

**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.**

Yes, but the specific times of line outages are not tracked past the clearance paperwork. Tracking specific lines would entail adding new procedures and requesting new capabilities in the outage software.

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

I will say ‘No’ to this, simply because the goals of collecting this massive amount of information do not seem to justify the costs that will be associated.

The following quote seems to point out that advantages of collecting all of this data are very limited:

Some regions, such as the former East Central Area Reliability (ECAR), Mid- America Interconnected Network (MAIN), and Mid-Continent Area Power Pool(MAPP) regions collected all transmission outages for over 20 years. However, no recommendations were made by them as a result of the collection and reporting of the planned outage data over that same period. They did make formal observations in their summary reports as to outage duration and cause.

Possibly reviewing this data and seeing if any valid and worthwhile conclusions can be made will validate whether or not a nation-wide collection is necessary.

**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.**

This seems like it will increase the burden on reporting while taking away from one of the main goals of the program.

Complete transmission outage information could allow for improved system analysis by bridging gaps between the operating environment and planning assumptions.

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

I'm not sure if having this information available would benefit or impact any of the day to day tasks that are preformed in operations, and therefore do not see them as needed. If some concrete benefits could be outlined then I think these metrics could be good.

***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.***

This seems fine; data retention doesn't seem like an issue.

***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.***

This is attainable. New software features and new outage tracking processes would have to be implemented.

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

*The manual is pretty straight forward and easy to understand.*

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