

Attachment 1
WECC Reliability Subcommittee Comments Regarding the Proposed TADS
August 14, 2007

The WECC Reliability Subcommittee (WECC-RS) is pleased to provide comments on the NERC proposed Transmission Availability Data System (TADS) as per the June 28, 2007 request for comments. In general the WECC-RS would like to express its support for the initiative undertaken by NERC through the TADS project which is similar to effort that WECC initiated and begun this year for the collection of forced outage data for the calendar year of 2006.

The following are the WECC-RS response to the specific comment questions identified in the June 28, 2007 request for comment notification.

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 transmission outage data similar to TADS? If "yes," please explain.

WECC-RS: This year WECC initiated the collection of forced outage data for 2006 in a similar format to the TADS, with a few exceptions noted below.

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

WECC-RS: The majority of the data is reasonably consistent with the data the WECC is currently collecting, with the exception of the noted comments below.

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

WECC-RS: Yes, with the noted comments below.

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

WECC-RS: Yes, with the noted comments below.

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

WECC-RS: The scope of the requirements is considerable. We recommend reducing the requirements in the initial years and phase in some of the aspects of the program over time

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

WECC-RS: Yes, with the noted comments below.

In addition to the responses to the specific questions outlined in the request for comments, the WECC-RS provides the following comments on the proposed Transmission Availability Data System (TADS).

- In regards to data that are not currently collected by the WECC, the reports indicate that as data collection is for 200 kV and above. The manual collection process in WECC will be onerous. The WECC initiated the collection of forced outage data for 200 kV transmission lines and transformers outage events during 2006 and is still in the process of summarizing the data. The number of sustained and momentary outages reported for 2006 were 900 and 692 respectively. It should be noted that this was the first year of outage data collection and represents approximately 2/3 of the members' submissions.
- The WECC-RS recommends that the focus of the TADS initiative should be based upon Automatic (Forced) Outages only. If planned outages are required for a different purpose (technically justified purpose), then it may be worthwhile considering two separate processes for data collection as the data requirements may not be consistent between the two.
- The WECC-RS is not convinced of the need for Primary and Secondary outage codes. Since the data are not collected at this time, existing data collection systems do not include both data fields for entry. As a result, a parallel manual process will have to be used until automated systems can be modified and updated. As indicated by the number of events recorded this is not a trivial matter. If it is determined that there is a compelling need for Primary and Secondary outage data, this should be phased in to allow for automated systems to be updated as manual collection for this will be unmanageable and onerous due to the large volume. If the NERC Planning Committee task force demonstrates there is a compelling need for Primary and Secondary outage data, this should be considered in a second phase for this project implemented no earlier than 2009. Otherwise, the WECC outage data will likely be meaningless as the secondary cause code may only be reported as unknown or the same as the primary cause code.
- In regards to the Data confidentiality as presented in Table 1.3 of the Data Reporting Instruction Manual, the WECC RS is in support of the specific outage data for Transmission Facility Owners being treated as confidential. This is consistent with the WECC forced outage reporting process.
- The WECC-RS questions the need to prorate the data for new equipment/lines that are added mid year. This appears to be beyond accuracy requirements for the metrics, particularly as multi year data are available (i.e. 5 year average values) in future years.
- The event type numbering is not currently collected within the WECC collection process and will require manual entry. As indicated by the number of events recorded this is not a trivial matter. With this the WECC-RS recommends that this be phased in a second phase for the project.
- In the declarations of event type, types 30 and 40 (the ones that involve two adjacent AC/DC circuits on the same structure) could be hard to identify if the name of the other shared circuit is never referenced. (Pg 14 of the PC Final Report)

- In the WECC-RS view, how the weighted average percent was represented appears to be vague. It appears to be unclear as to what it is referring, be it unit mean, distance, capacity, common exposure, or something else. (Pg 17, sec 3.2.1 C)
- Some circuits have both overhead and underground segments. It is unclear as to how the reporting entities should treat this during data collection. Will this be through separate event listings (which would cause issues in over representing the number of outages), or possibly combining those listings and categorizing the line based on whatever the majority of the line's characteristics. (which still is not a very accurate representation)? (Sec 3.2.2)