

August 15, 2007

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

Dear John;

On behalf of its member companies, Edison Electric Institute is pleased to provide some brief comments on the proposed NERC Transmission Availability Database System (TADS). In general, EEI supports the NERC proposal to develop TADS. Properly designed and managed, TADS has the potential to provide an effective tool to support transmission planning and operations.

Design and development of TADS should include careful analyses of existing commercial products that could support all or part of the project specification. EEI understands that some commercial products could be tailored to meet design needs. The NERC Technology Committee should make sure to thoroughly explore these products before approving a final project plan. The costs and benefits of making use of such products should be carefully weighed against possible in-house development.

In conducting design work, NERC should consult with transmission entities to explore the compatibility of a NERC system with existing transmission data collection and management systems that are currently deployed by system operators. Since transmission entities currently collect and manage various types of transmission data, in developing the project plan and timeline NERC should carefully consult with various entities around the country to determine how to most effectively transition the industry toward the new TADS platform. NERC staff needs to develop a complete and detailed project management plan.

With regard to entity reporting requirements in Section 5.1 of the TADS Final Report, the project needs to consider how transmission owners may be permitted to delegate reporting obligations to an RTO or ISO. For example, if the delegation is agreed to by both parties and the RTO/ISO registers with NERC for this purpose, then it would make sense for the RTO/ISO to have the ultimate responsibility for ensuring the timely and accurate reporting of data to NERC. Section 5.1 of the Report should be revised to reflect this delegation and responsibility by deleting the last sentence in the Section.

Thanks again for the opportunity to provide comments, feel free to contact me if you have any questions or need additional information.

Sincerely,

/s/

James P. Fama
Executive Director, Energy Delivery