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June 16, 2008

To whom it may concern:

The Western Electricity Coordinating Council (WECC) is submitting the attached response to the North American Electric Reliability Corporation's (NERC's) request for comments on behalf of the WECC Reliability Subcommittee (RS) and the WECC Reliability Performance Evaluation Work Group (RPEWG).

WECC staff, the RS and the RPEWG have concluded that NERC's Transmission Availability Database Systems (TADS) Phase II request is unduly burdensome on WECC and its members. As described in the attached comments, TADS Phase II will yield no meaningful benefit to the reliability of the Western Interconnection. Collectively we are very concerned about NERC's effort to gather this data on behalf of the Department of Energy (DOE) when the DOE would not otherwise have access to this information.

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