

Southern Company Transmission Comments on Phase II TADS

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.

Not all of Southern Companies’ Transmission Owners currently collect data for non-automatic transmission outages. Internal processes for outage collection would need to be revised to incorporate the non-automatic occurrences. This process of collecting specific outage data would be implemented using existing personnel, and to do so, would divert them from their primary responsibilities.

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

No. The data is obtainable however the burden of the data collection will be placed on operators adding yet another distraction from maintaining the reliability of the system making this request unreasonable.

*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.*
The 30 minute or less outage exclusion is reasonable. However, planned outages on transmission lines of 200Kv or greater typically exceed 30 minutes and, therefore, would not provide a benefit to us.
- *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?*
No, only the outage times greater than 30 minutes should be recorded.
- *Should a TO’s supporting data for determining exclusions be part of NERC’s data review?*
No. This would create additional work for NERC and provide little value.
- *Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.*
Planned outages for transmission lines of 200Kv or greater typically exceed 30 minutes and, therefore, excluding them would not reduce the reporting burden.

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

No; We are not convinced including planned outage information in the Phase II data request will benefit the day-to-day operation of the transmission system.

Trending planned outages could lead NERC to suggest standards which might limit Transmission Owners to certain “windows” of time and certain “lengths of duration” for maintenance to be performed. Doing so could possibly do more harm than good to the transmission system. NERC should encourage the “What’s” required for system reliability and not the “How’s” as trending planned outages might do.

Additionally, there is industry concern that the reporting of non-automatic outages would become more burdensome with the possible future collection of data for 100Kv and above.

Finally, the metrics resulting from the Phase II TADS data collection process may not provide meaningful results where there are significant climatic or geographical differences between regions.

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.

Yes.

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

It appears to be reasonable.

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

While we have not discovered any ambiguities in the Manual to date, there could still be some contained in the Manual. We recommend NERC further review the Manual for such occurrences.