

April 24, 2012

**VIA ELECTRONIC FILING**

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

**Re: Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standard FAC-003-2—Transmission Vegetation Management, *North American Electric Reliability Corporation*, FERC Docket No. RM12-4-000**

Dear Ms. Bose:

On December 21, 2011, NERC filed a Petition for Approval of Proposed Reliability Standard FAC-003-2 –Transmission Vegetation Management.<sup>1</sup>

It has come to NERC’s attention that in the Compliance section of the proposed standard, the “Regional Entity” should be identified as the Compliance Enforcement Authority under 1.1, and the heading of 1.2 should read “Evidence Retention.” A redline of the proposed change is attached as **Exhibit A**. A clean version of this proposed change is attached as **Exhibit B**.

Accordingly, NERC respectfully requests that the Commission take note of this errata filing, and issue an order consistent with NERC’s filings submitted in this proceeding.

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins

*Attorney for North American Electric Reliability Corporation*

cc: Official service list in Docket No. RM12-4-000

<sup>1</sup> *Petition of the North American Electric Reliability Corporation for Approval of Proposed Reliability Standard FAC-003-2 — Transmission Vegetation Management*, Docket No. RM12-4-000 (December 21, 2011).

**Exhibit A**

**FAC-003-2 Redline Version**

**Effective Dates**

This standard becomes effective on the first calendar day of the first calendar quarter one year after the date of the order approving the standard from applicable regulatory authorities where such explicit approval is required. Where no regulatory approval is required, the standard becomes effective on the first calendar day of the first calendar quarter one year after Board of Trustees adoption.

Requirement	Jurisdiction									
	Alberta	British Columbia	Manitoba	New Brunswick	Newfoundland	Nova Scotia	Ontario	Quebec	Saskatchewan	USA
R1 – R7 (All Req.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

Effective dates for individual lines when they undergo specific transition cases:

1. A line operated below 200kV, designated by the Planning Coordinator as an element of an Interconnection Reliability Operating Limit (IROL) or designated by the Western Electricity Coordinating Council (WECC) as an element of a Major WECC Transfer Path, becomes subject to this standard the latter of: 1) 12 months after the date the Planning Coordinator or WECC initially designates the line as being an element of an IROL or an element of a Major WECC Transfer Path, or 2) January 1 of the planning year when the line is forecast to become an element of an IROL or an element of a Major WECC Transfer Path.
2. A line operated below 200 kV currently subject to this standard as a designated element of an IROL or a Major WECC Transfer Path which has a specified date for the removal of such designation will no longer be subject to this standard effective on that specified date.

3. A line operated at 200 kV or above, currently subject to this standard which is a designated element of an IROL or a Major WECC Transfer Path and which has a specified date for the removal of such designation will be subject to Requirement R2 and no longer be subject to Requirement R1 effective on that specified date.
4. An existing transmission line operated at 200kV or higher which is newly acquired by an asset owner and which was not previously subject to this standard becomes subject to this standard 12 months after the acquisition date.
5. An existing transmission line operated below 200kV which is newly acquired by an asset owner and which was not previously subject to this standard becomes subject to this standard 12 months after the acquisition date of the line if at the time of acquisition the line is designated by the Planning Coordinator as an element of an IROL or by WECC as an element of a Major WECC Transfer Path.

## A. Introduction

1. **Title:** Transmission Vegetation Management
2. **Number:** FAC-003-2
3. **Purpose:** To maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.

### 4. Applicability

#### 4.1. Functional Entities:

##### 4.1.1 Transmission Owners

- 4.2. **Facilities:** Defined below (referred to as “applicable lines”), including but not limited to those that cross lands owned by federal<sup>1</sup>, state, provincial, public, private, or tribal entities:

4.2.1. Each overhead transmission line operated at 200kV or higher.

4.2.2. Each overhead transmission line operated below 200kV identified as an element of an IROL under NERC Standard FAC-014 by the Planning Coordinator.

4.2.3. Each overhead transmission line operated below 200 kV identified as an element of a Major WECC Transfer Path in the Bulk Electric System by WECC.

4.2.4. Each overhead transmission line identified above (4.2.1 through 4.2.3) located outside the fenced area of the switchyard, station or substation and any portion of the span of the transmission line that is crossing the substation fence.

### 5. Background:

This standard uses three types of requirements to provide layers of protection to prevent vegetation related outages that could lead to Cascading:

- a) Performance-based — defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four

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<sup>1</sup> EAct 2005 section 1211c: “Access approvals by Federal agencies.”

components: *who, under what conditions (if any), shall perform what action, to achieve what particular bulk power system performance 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 set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?*

The defense-in-depth strategy for reliability standards development recognizes 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.

This standard uses a defense-in-depth approach to improve the reliability of the electric Transmission system by:

- Requiring that vegetation be managed to prevent vegetation encroachment inside the flash-over clearance (R1 and R2);
- Requiring documentation of the maintenance strategies, procedures, processes and specifications used to manage vegetation to prevent potential flash-over conditions including consideration of 1) conductor dynamics and 2) the interrelationships between vegetation growth rates, control methods and the inspection frequency (R3);
- Requiring timely notification to the appropriate control center of vegetation conditions that could cause a flash-over at any moment (R4);
- Requiring corrective actions to ensure that flash-over distances will not be violated due to work constrains such as legal injunctions (R5);
- Requiring inspections of vegetation conditions to be performed annually (R6); and
- Requiring that the annual work needed to prevent flash-over is completed (R7).

For this standard, the requirements have been developed as follows:

- Performance-based: Requirements 1 and 2
- Competency-based: Requirement 3

- Risk-based: Requirements 4, 5, 6 and 7

R3 serves as the first line of defense by ensuring that entities understand the problem they are trying to manage and have fully developed strategies and plans to manage the problem. R1, R2, and R7 serve as the second line of defense by requiring that entities carry out their plans and manage vegetation. R6, which requires inspections, may be either a part of the first line of defense (as input into the strategies and plans) or as a third line of defense (as a check of the first and second lines of defense). R4 serves as the final line of defense, as it addresses cases in which all the other lines of defense have failed.

Major outages and operational problems have resulted from interference between overgrown vegetation and transmission lines located on many types of lands and ownership situations. Adherence to the standard requirements for applicable lines on any kind of land or easement, whether they are Federal Lands, state or provincial lands, public or private lands, franchises, easements or lands owned in fee, will reduce and manage this risk. For the purpose of the standard the term “public lands” includes municipal lands, village lands, city lands, and a host of other governmental entities.

This standard addresses vegetation management along applicable overhead lines and does not apply to underground lines, submarine lines or to line sections inside an electric station boundary.

This standard focuses on transmission lines to prevent those vegetation related outages that could lead to Cascading. It is not intended to prevent customer outages due to tree contact with lower voltage distribution system lines. For example, localized customer service might be disrupted if vegetation were to make contact with a 69kV transmission line supplying power to a 12kV distribution station. However, this standard is not written to address such isolated situations which have little impact on the overall electric transmission system.

Since vegetation growth is constant and always present, unmanaged vegetation poses an increased outage risk, especially when numerous transmission lines are operating at or near their Rating. This can present a significant risk of consecutive line failures when lines are experiencing large sags thereby leading to Cascading. Once the first line fails the shift of the current to the other lines and/or the increasing system loads will lead to the second and subsequent line failures as contact to the vegetation under those lines occurs. Conversely, most other outage causes (such as trees falling into lines, lightning, animals, motor vehicles, etc.) are not an interrelated function of the shift of currents or the increasing system loading. These events are not any more likely to occur during heavy system loads than any other time. There is no cause-effect relationship which creates the probability of simultaneous occurrence of other such events. Therefore these types of events are highly unlikely to cause large-scale grid failures. Thus, this standard places the highest priority on the management of vegetation to prevent vegetation grow-ins.

## B. Requirements and Measures

**R1.** Each Transmission Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are either an element of an IROL, or an element of a Major WECC Transfer Path; operating within their Rating and all Rated Electrical Operating Conditions of the types shown below<sup>2</sup> [*Violation Risk Factor: High*] [*Time Horizon: Real-time*]:

1. An encroachment into the MVCD as shown in FAC-003-Table 2, observed in Real-time, absent a Sustained Outage,<sup>3</sup>
2. An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
3. An encroachment due to the blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
4. An encroachment due to vegetation growth into the MVCD that caused a vegetation-related Sustained Outage.<sup>4</sup>

**M1.** Each Transmission Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R1. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R1)

**R2.** Each Transmission Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are not either an element of an IROL, or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions of the types shown below<sup>2</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time*]:

1. An encroachment into the MVCD, observed in Real-time, absent a Sustained Outage,<sup>3</sup>
2. An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
3. An encroachment due to blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>

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<sup>2</sup> This requirement does not apply to circumstances that are beyond the control of a Transmission Owner subject to this reliability standard, including natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, wind shear, fresh gale, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods; human or animal activity such as logging, animal severing tree, vehicle contact with tree, or installation, removal, or digging of vegetation. Nothing in this footnote should be construed to limit the Transmission Owner's right to exercise its full legal rights on the ROW.

<sup>3</sup> If a later confirmation of a Fault by the Transmission Owner shows that a vegetation encroachment within the MVCD has occurred from vegetation within the ROW, this shall be considered the equivalent of a Real-time observation.

<sup>4</sup> Multiple Sustained Outages on an individual line, if caused by the same vegetation, will be reported as one outage regardless of the actual number of outages within a 24-hour period.



