

From: Gopi Biju
Sent: February 9, 2007 3:18 PM
To: Gopi Biju
Subject: IESO Comments on the NERC SAR on Vegetation Management Standard - FAC-003

IESO Communication on Standards – Comments on the Vegetation Management SAR

As you are aware, the Standard Authorization Request (SAR) to modify the Vegetation Management Standard FAC-003-1 has been posted for a 30-day Comment Period, from January 15 through to February 14, 2007. This SAR proposes modifying the Vegetation Management standard FAC-003-1 to address concerns raised by FERC and stakeholders and to bring the standard into conformance with the ERO Rules of Procedure and the latest version of the *Reliability Standards Development Procedure*.

In this regard, attached along with the SAR, are the IESO comments on the subject matter which we plan to file with NERC. Please review the attached documents and let us know if there are any comments or issues that you would like to share with us.

Regards,

Biju Gopi,
Reliability Standards & Assessments,
Independent Electricity System Operator,

Please use this form to submit comments on the Vegetation Management SAR. Comments must be submitted by **February 14, 2007**. You may submit the completed form by e-mail to sarcomm@nerc.com with the words "Vegetation Management" in the subject line. If you have questions, please contact Richard Schneider at richard.schneider@nerc.net or by telephone at 609-452-8060.

| Individual Commenter Information | | |
|--|-------------------------------------|--|
| (Complete this page for comments from one organization or individual.) | | |
| Name: | Ron Falsetti | |
| Organization: | IESO Ontario | |
| Telephone: | 905 855-6187 | |
| E-mail: | ron.falsetti@ieso.ca | |
| NERC Region | <input type="checkbox"/> | Registered Ballot Body Segment |
| <input type="checkbox"/> ERCOT | <input type="checkbox"/> | 1 — Transmission Owners |
| <input type="checkbox"/> FRCC | <input checked="" type="checkbox"/> | 2 — RTOs, ISOs, |
| <input type="checkbox"/> MRO | <input type="checkbox"/> | 3 — Load-serving Entities |
| <input checked="" type="checkbox"/> NPCC | <input type="checkbox"/> | 4 — Transmission-dependent Utilities |
| <input type="checkbox"/> RFC | <input type="checkbox"/> | 5 — Electric Generators |
| <input type="checkbox"/> SERC | <input type="checkbox"/> | 6 — Electricity Brokers, Aggregators, and Marketers |
| <input type="checkbox"/> SPP | <input type="checkbox"/> | 7 — Large Electricity End Users |
| <input type="checkbox"/> WECC | <input type="checkbox"/> | 8 — Small Electricity End Users |
| <input type="checkbox"/> NA – Not Applicable | <input type="checkbox"/> | 9 — Federal, State, Provincial Regulatory or other Government Entities |
| | <input type="checkbox"/> | 10 — Regional Reliability Organizations, Regional Entities |

Background Information:

FAC-003-1 is a relatively new standard that was approved in 2006. FAC-003 has some “fill-in-the-blank” components to eliminate. In addition, the following comments submitted by FERC and stakeholders need to be addressed in the refinement of the standard:

FERC NOPR

- Develop a minimum vegetation inspection cycle that allows variation for physical differences, as discussed above; and
- Remove the applicability to transmission lines operated at 200 kV and above so that the Reliability Standard applies to bulk power system transmission lines that have an impact of reliability as determined by the ERO.

FERC staff report

- Objections to use of IEEE standard

Stakeholder Comments

- Reliability Coordinator vs. Regional Reliability Organization
- Too weak on compliance
- Format inconsistencies

The improvements to the standard should bring the standard’s format and elements into conformance with the latest version of the *Reliability Standards Development Procedure* and the ERO Rules of Procedure.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

You do not have to answer all questions. Enter All Comments in Simple Text Format.

Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.

1. Do you agree that there is a reliability-related need to address the proposed revisions to FAC-003-1 — Transmission Vegetation Management? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments:

With respect to the item in the Brief Description section under FERC NOPR:

"Remove the applicability to transmission lines operated at 200 kV and above so that the Reliability Standard applies to Bulk-Power System transmission lines that have an impact of reliability as determined by the ERO." It is the IESO's view requiring the ERO to make these determinations is inappropriate. We believe the standard should remain applicable to lines 200 kV and above and lines below 200 kV as determined by the Reliability Coordinator, similar to PRC-023.

