August 15, 2007

Mr. John Seelke
North American Electric Reliability Corporation
116-390 Village Boulevard
Princeton, New Jersey 08540-5721

RE: Request For Public Comment on TADS Report and Manual

Dear Mr. Seelke:

Please find below the comments of Southern Company - Transmission on the Transmission Availability Data System (TADS) Report and Manual which we are submitting in response to your request letter dated and posted June 28, 2007. Our response has followed the format found in Section B of your letter.

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

   Comment – Yes, similar information is currently collected. but not in the particular format prescribed. Outage information is currently collected to document system events and to assist our planning and maintenance functions in evaluating system performance, equipment maintenance activities, and expansion/repair projects. Manual "data grooming" will be required to convert the data to the particular categories and fields desired by TADs.

   It is also likely that the format and coding of data will vary somewhat among transmission owners and will therefore require manual grooming by the NERC regions to aggregate the data of different transmission owners.

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

   Comment – Yes, Phase I data collection is feasible due to the relatively limited number of forced outages above 200 KV and reasonable in that outages above 200 KV can affect performance of the bulk power system.

   Phase II is not appropriate in our opinion. We disagree with the need to report "planned outages" as this information does not support the stated use of "outage-cause analysis and outage Event analysis". Also, planned outages are scheduled when impacts to the bulk power system are minimal. In addition, the volume of planned outages greatly exceeds that of forced outages which would greatly increase the burden of providing this information.

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

   Comment – The metrics are appropriate only in their proper context. They are most useful in trending the performance of particular lines or areas over time. The metrics are not appropriate or useful in comparing differing systems or geographical regions, particularly where significant climatic or structural differences exist. It will also need to be demonstrated that the proposed metrics are appropriate for changes to NERC Table 1 categories.

   For example, outages per 100 miles can be a useful screening tool to identify circuits where a specific performance assessment is warranted. It may indicate the need for an upgrade or repair project. However, a high value in this metric can also simply indicate that a single outage occurred on a relatively short line.

4. Is the data reporting process reasonable? See Section 5.2 of the Report. If "no," please explain.
   Comment –Yes. The process proposed for Phase 1 will require some manual input, but is feasible.

5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If "no," please explain.
   Comment –Yes, if the data can be provided in individual companies' existing formats. However, a requirement to use one common format will likely result in system and process modifications that make meeting the schedule difficult at best.

6. Are there ambiguities in the Manual that need clarification? If "yes," please explain.
   Comment –None noted at this time.

As additional comment, beyond the publishing of a report we find the intended use of this information to be somewhat hazy. We ask who the intended audience is for information reported in TADS as well as what the expectation is for "how" the information will be used.

TADS reporting will be significantly manual as outages will require verification – actual outage as opposed to a RTU failure. Will the value of the compiled data outweigh the effort to produce it?

Southern Company - Transmission appreciates the opportunity to comment on important industry matters such as this. Should you have any questions or need further clarification of our comments, please do not hesitate to contact me.

Sincerely,

Jim Busbin
Power Coordination Center
Bulk Power Operations
Southern Company - Transmission