4. An encroachment due to vegetation growth into the line MVCD that caused a vegetation-related Sustained Outage<sup>4</sup>
- M2.** Each Transmission Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R2. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R2)
- R3.** Each Transmission Owner shall have documented maintenance strategies or procedures or processes or specifications it uses to prevent the encroachment of vegetation into the MVCD of its applicable lines that accounts for the following:
  - 3.1** Movement of applicable line conductors under their Rating and all Rated Electrical Operating Conditions;
  - 3.2** Inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency.  
[Violation Risk Factor: Lower] [Time Horizon: Long Term Planning]:
- M3.** The maintenance strategies or procedures or processes or specifications provided demonstrate that the Transmission Owner can prevent encroachment into the MVCD considering the factors identified in the requirement. (R3)
- R4.** Each Transmission Owner, without any intentional time delay, shall notify the control center holding switching authority for the associated applicable line when the Transmission Owner has confirmed the existence of a vegetation condition that is likely to cause a Fault at any moment [Violation Risk Factor: Medium] [Time Horizon: Real-time].
- M4.** Each Transmission Owner that has a confirmed vegetation condition likely to cause a Fault at any moment will have evidence that it notified the control center holding switching authority for the associated transmission line without any intentional time delay. Examples of evidence may include control center logs, voice recordings, switching orders, clearance orders and subsequent work orders. (R4)
- R5.** When a Transmission Owner is constrained from performing vegetation work on an applicable line operating within its Rating and all Rated Electrical Operating Conditions, and the constraint may lead to a vegetation encroachment into the MVCD prior to the implementation of the next annual work plan, then the Transmission Owner shall take corrective action to ensure continued vegetation management to prevent encroachments [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].

- M5.** Each Transmission Owner has evidence of the corrective action taken for each constraint where an applicable transmission line was put at potential risk. Examples of acceptable forms of evidence may include initially-planned work orders, documentation of constraints from landowners, court orders, inspection records of increased monitoring, documentation of the de-rating of lines, revised work orders, invoices, or evidence that the line was de-energized. (R5)
- R6.** Each Transmission Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW<sup>5</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*].
- M6.** Each Transmission Owner has evidence that it conducted Vegetation Inspections of the transmission line ROW for all applicable lines at least once per calendar year but with no more than 18 calendar months between inspections on the same ROW. Examples of acceptable forms of evidence may include completed and dated work orders, dated invoices, or dated inspection records. (R6)
- R7.** Each Transmission Owner shall complete 100% of its annual vegetation work plan of applicable lines to ensure no vegetation encroachments occur within the MVCD. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made (provided they do not allow encroachment of vegetation into the MVCD) and must be documented. The percent completed calculation is based on the number of units actually completed divided by the number of units in the final amended plan (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) Examples of reasons for modification to annual plan may include [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]:
- Change in expected growth rate/ environmental factors
  - Circumstances that are beyond the control of a Transmission Owner<sup>6</sup>
  - Rescheduling work between growing seasons
  - Crew or contractor availability/ Mutual assistance agreements
  - Identified unanticipated high priority work
  - Weather conditions/Accessibility
  - Permitting delays
  - Land ownership changes/Change in land use by the landowner
  - Emerging technologies

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<sup>5</sup> When the Transmission Owner is prevented from performing a Vegetation Inspection within the timeframe in R6 due to a natural disaster, the TO is granted a time extension that is equivalent to the duration of the time the TO was prevented from performing the Vegetation Inspection.

<sup>6</sup> Circumstances that are beyond the control of a Transmission Owner include but are not limited to natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, ice storms, floods, or major storms as defined either by the TO or an applicable regulatory body.

- M7.** Each Transmission Owner has evidence that it completed its annual vegetation work plan for its applicable lines. Examples of acceptable forms of evidence may include a copy of the completed annual work plan (as finally modified), dated work orders, dated invoices, or dated inspection records. (R7)

## C. Compliance

### 1. Compliance Monitoring Process

#### **1.1 Compliance Enforcement Authority**

#### ~~1.1~~ Regional Entity

#### **~~1.2~~ Regional Entity Evidence Retention**

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Transmission Owner retains data or evidence to show compliance with Requirements R1, R2, R3, R5, R6 and R7, Measures M1, M2, M3, M5, M6 and M7 for three calendar years unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Transmission Owner retains data or evidence to show compliance with Requirement R4, Measure M4 for most recent 12 months of operator logs or most recent 3 months of voice recordings or transcripts of voice recordings, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### **1.3 Compliance Monitoring and Enforcement Processes:**

Compliance Audit

Self-Certification

Spot Checking

Compliance Violation Investigation

Self-Reporting

Complaint

Periodic Data Submittal

#### 1.4 Additional Compliance Information

***Periodic Data Submittal:*** The Transmission Owner will submit a quarterly report to its Regional Entity, or the Regional Entity's designee, identifying all Sustained Outages of applicable lines operated within their Rating and all Rated Electrical Operating Conditions as determined by the Transmission Owner to have been caused by vegetation, except as excluded in footnote 2, and including as a minimum the following:

- The name of the circuit(s), the date, time and duration of the outage; the voltage of the circuit; a description of the cause of the outage; the category associated with the Sustained Outage; other pertinent comments; and any countermeasures taken by the Transmission Owner.

A Sustained Outage is to be categorized as one of the following:

- Category 1A — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, that are identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 2A — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 2B — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 3 — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines from outside the ROW;
- Category 4A — Blowing together: Sustained Outages caused by vegetation and applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW.

- Category 4B — Blowing together: Sustained Outages caused by vegetation and applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW.

The Regional Entity will report the outage information provided by Transmission Owners, as per the above, quarterly to NERC, as well as any actions taken by the Regional Entity as a result of any of the reported Sustained Outages.

**Table of Compliance Elements**

R#	Time Horizon	VRF	Violation Severity Level			
			Lower	Moderate	High	Severe
R1	Real-time	High	N/A	N/A	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-Table 2 was observed in real time absent a Sustained Outage.	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• A fall-in from inside the active transmission line ROW</li> <li>• Blowing together of applicable lines and vegetation located inside the active transmission line ROW</li> <li>• A grow-in</li> </ul>
R2	Real-time	Medium	N/A	N/A	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-Table 2 was observed in real time absent a Sustained Outage.	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• A fall-in from inside the</li> </ul>

						<p>active transmission line ROW</p> <ul style="list-style-type: none"> <li>Blowing together of applicable lines and vegetation located inside the active transmission line ROW</li> <li>A grow-in</li> </ul>
R3	Long-Term Planning	Lower	N/A	The Transmission Owner has maintenance strategies or documented procedures or processes or specifications but has not accounted for the inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency, for the Transmission Owner’s applicable lines. (Requirement R3, Part 3.2)	The Transmission Owner has maintenance strategies or documented procedures or processes or specifications but has not accounted for the movement of transmission line conductors under their Rating and all Rated Electrical Operating Conditions, for the Transmission Owner’s applicable lines. Requirement R3, Part 3.1)	The Transmission Owner does not have any maintenance strategies or documented procedures or processes or specifications used to prevent the encroachment of vegetation into the MVCD, for the Transmission Owner’s applicable lines.
R4	Real-time	Medium	N/A	N/A	The Transmission Owner experienced a confirmed vegetation threat and notified the control center holding switching authority for that applicable line, but there was intentional delay in that notification.	The Transmission Owner experienced a confirmed vegetation threat and did not notify the control center holding switching authority for that applicable line.
R5	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Owner did not take corrective action when it was constrained from performing planned vegetation work where an applicable line

						was put at potential risk.
R6	Operations Planning	Medium	The Transmission Owner failed to inspect 5% or less of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.)	The Transmission Owner failed to inspect more than 5% up to and including 10% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The Transmission Owner failed to inspect more than 10% up to and including 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The Transmission Owner failed to inspect more than 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).
R7	Operations Planning	Medium	The Transmission Owner failed to complete 5% or less of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 5% and up to and including 10% of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 10% and up to and including 15% of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 15% of its annual vegetation work plan for its applicable lines (as finally modified).

**D. Regional Differences**

None.

**E. Interpretations**

None.

**F. Associated Documents**

Guideline and Technical Basis (attached).



## Guideline and Technical Basis

### Enforcement:

The Requirements within a Reliability Standard govern and will be enforced. The Requirements within a Reliability Standard define what an entity must do to be compliant and binds an entity to certain obligations of performance under Section 215 of the Federal Power Act. Compliance will in all cases be measured by determining whether a party met or failed to meet the Reliability Standard Requirement given the specific facts and circumstances of its use, ownership or operation of the bulk power system.

Measures provide guidance on assessing non-compliance with the Requirements. Measures are the evidence that could be presented to demonstrate compliance with a Reliability Standard Requirement and are not intended to contain the quantitative metrics for determining satisfactory performance nor to limit how an entity may demonstrate compliance if valid alternatives to demonstrating compliance are available in a specific case. A Reliability Standard may be enforced in the absence of specified Measures.

Entities must comply with the “Compliance” section in its entirety, including the Administrative Procedure that sets forth, among other things, reporting requirements.

The “Guideline and Technical Basis” section, the Background section and text boxes with “Examples” and “Rationale” are provided for informational purposes. They are designed to convey guidance from NERC’s various activities. The “Guideline and Technical Basis” section and text boxes with “Examples” and “Rationale” are not intended to establish new Requirements under NERC’s Reliability Standards or to modify the Requirements in any existing NERC Reliability Standard. Implementation of the “Guideline and Technical Basis” section, the Background section and text boxes with “Examples” and “Rationale” is not a substitute for compliance with Requirements in NERC’s Reliability Standards.”

### Effective dates:

The first two sentences of the Effective Dates section is standard language used in most NERC standards to cover the general effective date and is sufficient to cover the vast majority of situations. Five special cases are needed to cover effective dates for individual lines which undergo transitions after the general effective date. These special cases cover the effective dates for those

lines which are initially becoming subject to the standard, those lines which are changing their applicability within the standard, and those lines which are changing in a manner that removes their applicability to the standard.

Case 1 is needed because the Planning Coordinators may designate lines below 200 kV to become elements of an IROL or Major WECC Transfer Path in a future Planning Year (PY). For example, studies by the Planning Coordinator in 2011 may identify a line to have that designation beginning in PY 2021, ten years after the planning study is performed. It is not intended for the Standard to be immediately applicable to, or in effect for, that line until that future PY begins. The effective date provision for such lines ensures that the line will become subject to the standard on January 1 of the PY specified with an allowance of at least 12 months for the Transmission Owner to make the necessary preparations to achieve compliance on that line. The table below has some explanatory examples of the application.

