

B. Comment Questions

While commenters are not restricted in the format of their comments, we would appreciate your answers to the following questions:

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.*

- a. We do not currently retain Non-Automatic outage data.
- b. Section A.6 in the request mentions “several Reliability Standards require that Transmission Operators report all key transmission facilities outages to other entities. *Hence, tracking actual outages is already a routine part of operations.* Therefore, the implementation of Phase II TADS should not add a significant reporting burden, merely require data that is already being collected to be reported in a uniform manner.”
 - i. This is technically inaccurate.
 1. “Several standards require **notification** of key facility outages”, this would refer to Phase I data (unplanned outages).
 2. Several standards require **coordination of outages of key facilities**. The retention of data after the fact is not part of the standard. The compliance quagmire requires you to retain enough evidence to prove you do coordinate, but does not require the data retention proposed in TADS Phase II.
 - c. Once the planned outage is over, no data retention is required. It serves no useful purpose.

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

- a. While the data is obtainable, I have serious questions as to it being reasonable. This phase seems to be an effort to justify a course of action that is fraught with unknowns and inconsistencies.
 - i. Has the data collected for over 20 years in ECAR, MAIN and MAPP been fully analyzed to determine what can be drawn from it?
 - ii. Or to see if continued collection of the same data is pointless because of the skews introduced by statistical outliers that wipe clean the record? (Ice storms or hurricanes that require a complete rebuild of several lines will skew the expected metrics.)
 - iii. Why are we spending SIGNIFICANT hours and dollars on an effort that “could allow”, or “may improve” the BES reliability, or “may therefore” be used in other efforts such as development of future standards.
 - iv. This seems like a fishing expedition that is looking to see what we can do to appease the FERC directive of Section 215(g) to make assessments on the reliability of the grid, or to see how we can use statistics to make the general public think we are doing something to improve reliability.

- v. The way to improve reliability is to put more wire in the air in areas that show consistent contingency problems.

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. 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? Should a TO’s supporting data for determining exclusions be part of NERC’s data review? Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.*

a. The exclusion will increase the burden:

- i. You say it in the paragraph above: “Should a TO’s supporting data for determining exclusions be part of NERC’s data review?” Who am I to say “no”? You are going to review it anyway since you are that authority.
- ii. Since I am sure if this goes through we will end up with a Standard and Compliance efforts, the ‘burden of proof’ will be placed on the entities. If I say I can exclude it because it was less than 30 minutes, I have to keep “evidence” that it was, otherwise I have a potential non-compliance issue.
- iii. If I have to collect the same data for outages <30 minutes to prove that it was excludable (and to have it in case NERC determines it was really 29:45 so they call it 30), why not just put it all on the form and not worry about it?

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

a. NO!

- i. Any of these statistics could be argued that they are not representative of how the BES is operated.
 - 1. Outages are planned during a time when they will not impact reliability.
 - 2. The number of times an element is taken out of service is minimized to prolong the life of the element.
 - 3. Try to get everything done on the element that needs to be done in one shot.
- ii. The statistics will be skewed after the first major ice storm, hurricane, or tornado that hits an area.
 - 1. It is not cost effective to build lines that will sustain the forces of tornados or some hurricanes. The windborne debris will be the major contributor to damage. So one hits an area and wreaks havoc. I report the outages on TADS, do the immediate repairs and get the line back in service. I now go back and take the line out again on a “planned outage” to fix all that is wrong. Now the line has been gone over with a fine-tooth comb and doesn’t need any more work for a couple of years. The statistics will even out. But another hurricane hits a month later and does the same thing.

The statistics are skewed because it is NOT REPRESENTATIVE of how an entity plans, build or operates it's system!

2. If this goes through, I am sure these statistics will be used in the compliance quagmire. I should not be penalized for stuff I cannot control. The data provided would not show how I routinely operate.
 - b. Is the planned outage data the correct data to collect?
 - i. The real issue should be what impact does the planned outage have on the BES and your neighbors.
 - ii. Should the Reliability Coordinator studies be the data that is retained?
 1. This would show the impact of the simultaneous outages within the region and the impacts.
 2. If an entity plans an outage and the same problems show up repeatedly, the root cause(s) should be investigated and addressed, whether the problem is in it's own or a neighboring area.
 - a. While this is occurring to some degree, it is not always happening at a fast enough pace to minimize the impact to the BES.
 - c. Are we trying to create busy work or provide data to really improve reliability?
 - i. The proposed metrics seem to indicate the busy work response.
 - ii. The collection of Contingency Analysis for next day studies, which captures the "planned outages", seems to be a better indicator of the reliability of the BES and would point out the weaknesses in the grid.
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.***
- a. NO!
 - i. If NERC can't determine that my data is accurate rapidly, they are collecting too much information or not collecting the correct data to start with.
 - ii. Why are you placing the burden of record retention on the entity? We have enough other NERC "stuff" to track and retain.
 - iii. The "historical supporting information" is not clear. This can be anything and everything! And I am sure what I think I need to retain would not be the same that you think I need to retain, especially if this turns into a Standard.
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.***
- a. ASSUMING that Phase II goes through, it may be reasonable for a smaller entity to comply, but it will be difficult for a larger entity to get everything in place to ensure they are capturing all the data.

Comments submitted on June 11, 2008 by Alan Gale of City of Tallahassee, FL

- b. If you go with response b in 4 above it will need additional time to determine the format needed to make it easier on NERC to review the volume of data.

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

Comments are due on June 16, 2008 and must be submitted in a Word document to tadcomments@nerc.net. If you have any questions, please contact John Seelke at (609) 452-8060 or by e-mail at john.seelke@nerc.net.