

Request for Public Comment on TADS Report and Manual

General Comments:

We appreciate having the opportunity to provide comments on the proposed Transmission Availability Data System. In general, we are taking the approach that any data capture and reporting functions that we do should be automated as much as possible utilizing our existing transmission outage database. Using this philosophy affects the complexity of what is actually involved behind the scenes in reporting data for the TADS effort. In most cases the actual data requested is not unreasonable, but it could be rather time consuming if it were to be reported manually. Reporting should lend itself to using an automated approach but it will require considerable programming changes in our outage management system initially.

We are also particularly concerned with the “cause” code definitions and recommend an alternative that is more in line with our utility benchmarking standards (See question 2 - Form 4.1, columns M and N).

1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If “yes,” please explain.

We currently collect transmission outage data similar to TADS using a custom built outage tracking system. This system is used by our two transmission energy control centers and transmission asset management group to capture forced transmission outages along with associated data such as outage start and end times, cause codes, customer impact data, detailed outage reports, lightning correlation, etc.

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

The data being requested is reasonable for the most part. Much of it is already collected in our current system. There are some specific requirements however that will be difficult to meet without modifying both our outage management system as well as our outage reporting philosophy. The major issues we have are outlined below:

- We would like to maintain consistency in the outage data collection process for *every* outage, regardless of voltage level. Having to use a different process for only 200kV and above elements equates to more manual work on our part and having to treat outages inconsistently.
- To simplify the reporting process for the data providers, and as an aid for NERC in collecting and examining the data, providing an output data file would be preferred over the suggested data forms. Providing a data file would take a relatively short time to prepare as compared to the several hours required to populate multiple spreadsheets. The file could be something like a comma delimited text file or perhaps an MS Access database table.

- Form 2.1, columns B and C - we do not have an association in our facilities database that relates *From* and *To* terminal names to a transmission circuit. This data will have to be added to our maintenance management system and corresponding changes made in our outage database.
- Form 2.1, columns G - K - similarly, joint transmission owner data that is related to a jointly owned transmission circuit is not captured as a field in our database.
- Form 3.1 - most of this data could be derived automatically from a simple output data file that we could provide that contains a comprehensive list of all circuits along with installation dates, removal dates, as well as other parameters. This would make it possible to automatically calculate things like number of circuits added, circuits removed, circuit miles added, etc.
- Form 3.2 - similarly, this data could be derived from an output data file
- Form 4.1, columns C-E - Terminal names are not associated with circuits in our asset database, these fields would have to be added, populated, and maintained
- Form 4.1, column I - we do not currently capture an Outage Initiation Code
- Form 4.1, columns M and N - our current cause coding process uses a different approach than what is suggested by TADS and is designed to provide a way for us to perform outage analysis, equipment failure trending, and to assist in making improvements on our system. We use a “primary” and “secondary” hierarchical approach that would not always relate to the suggested “initiating” and “sustained” cause codes in the proposal. Most sustained outages on our system have only one cause, a primary cause with no secondary cause. Would sustained cause be assumed to be initiating cause also, if no sustained cause exists? We also have a different philosophy when it comes to sustained outages that would have normally been a momentary. For example, if lightning strikes a line and a static wire falls, we would enter “static wire” as the primary cause and “lightning” as the secondary cause because more weight is given to a sustained outage cause for historical trending purposes. In order to provide “initiating” and “sustained” causes, we would have to capture them separately.
- Form 4.1, column O - we do not currently capture Outage Mode
- Form 4.3 - we capture two kinds of outages. Transmission Circuit outages and Substation outages. A substation outage could be caused by any of a number of elements, including circuit breaker, switch, arrester, and transformer. In order to report this data we would have to start specifically associating transformer related outages to a specific transformer in our database.
- Form 4.3, columns M and N - same as above for form 4.1
- Form 4.3, column O - same as above for form 4.1
- Form 5 - we do not currently capture any of this data.

3. *Are the metrics appropriate? See section 4.b and Appendix 4 of the Report. If “no,” please explain.*

They look appropriate and comprehensive. If I understand correctly, metrics will be calculated and analyzed at a circuit or element level only. This is good as there may be a small number of circuits or elements that are having issues and problems that could be skewing the system measures. Are there plans to look at system level metrics? If so, what would these metrics be used for?

4. *Is the data reporting process reasonable? See Section 5.2 of the Report. If “no,” please explain.*

I feel the data reporting process could be streamlined significantly if it involved submitting an output data file as opposed to spreadsheets and forms. (Please refer to my comments on question 2)

5. *Is the implementation schedule for Phase I TADS for 2008 reasonable? See section 5.3.1 of the Report. If “no,” please explain.*

We will more than likely have to provide the first report manually until our IT organization is able to make the required application and database changes to start collecting and reporting the data automatically. We should be able to “deduce” any data we are not currently capturing in our database. We recommend that time (6 months) be allowed after the final TADS request is determined for programming changes to our transmission outage management system.

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

I do not see any

Comments submitted by: Mark Matthews of Progress Energy, Raleigh, NC, August 14, 2007.