<u>Date that Planning Study is completed</u>	<u>PY the line will become an IROL element</u>	<u>Date 1</u>	<u>Date 2</u>	<u>Effective Date The latter of Date 1 or Date 2</u>
05/15/2011	2012	05/15/2012	01/01/2012	05/15/2012
05/15/2011	2013	05/15/2012	01/01/2013	01/01/2013
05/15/2011	2014	05/15/2012	01/01/2014	01/01/2014
05/15/2011	2021	05/15/2012	01/01/2021	01/01/2021

Case 2 is needed because a line operating below 200kV designated as an element of an IROL or Major WECC Transfer Path may be removed from that designation due to system improvements, changes in generation, changes in loads or changes in studies and analysis of the network.

Case 3 is needed because a line operating at 200 kV or above that once was designated as an element of an IROL or Major WECC Transfer Path may be removed from that designation due to system improvements, changes in generation, changes in loads or changes in studies and analysis of the network. Such changes result in the need to apply R1 to that line until that date is reached and then to apply R2 to that line thereafter.

Case 4 is needed because an existing line that is to be operated at 200 kV or above can be acquired by a Transmission Owner from a third party such as a Distribution Provider or other end-user who was using the line solely for local distribution purposes, but the Transmission Owner, upon acquisition, is incorporating the line into the interconnected electrical energy transmission network which will thereafter make the line subject to the standard.

Case 5 is needed because an existing line that is operated below 200 kV can be acquired by a Transmission Owner from a third party such as a Distribution Provider or other end-user who was using the line solely for local distribution purposes, but the Transmission owner, upon acquisition, is incorporating the line into the interconnected electrical energy transmission network. In this special case the line upon acquisition was designated as an element of an Interconnection Reliability Operating Limit (IROL) or an element of a Major WECC Transfer Path.

#### **Defined Terms:**

##### **Explanation for revising the definition of ROW:**

The current NERC glossary definition of Right of Way has been modified to address the matter set forth in Paragraph 734 of FERC Order 693. The Order pointed out that Transmission Owners may in some cases own more property or rights than are needed to reliably operate transmission lines. This modified definition represents a slight but significant departure from the strict legal definition of “right of way” in that this definition is based on engineering and construction considerations that establish the width of a corridor from a technical basis. The pre-2007 maintenance records are included in the revised definition to allow the use of such vegetation widths if there were no engineering or construction standards that referenced the width of right of way to be maintained for vegetation on a particular line but the evidence exists in maintenance records for a width that was in fact maintained prior to this standard becoming mandatory. Such widths may be the only information available for lines that had limited or no vegetation easement rights and were typically maintained primarily to ensure public safety. This standard does not require additional easement rights to be purchased to satisfy a minimum right of way width that did not exist prior to this standard becoming mandatory.

##### **Explanation for revising the definition of Vegetation Inspections:**

The current glossary definition of this NERC term is being modified to allow both maintenance inspections and vegetation inspections to be performed concurrently. This allows potential efficiencies, especially for those lines with minimal vegetation and/or slow vegetation growth rates.

##### **Explanation of the definition of the MVCD:**

The MVCD is a calculated minimum distance that is derived from the Gallet Equations. This is a method of calculating a flash over distance that has been used in the design of high voltage transmission lines. Keeping vegetation away from high voltage conductors by this distance will prevent voltage flash-over to the vegetation. See the explanatory text below for Requirement R3 and associated Figure 1. Table 2 below provides MVCD values for various voltages and altitudes. Details of the equations and an example calculation are provided in Appendix 1 of the Technical Reference Document.

**Guidelines:**

**Requirements R1 and R2:**

R1 and R2 are performance-based requirements. The reliability objective or outcome to be achieved is the management of vegetation such that there are no vegetation encroachments within a minimum distance of transmission lines. Content-wise, R1 and R2 are the same requirements; however, they apply to different Facilities. Both R1 and R2 require each Transmission Owner to manage vegetation to prevent encroachment within the MVCD of transmission lines. R1 is applicable to lines that are identified as an element of an IROL or Major WECC Transfer Path. R2 is applicable to all other lines that are not elements of IROLs, and not elements of Major WECC Transfer Paths.

The separation of applicability (between R1 and R2) recognizes that inadequate vegetation management for an applicable line that is an element of an IROL or a Major WECC Transfer Path is a greater risk to the interconnected electric transmission system than applicable lines that are not elements of IROLs or Major WECC Transfer Paths. Applicable lines that are not elements of IROLs or Major WECC Transfer Paths do require effective vegetation management, but these lines are comparatively less operationally significant. As a reflection of this difference in risk impact, the Violation Risk Factors (VRFs) are assigned as High for R1 and Medium for R2.

Requirements R1 and R2 state that if inadequate vegetation management allows vegetation to encroach within the MVCD distance as shown in Table 2, it is a violation of the standard. Table 2 distances are the minimum clearances that will prevent spark-over based on the Gallet equations as described more fully in the Technical Reference document.

These requirements assume that transmission lines and their conductors are operating within their Rating. If a line conductor is intentionally or inadvertently operated beyond its Rating and Rated Electrical Operating Condition (potentially in violation of other standards), the occurrence of a clearance encroachment may occur solely due to that condition. For example, emergency actions taken by a Transmission Operator or Reliability Coordinator to protect an Interconnection may cause excessive sagging and an outage. Another example would be ice loading beyond the line's Rating and Rated Electrical Operating Condition. Such vegetation-related encroachments and outages are not violations of this standard.

Evidence of failures to adequately manage vegetation include real-time observation of a vegetation encroachment into the MVCD (absent a Sustained Outage), or a vegetation-related encroachment resulting in a Sustained Outage due to a fall-in from inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to the blowing together of the lines and vegetation located inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to a grow-in. Faults which do not cause a Sustained outage and which are confirmed to have been caused by vegetation encroachment within the MVCD are considered the equivalent of a Real-time observation for violation severity levels.

With this approach, the VSLs for R1 and R2 are structured such that they directly correlate to the severity of a failure of a Transmission Owner to manage vegetation and to the corresponding performance level of the Transmission Owner's vegetation program's ability to meet the objective of "preventing the risk of those vegetation related outages that could lead to Cascading." Thus violation severity increases with a Transmission Owner's inability to meet this goal and its potential of leading to a Cascading event. The additional benefits of such a combination are that it simplifies the standard and clearly defines performance for compliance. A performance-based requirement of this nature will promote high quality, cost effective vegetation management programs that will deliver the overall end result of improved reliability to the system.

Multiple Sustained Outages on an individual line can be caused by the same vegetation. For example initial investigations and corrective actions may not identify and remove the actual outage cause then another outage occurs after the line is re-energized and previous high conductor temperatures return. Such events are considered to be a single vegetation-related Sustained Outage under the standard where the Sustained Outages occur within a 24 hour period.

The MVCD is a calculated minimum distance stated in feet (or meters) to prevent spark-over, for various altitudes and operating voltages that is used in the design of Transmission Facilities. Keeping vegetation from entering this space will prevent transmission outages.

If the Transmission Owner has applicable lines operated at nominal voltage levels not listed in Table 2, then the TO should use the next largest clearance distance based on the next highest nominal voltage in the table to determine an acceptable distance.

**Requirement R3:**

R3 is a competency based requirement concerned with the maintenance strategies, procedures, processes, or specifications, a Transmission Owner uses for vegetation management.

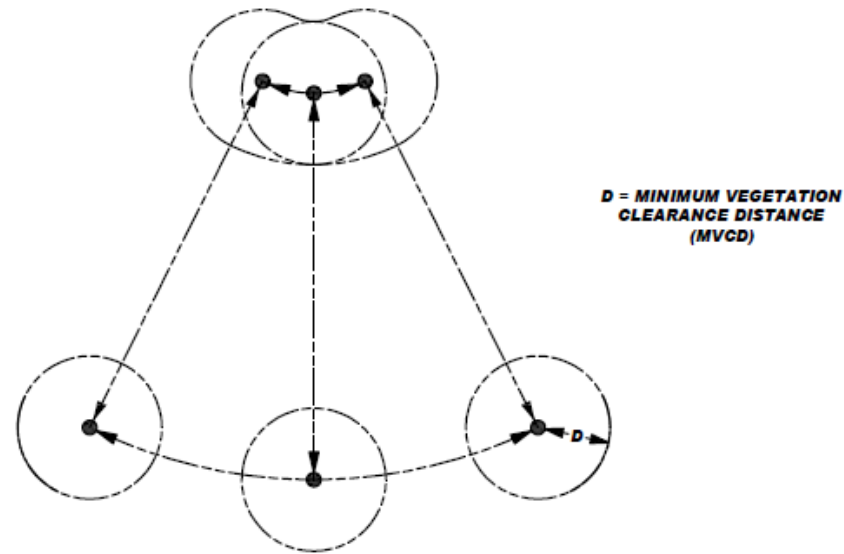
An adequate transmission vegetation management program formally establishes the approach the Transmission Owner uses to plan and perform vegetation work to prevent transmission Sustained Outages and minimize risk to the transmission system. The approach provides the basis for evaluating the intent, allocation of appropriate resources, and the competency of the Transmission

Owner in managing vegetation. There are many acceptable approaches to manage vegetation and avoid Sustained Outages. However, the Transmission Owner must be able to show the documentation of its approach and how it conducts work to maintain clearances.

An example of one approach commonly used by industry is ANSI Standard A300, part 7. However, regardless of the approach a utility uses to manage vegetation, any approach a Transmission Owner chooses to use will generally contain the following elements:

1. *the maintenance strategy used (such as minimum vegetation-to-conductor distance or maximum vegetation height) to ensure that MVCD clearances are never violated.*
2. *the work methods that the Transmission Owner uses to control vegetation*
3. *a stated Vegetation Inspection frequency*
4. *an annual work plan*

The conductor's position in space at any point in time is continuously changing in reaction to a number of different loading variables. Changes in vertical and horizontal conductor positioning are the result of thermal and physical loads applied to the line. Thermal loading is a function of line current and the combination of numerous variables influencing ambient heat dissipation including wind velocity/direction, ambient air temperature and precipitation. Physical loading applied to the conductor affects sag and sway by combining physical factors such as ice and wind loading. The movement of the transmission line conductor and the MVCD is illustrated in Figure 1 below. In the Technical Reference document more figures and explanations of conductor dynamics are provided.



