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Subject: Request for Public Comment on Phase II TADS Preliminary Report and Manual

I'd like to take this opportunity to comment on question 3 of the request letter, which asks about the appropriateness of the 30-minute exclusion.

I do not agree with the 30-minute exclusion and recommend that it be removed from the planned outage data collection process.

This 30-minute exclusion appears to be an arbitrary time period with no technical justification, except that it may create a little more work for outage review and cause a few more outages to be reported. What technical justification is there for elements being excluded solely because they are part of a switching sequence? What special circumstance of a switching sequence makes them not reportable?

If a fault were to occur during a switching sequence which resulted in an automatic TADS Element outage with duration of less than 30 minutes, then the outage of that facility would be reported via TADS. This would create an inconsistency between the reporting of automatic and planned outages. Also, an excluded 30-minute (or less) outage of a TADS Element in a switching sequence could possibly be longer in duration than the planned TADS Element outage, which would be reported. This also seems to be inconsistent logic.

Isn't the whole purpose of this effort to calculate statistics and metrics for transmission system availability? How can that occur when an arbitrary subset (those outages with the 30-minute exclusion) of the total population of planned outages would be missing? This data could eventually be correlated to the NERC TPL Standards to aid in study analyses. But with this 30-minute exclusion, I don't see how this would be possible because a "piece of the puzzle" would be missing. More specifically, the total number of transmission lines out-of-service for any one time period would not be known because of this 30-minute exclusion.

As a member of the TADSTF, I was opposed to this 30-minute exclusion during the deliberation and development of the Phase II planned outage process, and continue to oppose it.

Thank you for the opportunity to comment on this effort!

Sincerely,
JLM
Jeffrey L. Mitchell