Unofficial Comment Form for 5th Draft of FAC-003-2 Transmission Vegetation Management —Project 2007-07 Vegetation Management

Please **DO NOT** use this form to submit comments. Please use the [electronic form](http://www.nerc.com/filez/standards/Vegetation-Management_Project_2007-7.html) located at the site below to submit comments on the 5th Draft of FAC-003-2 Transmission Vegetation Management. Comments must be submitted by February 28, 2011.

If you have questions please contact [Doug Keegan](mailto:Doug.Keegan@nerc.com) or by telephone at 404-446-2576.

**Draft 5 Information**

On November 4, 2010 NERC staff provided a Quality Review of FAC-003-2 to the Standards Committee (SC). In November, 2010 the SC requested the VMSDT to work with NERC staff in addressing the items identified in the Quality Review, and approved posting of the revised documents. The SDT conducted several conference calls and acted in good faith to produce this Draft 5 of FAC-003-2. The VMSDT considered the feedback provided in the Quality Review by NERC staff and reached consensus in the following areas:

1. Elaborated upon the Purpose Statement to encompass more of the standard’s content.
2. Added a Rationale text box to the 4.2 Facilities section, to explain the exclusion of substation facilities. Clarified 4.2.4 by adding specific boundary details.
3. Updated Requirement R1 and R2 to emphasize the “planning” time horizon as the applicable temporal context.
4. Elaborated upon the explanation in the Rationale text boxes for R1 and R2, to highlight the range of non-compliant performance.
5. Re-organized the content of Requirement R3 for improved readability.
6. Augmented Requirement R5 to include a “reliability objective.”
7. Modified Requirement R6 and the associated VSLs for improved enforceability and for consistency in the units of measure between the Requirement and the associated VSLs.
8. Modified Requirement R7 and the associated VSLs for improved enforceability and for consistency in the units of measure between the Requirement and the associated VSLs.
9. Updated the Evidence Retention section in accordance with current guidelines.

Modification incorporated into this Draft 5 of FAC-003-2 in response to stakeholder comments include:

A. Removed reference to Active Transmission Line ROW.
B. Redefined the Glossary term for ROW to address Paragraph 734 of FERC Order 693 addressing the width of ROW to be maintained.
C. Redefined the Glossary term for Vegetation Inspection to include identifying hazards to the line inside the ROW.
D. Included the term referred to as “applicable lines” under 4.2 Facilities.
E. Removed 4.4 addressing “force majeure” under Applicability to Footnotes 2, 3 and 4.
F. In [R1./R2 – M1/M2](mailto:R1./R2-M1/M2) • Added reference “into the MVCD” into the text.
• Eliminated “types of encroachment” and added “The four types of failure to manage vegetation, in order of increasing severity.”
• In M1/M2 Added a paragraph defining “later confirmation of a Fault by the TO as a real-time observation.”
• Added Footnote 2
• Added to the Rationale box types of failures to manage vegetation.
G. In R4. Changed “qualified personnel” to TO.
H. In R5. Added the term “is constrained from performing vegetation work” and referenced MVCD.
• Removed reference to 2003 NE blackout from Rationale box
I. In R6. added the phrase “but no more than 18 months between inspections” also added Footnote 3.
J. In R7. Replaced major storms bullet with “circumstances that are beyond the control of a Transmission Owner”. Added Footnote 4 to this requirement.
K. In Additional Compliance Information
• Category 2 was split into two parts recognizing IROL’s and Major WECC Transfer Paths
• Added Category 3 for Fall-ins from outside the ROW.
• Category 4 was split into two parts recognizing IROL’s and Major WECC Transfer Paths
L. Removed alternate versions of VSL’s for R1./R2.
M. Deleted Table 3 from the Guidelines and Technical Basis section

Background Information
The purpose of Project 2007-07 Vegetation Management is to:
• Assist in providing an adequate level of reliability for the North American electric Transmission System by verifying that the FAC-003-2 Transmission Vegetation Management standard is complete and that its requirements are set at an appropriate level to ensure reliability.
• Incorporate other general improvements described in the Standard Review Guidelines to bring FAC-003-2 Transmission Vegetation Management into conformance with the latest version of the Reliability Standards Development Procedure and the ERO Sanctions Guidelines.
• Consider comments received from ERO regulatory authorities and stakeholders on FAC-003-1 Transmission Vegetation Management as noted in the NERC Standards Issues Database.
• Satisfy the requirement for review of FAC-003-2 Transmission Vegetation Management within five-year review cycle.

In addition, on January 14, 2010, the NERC Standards Committee endorsed the use of Project 2007-07 Vegetation Management as the prototype for the proof-of-concept for using the results-based criteria for developing a reliability standard. The results-based initiative is intended to focus the collective effort of NERC and industry participants on improving the clarity and quality of NERC reliability standards by developing performance-based, risk-based and competency-based requirements that accomplish a reliability objective through a defense-in-depth strategy, while eliminating documentation-driven requirements that do not have an impact on bulk power system reliability.

The Standards Committee also directed the standard drafting team for Project 2007-07 Vegetation Management to do so with a target for final industry ballot of draft FAC-003-2 Transmission Vegetation Management by August 31, 2010.
The criteria for developing a results-based reliability standard include:

1. Strive to achieve a portfolio of performance-based, risk-based, and competency-based mandatory reliability requirements that provide an effective defense-in-depth strategy for achieving an adequate level of reliability of the bulk power system.
   
   a) **Performance-based** — defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome?
   
   b) **Risk-based** — preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?
   
   c) **Competency-based** — defines a minimum capability an entity needs to have to demonstrate it is able to perform its designated reliability functions.

