

Response to Questions from NERC and Additional Comments

Reference.: Letter from NERC dated June 28, 2007, “Request for Public Comment on TADS Report and Manual”

Questions reproduced here in italic font were those stated in the NERC letter dated June 28, 2007. Responses are from Hydro One Networks Inc. (Hydro One)

Q1. If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If “yes,” please explain.

Response:

Yes. Hydro One currently collects transmission outage data similar to TADS. Hydro One has participated along with other Canadian utilities in the Canadian Electricity Association (CEA) Equipment Reliability Information System (ERIS) program since its inception in 1978. Hydro One has participated for 3 consecutive years in the Annual SGS Transmission Reliability Benchmarking Study. These programs have set a high standard in terms of their clear objectives and detail of metrics and definitions.

The collection of this data is primarily used to track major equipment performance and identify equipment that are either (a) exhibiting a deteriorating trend and (b) performing significantly worse compared with similar equipment in other jurisdictions. Hydro One primarily uses this information for asset management purposes.

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

Response:

The data being requested by NERC for TADS is mostly obtainable and essentially duplicates to some extent certain major equipment outage tracking programs as described in the response to question 1. However, Hydro One believes that tracking this type of data will only provide NERC with performance of components that the Transmission Owners utilize for asset management. Its value to determine system reliability performance is questionable. The scope of the Report (section 2.1) states “...*On the premise that transmission availability data will help quantify system performance and reliability, ...*”. This is an assumption that is not substantiated in the Report. Major equipment availability data do not provide a direct measure of the ability of transmission system to transmit or deliver electricity to its customers or the risk that a transmission system may pose to neighbouring systems. Hydro One does not believe that the collection of this data now also by NERC will add value to assessing transmission network performance on a regional scale.

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

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Response:

It appears that the approach NERC has taken is to establish which data are presently available from Transmission Owners and then determine how they might be useful to NERC. As stated in the Report section 4 “... *We have not established a comprehensive set of uniform metric calculations since we expect that it will take some work with the data itself to tell us which combinations provide meaningful information.*” A more appropriate approach would be to determine the metrics that would provide NERC with reliability knowledge they require rather than establish metrics on the basis of data that seem to be widely and presently available within the industry.

A measure of the Availability of circuits and transformers, on an outage by outage basis does not directly reflect the performance of the primary functions of a transmission network which are to transmit and deliver electrical energy. Availability metrics will also not directly reflect risks that the transmission system is exposed to on a Regional basis and will therefore not provide a useful assessment of reliability and security of the bulk power system in North America

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

Response:

Refer to response to questions 1-3. No comments at this time.

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

Response:

Refer to response to questions 1-3. No comments at this time.

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

Response:

Refer to response to questions 1-3. No comments at this time.

Additional Comment on NERC TADS from Hydro One

The TADS Report states that “...*An RE may request additional data from the TOs in their footprint...*”. The requirements in this document must be limited to NERC’s data requirements only and reference should not be made on the requirements of other entities such as RE. Note that similar type data is submitted and collected through CEA in Canada. We suggest that NERC should not be making any statements on the requirements of other entities, and be limited to NERC’s requirements only. We suggest that this statement should be removed.

In case NERC receives the data, it should ensure that the information is not publicly disclosed in any way that permits the identification of individual assets and/or entities, that is, it must be disclosed in an aggregated form. In addition, the information is to be used only by NERC and not provided to any other entity without its originator’s permission. Information from Canadian utilities is not to be forwarded to FERC or any other US government agencies.

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