Summary of Comments from Industry Discussion
Transmission Availability Data Systems

Below is a summary of the comments received from industry members regarding the discontinuation of the collection of TADS Planned Outages data. NERC staff and TADSWG members addressed several comments and those responses are indicated in red below.

1. Lack of clarity for below 200kV TADS reporting
   Row 40 – Additional Comments:
   - “The Section 1600 Data Request – Discontinuation of TADS Non-Automatic Planned Outage Data Collection document does not clearly state the reporting requirements regarding Transmission operated below 200 kV. Utility respectfully requests the FAQ portion of the document recognize the addition TADS reporting of Facilities operated below 200 kV in 2015, and that reporting for both Non-Automatic Outage and Operational Outage data will no longer be required for those Facilities operated below 200 kV.”
   
   Collection of elements below 200kV is stated in the TADS Data Reporting Instructions (DRI). The discontinuation of TADS Non-Automatic Planned Outage Data will encompass all BES elements.

2. What value does TADS provide the industry?
   - Row 6 - “Utility sees no business case for any of the TADS data collections. Utility has not viewed any reports or studies that show any correlation for forced outages.”
   
   Discussed TADS value contribution to the industry. Many contributions were discussed: e.g. contribution to State of Reliability (SOR) report – highlight of areas of concern (e.g. protection system misoperations and AC Substation failures) and the engagement of the industry on a common specification that acts as a foundation for voluntary member-driven reporting/analysis.
   - Row 28 – “No, the data is not reasonable as it serves no tangible value. The data is obtainable although the collection and submittal to TADS requires a lot of effort and expense.”
   - Row 35 – “NERC has shown no definite value or metrics which provide indications. Also, no analysis has been performed with meaningful results published. Quality data requires large resources dedicated to submitting this data. Quarterly requirement of this data represents approximately 80% of outages collected. Data has not altered or influenced any standards to date. Original hopes for the data to influence standards TPL-002-0, TPL-003-0, and TPL-004-0 have never materialized.”
   
   TADS data are used by NERC to perform metric studies and included in the SOR for industry to review and use as a benchmark.

3. webTADS user interface
Row 16 – “The TADS data entry forms are extremely non-user-friendly and are not intuitive. Once you sign in, a list of all your facilities should appear in a spreadsheet-like format where you can simply enter the appropriate data for each facility. Additionally, it is confusing when the quarterly data is not deemed “submitted” until the end of the year.”

Data form entry is done via an OATI webPortal interface. Training is provided to TOs to aid in the data reporting effort.

4. Discuss and confirm this point

   - Row 18 - “Planned Outage data in its current format does not allow for probabilistic planning. Inventory and system configurations would be required in addition to allow for planning related uses.”
     
     Discussed and agree.

5. Value of collecting Operational Outage data beyond EIA need.

   - Row 20 – “The Operational Outage data being requested is obtainable, however, the reporting the data may not be reasonable. NERC’s basis for continuing to require Operational Outage data rests primarily on the explanation that the data continues to be required by the EIA and NERC acts as a clearing house for data on behalf of TOs and the EIA. (See NERC, Section 1600 Data Request: Continuation of TADS Operational Outage Data, April 2015, page 5). There is no demonstration that the collected data is useful, ...”

   - Row 21 – “Utility feels that the analysis of operational outages does provide value, however, and agrees that it should continue to be collected.”

   - Row 22 – “Continuing to expect utilities to maintain a TADS Non-Automatic Outage data collection and reporting system to capture the required Operational Outage data across all Operational Outage Cause Codes is an undue regulatory burden on the utility industry for no particular documented benefit. In summary, Utility supports the discontinuation of the Planned Outage data collection. Utility supports the continued collection of Operational Outage data collection until such time as the EIA decides to remove it from its Form 411 Schedule 7.”

   - Row 25 – “Discontinuation of Planned Outage data reporting (and Operational Outage reporting) would allow Utility Operations Engineers to focus their time on more thoroughly recording Forced outages which have more impact to the reliability of the BES.”

   - Row 33 – “Utility supports the TADSWG proposal to discontinue the collection of Non-Automatic outage data for TADS submittal. We do support the proposal to continue the collection of Operational Outages since these are not planned and provide similar value to Automatic Outages Data collection.”