The IESO also suggests that it be made clear in the SAR that it will be a complete review of the subject requirements: to include the addition, deletion and modification of requirements as agreed to by public consensus.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments:

Standard Authorization Request Form

| | |
|----------------------------|--|
| Title of Proposed Standard | Revisions to FAC-003-1 Vegetation Management Program Project 2007-07 |
| Request Date | January 9, 2007 |

| SAR Requestor Information | SAR Type (<i>Check a box for each one that applies.</i>) |
|---|---|
| Name Richard Schneider (To be replaced by SAR DT Chair when the SAR DT is appointed.) | <input type="checkbox"/> New Standard |
| Primary Contact Richard Schneider | <input checked="" type="checkbox"/> Revision to existing Standard |
| Telephone 609-452-8060 Fax | <input type="checkbox"/> Withdrawal of existing Standard |
| E-mail Richard.schneider@nerc.net | <input type="checkbox"/> Urgent Action |

| |
|--|
| <p>Purpose/Industry Need (Describe the purpose of the standard — what the standard will achieve in support of reliability.)</p> <p>The purpose of revising this standard is to:</p> <ol style="list-style-type: none"> 1. Provide an adequate level of reliability for the North American bulk power systems - the standard is complete and the requirements are set at an appropriate level to ensure reliability. 2. Ensure it is enforceable as a mandatory reliability standard with financial penalties - the applicability to bulk power system owners, operators, and users, and as appropriate particular classes of facilities, is clearly defined; the purpose, requirements, and measures are results-focused and unambiguous; the consequences of violating the requirements are clear. 3. Incorporate other general improvements described in the attached Standard Review Guidelines 4. Consider comments received from ERO regulatory authorities and stakeholders, as noted in the attached review sheets. 5. Satisfy the standards procedure requirement for five-year review of the standards. |
|--|

Brief Description

This is a new standard that was approved in 2006. It has some 'fill-in-the-blank' components to eliminate. In addition, the following comments submitted by FERC and stakeholders need to be addressed in the refinement of the standard:

FERC NOPR

- Develop a minimum vegetation inspection cycle that allows variation for physical differences, as discussed above; and
- Remove the applicability to transmission lines operated at 200 kV and above so that the Reliability Standard applies to Bulk-Power System transmission lines that have an impact of reliability as determined by the ERO.

FERC staff report

- Objections to use of IEEE standard

Stakeholder Comments

- RA vs. RRO
- Too weak on compliance
- Format inconsistencies

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

Reliability Functions

| The Standard will Apply to the Following Functions <i>(Check box for each one that applies.)</i> | | |
|---|-------------------------------|--|
| <input type="checkbox"/> | Reliability Coordinator | Ensures the reliability of the bulk transmission system within its Reliability Coordinator area. This is the highest reliability authority. |
| <input type="checkbox"/> | Balancing Authority | Integrates resource plans ahead of time, and maintains load-interchange-resource balance within its metered boundary and supports system frequency in real time. |
| <input type="checkbox"/> | Interchange Authority | Authorizes valid and balanced Interchange Schedules. |
| <input type="checkbox"/> | Planning Authority | Plans the Bulk Electric System. |
| <input type="checkbox"/> | Resource Planner | Develops a long-term (>one year) plan for the resource adequacy of specific loads within a Planning Authority area. |
| <input type="checkbox"/> | Transmission Planner | Develops a long-term (>one year) plan for the reliability of transmission systems within its portion of the Planning Authority area. |
| <input type="checkbox"/> | Transmission Service Provider | Provides transmission services to qualified market participants under applicable transmission service agreements |
| <input checked="" type="checkbox"/> | Transmission Owner | Owns transmission facilities. |
| <input type="checkbox"/> | Transmission Operator | Operates and maintains the transmission facilities, and executes switching orders. |
| <input type="checkbox"/> | Distribution Provider | Provides and operates the "wires" between the transmission system and the customer. |
| <input type="checkbox"/> | Generator Owner | Owns and maintains generation unit(s). |
| <input type="checkbox"/> | Generator Operator | Operates generation unit(s) and performs the functions of supplying energy and Interconnected Operations Services. |
| <input type="checkbox"/> | Purchasing-Selling Entity | The function of purchasing or selling energy, capacity, and all necessary Interconnected Operations Services as required. |
| <input type="checkbox"/> | Market Operator | Integrates energy, capacity, balancing, and transmission resources to achieve an economic, reliability-constrained dispatch. |
| <input type="checkbox"/> | Load-Serving Entity | Secures energy and transmission (and related generation services) to serve the end user. |

