

April 30, 2008

TO: TRANSMISSION OWNERS  
INDUSTRY STAKEHOLDERS

Ladies and Gentlemen:

## **Request for Public Comment on Phase II TADS Preliminary Report and Manual**

The North American Electric Reliability Corporation (NERC) requests public comment by June 16, 2008 on its proposed Phase II Transmission Availability Data System (TADS). Comments must be submitted in a Word document to [tadscomments@nerc.net](mailto:tadscomments@nerc.net).

Phase II TADS is described in the *Transmission Availability Data System Phase II Preliminary Report* (“Phase II Report”) that was approved by NERC’s Planning Committee on March 13, 2008, as well as in the TADS Data Reporting Instruction Manual (“Manual”), dated April 4, 2008 and named “Ph II Data Reporting Instr Manual 04 04 08.” In the Manual, Phase II changes are highlighted in yellow. These documents may be downloaded at <http://www.nerc.com/~filez/tadstf.html>, and comments are requested on both documents.

- When downloading documents, please note that a redline Manual also is posted which includes both the proposed Phase II highlighted changes as well as redlined Phase I changes. It is named “Redline Ph II Data Reporting Instr Manual 04 04 08.” The Phase I changes are already effective, and we are not seeking comments on the Phase I changes. *Please do not make comments on the redline version of the Manual because page numbers are slightly different.*
- Phase II TADS requests historic Non-Automatic Outage data be supplied to NERC by Transmission Owners (TOs) for the same transmission facilities covered in Phase I, which requires TOs to submit Automatic Outage data. Phase II TADS is a data request, not a Reliability Standard, and therefore this request for public comment is pursuant to Section 1600 – Requests for Data or Information of NERC’s *Rules of Procedures*. The information required for a data request is defined in Section 1602.1.1 and is provided in Section A.

## A. Phase II TADS Data Request Information

The italicized language is information that must accompany a data request.

1. *A description of the data or information to be requested, how the data or information will be used, and how the availability of the data or information is necessary for NERC to meet its obligations under applicable laws and agreements.*

Our response is provided in subparts. Capitalized terms are definitions that are contained in Appendix 3 of the Phase II Report.

- a. *A description of the data or information requested.*

Phase II TADS will be collecting Non-Automatic Outage data for the transmission facilities listed below, beginning with data for the 2009 calendar year.

- AC Circuits  $\geq$  200 kV (Overhead and Underground Circuits). Radial circuits are included.
- Transformers with  $\geq$  200 kV low-side voltage
- AC/DC Back-to-Back Converters with  $\geq$  200 kV AC voltage, both sides
- DC Circuits with  $\geq$  +/-200 kV DC voltage

The specific data that is being requested is described in Section 3 of the Phase II Report as well as in Section 6 and Appendices 6 and 10 of the Manual.

- b. *How the data or information will be used.*

NERC will use the information to develop transmission metrics that analyze outage frequency, duration, causes, and many other factors related to Non-Automatic Outages. A description of these Phase II metrics is in Section 4 of the Phase II Report.

A public report showing common metrics for each NERC region will be prepared annually, and each Transmission Owner reporting TADS data will be provided a confidential copy of the same metrics for its facilities. This is discussed in Section 5.2.3 of the Phase I report *Transmission Availability Data System Revised Final Report* dated September 26, 2007 (“Phase I Report”), which may be downloaded at <http://www.nerc.com/~filez/tadstf.html>.

- c. *How the availability of the data or information is necessary for NERC to meet its obligations under applicable laws and agreements.*

Pursuant to Section 215 of the Federal Power Act, NERC develops Reliability Standards. Whether a new standard is needed or whether an existing standard needs to be modified, sound data is needed. While most Non-Automatic Outages will probably be categorized as pre-scheduled and deferrable Planned Outages, these outages could limit the ability of the system to perform at its full capacity. Complete transmission outage information could allow for improved system analysis by bridging gaps between the operating environment and planning assumptions and may therefore influence the development of future standards. For example, Transmission Planners could compare historical Planned Outages for a period with previously forecasted outages for the same period allowing them to assess whether their outage representation for planning is valid.<sup>1</sup> TOs, Transmission Planners, and Planning Coordinators could compare historic Planned

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<sup>1</sup> To be clear, Phase II will *not* be collecting forecasted Planned Outage data; it will be collecting historic Planned Outage data.

Outages to historic load levels to determine the frequency of such outages during peak load period.

Phase II TADS data will complete the development of a NERC database that is designed to capture data for almost all outages on the aforementioned transmission facilities.<sup>2</sup> The specific facilities outaged, the time and duration of each outage, and the cause of each outage are some of the common data collected for each outage in Phase I and Phase II.<sup>3</sup> With Phase II data, TADS will be able to depict the historic availability of the transmission system at any time, including the causes for unavailability, and the Mean Time Between Failures by cause for specific TADS transmission facilities (e.g., AC Circuits in the 200-299 kV range). Section 215(g) requires NERC to make periodic assessments on the reliability of the bulk power system in North America. We view TADS data as part of the information needed in meeting this obligation.

