

Comments on NERC's Proposal to Implement a Transmission Availability Data System

William F. Reinke, P. E.

This proposal strikes me as a modern-day example of the Abilene Paradox. For years the electric utility industry, including NERC, resisted proposals to collect information concerning transmission availability because variables in transmission system design, geography, and weather, to name a few, made it difficult, if not impossible, to derive coherent results from the data.

Now we find NERC promoting a system it once resisted, apparently because it could not convince the United States Government Department of Energy that such a data collection exercise is not useful. I agree with other comments submitted that question how collection of this information will enhance or improve reliability.

Specific comments on the proposal

NERC notes that its proposal is subject to approval by the NERC Board of Trustees, after which NERC states that the collection of this data will be mandatory. NERC states that it has the authority to issue a mandatory data request by citing 18 C.F.R. 39.2(d). I believe it is problematic that the collection of such information will be deemed necessary to implement section 215 of the Federal Power Act. The NERC Board of Trustees should reject this contention. Further, NERC acknowledges that it is asking the Board to approve the TADS proposal "as if the data rule were in effect." The Board should resist stepping out ahead of the Commission in this matter.

NERC notes that it disagrees with EIA on the need to collect scheduled and manual outage data. I agree with NERC on this matter. However, NERC has abandoned that position so that its TADS can be the single source of transmission outage data. While on the surface this is a noble goal, NERC should stand on its principles and refuse to participate in an effort that will burden the industry.

In Section 2.6 of the Final Report NERC states that "we believe that the greatest use of the data will be for outage cause analysis and outage Event analysis." NERC goes on to state that this will enable it to trend "...each Regional Entity's performance against its own history will show how that region's performance is changing over time. This through-time comparison is appropriate for the evaluation of a region's performance." I am unaware that Regional Entities own and operate transmission systems such that their performance is a measure of interest to NERC. If NERC intends to measure the performance of transmission owners and operators within a region it should make that clear and not base its justification for the collection of information on false premises.

In summary, NERC should revert to its prior position that the collection of such information will be a burden to the industry and that the data will not provide a foundation for serious and meaningful analysis. If the EIA insists on making the trip to Abilene it should do so on its own.