

Per your request for comment in your letter dated June 29, 2007, please find below responses to the Section B Comment Questions:

*Question 1*

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

Response 1

Northeast Utilities owns and operates transmission facilities in CT, Western Massachusetts and New Hampshire. Our transmission system is comprised of facilities operating at 69kV or greater. NU routinely collects data for transmission outages caused by automatic operation of protective devices. Each disturbance is reviewed. Causes are identified, equipment operation is reviewed and corrective actions are assigned as necessary. Cause trending analysis is performed, typically over the previous 5 years and broader corrective actions (i.e. refurbishment projects, process improvements, etc.) are initiated.

*Question 2*

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

Response 2

Yes

*Question 3*

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

Response 3

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 4*

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

Response 4

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.*

Response 5

Yes

*Question 6*

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

Response 6

Consider modifying cause code 9 (Relay and/or Control Misoperation) and cause code 12 (Human Error). NU's cause codes would consider a incorrect relay setting as Human Error and not a relay misoperation.

*Comments were submitted by Richard Halleck of Northeast Utilities on July 18, 2007.*