

Pepco Holdings, Inc. (PHI) Comments on Phase II TADS Preliminary Report and Manual

PHI is the holding company for the Transmission Owners Atlantic City Electric, Delmarva Power and Light and Potomac Electric Power Company.

*1. If you are a Transmission Owner, do you currently collect Non-Automatic transmission outage data similar to Phase II TADS? If "yes," please explain.*

Yes. In addition to the automatic recording of any transmission outages by the EMS of Pepco Holdings, Inc Transmission Owners, as members of PJM, we request non-automatic outages in advance, and provide purpose and expected duration as part of the request. PJM's systems also record the information.

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

Yes

*3. Planned Outages have a 30-minute outage exclusion that is stated as follows:*

*"Outages of TADS Elements of 30 minutes or less duration resulting from switching steps or sequences that are performed in preparation or restoration of an outage of another TADS Element are not reportable."*

*Please comment on the appropriateness of this exclusion. While the 30-minute exclusion will reduce the number of reported outages, should all outage times be recorded in order to determine which outages can be excluded based upon the 30-minute limit? Should a TO's supporting data for determining exclusions be part of NERC's data review? Does the 30-minute exclusion reduce the reporting burden or does it increase it? Please explain your response.*

As explained above, we already record all outages. The thirty minute exclusion does reduce the amount of information that must be provided through TADS, but does not significantly change the burden on PJM TOs.

*4. Are the metrics appropriate? See Section 4 the Phase II Report. If "no," please explain.*

Yes

*5. Are the data review process and the requirement that TOs maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data? If "no," please explain.*

Yes

*6. Is the implementation schedule for Phase II TADS for 2009 reasonable? See Section 6 of the Phase II Report, Table 3. If "no," please explain.*

Yes

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

No