



AEP: America's Energy Partner®

August 15, 2007

Mr. John Seelke
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, NJ 08540

Dear Mr. Seelke;

American Electric Power (AEP) appreciates the opportunity to provide comments on the proposed NERC Transmission Availability Database System (TADS). The following items are AEP's comments to the questions specified in the request.

1. *If you are a Transmission Owner, do you currently collect transmission outage data similar to TADS? If "yes", please explain.*

Yes, AEP does collect transmission outage data similar to TADS using the AEP Transmission Outage Reporting System (TORS) software.

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

Yes

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

The metrics do not distinguish between the importance of circuits, i.e., all circuits are treated the same. In a highly networked power grid, a single, poor performing circuit may not have any impact on grid performance. AEP as well as numerous other utilities participated in the EPRI Delivery Point Metrics Project. This project was referenced in the TADS Final Report dated June 7, 2007 on page 6, Section 2.2(e). One of the outcomes of this project was a set of Delivery Point Metrics and AEP would have liked these metrics adopted in the TADS Final Report.

Furthermore, AEP is the only owner of assets of a particular voltage level in some regions; the metrics that could single out an entity should be classified as confidential and treated as Critical Energy Infrastructure Information (CEII).

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

This question can best be answered after utilities have had the opportunity to go through the reporting process for the first time.

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

The schedule appears to be reasonable. AEP will likely have to develop some custom queries in TORS to facilitate the reporting process.

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

Utilities will need an opportunity to go through the first reporting cycle to fully determine the ambiguities or clarifications that may arise.

It would be preferable that the definition of a momentary event be changed from “less than 60 seconds” to “less than or equal to 60 seconds”. This would align with other definitions for reliability indices.

NERC may want to consider greater granularity for failed equipment cause code--finer subcategories, e.g., circuit breakers and transformers, etc.

Please feel free to contact me if you have any questions or need additional information.

Sincerely,

Thad K. Ness
Reliability Standards Compliance Manager