

**Comment Form – Proposed Transmission System Vegetation Management Standard**

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This form is to be used to submit comments on the proposed Transmission System Vegetation Management Standard. Comments must be submitted by **July 31, 2005**. You may submit the completed form by emailing it to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words “Vegetation Standard Comments” in the subject line. If you have questions please contact Mark Ladrow at [mark.ladrow@nerc.net](mailto:mark.ladrow@nerc.net) or by telephone at 609-452-8060.

**ALL DATA ON THIS FORM WILL BE TRANSFERRED AUTOMATICALLY TO A DATABASE AND IT IS THEREFORE IMPORTANT TO ADHERE TO THE FOLLOWING REQUIREMENTS:**

- DO:**
- Do** enter text only, with no formatting or styles added.
  - Do** use punctuation and capitalization as needed (except quotations).
  - Do** use more than one form if responses do not fit in the spaces provided.
  - Do** submit any formatted text or markups in a separate WORD file.

- DO NOT:**
- Do not** insert tabs or paragraph returns in any data field.
  - Do not** use numbering or bullets in any data field.
  - Do not** use quotation marks in any data field.
  - Do not** submit a response in an unprotected copy of this form.

<b>Individual Commenter Information</b>		
(Complete this page for comments from one organization or individual.)		
Name:		
Organization:		
Telephone:		
Email:		
NERC Region		Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 - Transmission Owners
<input type="checkbox"/> ECAR	<input type="checkbox"/>	2 - RTOs, ISOs, Regional Reliability Councils
<input type="checkbox"/> FRCC	<input type="checkbox"/>	3 - Load-serving Entities
<input type="checkbox"/> MAAC	<input type="checkbox"/>	4 - Transmission-dependent Utilities
<input type="checkbox"/> MAIN	<input type="checkbox"/>	5 - Electric Generators
<input type="checkbox"/> MAPP	<input type="checkbox"/>	6 - Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> NPCC	<input type="checkbox"/>	7 - Large Electricity End Users
<input type="checkbox"/> SERC	<input type="checkbox"/>	8 - Small Electricity End Users
<input type="checkbox"/> SPP	<input type="checkbox"/>	9 - Federal, State, Provincial Regulatory or other Government Entities
<input type="checkbox"/> WECC	<input type="checkbox"/>	
<input type="checkbox"/> NA - Not Applicable	<input type="checkbox"/>	



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### Background Information:

This standard is intended to improve the reliability of the electric transmission system by eliminating transmission outages caused by vegetation located on transmission rights-of-way (ROW) and minimizing outages caused by vegetation located adjacent to ROW, maintaining safe clearances between transmission lines and vegetation on and along transmission rights-of-way. This standard will also provide for uniform reporting of vegetation-related outages to the Regions and to NERC so that Planning Authorities and Reliability Authorities may measure the impact of vegetation-related outages on the reliability of the interconnected electric transmission systems. Each program is to be designed for the geographical area and specific design configurations of the transmission owner's system.

The "Transmission System Vegetation Management" SAR was developed by the Vegetation Management Task Force of the NERC Planning Committee's Transmission Issues Subcommittee and was posted for comment during the period May 20 and July 2, 2004. The SAR was approved by the SAC on November 12, 2004, to be moved to standard development. Additionally on November 12, 2004, the SAC approved the draft version of the proposed Vegetation Management Standard to be posted with an "executive summary" of the issues raised by the SAR posting and the resolution to each of these issues as adopted by the Vegetation Management Task Force. The draft proposed standards were first posted on the proposed standard for 45-day (January 3, 2005 through February 18, 2005). The subject document is the second posting of the proposed standard for 45-day (June 16, 2005 through July 31, 2005) review and comment. This version of the posting of the proposed standard has incorporated the industry comments received from the initial posting of the draft standard and has been significantly modified as a result of those comments. The purpose of this comment form is to judge the level of consensus and to obtain industry reaction to the Proposed Transmission System Vegetation Standard.

The Certification Standard Drafting Team would like to receive industry comments on this group of standards. Accordingly, we request your comments included on this form, emailed to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the subject "Vegetation Standard Comments" by **July 31, 2005**.

## Comment Form – Proposed Transmission System Vegetation Management Standard

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1. Requirement 1 of the standard specifies that each transmission owner (TO) prepare a transmission vegetation management program (TVMP) that contains the elements described in R1.1, R1.2, R1.3, R1.4, and R1.5. Should each TO should be required to prepare a schedule for its ROW inspections based on the unique conditions and circumstances appropriate to the TO as proposed in R1.1? If not, please explain in the comment area.

