



A Constellation Energy Company

Dear John,

Here are BGE's comments in response to your June 28th letter requesting public comment on the **TADS Report and Manual**.

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

Yes, as part of normal internal business processes, BGE collects data for all transmission outages caused by the automatic operation of protective devices.

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

Yes, the data is reasonable and obtainable via existing BGE processes.

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

Yes.

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

Yes.

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

Yes.

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

No.

BGE has an additional comment regarding the proposed Phase II TADS. BGE does not feel collecting planned outage data will lead to marked improvement in bulk electric system reliability or performance. BGE is a Transmission Owner in the PJM RTO. PJM, as the Transmission Operator, approves planned transmission outages. The very nature of the fact that these outages are planned means that they occur only when operating reliability criteria can be maintained, and they occur in accordance with established business rules which provide proper notification to market participants. Focusing on planned outages could potentially create a disincentive for transmission owners to take outages and perform needed maintenance activities, thus leading to degraded reliability. Also, intervals and work practices (including the ability to perform live line work as well as the scope of work performed) vary among transmission owners, thus creating additional uncertainty in the usefulness of the planned outage data.