occurred, the less likely it can be readily replayed and understood. As a result, derivative metrics for a given time period may make sense, however the raw data documenting any planned outage activities does not make sense due to the ever-changing nature of the delivery system, including generation locations, transmission corridors and markets.

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.

No. TADS I was able to be implemented relatively quickly and painlessly due to other data collection exercises that companies were already engaged in. There has been no unified method for collecting planned outage information. In fact, as stated previously, systems that will collect this information are just in the formative stages. Thus, any interim collection is likely to be incomplete, costly and unnecessarily burdensome. Further, it will not have allowed time for system improvements in the collection and data-mining resulting from the implementation of such systems and may miss out on some of the fundamental benefits the industry was able to deliver to the TADS I effort. It is advised that consideration be given to allowing DOE to proceed with its work effort and evaluate whether additional data might be required. It would be beneficial if any proposed schedules recognize this work and its deadlines and data requirements.

7. Are there ambiguities in the Manual that need clarification? If "yes," please explain.
None so far.

General Comments:

- The company is concerned that this documentation and reporting requirement is presumptuous and does not yet have a clearly outlined objective for measuring best performance and improvable performance.
- Consideration should be given to evaluating whether the scheduling of an outage somehow negatively impacted the system, and use that as the basis for documenting an event.
- Apparently in the past capturing and reporting this data has been discussed and the costs of collection were determined to not offset the benefits. It is

questionable whether any substantial changes have occurred in the intervening year.