Reliability and Market Interface Principles

| Applicable Reliability Principles (Check box for all that apply.) | |
|--|--|
| <input type="checkbox"/> | 1. Interconnected bulk electric systems shall be planned and operated in a coordinated manner to perform reliably under normal and abnormal conditions as defined in the NERC Standards. |
| <input type="checkbox"/> | 2. The frequency and voltage of interconnected bulk electric systems shall be controlled within defined limits through the balancing of real and reactive power supply and demand. |
| <input type="checkbox"/> | 3. Information necessary for the planning and operation of interconnected bulk electric systems shall be made available to those entities responsible for planning and operating the systems reliably. |
| <input type="checkbox"/> | 4. Plans for emergency operation and system restoration of interconnected bulk electric systems shall be developed, coordinated, maintained and implemented. |
| <input checked="" type="checkbox"/> | 5. Facilities for communication, monitoring and control shall be provided, used and maintained for the reliability of interconnected bulk electric systems. |
| <input type="checkbox"/> | 6. Personnel responsible for planning and operating interconnected bulk electric systems shall be trained, qualified, and have the responsibility and authority to implement actions. |
| <input type="checkbox"/> | 7. The security of the interconnected bulk electric systems shall be assessed, monitored and maintained on a wide area basis. |
| Does the proposed Standard comply with all the following Market Interface Principles? (Select "yes" or "no" from the drop-down box.) | |
| 1. The planning and operation of bulk electric systems shall recognize that reliability is an essential requirement of a robust North American economy. Yes | |
| 2. An Organization Standard shall not give any market participant an unfair competitive advantage. Yes | |
| 3. An Organization Standard shall neither mandate nor prohibit any specific market structure. Yes | |
| 4. An Organization Standard shall not preclude market solutions to achieving compliance with that Standard. Yes | |
| 5. An Organization Standard shall not require the public disclosure of commercially sensitive information. All market participants shall have equal opportunity to access commercially non-sensitive information that is required for compliance with reliability standards. Yes | |

Related Standards

| Standard No. | Explanation |
|--------------|-------------|
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Related SARs

| SAR ID | Explanation |
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Regional Differences

| Region | Explanation |
|--------|-------------|
| ERCOT | |
| FRCC | |
| MRO | |
| NPCC | |
| SERC | |
| RFC | |
| SPP | |
| WECC | |

Standard Review Guidelines

Applicability

Does this reliability standard clearly identify the functional classes of entities responsible for complying with the reliability standard, with any specific additions or exceptions noted? Where multiple functional classes are identified is there a clear line of responsibility for each requirement identifying the functional class and entity to be held accountable for compliance? Does the requirement allow overlapping responsibilities between Registered Entities possibly creating confusion for who is ultimately accountable for compliance?

Does this reliability standard identify the geographic applicability of the standard, such as the entire North American bulk power system, an interconnection, or within a regional entity area? If no geographic limitations are identified, the default is that the standard applies throughout North America.

Does this reliability standard identify any limitations on the applicability of the standard based on electric facility characteristics, such as generators with a nameplate rating of 20 MW or greater, or transmission facilities energized at 200 kV or greater or some other criteria? If no functional entity limitations are identified, the default is that the standard applies to all identified functional entities.

Purpose

Does this reliability standard have a clear statement of purpose that describes how the standard contributes to the reliability of the bulk power system? Each purpose statement should include a value statement.

Performance Requirements

Does this reliability standard state one or more performance requirements, which if achieved by the applicable entities, will provide for a reliable bulk power system, consistent with good utility practices and the public interest?

Does each requirement identify who shall do what under what conditions and to what outcome?

Measurability

Is each performance requirement stated so as to be objectively measurable by a third party with knowledge or expertise in the area addressed by that requirement?

Does each performance requirement have one or more associated measures used to objectively evaluate compliance with the requirement?

If performance results can be practically measured quantitatively, are metrics provided within the requirement to indicate satisfactory performance?

Technical Basis in Engineering and Operations

Is this reliability standard based upon sound engineering and operating judgment, analysis, or experience, as determined by expert practitioners in that particular field?

Completeness

Is this reliability standard complete and self contained? Does the standard depend on external information to determine the required level of performance?

Consequences for Noncompliance

In combination with guidelines for penalties and sanctions, as well as other ERO and regional entity compliance documents, are the consequences of violating a standard clearly known to the responsible entities?

Clear Language

Is the reliability standard stated using clear and unambiguous language? Can responsible entities, using reasonable judgment and in keeping with good utility practices, arrive at a consistent interpretation of the required performance?

Practicality

Does this reliability standard establish requirements that can be practically implemented by the assigned responsible entities within the specified effective date and thereafter?

Capability Requirements versus Performance Requirements

In general, requirements for entities to have “capabilities” (this would include facilities for communication, agreements with other entities, etc.) should be located in the standards for certification. The certification requirements should indicate that entities have a responsibility to “maintain” their capabilities.

Consistent Terminology

To the extent possible, does this reliability standard use a set of standard terms and definitions that are approved through the NERC reliability standards development process?

If the standard uses terms that are included in the NERC Glossary of Terms Used in Reliability Standards, then the term must be capitalized when it is used in the standard. New terms should not be added unless they have a “unique” definition when used in a NERC reliability standard. Common terms that could be found in a college dictionary should not be defined and added to the NERC Glossary.

