

Comments for NERC TADS Phase II
Western Area Power Administration Upper Great Plains Region
Submitted on June 16, 2008 by Robert Markel

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, we have an in house outage program that is used to schedule outages and track forced outages in both WECC and MRO regions. There is no link to any reliability region tracking tools at this time. For regional coordination UGPR uses MISO's Outage Scheduler and has access to NWPP's Coordinated Outage System.

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

Yes it is obtainable, however at this time the information doesn't appear to be useful; simply too much data to process in a meaningful manner. In the MRO region UGPR submits scheduled outages in MISO's Outage Scheduler program. During forced outages UGPR notifies either MISO RC or PNSC of pertinent transmission facility outages. The question is could NERC coordinate the TADS project with the RC data?

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.

Rarely does UGPR have switching that would require us to take out a line section in preparation for other switching, so this element would not really effect us.

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

It is difficult to see how the scheduled outage data can be used as a useful feedback mechanism for improvement of system performance. The attributes of the circuits and transformers are not known so conclusions cannot be drawn to determine which 'type' of an element are requiring more scheduled outages than other 'types' of elements. This could lead to false conclusion and actions.

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.

Undecided, it doesn't seem to be a problem; however depending on how the system has changed this data may no longer be meaningful.

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.

Yes,

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

The manual seems clear enough

General Comments:

- There is concern of the WECC TOs that this data collection will result in another compliance medium.
- Scheduled outages are taken during a system condition which allows the outage, i.e., the off-peak condition. It is unclear how this information will be used to enhance Planning Standards development.
- We do not understand how NERC will correlate system performance, i.e., automatic outages, with scheduled outages. It may be done on a circuit to circuit basis, but NERC TADS data does not gather enough of the attributes of the circuits to make a useful correlation.
- The NERC TADS members voted originally to not collect the scheduled outage data.
 - The original NERC TADS Phase I Report, dated March 7, 2007, listed reasons why the scheduled outage data should not be collected:
 - Planned outage data doesn't capture live-line maintenance.
 - Planned outages are subject to many Transmission Owner variables (weather, crew availability, and budgets) so true comparisons cannot be made.
 - Planned outages are only allowed when system conditions permit them and therefore do not jeopardize reliability.
 - Trending system unavailability has a potential negative unintended consequence. Since planned outages comprise the largest part of unavailability, a Transmission Owner could maximize system availability by (a) reducing planned outages, which could (b) increase forced outages but (c) meet a goal of increased availability. The EPRI Grid Reliability project found that planned outages were reported as less attainable through participant surveys than forced outages.
 - In the March 7, 2007 Report, there was also a comparison made of the indices for 2006 if the scheduled outages were included in the calculation

of indices, Impacts on Metrics of Excluding Planned Outages. The following was the conclusion:

- Since both scheduled and unscheduled outages are relatively small percentages of circuit in-service time, the impact on the Percent Availability and MTBF metrics is very small if planned outages are excluded.