



701 Ninth Street, NW
Suite 1100
Washington, DC 20068

August 15, 2007

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

Dear John;

Pepco Holdings, Inc. ("PHI"), on behalf of its jurisdictional subsidiaries, Potomac Electric Power Company, Delmarva Power & Light Company, and Atlantic City Electric Company, offers the following brief comments on the proposed NERC Transmission Availability Database System ("TADS").

PHI does not object to the NERC proposed TADS system and currently collects data for transmission outages that are reported in the PHI companies' Energy Management Systems. With the exception of Question #3, we do not have substantive comments on the questions posed in the June 28, 2007, "Request for Public Comment on TADS Report and Manual." In response to Question #3: "Are the Metrics Appropriate?" PHI believes that NERC should revise the proposed normalization of the data it receives (outages normalized per 100 miles of transmission). This is necessary to maximize the usefulness of the data received, because, as noted by Exelon in its comments (August 2, 2007), the value of reporting outages per 100 miles in an area of lower density transmission facilities is not comparable to an area of higher density transmission.

In addition, PHI supports the EEI comments, wherein EEI urges the careful analyses of existing commercial products and the need to balance resources in order to effectively transition toward the new TADS platform. PHI agrees that NERC staff must develop a complete and detailed project management plan for the implementation of TADS.

Thank you for the opportunity to provide comments. Please feel free to contact me if you have any questions.

Sincerely,

/s/ Tsion Messick

Tsion Messick
Vice President, Transmission
Pepco Holdings, Inc.