Yes

No

Comments:

2. Should each TO identify the clearances in its TVMP based on the unique conditions and circumstance appropriate to the TO, as proposed in R1.2? If not, please explain in the comment area.

Yes

No

Comments: The SRC considers documented clearances to be a vital part of the TVMP to assure proper execution of the plan, especially in areas where conditions that ROWs pass through may be vastly different.

3. Should the TO require that its vegetation-related personnel hold the qualifications defined by the TO in its TVMP, as proposed in R1.3? If not, please explain in the comment area.

Yes

No

Comments: The SRC recommends R1.3 and M1.3 be deleted from the standard. It is the SRC's opinion that it is unnecessary and inappropriate to define a need to have qualified personnel with appropriate training perform a job function, in a reliability standard. It should be an organizational requirement of any entity to ensure all tasks are performed by qualified personnel.

The effectiveness of their vegetation management program should be demonstrated through results not the qualifications of individual employees.

4. Many TO's expressed concern that due to federal, state, or local regulations, land-owner resistance, or for other reasons, it is difficult to apply their standard ROW clearing procedures in all locations. Should the TO be required to identify those ROW areas that do

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**not meet the TO's VM standards, as proposed in R1.4? If not, please explain in the comment area.**

Yes

No

Comments: The SRC recognizes that issues such as rights of "adjacent property owners", trimming along R/R ROWs, which may be restricted at any given time, etc, may impede a transmission owner's annual work plan. It is the SRC's view, however, that the provisions provided in R2 is intended to address such issues.

R1.4 appears to undermine the objective of the standard by allowing TO's to simply list such exemptions with a defined mitigation plan. It is the SRC's view that such cases, when they occur, be considered as non-compliant and the TO define its mitigation plan to achieve compliance. And should a need for an exemption exist, it should be submitted to the RRO on a case by case basis with the basis why the deviation from the standard be deemed acceptable.

**5. Should each TO be required to document its internal process for communicating threats to its transmission lines, as proposed in R1.5? If not, please explain in the comment area.**

Yes

No

Comments: The term "appropriate authority" should be defined for clarity. Because this is a reliability issue, it is the SRC's view, it should be communicated to the TOP and the TOP to the RC as appropriate.

**6. Should each TO be required to implement its plan for VM work, as proposed in R2? If not, please explain in the comment area.**

Yes

No

Comments:

**7. R3 proposes that the TO report sustained transmission line outages caused by vegetation generally within the control of the TO. (Category 1 and Category 2 outages are caused by vegetation within the ROW, and should be controllable by the TO. Category 3 outages are less controllable by the TO.) Should the TO be required to report momentary vegetation-related outages and/or other vegetation-related outages proposed to be excluded by R3.2? If so, please explain what additional reporting should be required of the TO in the comment area.**

Yes

No

Comments:

**8. Should RRO be required to report the results of its area to NERC, including the information provided by the TO to the RRO, as proposed by R4?**

Yes

No

Comments:

**9. The Standard Drafting Team believes FAC-003-1 is an incremental change from FAC-003-0. Do you agree the implementation plan proposed with this posting allows sufficient time to implement any changes between FAC-003-0 and FAC-003-1?**

Yes

No

Comments: Step 1 - While the SRC agrees with the proposed time period it is believed it could be even reduced considering the reporting mechanism already exist.

Step 2 of the Implementation Plan states after one year of the adoption of this standard (R1 & R2) the TO shall begin preparing a formal TVMP. It should be consistent with the standard's Effective Date which refers to one calendar year from the date of adoption. We recommend that the compliance implementation period for these requirements should become effective after first full year following adoption of standards.

**10. Do you have any other comments on these proposed standards?**

Comments: The definition Inspection name should be changed to avoid confusion with the use of the word in other NERC standards. Because it provides a specific definition that only applies for Transmission Circuits Vegetation inspection. The SRC suggests to name it ROW Vegetation Inspection or Vegetation Inspection.

There is a term, sustained transmission line outages, in requirement R3 which we believe should be defined.

Requirement R3 states that reporting is to the RRO or the RRO's designee. To be consistent the standard's Applicability, Compliance Monitoring Responsibility and Level of Non-Compliance sections should also reference the RRO designee.

Compliance 2.1.3 implies that RRO's outage report should contain the information required in R4, but requirement R4 does not define any specific required information. Please clarify what information is to be provided.