

## Summary of Phase I TADS Data Collection

On October 23, 2007, the NERC Board of Trustees approved the collection of the Phase I Transmission Availability Data System (TADS) data beginning in calendar year 2008. This document describes the data being requested. Some of the descriptions below refer to the *Transmission Availability Data System Revised Final Report* (“Report”) dated September 26, 2007 and the *TADS Data Reporting Instruction Manual* (“Manual”) dated October 17, 2007. The Report and Manual can be found at <http://www.nerc.com/~filez/tadstf.html>.

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 2 of the Report.

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

Phase I TADS will be collecting Automatic Outage data for the transmission facilities listed below, beginning with data for the 2008 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  $\geq \pm 200$  kV DC voltage

- 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 transmission outages. A description of these metrics is in Section 4 of the 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 5.3.3 of the Report.

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

One of the NERC’s central missions is to develop reliability standards. This is a central theme of the Section 215 of the Federal Power Act which created the Electric Reliability Organization (ERO) in the U.S. Whether a new standard is needed or whether an existing standard needs to be modified, sound data is needed for this purpose. TADS data is intended to provide a basis for standards. By analysis of data from all Transmission Owners, NERC will be better equipped to address its central role of developing reliability standards.

While TADS data is not intended to provide determinative performance measures, we believe it can quantify certain performance aspects. In addition to collecting simple transmission equipment availability, TADS will collect detailed information about individual outage events that, when analyzed at the regional and NERC level, will provide data such as causes that may be used to improve reliability. We will also know whether specific equipment outages were associated load and generation outages by knowing whether they were associated with disturbance reports filed with NERC. In addition, we will also know whether outages by one Transmission Owner are related to outages of other Transmission Owners. Section 215(g) requires the ERO to make periodic assessments on the reliability of the bulk power system in North America. We view TADS data as part of the information that will be needed in meeting this obligation.

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

This information will be collected by a coordinated effort between NERC and the Regional Entities. The data collection and validation process is described in Section 5 of the Report.

3. *A description of the entities (by functional class and jurisdiction) that will be required to provide the data or information (“reporting entities”).*

U.S. Transmission Owners registered on the NERC Compliance Registry will be required to report TADS data; however, NERC, through the regions, will also be requesting TADS data from non-U.S. Transmission Owners.

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

For 2008, there are two data submission dates: May 30, 2008 (for data collected through March 31, 2008) and March 1, 2009 (for the balance of 2008 data). Since the start-up year will be 2008, we developed a timetable that would attempt to catch any fundamental design or implementation issues early rather than wait until year-end.

For 2009, data will be due on March 1, 2010. We expect this pattern to hold for subsequent years. A data collection timetable of 2008 and 2009 is provided in Section 5.4 of the Report.

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

All Transmission Owner confidential information will be protected pursuant to NERC’s confidential information policies in Section 1500 of its Rules of Procedures. In addition, 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 Report addresses data confidentiality, while Section 5.5 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.*

Many Transmission Owners already collect some type of transmission outage data, and these Transmission Owners will naturally be concerned with their ability to extract TADS data from existing data they now collect. Given the short start-up time associated with a 2008 implementation date, it may not be practical for Transmission Owners to modify their existing transmission outage data collection systems to extract TADS data. Therefore, we fully expect that supplying 2008 data may require a manual collection and extraction process. Given that we are limiting our request to facilities  $\geq 200$  kV, we do not expect the burden of collection to be excessive.