**Figure 1**

A cross-section view of a single conductor at a given point along the span is shown with six possible conductor positions due to movement resulting from thermal and mechanical loading.

**Requirement R4:**

R4 is a risk-based requirement. It focuses on preventative actions to be taken by the Transmission Owner for the mitigation of Fault risk when a vegetation threat is confirmed. R4 involves the notification of potentially threatening vegetation conditions, without any intentional delay, to the control center holding switching authority for that specific transmission line. Examples of acceptable unintentional delays may include communication system problems (for example, cellular service or two-way radio disabled), crews located in remote field locations with no communication access, delays due to severe weather, etc.

Confirmation is key that a threat actually exists due to vegetation. This confirmation could be in the form of a Transmission Owner’s employee who personally identifies such a threat in the field. Confirmation could also be made by sending out an employee to evaluate a situation reported by a landowner.

Vegetation-related conditions that warrant a response include vegetation that is near or encroaching into the MVCD (a grow-in issue) or vegetation that could fall into the transmission conductor (a fall-in issue). A knowledgeable verification of the risk would include an assessment of the possible sag or movement of the conductor while operating between no-load conditions and its rating.

The Transmission Owner has the responsibility to ensure the proper communication between field personnel and the control center to allow the control center to take the appropriate action until or as the vegetation threat is relieved. Appropriate actions may include a temporary reduction in the line loading, switching the line out of service, or other preparatory actions in recognition of the increased risk of outage on that circuit. The notification of the threat should be communicated in terms of minutes or hours as opposed to a longer time frame for corrective action plans (see R5).

All potential grow-in or fall-in vegetation-related conditions will not necessarily cause a Fault at any moment. For example, some Transmission Owners may have a danger tree identification program that identifies trees for removal with the potential to fall near the line. These trees would not require notification to the control center unless they pose an immediate fall-in threat.

**Requirement R5:**

R5 is a risk-based requirement. It focuses upon preventative actions to be taken by the Transmission Owner for the mitigation of Sustained Outage risk when temporarily constrained from performing vegetation maintenance. The intent of this requirement is to deal with situations that prevent the Transmission Owner from performing planned vegetation management work and, as a result, have the potential to put the transmission line at risk. Constraints to performing vegetation maintenance work as planned could result from legal injunctions filed by property owners, the discovery of easement stipulations which limit the Transmission Owner's rights, or other circumstances.

This requirement is not intended to address situations where the transmission line is not at potential risk and the work event can be rescheduled or re-planned using an alternate work methodology. For example, a land owner may prevent the planned use of chemicals on non-threatening, low growth vegetation but agree to the use of mechanical clearing. In this case the Transmission Owner is not under any immediate time constraint for achieving the management objective, can easily reschedule work using an alternate approach, and therefore does not need to take interim corrective action.

However, in situations where transmission line reliability is potentially at risk due to a constraint, the Transmission Owner is required to take an interim corrective action to mitigate the potential risk to the transmission line. A wide range of actions can be taken to address various situations. General considerations include:



- Identifying locations where the Transmission Owner is constrained from performing planned vegetation maintenance work which potentially leaves the transmission line at risk.
- Developing the specific action to mitigate any potential risk associated with not performing the vegetation maintenance work as planned.
- Documenting and tracking the specific action taken for the location.
- In developing the specific action to mitigate the potential risk to the transmission line the Transmission Owner could consider location specific measures such as modifying the inspection and/or maintenance intervals. Where a legal constraint would not allow any vegetation work, the interim corrective action could include limiting the loading on the transmission line.
- The Transmission Owner should document and track the specific corrective action taken at each location. This location may be indicated as one span, one tree or a combination of spans on one property where the constraint is considered to be temporary.

**Requirement R6:**

R6 is a risk-based requirement. This requirement sets a minimum time period for completing Vegetation Inspections. The provision that Vegetation Inspections can be performed in conjunction with general line inspections facilitates a Transmission Owner's ability to meet this requirement. However, the Transmission Owner may determine that more frequent vegetation specific inspections are needed to maintain reliability levels, based on factors such as anticipated growth rates of the local vegetation, length of the local growing season, limited ROW width, and local rainfall. Therefore it is expected that some transmission lines may be designated with a higher frequency of inspections.

The VSLs for Requirement R6 have levels ranked by the failure to inspect a percentage of the applicable lines to be inspected. To calculate the appropriate VSL the Transmission Owner may choose units such as: circuit, pole line, line miles or kilometers, etc.

For example, when a Transmission Owner operates 2,000 miles of applicable transmission lines this Transmission Owner will be responsible for inspecting all the 2,000 miles of lines at least once during the calendar year. If one of the included lines was 100 miles long, and if it was not inspected during the year, then the amount failed to inspect would be  $100/2000 = 0.05$  or 5%. The "Low VSL" for R6 would apply in this example.

**Requirement R7:**

R7 is a risk-based requirement. The Transmission Owner is required to complete its an annual work plan for vegetation management to accomplish the purpose of this standard. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made and documented provided they do not put the transmission system at risk. The annual work plan requirement is not intended to necessarily require a “span-by-span”, or even a “line-by-line” detailed description of all work to be performed. It is only intended to require that the Transmission Owner provide evidence of annual planning and execution of a vegetation management maintenance approach which successfully prevents encroachment of vegetation into the MVCD.

For example, when a Transmission Owner identifies 1,000 miles of applicable transmission lines to be completed in the Transmission Owner’s annual plan, the Transmission Owner will be responsible completing those identified miles. If a Transmission Owner makes a modification to the annual plan that does not put the transmission system at risk of an encroachment the annual plan may be modified. If 100 miles of the annual plan is deferred until next year the calculation to determine what percentage was completed for the current year would be:  $1000 - 100$  (deferred miles) = 900 modified annual plan, or  $900 / 900 = 100\%$  completed annual miles. If a Transmission Owner only completed 875 of the total 1000 miles with no acceptable documentation for modification of the annual plan the calculation for failure to complete the annual plan would be:  $1000 - 875 = 125$  miles failed to complete then,  $125$  miles (not completed) /  $1000$  total annual plan miles = 12.5% failed to complete.

The ability to modify the work plan allows the Transmission Owner to change priorities or treatment methodologies during the year as conditions or situations dictate. For example recent line inspections may identify unanticipated high priority work, weather conditions (drought) could make herbicide application ineffective during the plan year, or a major storm could require redirecting local resources away from planned maintenance. This situation may also include complying with mutual assistance agreements by moving resources off the Transmission Owner’s system to work on another system. Any of these examples could result in acceptable deferrals or additions to the annual work plan provided that they do not put the transmission system at risk of a vegetation encroachment.

In general, the vegetation management maintenance approach should use the full extent of the Transmission Owner’s easement, fee simple and other legal rights allowed. A comprehensive approach that exercises the full extent of legal rights on the ROW is superior to incremental management because in the long term it reduces the overall potential for encroachments, and it ensures that future planned work and future planned inspection cycles are sufficient.

When developing the annual work plan the Transmission Owner should allow time for procedural requirements to obtain permits to work on federal, state, provincial, public, tribal lands. In some cases the lead time for obtaining permits may necessitate preparing work plans more than a year prior to work start dates. Transmission Owners may also need to consider those special landowner requirements as documented in easement instruments.

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. Therefore, deferrals or relevant changes to the annual plan shall be documented. Depending on the planning and documentation format used by the Transmission Owner, evidence of successful annual work plan execution could consist of signed-off work orders, signed contracts, printouts from work management systems, spreadsheets of planned versus completed work, timesheets, work inspection reports, or paid invoices. Other evidence may include photographs, and walk-through reports.

FAC-003 — TABLE 2 — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Alternating Current** Voltages (feet)

( AC ) Nominal System Voltage (KV)	( AC ) Maximum System Voltage (kV) <sup>8</sup>	MVCD (feet)	MVCD (feet)	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet
		Over sea level up to 500 ft	Over 500 ft up to 1000 ft	Over 1000 ft up to 2000 ft	Over 2000 ft up to 3000 ft	Over 3000 ft up to 4000 ft	Over 4000 ft up to 5000 ft	Over 5000 ft up to 6000 ft	Over 6000 ft up to 7000 ft	Over 7000 ft up to 8000 ft	Over 8000 ft up to 9000 ft	Over 9000 ft up to 10000 ft	Over 10000 ft up to 11000 ft
765	800	8.2ft	8.33ft	8.61ft	8.89ft	9.17ft	9.45ft	9.73ft	10.01ft	10.29ft	10.57ft	10.85ft	11.13ft
500	550	5.15ft	5.25ft	5.45ft	5.66ft	5.86ft	6.07ft	6.28ft	6.49ft	6.7ft	6.92ft	7.13ft	7.35ft
345	362	3.19ft	3.26ft	3.39ft	3.53ft	3.67ft	3.82ft	3.97ft	4.12ft	4.27ft	4.43ft	4.58ft	4.74ft
287	302	3.88ft	3.96ft	4.12ft	4.29ft	4.45ft	4.62ft	4.79ft	4.97ft	5.14ft	5.32ft	5.50ft	5.68ft
230	242	3.03ft	3.09ft	3.22ft	3.36ft	3.49ft	3.63ft	3.78ft	3.92ft	4.07ft	4.22ft	4.37ft	4.53ft
161*	169	2.05ft	2.09ft	2.19ft	2.28ft	2.38ft	2.48ft	2.58ft	2.69ft	2.8ft	2.91ft	3.03ft	3.14ft
138*	145	1.74ft	1.78ft	1.86ft	1.94ft	2.03ft	2.12ft	2.21ft	2.3ft	2.4ft	2.49ft	2.59ft	2.7ft
115*	121	1.44ft	1.47ft	1.54ft	1.61ft	1.68ft	1.75ft	1.83ft	1.91ft	1.99ft	2.07ft	2.16ft	2.25ft
88*	100	1.18ft	1.21ft	1.26ft	1.32ft	1.38ft	1.44ft	1.5ft	1.57ft	1.64ft	1.71ft	1.78ft	1.86ft
69*	72	0.84ft	0.86ft	0.90ft	0.94ft	0.99ft	1.03ft	1.08ft	1.13ft	1.18ft	1.23ft	1.28ft	1.34ft

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)

<sup>7</sup> The distances in this Table are the minimums required to prevent Flash-over; however prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at time of vegetation maintenance.

