

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ELECTRIC RELIABILITY

North American Electric Reliability Corporation
Docket No. RM12-4-000

Issued May 4, 2012

North American Electric Reliability Corporation
1120 G Street, N.W., Suite 990
Washington, DC 20005-3801

Attention: Holly A. Hawkins, Assistant General Counsel for Standards and Critical
Infrastructure Protection

Reference: Data Request in Response to the North American Electric Reliability
Corporation's Petition for Approval of Proposed Reliability Standard FAC-
003-2 – Transmission Vegetation Management

Dear Ms. Hawkins:

On December 21, 2011, you filed on behalf of the North American Electric Reliability Corporation (NERC) its Petition for Approval of Proposed Reliability Standard FAC-003-2 – Transmission Vegetation Management. Additional information is required in order to better understand NERC's petition, as set out in the data requests below. NERC must respond within 21 days of the date of this request with all pertinent information and records. As appropriate, NERC may seek non-public treatment of information in the responses pursuant to sections 388.112 and 388.113 of the Commission's regulations.¹

1. Provide the technical basis for the statement at page 6 of the petition that "The distances derived using the Gallet equation result in the probability of flashover in the range of 10^{-6} ."

¹ 18 C.F.R. §§ 388.112, 388.113 (2011).

2. Please explain how implementation of the maintenance strategies, procedures processes, or specifications used to prevent encroachment under Requirement R3 of the proposed standard is mandatory and enforceable.
3. Please explain whether or to what extent modifications to an “annual vegetation work plan” under proposed Requirement R7 allow Transmission Owners to delay completion of an annual vegetation workplan. If a delay is permitted, explain whether proposed FAC-003-2 requires an applicable entity to implement other corrective actions? Explain and provide examples with citations to specific Requirements.
4. Explain whether and to what extent “documented maintenance strategies” under Requirement R3 may be generalized and require no specific actions to prevent encroachments.
5. With respect to proposed Requirement R6, how will NERC and Regional Entity auditors determine whether a Transmission Owner performed a vegetation inspection “at least once per calendar year and with no more than 18 calendar months between inspections” at a particular location on the Transmission Owner’s Right of Way?
6. Explain whether and to what extent proposed FAC-003-2 requires qualification or training of personnel directly involved in implementation of vegetation management, and provide citations to any relevant Requirements or sub-Requirements of any current Reliability Standard.
7. Does the proposed standard allow for any exceptions to the requirements of Requirement R6 other than a failure to timely perform a Vegetation Inspection as a direct result of a “natural disaster” as stated in footnote 5 of the proposed standard? Explain.
8. The proposed standard provides an effective date “on the first calendar day of the first calendar quarter one year after” the date of Commission approval. Explain why a 12-month transition period is necessary and appropriate for implementing this proposed vegetation management standard.
9. The proposed standard revises NERC’s definition of “Right-Of-Way” (ROW). What obligations govern a Transmission Owner who identifies a vegetation condition that might encroach into the MVCD, if the vegetation is located outside of the ROW as defined by the TO under the proposed standard, but inside of the legal ROW?

This data request is issued pursuant to the authority delegated to the Director of the Office of Electric Reliability under 18 C.F.R. § 375.303 (2011) and is interlocutory.

NERC is encouraged to e-file its responses with the Commission. Instructions for e-filing are provided on the Commission's website at www.ferc.gov/docs-filing/efiling.asp. Otherwise, if you choose to file hard copies, please address your response to:

Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, N.E.
Washington, D.C. 20426

Irrespective of your filing method, please also provide a copy of your responses to:

Tom Bradish
Office of Electric Reliability
1800 Dual Highway
Suite 201
Hagerstown, MD 21740

Any questions regarding this letter should be directed to Mr. Tom Bradish at (301) 665-1391.

Sincerely,

Joseph H. McClelland, Director
Office of Electric Reliability

Document Content(s)

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