2. *A description of how the data or information will be collected and validated.*

The data collection and validation process is described in Section 5.2 of the Phase I Report. The Phase II information will be collected in a coordinated effort between NERC and the Regional Entities and follow the same process as Phase I data collection and validation. Data will be input by TOs into a software system that will have its own rules for rejecting illogical data. After software checks for errors, data will be further validated by the Regional Entities and finally by NERC as described in Section 5.3.2 of the Phase I Report.

In addition, Section 5.1 of the Phase II Report permits NERC to review the data and conduct data validation reviews of *all* TADS data submissions with the submitting TOs. These reviews would cover the TO's most recent TADS data submittal and evaluate the TO's process for collecting and validating its TADS data. This review has the single objective of improving the quality of TADS data. Eventually all TOs would be reviewed. The results of these reviews will only be shared with the TO that was reviewed. Reviews will not be made public.

To the extent that a review indicates systematic data entry errors, data entries for previous years may need to be revised. NERC will limit the period for historic corrections to five (5) years. Therefore, TOs would need to maintain historical supporting information used to develop its TADS data for a five-year period.

3. *A description of the entities that will be required to provide the data or information ("reporting entities").*

The submission of Phase II TADS data will be mandatory for all U.S. Transmission Owners who are on the NERC Compliance Registry. Non-U.S. Transmission Owners who are also NERC members are required to comply with NERC's *Rules of Procedure*, and because Phase II TADS data are being requested in accordance with Section 1600, non-U.S. Transmission Owners too must provide Phase II TADS data.<sup>4</sup>

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<sup>2</sup> Although outages that qualify for the 30-minute exclusion of Planned Outages will not be recorded, these are expected to be minimal in total duration.

<sup>3</sup> Phase I requires additional information for Automatic Outages, such as Fault Type.

<sup>4</sup> Phase I was approved by the NERC Board of Trustees prior to the addition of Section 1600 to the *Rules of Procedure*. Because NERC's Phase I TADS approval relied upon Section 39.2(d) of the Federal Energy Regulatory Commission's regulations, 18 C.F.R. § 39.2(d), it is mandatory on all U.S. Transmission Owners. However, most non-U.S. Transmission Owners have indicated that they will voluntarily comply with Phase I.

4. *The schedule or due date for the data or information.*

For 2009, all TADS data (both Phase I and Phase II) must be submitted by March 1, 2010. The combined Phase I and Phase II schedule is contained in Table 3 in Section 6 of the Phase II Report.

5. *A description of any restrictions on disseminating the data or information (e.g., “confidential,” “critical energy infrastructure information,” “aggregating” or “identity masking”).*

The treatment of confidential information for Phase II TADS is the same as Phase I TADS. NERC’s treatment of confidential information is governed by Section 1500 of NERC’s *Rules of Procedures*. TADS public reports will not inadvertently release confidential information by the display of regional or NERC information from which a Transmission Owner’s confidential information could be ascertained. For example, if the Transmission Owner in a region is the only owner of assets in a particular Voltage Class, the metrics on that data would not be released if the Transmission Owner’s name and its confidential information could be identified. Section 2.4.7 of the Phase I Report addresses data confidentiality, while Section 5.4 addresses data access policies.

However, we do not believe that all the information to be submitted will be confidential information. Section 1.4 of the Manual provides our assessment of the confidentiality of data, broken down by the data requested on each data form.

6. *An estimate of the relative burden imposed on the reporting entities to accommodate the data or information request.*

While less data per outage is required for a Non-Automatic Outage compared to an Automatic Outage, the number of Non-Automatic Outages is expected to be significantly greater than the number of Automatic Outages. In the U.S., Transmission Owners in five of the eight regions have voluntarily submitted data for EIA Form 411, Schedule 7.<sup>5</sup> Schedule 7 requires data that is comparable to Phase I and Phase II TADS. However, we believe that all TOs will be impacted by Phase II because Phase II requires more detailed outage data compared to EIA Schedule 7 data. In addition, several Reliability Standards require that Transmission Operators report all key transmission facilities outages to other entities.<sup>6</sup> Hence, tracking actual outages is already a routine part of operations. Therefore, the implementation of Phase II TADS should not add a significant reporting burden. It will merely require data that is already being collected to be reported in a uniform manner.

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<sup>5</sup> TOs in WECC, SERC and FRCC have not submitted EIA Schedule 7 data to their regions. All other regions submitted Schedule 7 data.

<sup>6</sup> For example, Attachment 1 of TOP-005-1 requires the reporting of “Transmission data for all Interconnections plus all other facilities considered key, from a reliability standpoint” at least every 10 minutes by Reliability Coordinators, Balancing Authorities and Transmission Operators to each other. Facility “status” is part of the data that is required to be reported.

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

4. *Are the metrics appropriate? See Section 4 the Phase II Report. If “no,” please explain.*
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.*
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.*
7. *Are there ambiguities in the Manual that need clarification? If “yes,” please explain.*

Comments are due on June 16, 2008 and must be submitted in a Word document to [tadscomments@nerc.net](mailto:tadscomments@nerc.net). If you have any questions, please contact John Seelke at (609) 452-8060 or by e-mail at [john.seelke@nerc.net](mailto:john.seelke@nerc.net).

Sincerely,



Senior Vice President and  
Director of Reliability Assessment & Performance Analysis