

## Comment Form — Transmission Vegetation Management SAR

Please use this form to submit comments on the draft Transmission Vegetation Management SAR. Comments must be submitted by **May 9, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the words "**Vegetation Management SAR**" in the subject line. If you have questions please contact Harry Tom at [Harry.Tom@nerc.net](mailto:Harry.Tom@nerc.net) or by telephone at 609-452-8060.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
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NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs and 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 and Regional Entities



**Background Information:**

The SAR drafting team considered the comments submitted in response to the first posting of the SAR as well as the FERC Order 693 in preparing the revised SAR to modify FAC-003-1 — Transmission Vegetation Management.

The SAR drafting team modified the SAR to state more specifically that the revisions to the standard need to incorporate the compliance program elements of time horizons and violation severity levels to bring FAC-003-1 into conformance with the latest version of the Reliability Standard Development Procedure and the ERO Sanctions Guidelines.

The FERC has urged further industry consideration of a number of issues and these have been listed in the revised SAR as items to address during using standards development process to refine FAC-003-1. The SAR drafting team consensus is that a modification to FAC-003-1 to address the aforementioned items is warranted.

Please review the changes made to the Vegetation Management SAR and then respond to the questions on the following pages. Please e-mail your comments to [sarcomm@nerc.net](mailto:sarcomm@nerc.net) with the subject "Vegetation Management SAR" by **May 9, 2007**.

***You need not answer all questions. Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.***

The SAR drafting team considered stakeholder comments on the first draft of this SAR and the FERC Order 693 in preparing the second draft of the SAR to modify FAC-003-1 — Transmission Vegetation Management.

The SAR drafting team modified the SAR to clarify that FAC-003-1 needs to add time horizons and violation severity levels to bring the standard into conformance with the latest version of the Reliability Standards Development Procedure and the ERO Sanctions Guidelines. (Time Horizons and Violation Severity Levels are both elements used to determine an appropriate sanction for violation of a standard.)

The SAR drafting team also modified the SAR to clarify that the scope of revisions to this standard will include addressing the issues raised by FERC in Order 693, including the following:

- Consideration of minimum clearances needed to avoid sustained vegetation-related outages that would apply to transmission lines crossing both federal land and non-federal land
- Revisions to the definition of 'right of way' to encompass required clearance areas
- Review of the suitability of IEEE Standard 516-2003 for minimum vegetation clearance

Several commenters indicated that the reporting requirements may need revision and the SAR was revised to include consideration of modifications to the reporting requirements.

The SAR drafting team consensus is that modification of FAC-003-1 to address the

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**1. Do you agree there is a reliability need for the proposed modifications and review of the standard?**

Yes

No

Comments:

**2. If you are a transmission owner, have you been provided a list from a Reliability Entity (formerly RRO) of sub 200kV critical transmission lines that must comply with FAC-003-1?**

Yes

No

Comments:

**3. If you are a transmission owner would you provide your methodology for determining clearance 1 and clearance 2? (As described in FAC-003-1 R1.2.1 and R1.2.2) If so, please attach.**

Yes

No

Comments:

**4. Are there any other comments regarding the standard, its possible modifications or the SAR?**

Yes

No

Comments:

1. The SAR indicates that a list of critical low voltage transmission lines will be provided to FERC. We do not interpret Order 693 to direct NERC to provide this list. Rather, we interpret that FERC asks for defining a criteria that would include low voltage transmission lines that have impact on Bulk Power System reliability. We do not think the list is required.

2. The SAR indicates: "The standard DT may consider other criteria in determining applicability of the standard to sub 200kV lines..." Per Order 693, the criteria is quite clearly stated to be the transmission lines of less than 200 kV that could impact Bulk Power System reliability. We don't feel any other criteria would be necessary. Further, to identify the candidates that meet these criteria, we believe they should be determined by the Reliability Coordinator, similar to the PRC-023 standard, since the RC has the primary responsibility and knowledge of interconnection reliability impact.

3. We do not understand why the SDT considers removing Category 3 incidents? In our view, Category 3 outages are important information for assessing the effectiveness of vegetation program. Since the industry started reporting vegetation related outages about 3 years ago, data collected so far indicates that of a total of 98 reported vegetation outages, 67 of them were category 3 outages. With this high percentage,

reporting of Category 3 events should be a must since the associated trends can provide valuable information to the TOs to aid its evaluation of the vegetation management program.

4. The white paper and field tests are a good idea and the SDT should be commended for these, especially the white paper.

5. Item 2 under the FERC Order 693 Items in the Detailed Description Section indicates the SDT will also collection outage data. While we understand that FERC has directed the ERO to collect outage data for transmission outages of lines that cross both federal and non-federal lands, we do not feel that it is the SDT's role to perform this task. We feel that this task should be performed by the ERO line functions or a group separate from the SDT such that the task does not add burden to the SDT which may slow down the standard development process or result in the standard development being driven by unanalyzed data and resulting in erroneous requirements.

6. With respect to reporting exemptions, our position during development of the previous version of this standard was to limit them. We commend the SDT intention to clarify the outage exemptions under major disasters, but to consider including all category outage exemptions in the standard body is too prescriptive and will add to the already extended list. It can end up with a very long list of outage exemptions, thereby reducing the coverage of the standard substantially and defeating its purpose.