<sup>8</sup> Where applicable lines are operated at nominal voltages other than those listed, The Transmission Owner should use the maximum system voltage to determine the appropriate clearance for that line.

TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Alternating Current** Voltages (meters)

( AC ) Nominal System Voltage (KV)	( AC ) Maximum System Voltage (kV) <sup>8</sup>	MVCD meters  Over sea level up to 152.4 m	MVCD meters  Over 152.4 m up to 304.8 m	MVCD meters  Over 304.8 m up to 609.6m	MVCD meters  Over 609.6m up to 914.4m	MVCD meters  Over 914.4m up to 1219.2m	MVCD meters  Over 1219.2m up to 1524m	MVCD meters  Over 1524 m up to 1828.8 m	MVCD meters  Over 1828.8m up to 2133.6m	MVCD meters  Over 2133.6m up to 2438.4m	MVCD meters  Over 2438.4m up to 2743.2m	MVCD meters  Over 2743.2m up to 3048m	MVCD meters  Over 3048m up to 3352.8m
765	800	2.49m	2.54m	2.62m	2.71m	2.80m	2.88m	2.97m	3.05m	3.14m	3.22m	3.31m	3.39m
500	550	1.57m	1.6m	1.66m	1.73m	1.79m	1.85m	1.91m	1.98m	2.04m	2.11m	2.17m	2.24m
345	362	0.97m	0.99m	1.03m	1.08m	1.12m	1.16m	1.21m	1.26m	1.30m	1.35m	1.40m	1.44m
287	302	1.18m	0.88m	1.26m	1.31m	1.36m	1.41m	1.46m	1.51m	1.57m	1.62m	1.68m	1.73m
230	242	0.92m	0.94m	0.98m	1.02m	1.06m	1.11m	1.15m	1.19m	1.24m	1.29m	1.33m	1.38m
161*	169	0.62m	0.64m	0.67m	0.69m	0.73m	0.76m	0.79m	0.82m	0.85m	0.89m	0.92m	0.96m
138*	145	0.53m	0.54m	0.57m	0.59m	0.62m	0.65m	0.67m	0.70m	0.73m	0.76m	0.79m	0.82m
115*	121	0.44m	0.45m	0.47m	0.49m	0.51m	0.53m	0.56m	0.58m	0.61m	0.63m	0.66m	0.69m
88*	100	0.36m	0.37m	0.38m	0.40m	0.42m	0.44m	0.46m	0.48m	0.50m	0.52m	0.54m	0.57m
69*	72	0.26m	0.26m	0.27m	0.29m	0.30m	0.31m	0.33m	0.34m	0.36m	0.37m	0.39m	0.41m

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)

TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Direct Current** Voltages feet (meters)

(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)
	Over sea level up to 500 ft	Over 500 ft up to 1000 ft	Over 1000 ft up to 2000 ft	Over 2000 ft up to 3000 ft	Over 3000 ft up to 4000 ft	Over 4000 ft up to 5000 ft	Over 5000 ft up to 6000 ft	Over 6000 ft up to 7000 ft	Over 7000 ft up to 8000 ft	Over 8000 ft up to 9000 ft	Over 9000 ft up to 10000 ft	Over 10000 ft up to 11000 ft
	(Over sea level up to 152.4 m)	(Over 152.4 m up to 304.8 m)	(Over 304.8 m up to 609.6m)	(Over 609.6m up to 914.4m)	(Over 914.4m up to 1219.2m)	(Over 1219.2m up to 1524m)	(Over 1524 m up to 1828.8 m)	(Over 1828.8m up to 2133.6m)	(Over 2133.6m up to 2438.4m)	(Over 2438.4m up to 2743.2m)	(Over 2743.2m up to 3048m)	(Over 3048m up to 3352.8m)
±750	14.12ft (4.30m)	14.31ft (4.36m)	14.70ft (4.48m)	15.07ft (4.59m)	15.45ft (4.71m)	15.82ft (4.82m)	16.2ft (4.94m)	16.55ft (5.04m)	16.91ft (5.15m)	17.27ft (5.26m)	17.62ft (5.37m)	17.97ft (5.48m)
±600	10.23ft (3.12m)	10.39ft (3.17m)	10.74ft (3.26m)	11.04ft (3.36m)	11.35ft (3.46m)	11.66ft (3.55m)	11.98ft (3.65m)	12.3ft (3.75m)	12.62ft (3.85m)	12.92ft (3.94m)	13.24ft (4.04m)	13.54ft (4.13m)
±500	8.03ft (2.45m)	8.16ft (2.49m)	8.44ft (2.57m)	8.71ft (2.65m)	8.99ft (2.74m)	9.25ft (2.82m)	9.55ft (2.91m)	9.82ft (2.99m)	10.1ft (3.08m)	10.38ft (3.16m)	10.65ft (3.25m)	10.92ft (3.33m)
±400	6.07ft (1.85m)	6.18ft (1.88m)	6.41ft (1.95m)	6.63ft (2.02m)	6.86ft (2.09m)	7.09ft (2.16m)	7.33ft (2.23m)	7.56ft (2.30m)	7.80ft (2.38m)	8.03ft (2.45m)	8.27ft (2.52m)	8.51ft (2.59m)
±250	3.50ft (1.07m)	3.57ft (1.09m)	3.72ft (1.13m)	3.87ft (1.18m)	4.02ft (1.23m)	4.18ft (1.27m)	4.34ft (1.32m)	4.5ft (1.37m)	4.66ft (1.42m)	4.83ft (1.47m)	5.00ft (1.52m)	5.17ft (1.58m)

**Notes:**

The SDT determined that the use of IEEE 516-2003 in version 1 of FAC-003 was a misapplication. The SDT consulted specialists who advised that the Gallet Equation would be a technically justified method. The explanation of why the Gallet approach is more appropriate is explained in the paragraphs below.

The drafting team sought a method of establishing minimum clearance distances that uses realistic weather conditions and realistic maximum transient over-voltages factors for in-service transmission lines.

The SDT considered several factors when looking at changes to the minimum vegetation to conductor distances in FAC-003-1:

- avoid the problem associated with referring to tables in another standard (IEEE-516-2003)
- transmission lines operate in non-laboratory environments (wet conditions)
- transient over-voltage factors are lower for in-service transmission lines than for inadvertently re-energized transmission lines with trapped charges.

FAC-003-1 uses the minimum air insulation distance (MAID) without tools formula provided in IEEE 516-2003 to determine the minimum distance between a transmission line conductor and vegetation. The equations and methods provided in IEEE 516 were developed by an IEEE Task Force in 1968 from test data provided by thirteen independent laboratories. The distances provided in IEEE 516 Tables 5 and 7 are based on the withstand voltage of a dry rod-rod air gap, or in other words, dry laboratory conditions. Consequently, the validity of using these distances in an outside environment application has been questioned.

FAC-003-01 allowed Transmission Owners to use either Table 5 or Table 7 to establish the minimum clearance distances. Table 7 could be used if the Transmission Owner knew the maximum transient over-voltage factor for its system. Otherwise, Table 5 would have to be used. Table 5 represented minimum air insulation distances under the worst possible case for transient over-voltage factors. These worst case transient over-voltage factors were as follows: 3.5 for voltages up to 362 kV phase to phase; 3.0 for 500 - 550 kV phase to phase; and 2.5 for 765 to 800 kV phase to phase. These worst case over-voltage factors were also a cause for concern in this particular application of the distances.

In general, the worst case transient over-voltages occur on a transmission line that is inadvertently re-energized immediately after the line is de-energized and a trapped charge is still present. The intent of FAC-003 is to keep a transmission line that is *in service* from becoming de-energized (i.e. tripped out) due to spark-over from the line conductor to nearby vegetation. Thus, the worst case transient overvoltage assumptions are not appropriate for this application. Rather, the appropriate over voltage values are those that occur only while the line is energized.

Typical values of transient over-voltages of in-service lines, as such, are not readily available in the literature because they are negligible compared with the maximums. A conservative value for the maximum transient over-voltage that can occur anywhere along the length of an in-service ac line is approximately 2.0 per unit. This value is a conservative estimate of the transient over-

voltage that is created at the point of application (e.g. a substation) by switching a capacitor bank without pre-insertion devices (e.g. closing resistors). At voltage levels where capacitor banks are not very common (e.g. Maximum System Voltage of 362 kV), the maximum transient over-voltage of an in-service ac line are created by fault initiation on adjacent ac lines and shunt reactor bank switching. These transient voltages are usually 1.5 per unit or less.

Even though these transient over-voltages will not be experienced at locations remote from the bus at which they are created, in order to be conservative, it is assumed that all nearby ac lines are subjected to this same level of over-voltage. Thus, a maximum transient over-voltage factor of 2.0 per unit for transmission lines operated at 302 kV and below is considered to be a realistic maximum in this application. Likewise, for ac transmission lines operated at Maximum System Voltages of 362 kV and above a transient over-voltage factor of 1.4 per unit is considered a realistic maximum.

The Gallet Equations are an accepted method for insulation coordination in tower design. These equations are used for computing the required strike distances for proper transmission line insulation coordination. They were developed for both wet and dry applications and can be used with any value of transient over-voltage factor. The Gallet Equation also can take into account various air gap geometries. This approach was used to design the first 500 kV and 765 kV lines in North America.

If one compares the MAID using the IEEE 516-2003 Table 7 (table D.5 for English values) with the critical spark-over distances computed using the Gallet wet equations, for each of the nominal voltage classes and identical transient over-voltage factors, the Gallet equations yield a more conservative (larger) minimum distance value.

Distances calculated from either the IEEE 516 (dry) formulas or the Gallet “wet” formulas are not vastly different when the same transient overvoltage factors are used; the “wet” equations will consistently produce slightly larger distances than the IEEE 516 equations when the same transient overvoltage is used. While the IEEE 516 equations were only developed for dry conditions the Gallet equations have provisions to calculate spark-over distances for both wet and dry conditions.

