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John Seelke
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, New Jersey 08540-5721

Dear John;

The American Transmission Co. is submitting the following responses to questions posed in NERC's June 28 request for comments regarding the Transmission Availability Data System report.

Question 1:

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

ATC currently collects automatic transmission forced outage data. With that being said ATC will have to modify some existing procedures and add new procedure in order to collect all the data being requested for TADS.

Question 2:

Is the data being requested reasonable and obtainable?

Overall the forced outage data being requested can be obtained with minor changes to our existing effort. The line history data may require more changes in order to report the information properly.

Question 3:

Are the metrics appropriate?

The metrics lists seem to be appropriate. In the report for 2008 data TADS must make sure that they accurately describe what each metric represents.

When calculating the following metrics; TCOF, SCOT, MCOF, TMCOF, SMCOF and MMCOF, outages associated with terminal/substation failure should be excluded. The inclusion of these types of outages will only lead to a misrepresented result.

Normalization of Circuit Mile is a way to compare systems that have long transmission lines to those that have relatively short transmission lines. Terminal/substation related outages do not increase the exposure of the transmission line and therefore should be excluded.

Question 4:

Is the data reporting process reasonable?

Not having gone through the entire process makes answering this question difficult. ATC suggested that when the data is reported for the first time TADS also develop a system to get input on the process.

Question 5:

Is the implementation schedule for Phase 1 TADS for 2008 reasonable?

ATC agrees with the starting point of January 1, 2008.



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Question 6:

Are there ambiguities in the Manual that need clarification?

TADS should further explain the process that will be used for questions that will eventually arise.

Sincerely,

Jason Shaver
Reliability Standards & Performance Manager