

Date: May 08, 2007

**Comments on the NPCC Document C-25
“Procedure to Collect Power System Event Data for
Analysis of System Performance”**

The Independent Electricity System Operator (IESO) offers the following comments on the posted draft of the subject NPCC Document.

1. Section 3.0, last paragraph, last sentence: “...The data will be supplied as soon as practical and within 30 days” could be modified to read “...The data will be supplied as soon as practical and within 30 days [of the request](#)”.
2. Section 4 identifies the eligibility requirements of a person or an entity requesting data. We feel that this section broadly defines the scope of “eligibility” without giving due consideration to the justification for such a request nor does it consider impact of such a request on the Data Provider’s resources. We feel that this section should be rephrased to capture these points. In other words,

4.0 Eligibility to Request Data

Any individual of an organization involved with **bulk power system** operation, planning, or protection may request event data through this procedure. This will be done through the respective Area or Regional Data Collection Contacts listed on the NPCC website. A data provider may request confirmation of the data request on company letterhead and/or verification by an authorized company official. A data provider shall not unreasonably withhold data.

Could be replaced by:

4.0 Eligibility to Request Data

Any individual of an organization involved with **bulk power system** operation, planning, or protection may request event data through this procedure. This will be done through the respective Area or Regional Data Collection Contacts listed on the NPCC website. **The respective Area or the Regional Data Collection Contact will evaluate the data requestor’s justification regarding the need for requested data along with assessing the impact of such a request on the data provider’s resources before passing on the request to the appropriate data provider.** A data provider may request confirmation of the data request on company letterhead and/or verification by an authorized company official. A data provider shall not unreasonably withhold data.

3. Section 6.0, first paragraph, first 2 sentences: A data requestor may ask that steady state, pre-event, and system data (this is unclear and needs to be reworded) be captured for a particular event.
4. Section 6.0, first paragraph: "...systems provide a convenient means by which to save a power flow from real time data." could be modified to read "...systems provide a convenient means by which to save a power flow **case** from real time data.
5. Section 6.0, second paragraph, third sentence: "...Other data formats, such as raw data from other commercial power flows, are acceptable, provided the file format can be made known to the data requestor." could be modified to read "...Other data formats, such as raw data from other commercial power flow **simulation tools**, are acceptable, provided the file format can be made known to the data requestor."
6. Section 7.0, third paragraph, last sentence: "...individual NPCC members, other NPCC Task Forces, or the SS-38 Working Group." could be modified to read "...individual NPCC members, **any** NPCC Task Force, or the SS-38 Working Group."
7. The Appendices seem to be out of date.

Thank you for your attention to our comments and recommendations. In addition to this transmittal, the comments have also been posted on the NPCC Open-Process website.

Yours truly,



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