While EPRI is currently trying to establish empirical data for spark-over distances to live vegetation, there are no spark-over formulas currently derived expressly for vegetation to conductor minimum distances. Therefore the SDT chose a proven method that has been used in other EHV applications. The Gallet equations relevance to wet conditions and the selection of a Transient Overvoltage Factor that is consistent with the absence of trapped charges on an in-service transmission line make this methodology a better choice.

The following table is an example of the comparison of distances derived from IEEE 516 and the Gallet equations.



**Comparison of spark-over distances computed using Gallet wet equations vs. IEEE 516-2003 MAID distances**

( AC ) Nom System Voltage (kV)	( AC ) Max System Voltage (kV)	Transient Over-voltage Factor (T)	Clearance (ft.) Gallet (wet) @ Alt. 3000 feet	Table 7 (Table D.5 for feet) IEEE 516-2003 MAID (ft) @ Alt. 3000 feet
765	800	2.0	14.36	13.95
500	550	2.4	11.0	10.07
345	362	3.0	8.55	7.47
230	242	3.0	5.28	4.2
115	121	3.0	2.46	2.1

**Rationale:**

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for Applicability (section 4.2.4):**

The areas excluded in 4.2.4 were excluded based on comments from industry for reasons summarized as follows: 1) There is a very low risk from vegetation in this area. Based on an informal survey, no TOs reported such an event. 2) Substations, switchyards, and stations have many inspection and maintenance activities that are necessary for reliability. Those existing process manage the threat. As such, the formal steps in this standard are not well suited for this environment. 3) NERC has a project in place to address at a later date the applicability of this standard to Generation Owners. 4) Specifically addressing the areas where the standard does and does not apply makes the standard clearer.

**Rationale for R1 and R2:**

Lines with the highest significance to reliability are covered in R1; all other lines are covered in R2.

**Rationale for the types of failure to manage vegetation which are listed in order of increasing degrees of severity in non-compliant performance as it relates to a failure of a Transmission Owner's vegetation maintenance program:**

1. This management failure is found by routine inspection or Fault event investigation, and is normally symptomatic of unusual conditions in an otherwise sound program.
2. This management failure occurs when the height and location of a side tree within the ROW is not adequately addressed by the program.
3. This management failure occurs when side growth is not adequately addressed and may be indicative of an unsound program.
4. This management failure is usually indicative of a program that is not addressing the most fundamental dynamic of vegetation management, (i.e. a grow-in under the line). If this type of failure is pervasive on multiple lines, it provides a mechanism for a Cascade.

**Rationale for R3:**

The documentation provides a basis for evaluating the competency of the Transmission Owner's vegetation program. There may be many acceptable approaches to maintain clearances. Any approach must demonstrate that the Transmission Owner avoids vegetation-to-wire conflicts under all Ratings and all Rated Electrical Operating Conditions. See Figure 1 for an illustration of possible conductor locations.

**Rationale for R4:**

This is to ensure expeditious communication between the Transmission Owner and the control center when a critical situation is confirmed.

**Rationale for R5:**

Legal actions and other events may occur which result in constraints that prevent the Transmission Owner from performing planned vegetation maintenance work.

In cases where the transmission line is put at potential risk due to constraints, the intent is for the Transmission Owner to put interim measures in place, rather than do nothing.

The corrective action process is not intended to address situations where a planned work methodology cannot be performed but an alternate work methodology can be used.

**Rationale for R6:**

Inspections are used by Transmission Owners to assess the condition of the entire ROW. The information from the assessment can be used to determine risk, determine future work and evaluate recently-completed work. This requirement sets a minimum Vegetation Inspection frequency of once per calendar year but with no more than 18 months between inspections on the same ROW. Based upon average growth rates across North America and on common utility practice, this minimum frequency is reasonable. Transmission Owners should consider local and environmental factors that could warrant more frequent inspections.

**Rationale for R7:**

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. It allows modifications to the planned work for changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors, provided that those modifications do not put the transmission system at risk of a vegetation encroachment.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	TBA	1. Added “Standard Development Roadmap.” 2. Changed “60” to “Sixty” in section A, 5.2. 3. Added “Proposed Effective Date: April 7, 2006” to footer. 4. Added “Draft 3: November 17, 2005” to footer.	01/20/06
1	April 4, 2007	Regulatory Approval - Effective Date	New
2	November 3, 2011	Adopted by the NERC Board of Trustees	

**Exhibit B**

**FAC-003-2 Clean Version**

**Effective Dates**

This standard becomes effective on the first calendar day of the first calendar quarter one year after the date of the order approving the standard from applicable regulatory authorities where such explicit approval is required. Where no regulatory approval is required, the standard becomes effective on the first calendar day of the first calendar quarter one year after Board of Trustees adoption.

Requirement	Jurisdiction									
	Alberta	British Columbia	Manitoba	New Brunswick	Newfoundland	Nova Scotia	Ontario	Quebec	Saskatchewan	USA
R1 – R7 (All Req.)	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD	TBD

Effective dates for individual lines when they undergo specific transition cases:

1. A line operated below 200kV, designated by the Planning Coordinator as an element of an Interconnection Reliability Operating Limit (IROL) or designated by the Western Electricity Coordinating Council (WECC) as an element of a Major WECC Transfer Path, becomes subject to this standard the latter of: 1) 12 months after the date the Planning Coordinator or WECC initially designates the line as being an element of an IROL or an element of a Major WECC Transfer Path, or 2) January 1 of the planning year when the line is forecast to become an element of an IROL or an element of a Major WECC Transfer Path.
2. A line operated below 200 kV currently subject to this standard as a designated element of an IROL or a Major WECC Transfer Path which has a specified date for the removal of such designation will no longer be subject to this standard effective on that specified date.

3. A line operated at 200 kV or above, currently subject to this standard which is a designated element of an IROL or a Major WECC Transfer Path and which has a specified date for the removal of such designation will be subject to Requirement R2 and no longer be subject to Requirement R1 effective on that specified date.
4. An existing transmission line operated at 200kV or higher which is newly acquired by an asset owner and which was not previously subject to this standard becomes subject to this standard 12 months after the acquisition date.
5. An existing transmission line operated below 200kV which is newly acquired by an asset owner and which was not previously subject to this standard becomes subject to this standard 12 months after the acquisition date of the line if at the time of acquisition the line is designated by the Planning Coordinator as an element of an IROL or by WECC as an element of a Major WECC Transfer Path.

## A. Introduction

- 1. Title:** Transmission Vegetation Management
- 2. Number:** FAC-003-2
- 3. Purpose:** To maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.

### 4. Applicability

#### 4.1. Functional Entities:

##### 4.1.1 Transmission Owners

- #### 4.2. Facilities:
- Defined below (referred to as “applicable lines”), including but not limited to those that cross lands owned by federal<sup>1</sup>, state, provincial, public, private, or tribal entities:

- 4.2.1.** Each overhead transmission line operated at 200kV or higher.
- 4.2.2.** Each overhead transmission line operated below 200kV identified as an element of an IROL under NERC Standard FAC-014 by the Planning Coordinator.
- 4.2.3.** Each overhead transmission line operated below 200 kV identified as an element of a Major WECC Transfer Path in the Bulk Electric System by WECC.
- 4.2.4.** Each overhead transmission line identified above (4.2.1 through 4.2.3) located outside the fenced area of the switchyard, station or substation and any portion of the span of the transmission line that is crossing the substation fence.

### 5. Background:

This standard uses three types of requirements to provide layers of protection to prevent vegetation related outages that could lead to Cascading:

- a) Performance-based — defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four

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<sup>1</sup> EAct 2005 section 1211c: “Access approvals by Federal agencies.”



components: *who, under what conditions (if any), shall perform what action, to achieve what particular bulk power system performance 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 set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?*

The defense-in-depth strategy for reliability standards development recognizes 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.

This standard uses a defense-in-depth approach to improve the reliability of the electric Transmission system by:

- Requiring that vegetation be managed to prevent vegetation encroachment inside the flash-over clearance (R1 and R2);
- Requiring documentation of the maintenance strategies, procedures, processes and specifications used to manage vegetation to prevent potential flash-over conditions including consideration of 1) conductor dynamics and 2) the interrelationships between vegetation growth rates, control methods and the inspection frequency (R3);
- Requiring timely notification to the appropriate control center of vegetation conditions that could cause a flash-over at any moment (R4);
- Requiring corrective actions to ensure that flash-over distances will not be violated due to work constrains such as legal injunctions (R5);
- Requiring inspections of vegetation conditions to be performed annually (R6); and
- Requiring that the annual work needed to prevent flash-over is completed (R7).

For this standard, the requirements have been developed as follows:

- Performance-based: Requirements 1 and 2
- Competency-based: Requirement 3

- Risk-based: Requirements 4, 5, 6 and 7

R3 serves as the first line of defense by ensuring that entities understand the problem they are trying to manage and have fully developed strategies and plans to manage the problem. R1, R2, and R7 serve as the second line of defense by requiring that entities carry out their plans and manage vegetation. R6, which requires inspections, may be either a part of the first line of defense (as input into the strategies and plans) or as a third line of defense (as a check of the first and second lines of defense). R4 serves as the final line of defense, as it addresses cases in which all the other lines of defense have failed.

Major outages and operational problems have resulted from interference between overgrown vegetation and transmission lines located on many types of lands and ownership situations. Adherence to the standard requirements for applicable lines on any kind of land or easement, whether they are Federal Lands, state or provincial lands, public or private lands, franchises, easements or lands owned in fee, will reduce and manage this risk. For the purpose of the standard the term “public lands” includes municipal lands, village lands, city lands, and a host of other governmental entities.

This standard addresses vegetation management along applicable overhead lines and does not apply to underground lines, submarine lines or to line sections inside an electric station boundary.

This standard focuses on transmission lines to prevent those vegetation related outages that could lead to Cascading. It is not intended to prevent customer outages due to tree contact with lower voltage distribution system lines. For example, localized customer service might be disrupted if vegetation were to make contact with a 69kV transmission line supplying power to a 12kV distribution station. However, this standard is not written to address such isolated situations which have little impact on the overall electric transmission system.

