

8/2/2007

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Dear John,

Here are Exelon's comments in response to your June 28 request for public comment on the **TADS Report and Manual**.

Question 1

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

Yes.

Exelon routinely collects data for transmission outages caused by automatic operation of protective devices.

PJM, the transmission operator for our facilities collects all other scheduled outage data. Exelon has the ability to gather and report data from automatic operations or scheduled outages.

Question 2

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

Yes

Question 3

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

- Yes, the metrics seem to be a reasonable starting point.
 - As long as the spirit of the effort is considered a "work in progress" as characterized in the report and the data and metrics can be modified as the industry learns from the data analysis.
- Question the value of reporting failures per 100 miles. Does not seem reasonable to compare 100 miles in a congested / transmission dense area to an area with low densities of installed transmission facilities.

Question 4

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

Yes

Question 5

Is the implementation schedule for Phase 1 TADS for 2008 reasonable? See Section 5.3.1 of the Report. If "no", please explain.

Yes

Question 6

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

No comment