Are the verbs on the “verb list” from the Drafting Team Guidelines? If not, do new verbs need to be added to the guidelines or could you use one of the verbs from the verb list?

Violation Risk Factors (Risk Factor)**High Risk Requirement**

A requirement that, if violated, could directly cause or contribute to bulk power system instability, separation, or a cascading sequence of failures, or could place the bulk electric system at an unacceptable risk of instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly cause or contribute to bulk electric system instability, separation, or a cascading sequence of failures, or could place the bulk power system at an unacceptable risk of instability, separation, or cascading failures, or could hinder restoration to a normal condition.

Medium Risk Requirement

A requirement that, if violated, could directly affect the electrical state or the capability of the bulk power system, or the ability to effectively monitor and control the bulk power system. However, violation of a medium risk requirement is unlikely to lead to bulk electric system instability, separation, or cascading failures;

or a requirement in a planning time frame that, if violated, could, under emergency, abnormal, or restorative conditions anticipated by the preparations, directly and adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. However, violation of a medium risk requirement is unlikely, under emergency, abnormal, or restoration conditions anticipated by the preparations, to lead to bulk electric system instability, separation, or cascading failures, nor to hinder restoration to a normal condition.

Lower Risk Requirement

A requirement that, if violated, would not be expected to adversely affect the electrical state or capability of the bulk power system, or the ability to effectively monitor and control the bulk power system. A requirement that is administrative in nature;

or a requirement in a planning time frame that, if violated, would not, under the emergency, abnormal, or restorative conditions anticipated by the preparations, be expected to adversely affect the electrical state or capability of the bulk electric system, or the ability to effectively monitor, control, or restore the bulk electric system. A planning requirement that is administrative in nature.

Mitigation Time Horizon

The drafting team should also indicate the time horizon available for mitigating a violation to the requirement using the following definitions:

- **Long-term Planning** — a planning horizon of one year or longer.
- **Operations Planning** — operating and resource plans from day ahead up to and including seasonal.
- **Same-day Operations** — routine actions required within the time frame of a day, but not real time.
- **Real-time Operations** — actions required within one hour or less to preserve the reliability of the bulk power system.
- **Operations Assessment** — follow-up evaluations and reporting of real-time operations.

Violation Severity Levels

The drafting team should indicate a set of violation severity levels that can be applied for the requirements within a standard. ("Violation severity levels" replace existing "levels of non-compliance.") The violation severity levels may be applied for each requirement or combined to cover multiple requirements, as long as it is clear which requirements are included.

The violation severity levels should be based on the following definitions:

- **Lower: mostly compliant with minor exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more minor details. Equivalent score: 95% to 99% compliant.
- **Moderate: mostly compliant with significant exceptions** — The responsible entity is mostly compliant with and meets the intent of the requirement but is deficient with respect to one or more significant elements. Equivalent score: 85% to 94% compliant.

- **High: marginal performance or results** — The responsible entity has only partially achieved the reliability objective of the requirement and is missing one or more significant elements. Equivalent score: 70% to 84% compliant.
- **Severe: poor performance or results** — The responsible entity has failed to meet the reliability objective of the requirement. Equivalent score: less than 70% compliant.

Compliance Monitor

Replace “Regional Reliability Organization” with “Electric Reliability Organization”

Fill-in-the-blank Requirements

Do not include any “fill-in-the-blank” requirements. These are requirements that assign one entity responsibility for developing some performance measures without requiring that the performance measures be included in the body of a standard — then require another entity to comply with those requirements.

Every reliability objective can be met, at least at a threshold level, by a North American standard. If we need regions to develop regional standards, such as in underfrequency load shedding, we can always write a uniform North American standard for the applicable functional entities as a means of encouraging development of the regional standards.

Requirements for Regional Reliability Organization

Do not write any requirements for the Regional Reliability Organization. Any requirements currently assigned to the RRO should be re-assigned to the applicable functional entity.

Effective Dates

Must be 1st day of 1st quarter after entities are expected to be compliant — must include time to file with regulatory authorities and provide notice to responsible entities of the obligation to comply. If the standard is to be actively monitored, time for the Compliance Monitoring and Enforcement Program to develop reporting instructions and modify the Compliance Data Management System(s) both at NERC, and Regional Entities must be provided in the implementation plan.

Associated Documents

If there are standards that are referenced within a standard, list the full name and number of the standard under the section called, “Associated Documents.”

Functional Model Version 3

Review the requirements against the latest descriptions of the responsibilities and tasks assigned to functional entities as provided in pages 13 through 53 of the draft Functional Model Version 3.