Since vegetation growth is constant and always present, unmanaged vegetation poses an increased outage risk, especially when numerous transmission lines are operating at or near their Rating. This can present a significant risk of consecutive line failures when lines are experiencing large sags thereby leading to Cascading. Once the first line fails the shift of the current to the other lines and/or the increasing system loads will lead to the second and subsequent line failures as contact to the vegetation under those lines occurs. Conversely, most other outage causes (such as trees falling into lines, lightning, animals, motor vehicles, etc.) are not an interrelated function of the shift of currents or the increasing system loading. These events are not any more likely to occur during heavy system loads than any other time. There is no cause-effect relationship which creates the probability of simultaneous occurrence of other such events. Therefore these types of events are highly unlikely to cause large-scale grid failures. Thus, this standard places the highest priority on the management of vegetation to prevent vegetation grow-ins.

## B. Requirements and Measures

**R1.** Each Transmission Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are either an element of an IROL, or an element of a Major WECC Transfer Path; operating within their Rating and all Rated Electrical Operating Conditions of the types shown below<sup>2</sup> [*Violation Risk Factor: High*] [*Time Horizon: Real-time*]:

1. An encroachment into the MVCD as shown in FAC-003-Table 2, observed in Real-time, absent a Sustained Outage,<sup>3</sup>
2. An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
3. An encroachment due to the blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
4. An encroachment due to vegetation growth into the MVCD that caused a vegetation-related Sustained Outage.<sup>4</sup>

**M1.** Each Transmission Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R1. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R1)

**R2.** Each Transmission Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are not either an element of an IROL, or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions of the types shown below<sup>2</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time*]:

1. An encroachment into the MVCD, observed in Real-time, absent a Sustained Outage,<sup>3</sup>
2. An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>
3. An encroachment due to blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage,<sup>4</sup>

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<sup>2</sup> This requirement does not apply to circumstances that are beyond the control of a Transmission Owner subject to this reliability standard, including natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, wind shear, fresh gale, major storms as defined either by the Transmission Owner or an applicable regulatory body, ice storms, and floods; human or animal activity such as logging, animal severing tree, vehicle contact with tree, or installation, removal, or digging of vegetation. Nothing in this footnote should be construed to limit the Transmission Owner's right to exercise its full legal rights on the ROW.

<sup>3</sup> If a later confirmation of a Fault by the Transmission Owner shows that a vegetation encroachment within the MVCD has occurred from vegetation within the ROW, this shall be considered the equivalent of a Real-time observation.

<sup>4</sup> Multiple Sustained Outages on an individual line, if caused by the same vegetation, will be reported as one outage regardless of the actual number of outages within a 24-hour period.

4. An encroachment due to vegetation growth into the line MVCD that caused a vegetation-related Sustained Outage<sup>4</sup>
- M2.** Each Transmission Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R2. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R2)
- R3.** Each Transmission Owner shall have documented maintenance strategies or procedures or processes or specifications it uses to prevent the encroachment of vegetation into the MVCD of its applicable lines that accounts for the following:
  - 3.1** Movement of applicable line conductors under their Rating and all Rated Electrical Operating Conditions;
  - 3.2** Inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency.  
[Violation Risk Factor: Lower] [Time Horizon: Long Term Planning]:
- M3.** The maintenance strategies or procedures or processes or specifications provided demonstrate that the Transmission Owner can prevent encroachment into the MVCD considering the factors identified in the requirement. (R3)
- R4.** Each Transmission Owner, without any intentional time delay, shall notify the control center holding switching authority for the associated applicable line when the Transmission Owner has confirmed the existence of a vegetation condition that is likely to cause a Fault at any moment [Violation Risk Factor: Medium] [Time Horizon: Real-time].
- M4.** Each Transmission Owner that has a confirmed vegetation condition likely to cause a Fault at any moment will have evidence that it notified the control center holding switching authority for the associated transmission line without any intentional time delay. Examples of evidence may include control center logs, voice recordings, switching orders, clearance orders and subsequent work orders. (R4)
- R5.** When a Transmission Owner is constrained from performing vegetation work on an applicable line operating within its Rating and all Rated Electrical Operating Conditions, and the constraint may lead to a vegetation encroachment into the MVCD prior to the implementation of the next annual work plan, then the Transmission Owner shall take corrective action to ensure continued vegetation management to prevent encroachments [Violation Risk Factor: Medium] [Time Horizon: Operations Planning].

- M5.** Each Transmission Owner has evidence of the corrective action taken for each constraint where an applicable transmission line was put at potential risk. Examples of acceptable forms of evidence may include initially-planned work orders, documentation of constraints from landowners, court orders, inspection records of increased monitoring, documentation of the de-rating of lines, revised work orders, invoices, or evidence that the line was de-energized. (R5)
- R6.** Each Transmission Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW<sup>5</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*].
- M6.** Each Transmission Owner has evidence that it conducted Vegetation Inspections of the transmission line ROW for all applicable lines at least once per calendar year but with no more than 18 calendar months between inspections on the same ROW. Examples of acceptable forms of evidence may include completed and dated work orders, dated invoices, or dated inspection records. (R6)
- R7.** Each Transmission Owner shall complete 100% of its annual vegetation work plan of applicable lines to ensure no vegetation encroachments occur within the MVCD. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made (provided they do not allow encroachment of vegetation into the MVCD) and must be documented. The percent completed calculation is based on the number of units actually completed divided by the number of units in the final amended plan (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) Examples of reasons for modification to annual plan may include [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]:
- Change in expected growth rate/ environmental factors
  - Circumstances that are beyond the control of a Transmission Owner<sup>6</sup>
  - Rescheduling work between growing seasons
  - Crew or contractor availability/ Mutual assistance agreements
  - Identified unanticipated high priority work
  - Weather conditions/Accessibility
  - Permitting delays
  - Land ownership changes/Change in land use by the landowner
  - Emerging technologies

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<sup>5</sup> When the Transmission Owner is prevented from performing a Vegetation Inspection within the timeframe in R6 due to a natural disaster, the TO is granted a time extension that is equivalent to the duration of the time the TO was prevented from performing the Vegetation Inspection.

<sup>6</sup> Circumstances that are beyond the control of a Transmission Owner include but are not limited to natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, ice storms, floods, or major storms as defined either by the TO or an applicable regulatory body.

- M7.** Each Transmission Owner has evidence that it completed its annual vegetation work plan for its applicable lines. Examples of acceptable forms of evidence may include a copy of the completed annual work plan (as finally modified), dated work orders, dated invoices, or dated inspection records. (R7)

## **C. Compliance**

### **1. Compliance Monitoring Process**

#### **1.1 Compliance Enforcement Authority**

Regional Entity

#### **1.2 Evidence Retention**

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The Transmission Owner retains data or evidence to show compliance with Requirements R1, R2, R3, R5, R6 and R7, Measures M1, M2, M3, M5, M6 and M7 for three calendar years unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

The Transmission Owner retains data or evidence to show compliance with Requirement R4, Measure M4 for most recent 12 months of operator logs or most recent 3 months of voice recordings or transcripts of voice recordings, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

If a Transmission Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all requested and submitted subsequent audit records.

#### **1.3 Compliance Monitoring and Enforcement Processes:**

Compliance Audit

Self-Certification

Spot Checking

Compliance Violation Investigation

Self-Reporting

Complaint

Periodic Data Submittal

#### 1.4 Additional Compliance Information

***Periodic Data Submittal:*** The Transmission Owner will submit a quarterly report to its Regional Entity, or the Regional Entity's designee, identifying all Sustained Outages of applicable lines operated within their Rating and all Rated Electrical Operating Conditions as determined by the Transmission Owner to have been caused by vegetation, except as excluded in footnote 2, and including as a minimum the following:

- The name of the circuit(s), the date, time and duration of the outage; the voltage of the circuit; a description of the cause of the outage; the category associated with the Sustained Outage; other pertinent comments; and any countermeasures taken by the Transmission Owner.

A Sustained Outage is to be categorized as one of the following:

- Category 1A — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, that are identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 2A — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 2B — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 3 — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines from outside the ROW;
- Category 4A — Blowing together: Sustained Outages caused by vegetation and applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW.

- Category 4B — Blowing together: Sustained Outages caused by vegetation and applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW.

The Regional Entity will report the outage information provided by Transmission Owners, as per the above, quarterly to NERC, as well as any actions taken by the Regional Entity as a result of any of the reported Sustained Outages.



**Table of Compliance Elements**

R#	Time Horizon	VRF	Violation Severity Level			
			Lower	Moderate	High	Severe
R1	Real-time	High	N/A	N/A	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-Table 2 was observed in real time absent a Sustained Outage.	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• A fall-in from inside the active transmission line ROW</li> <li>• Blowing together of applicable lines and vegetation located inside the active transmission line ROW</li> <li>• A grow-in</li> </ul>
R2	Real-time	Medium	N/A	N/A	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-Table 2 was observed in real time absent a Sustained Outage.	The Transmission Owner failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• A fall-in from inside the</li> </ul>

						<p>active transmission line ROW</p> <ul style="list-style-type: none"> <li>• Blowing together of applicable lines and vegetation located inside the active transmission line ROW</li> <li>• A grow-in</li> </ul>
R3	Long-Term Planning	Lower	N/A	The Transmission Owner has maintenance strategies or documented procedures or processes or specifications but has not accounted for the inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency, for the Transmission Owner’s applicable lines. (Requirement R3, Part 3.2)	The Transmission Owner has maintenance strategies or documented procedures or processes or specifications but has not accounted for the movement of transmission line conductors under their Rating and all Rated Electrical Operating Conditions, for the Transmission Owner’s applicable lines. Requirement R3, Part 3.1)	The Transmission Owner does not have any maintenance strategies or documented procedures or processes or specifications used to prevent the encroachment of vegetation into the MVCD, for the Transmission Owner’s applicable lines.
R4	Real-time	Medium	N/A	N/A	The Transmission Owner experienced a confirmed vegetation threat and notified the control center holding switching authority for that applicable line, but there was intentional delay in that notification.	The Transmission Owner experienced a confirmed vegetation threat and did not notify the control center holding switching authority for that applicable line.
R5	Operations Planning	Medium	N/A	N/A	N/A	The Transmission Owner did not take corrective action when it was constrained from performing planned vegetation work where an applicable line

						was put at potential risk.
R6	Operations Planning	Medium	The Transmission Owner failed to inspect 5% or less of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.)	The Transmission Owner failed to inspect more than 5% up to and including 10% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The Transmission Owner failed to inspect more than 10% up to and including 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The Transmission Owner failed to inspect more than 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).
R7	Operations Planning	Medium	The Transmission Owner failed to complete 5% or less of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 5% and up to and including 10% of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 10% and up to and including 15% of its annual vegetation work plan for its applicable lines (as finally modified).	The Transmission Owner failed to complete more than 15% of its annual vegetation work plan for its applicable lines (as finally modified).

