

## **TADS Phase II Comments- SWTC**

1. If you are a Transmission owner, do you currently collect Non-Automatic transmission outage data similar to Phase II TADS?  
**SWTC tracks non-Automatic Outage Data in OATI webTrans.**
2. Is the data being requested reasonable and obtainable? **Yes**
3. Planned Outages have a 30-minute outage exclusion that is stated as follows:
  - a.) Should all outage times be recorded in order to determine which outages can be excluded based upon the 30-minute limit? **Yes**
  - b.) Should a TO's supporting data for determining exclusions be part of NERC's data review? **Yes, It would give a more concise picture.**
  - c.) Does the 30-minute exclusion reduce the reporting burden or does it increase it? **It would appear to me that it would be a slightly more burden, than if it was not tracked.**
4. Are the metrics appropriate? **Yes, All elements have been accounted for.**
5. Are the data review process and the requirement that TO's maintain historical supporting information used to develop its TADS data for a five-year period reasonable to ensure the quality of TADS data? **Yes, It is reasonable.**
6. Is the implementation schedule for Phase II TADS reasonable? **Yes**
7. Are there ambiguities in the Manual that need clarification? **No**