Unofficial Comment Form
Project 2010-07.1 Vegetation Management – FAC-003

DO NOT use this form for submitting comments. Use the electronic form to submit comments on the Standard Authorization Request (SAR) by 8:00 p.m. Eastern, Monday, September 28, 2015.

Documents and information about this project are available on the project page. If you have questions, contact Jordan Mallory (via email) or at 404-446-9733.

Background Information
This posting is soliciting informal comment on the SAR.

The purpose of the proposed project is to address the findings of the Electric Power Research Institute (EPRI) report, which was a part of the Federal Energy Regulatory Commission (FERC) Order No. 777 directive.

In Order No. 777, the FERC directed NERC to provide empirical data validating the gap factor for flashover distances between conductors and vegetation used in the Gallet equation to calculate Minimum Vegetation Clearance Distances (MVCDs) in NERC Reliability Standard FAC-003-2. In the order, FERC directed NERC to submit: (1) a schedule for testing; (2) the scope of work; (3) funding solutions; and (4) a deadline for submitting a final report on the test results to FERC, along with interim reports if a multiyear study is conducted.2 NERC contracted the EPRI and performed a collaborative research project to complete the work. NERC submitted a compliance filing on July 12, 2013,3 which FERC accepted on September 4, 2013.4

In January 2014, NERC formed an advisory group to develop the scope of work for the project. This team of subject matter experts assisted in developing the test plan, which included monitoring the testing and analyzing the test results to be provided in a final report. The advisory team was comprised of NERC staff, arborists, and industry members with wide-ranging expertise in transmission engineering, insulator characteristics, and vegetation management. The project’s scope of work and the detailed test plan were finalized in March 2014.

The testing project commenced in April 2014 and continued through October 2014. EPRI completed the prescribed tests to validate the gap factor applied in the Gallet equation. NERC filed an informational filing with FERC on July 31, 2014,5 that contained the results of the testing work completed to date. The initial

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2 Id. at P 61.
3 Compliance Filing of NERC, Docket No. RM12-4-000 (Jul. 12, 2013).
5 Informational Filing of NERC, Docket Nos. RM12-4-000 and RM12-4-001 (Jul. 31, 2014).
analysis, containing preliminary conclusions and recommendations, concluded in early 2015. Based on the preliminary results, the gap factor used in the Gallet equation required modification from 1.3 to 1.0, which would increase the MVCD values compared to those specified in the existing standard.

NERC, through EPRI, performed additional tests in 2015 to finalize the gap-factor verification, communicate the research findings to industry through webinars and committee meetings, and issued an industry advisory alert in May 2015. Final testing was completed and an EPRI report was posted on July 21, 2015. The report determined “that the proposed minimum vegetation clearance distances (MVCD), based on a gap factor of 1.3, should be increased and the corresponding gap factor reduced to a more conservative value of 1.0.”

Questions

1. Do you agree that the scope and objectives of the SAR? If not, please explain why you do not agree and, if possible, provide specific language revisions that would make it acceptable to you.

☑ Yes
☐ No

Comments: If you have any other comments on this SAR that you haven’t already mentioned above, please provide them here:

Comments: On page 2 of the SAR the last sentence under Detailed Description reads:

“The drafting team will be modifying the standard based on the final report, which is scheduled to be released in July 2015.”

This sentence should be revised to reflect the actual release date of the final report (August 15, 2015 from the NERC Website).

NERC’s May 14, 2015 Industry Advisory FAC-003-3 Minimum Vegetation Clearance Distances (MVCD) refers to “alternating current system voltages...” Was any testing done for high voltage DC voltages? The report apparently refers to only AC voltages. The SAR should stipulate this. What is the intention for addressing HVDC clearances?

The SAR should address a flexible Vegetation Control Cycle based on historic vegetation inspections from each area.

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6 [Industry Advisory Alert - FAC-003-3 MVCD](http://www.epri.com/abstracts/Pages/ProductAbstract.aspx?ProductId=000000003002006527)