

**Note** – This form is to comment on the “**Proposed Transmission System Vegetation Management Standard**”.

The latest version of this document (Transmission System Vegetation Management) is posted on the Standards web site at:

[ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/Trans\\_Sys\\_Veg\\_Mgt\\_SAR\\_V1\\_052004.doc](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Trans_Sys_Veg_Mgt_SAR_V1_052004.doc)

E-mail this form between January 3, 2005 and February 18, 2005 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “Comments: Proposed Vegetation Standard Comment Form” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director-Standards, Gerry Cauley or the Manager- Standards, Mark Ladrow at 609-452-8060.

### **Background:**

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 subject document is the first posting of the proposed standard for 45-day (January 3, 2005 through February 18, 2005) review and comment. This version, the posting of the proposed standard, has incorporated the industry comments received from the initial posting of the SAR. 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.

**Please review the SAR and the accompanying executive summary, as well as, the proposed Transmission System Vegetation Management Standards posted on the NERC website and complete this Comment Form to provide feedback to the Standard Drafting Team on the proposed standards.**

**Commenter Information (For Individual Commenters)**

Name:

Organization:

Industry Segment #:

Telephone:

E-mail:

**Key to Industry Segment #'s:**

- 1 – Trans. Owners
- 2 – RTO's, ISO's, RRC's
- 3 – LSE's
- 4 – TDU's
- 5 - Generators
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users
- 8 - Small Electricity Users
- 9 - Federal, State, and Provincial Regulatory or other Govt. Entities

**STD Commenter Information (For Groups Submitting Group Comments)**

Name of Group: ISO/RTO

Group Chair: Karl Tammar Chair Phone: 518-356-6205  
Chair Email: ktammar@nyiso.com

**List of Group Participants that Support These Comments:**

Name	Company	Industry Segment #
Dale McMaster	AESO	2
Ed Riley	CAISO	2
Sam Jones	ERCOT	2
Peter Henderson	IESO	2
Peter Brandien	ISO-NE	2
Bill Phillips	MISO	2
Karl Tammar	NYISO	2
Bruce Balmat	PJM	2
Charles Yeung	SPP	2

**Please Review the Proposed Standard and Answer the Following Questions**

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

1. Do you agree that there is a need for a transmission system vegetation management standard?

Yes  No

Comments:

2. Do you support the requirements in these standards? If you do not support the requirements in these standards, please provide additional comment.

Yes  No

Comments:

See comments on Question 7 below.

3. Do you agree with the definitions associated with these standards? If you do not agree with the definitions in these standards, please provide additional comment.

Yes  No

Comments:

There is a TYPO in definition of Rated Electrical Operating Conditions: intend should read intended.

4. Do you believe there are any additional requirements, that have not been included, that would appropriately be included with these proposed standards? If you do believe there are additional requirements that should be included, please provide additional detail.

Yes  No

Comments:

5. How would you recommend this transmission vegetation management standard be implemented after approval?

Comments:

There should be a transition period allowed, especially if minimum clearances will be adopted, to allow the TO with existing practices which are less stringent to finish their maintenance cycle.

We recommend that the compliance implementation period for these standards should become effective after first full year following adoption of standards.

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

Comments:

## **Comment Form: Proposed Transmission System Vegetation Management Standard**

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These standards should focus on reliability issues and should not to describe "how" to achieve the requirements nor prescribe the resources, qualifications and training of personnel involved.

There are requirements and measures that are far too prescriptive, for example:

- R3 of FAC-006 in specifying ANSI 300
- R4 of FAC-006 in stating that resources shall be identified
- M3 of FAC-003 in stating the qualification and training of personnel

In general, many of the measures are written more like requirements. Measures should be phrased such that they provide evidence for meeting the requirements. Also the levels of noncompliance should be specified. Most of the material, currently on the measures, can be used as a technical reference attachment to provide guidance and consistency among transmission owners.

with regards to standard FAC-007-1, the reporting mechanisms seems inconsistent with present reporting and we suggest Transmission Owners report to RCs then the RCs report to the RRC.

First paragraph of Exhibit A for standard FAC-003 refers to minimum vegetation-to-conductor distances to prevent flashover during normal operation of the line. It should be consistent with the M2 which refers to maximum design rating not normal operation.

FAC-003, M2.2 makes an incorrect reference to IEEE Standard 516-2003 Section 4.2.4. It should be referred to Section 4.2.2.