

# NERC

NORTH AMERICAN ELECTRIC  
RELIABILITY CORPORATION

February 25, 2010

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

RE: NERC Notice of Penalty regarding New York State Electric & Gas Corporation, FERC  
Docket No. NP10-48-000

Dear Ms. Bose:

On February 1, 2010, North American Electric Reliability Corporation (NERC) submitted a Notice of Penalty regarding New York State Electric & Gas Corporation (NYSEG) in the referenced proceeding. By this filing, NERC and the Northeast Power Coordinating Council, Inc. (NPCC) provide the following information regarding the risk impact of the violations addressed in support of the pending Notice of Penalty.

On April 18, 2008, NYSEG's 230 kV Line 67 tripped and locked out due to contact/flashover with an estimated 22' tall apple tree in the right of way. The resulting line outage lasted 7 hours and 14 minutes.<sup>1</sup> No System Operating Limits or Interconnection Reliability Operating Limits were violated.

On July 11, 2008, the 345 kV Line 33 tripped and locked out due to contact/flashover with a 51' spruce tree in the transmission right of way. The resulting line outage lasted 4 hours and 51 minutes. No System Operating Limits or Interconnection Reliability Operating Limits were violated.

NPCC Staff reported that they checked with the New York Independent System Operator (NYISO) about any impact either incident may have had on operations or the reliability of the bulk power system. On August 5, 2008, the NYISO indicated to NPCC that "no bulk power facilities were overloaded, there were no load relief measures taken and that generation was not limited due to the outages."

NPCC concluded that neither the contacts nor the associated line outages posed a serious or substantial threat to the reliability of the bulk power system because:

- Each line was restored within hours of the outage; and

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<sup>1</sup> There was a 7 hour and 4 minute outage of Line 67. The line tripped to lockout at 20:23 and returned to service at 03:27 the following morning. The line was effectively out of service from the time of the first trip at 20:12, which adds an additional 10 minutes to be 7 hours and 14 minutes.

- NYISO did not characterize either event as causing any serious reliability issues for the area as discussed above.

Based upon its consideration of the foregoing risk assessments, NERC also concluded that the violations did not pose serious or substantial risks to the bulk power system as discussed above.

Please contact me if you have any questions.

Sincerely,

/s/ Rebecca J. Michael  
Rebecca J. Michael  
*Assistant General Counsel for North  
American Electric Reliability  
Corporation*