2. The defense-in-depth strategy for reliability standards development should recognize that each requirement in a NERC reliability standard has a role in preventing system failures, and that these roles are complementary and reinforcing. Reliability standards should not be viewed as a body of unrelated requirements, but rather should be viewed as part of a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comport with the quality objectives of a reliability standard.

3. Each requirement should identify a clear and measurable expected outcome, such as: i) a stated level of reliability performance, ii) a reduction in a specified reliability risk, or iii) a necessary competency.

4. Strive to minimize prescriptive, administrative (document something), and commercial requirements within the set of NERC reliability standards (i.e., these types of requirements are permissible in standards but should be the exception rather than the rule).

5. A requirement should not prescribe commercial business practices which do not contribute directly to reliability.

The Vegetation Management Standard Drafting Team worked with Ivy Hooks of Compliance Automation, Inc. to apply the “results-based” approach to developing requirements that are clear and enforceable. Ivy is the CEO of Compliance Automation and has shared a wealth of knowledge and expertise with the drafting team. The “look and feel” of the proposed standard contains much more information than we have been including in previous standards, thus the look and feel of the draft FAC-003-2 Transmission Vegetation Management standard is quite different from the look of our existing standards. One of the more obvious changes is the addition of information to aid end users in reading the requirements from a common understanding of the standard’s objective and the rationale for including each requirement. During the Three-year Performance Assessment, stakeholders indicated that they wanted more information to assist in applying standards – and the additional details provided in the proposed Vegetation Management standard provide an example of one way to fill that void.
On February 11, 2010 the Standards Committee authorized the standard drafting team for Project 2007-07 Vegetation Management to take the following actions relative to the development of draft FAC-003-2 Transmission Vegetation Management:

- Discontinue work in developing a complete Consideration of Comments Report for the comments received in response to the posting of the second draft of the draft FAC-003-2 Transmission Vegetation Management standard that was posted in August 2009; however, post the comments received along with a summary of the actions taken by the team in response to those comments but without an individual response to each comment provided.

- Use informal comment periods to collect comments on future “drafts” of the standard, post the comments received during the informal comment periods along with a summary of how the team used the comments received and a redline version of the standard showing the changes made based on the comments received.

- Conduct a 45-day formal comment period in parallel with the formation of the ballot pool and the initial ballot of the standard; post the comments from the formal comment period as they are received for at least the first 30 days of the comment period.

- Use a standard template that is different from the template stipulated in the Reliability Standard Development Procedure as provided by the Standards Committee’s Process Subcommittee.

With respect to the first bullet above, that work was completed with the March 1, 2010 posting. With respect to the second bullet above, this current posting is the second informal posting for comments, and the current plans are for the next posting to be a formal posting. A summary of the SDT considerations for the responses to the March 1, 2010 submittal has been posted on the NERC website in lieu of a full Consideration of Comments Report.

The following questions will assist the SDT in finalizing the development of FAC-003-2 Transmission Vegetation Management. For questions where you agree with indicated statement, please state that you agree. If you disagree with the statement, please explain why you disagree and provide a rationale, or alternate language, to support your position. We would appreciate answers to as many of the following questions as possible.

1. The SDT proposes a revised NERC Glossary definition for Right-of-Way (ROW). This revised definition will be used in lieu of the Active Transmission Line ROW. Do you agree? If answer is no, please explain.

   ☑ Yes
   ☐ No

   Comments: There was no definition of ROW listed in FAC-003-1. The revised definition of ROW in FAC-003-2 is unclear regarding the application of standards and/or historic records as a means of determining ROW width. Is it necessary for a TO to select one method to apply in all cases, or can each span be treated in the manner deemed most appropriate by the TO? “Blowout standard” has not been defined in the document, technical paper, or NERC Glossary and it is not clear what this method is, and exactly how it would be applied. It could not be defended under scrutiny. It is still unclear whether Danger Tree rights are included in this definition.
In the NERC Glossary of Terms, Right-of-Way (ROW) is defined as “A corridor of land on which electric lines may be located. The Transmission Owner may own the land in fee, own an easement, or have certain franchise, prescription, or license rights to construct and maintain lines.” Propose keeping this definition.

Is encroachment into the MVCD, or (MVCD plus additional distance as defined by the TO)?

MVCD, as specified within the body of FAC-003-2 “is a calculated minimum distance stated in feet (meters) to prevent flashover between conductors and vegetation, for various altitudes and operating voltages.” MVCD should be “formally” defined in this document, and the NERC Glossary.

Can a list/database be established in 2011 that lists the widths for the pre-2007 vegetation management records?

2. In R1 and R2 and their associated VSLs, the SDT added the phrase “in order of increasing severity” and added the sentence, “The types of encroachments are listed in order of increasing degrees of severity in non-compliant performance as it relates to a failure of a TO’s vegetation maintenance program.” to the Rationale boxes for R1/R2. Do you agree? If answer is no, please explain.

☐ Yes
☐ No
Comments:

3. In response to comments received regarding the term “investigation” in M1/M2, the SDT substituted “confirmation...by the Transmission Owner...” in its place, among other minor edits to these measures. Do you agree? If answer is no, please explain.

☐ Yes
☐ No
Comments:

4. In response to comments received that requirement R3 is unclear with respect to intent, the SDT added “maintenance strategies.” Do you agree this clarifies the intent? If answer is no, please offer alternative language.

☐ Yes
☐ No
Comments:
5. The SDT added clarifying language in M7 to explain how the annual work plan percentage complete calculation is to be performed. Is this adequate? If no, please provide improved examples.

☐ Yes
☒ No

Comments: There is no percentage language in M7. Is it R7 that is being referred to?