



## **TRANSMITTER'S COMMENTS ON THE IMO'S DRAFT Version 5 VEGETATION MANAGEMENT STANDARD FOR TRANSMISSION LINES**

### **Transmitter Comments: (December, 2004)**

#### **General:**

The IMO standard should be harmonized with the NERC standard on vegetation management currently under development, once it is approved.

#### **Part 3 - Certification of Compliance**

Inclusion of a defined number of vegetation related incidents as a measure of non-compliance, unfairly penalizes larger transmitters with numerous transmission lines over smaller transmitters owning only a few lines.

It is suggested the level 3 and level 4 non-compliance levels exclude the measure of compliance based on vegetation related incidents or at a minimum the metric be established based on the number of vegetation related incidents on the same line or on the total number of transmission lines owned.

#### **IMO Response:**

#### **General:**

The IMO concurs with the need to harmonize its' standard with the NERC standard once it is finalized and plans to do so accordingly.

#### **Part 3 - Certification of Compliance**

It is IMO's opinion that the inclusion of a metric, based on a specific number of vegetation related incidents, as a measure of a market participant's compliance with the vegetation management standard is reasonable. It is IMO's view that any single vegetation related incident on a BPS impactive circuit should be regarded as excessive, if an appropriate maintenance program is in place. To establish compliance metrics based on the number of circuits or on a per circuit bases undermines the overall intent of the vegetation management standard, which is to prevent any occurrences of vegetation related incidents.

Further, the IMO views this standard in the same light as the NPCC minimum protection system maintenance standard and several other standards, which do not distinguish market participant compliance based on the number of facilities maintained.