**D. Regional Differences**

None.

**E. Interpretations**

None.

**F. Associated Documents**

Guideline and Technical Basis (attached).

## Guideline and Technical Basis

### Enforcement:

The Requirements within a Reliability Standard govern and will be enforced. The Requirements within a Reliability Standard define what an entity must do to be compliant and binds an entity to certain obligations of performance under Section 215 of the Federal Power Act. Compliance will in all cases be measured by determining whether a party met or failed to meet the Reliability Standard Requirement given the specific facts and circumstances of its use, ownership or operation of the bulk power system.

Measures provide guidance on assessing non-compliance with the Requirements. Measures are the evidence that could be presented to demonstrate compliance with a Reliability Standard Requirement and are not intended to contain the quantitative metrics for determining satisfactory performance nor to limit how an entity may demonstrate compliance if valid alternatives to demonstrating compliance are available in a specific case. A Reliability Standard may be enforced in the absence of specified Measures.

Entities must comply with the “Compliance” section in its entirety, including the Administrative Procedure that sets forth, among other things, reporting requirements.

The “Guideline and Technical Basis” section, the Background section and text boxes with “Examples” and “Rationale” are provided for informational purposes. They are designed to convey guidance from NERC’s various activities. The “Guideline and Technical Basis” section and text boxes with “Examples” and “Rationale” are not intended to establish new Requirements under NERC’s Reliability Standards or to modify the Requirements in any existing NERC Reliability Standard. Implementation of the “Guideline and Technical Basis” section, the Background section and text boxes with “Examples” and “Rationale” is not a substitute for compliance with Requirements in NERC’s Reliability Standards.”

### Effective dates:

The first two sentences of the Effective Dates section is standard language used in most NERC standards to cover the general effective date and is sufficient to cover the vast majority of situations. Five special cases are needed to cover effective dates for individual lines which undergo transitions after the general effective date. These special cases cover the effective dates for those

lines which are initially becoming subject to the standard, those lines which are changing their applicability within the standard, and those lines which are changing in a manner that removes their applicability to the standard.

Case 1 is needed because the Planning Coordinators may designate lines below 200 kV to become elements of an IROL or Major WECC Transfer Path in a future Planning Year (PY). For example, studies by the Planning Coordinator in 2011 may identify a line to have that designation beginning in PY 2021, ten years after the planning study is performed. It is not intended for the Standard to be immediately applicable to, or in effect for, that line until that future PY begins. The effective date provision for such lines ensures that the line will become subject to the standard on January 1 of the PY specified with an allowance of at least 12 months for the Transmission Owner to make the necessary preparations to achieve compliance on that line. The table below has some explanatory examples of the application.

<u>Date that Planning Study is completed</u>	<u>PY the line will become an IROL element</u>	<u>Date 1</u>	<u>Date 2</u>	<u>Effective Date The latter of Date 1 or Date 2</u>
05/15/2011	2012	05/15/2012	01/01/2012	05/15/2012
05/15/2011	2013	05/15/2012	01/01/2013	01/01/2013
05/15/2011	2014	05/15/2012	01/01/2014	01/01/2014
05/15/2011	2021	05/15/2012	01/01/2021	01/01/2021

Case 2 is needed because a line operating below 200kV designated as an element of an IROL or Major WECC Transfer Path may be removed from that designation due to system improvements, changes in generation, changes in loads or changes in studies and analysis of the network.

Case 3 is needed because a line operating at 200 kV or above that once was designated as an element of an IROL or Major WECC Transfer Path may be removed from that designation due to system improvements, changes in generation, changes in loads or changes in studies and analysis of the network. Such changes result in the need to apply R1 to that line until that date is reached and then to apply R2 to that line thereafter.

Case 4 is needed because an existing line that is to be operated at 200 kV or above can be acquired by a Transmission Owner from a third party such as a Distribution Provider or other end-user who was using the line solely for local distribution purposes, but the Transmission Owner, upon acquisition, is incorporating the line into the interconnected electrical energy transmission network which will thereafter make the line subject to the standard.

Case 5 is needed because an existing line that is operated below 200 kV can be acquired by a Transmission Owner from a third party such as a Distribution Provider or other end-user who was using the line solely for local distribution purposes, but the Transmission owner, upon acquisition, is incorporating the line into the interconnected electrical energy transmission network. In this special case the line upon acquisition was designated as an element of an Interconnection Reliability Operating Limit (IROL) or an element of a Major WECC Transfer Path.

#### **Defined Terms:**

##### **Explanation for revising the definition of ROW:**

The current NERC glossary definition of Right of Way has been modified to address the matter set forth in Paragraph 734 of FERC Order 693. The Order pointed out that Transmission Owners may in some cases own more property or rights than are needed to reliably operate transmission lines. This modified definition represents a slight but significant departure from the strict legal definition of “right of way” in that this definition is based on engineering and construction considerations that establish the width of a corridor from a technical basis. The pre-2007 maintenance records are included in the revised definition to allow the use of such vegetation widths if there were no engineering or construction standards that referenced the width of right of way to be maintained for vegetation on a particular line but the evidence exists in maintenance records for a width that was in fact maintained prior to this standard becoming mandatory. Such widths may be the only information available for lines that had limited or no vegetation easement rights and were typically maintained primarily to ensure public safety. This standard does not require additional easement rights to be purchased to satisfy a minimum right of way width that did not exist prior to this standard becoming mandatory.

##### **Explanation for revising the definition of Vegetation Inspections:**

The current glossary definition of this NERC term is being modified to allow both maintenance inspections and vegetation inspections to be performed concurrently. This allows potential efficiencies, especially for those lines with minimal vegetation and/or slow vegetation growth rates.

##### **Explanation of the definition of the MVCD:**

The MVCD is a calculated minimum distance that is derived from the Gallet Equations. This is a method of calculating a flash over distance that has been used in the design of high voltage transmission lines. Keeping vegetation away from high voltage conductors by this distance will prevent voltage flash-over to the vegetation. See the explanatory text below for Requirement R3 and associated Figure 1. Table 2 below provides MVCD values for various voltages and altitudes. Details of the equations and an example calculation are provided in Appendix 1 of the Technical Reference Document.

**Guidelines:**

**Requirements R1 and R2:**

R1 and R2 are performance-based requirements. The reliability objective or outcome to be achieved is the management of vegetation such that there are no vegetation encroachments within a minimum distance of transmission lines. Content-wise, R1 and R2 are the same requirements; however, they apply to different Facilities. Both R1 and R2 require each Transmission Owner to manage vegetation to prevent encroachment within the MVCD of transmission lines. R1 is applicable to lines that are identified as an element of an IROL or Major WECC Transfer Path. R2 is applicable to all other lines that are not elements of IROLs, and not elements of Major WECC Transfer Paths.

The separation of applicability (between R1 and R2) recognizes that inadequate vegetation management for an applicable line that is an element of an IROL or a Major WECC Transfer Path is a greater risk to the interconnected electric transmission system than applicable lines that are not elements of IROLs or Major WECC Transfer Paths. Applicable lines that are not elements of IROLs or Major WECC Transfer Paths do require effective vegetation management, but these lines are comparatively less operationally significant. As a reflection of this difference in risk impact, the Violation Risk Factors (VRFs) are assigned as High for R1 and Medium for R2.

Requirements R1 and R2 state that if inadequate vegetation management allows vegetation to encroach within the MVCD distance as shown in Table 2, it is a violation of the standard. Table 2 distances are the minimum clearances that will prevent spark-over based on the Gallet equations as described more fully in the Technical Reference document.

These requirements assume that transmission lines and their conductors are operating within their Rating. If a line conductor is intentionally or inadvertently operated beyond its Rating and Rated Electrical Operating Condition (potentially in violation of other standards), the occurrence of a clearance encroachment may occur solely due to that condition. For example, emergency actions taken by a Transmission Operator or Reliability Coordinator to protect an Interconnection may cause excessive sagging and an outage. Another example would be ice loading beyond the line's Rating and Rated Electrical Operating Condition. Such vegetation-related encroachments and outages are not violations of this standard.

Evidence of failures to adequately manage vegetation include real-time observation of a vegetation encroachment into the MVCD (absent a Sustained Outage), or a vegetation-related encroachment resulting in a Sustained Outage due to a fall-in from inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to the blowing together of the lines and vegetation located inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to a grow-in. Faults which do not cause a Sustained outage and which are confirmed to have been caused by vegetation encroachment within the MVCD are considered the equivalent of a Real-time observation for violation severity levels.

With this approach, the VSLs for R1 and R2 are structured such that they directly correlate to the severity of a failure of a Transmission Owner to manage vegetation and to the corresponding performance level of the Transmission Owner's vegetation program's ability to meet the objective of "preventing the risk of those vegetation related outages that could lead to Cascading." Thus violation severity increases with a Transmission Owner's inability to meet this goal and its potential of leading to a Cascading event. The additional benefits of such a combination are that it simplifies the standard and clearly defines performance for compliance. A performance-based requirement of this nature will promote high quality, cost effective vegetation management programs that will deliver the overall end result of improved reliability to the system.

Multiple Sustained Outages on an individual line can be caused by the same vegetation. For example initial investigations and corrective actions may not identify and remove the actual outage cause then another outage occurs after the line is re-energized and previous high conductor temperatures return. Such events are considered to be a single vegetation-related Sustained Outage under the standard where the Sustained Outages occur within a 24 hour period.

The MVCD is a calculated minimum distance stated in feet (or meters) to prevent spark-over, for various altitudes and operating voltages that is used in the design of Transmission Facilities. Keeping vegetation from entering this space will prevent transmission outages.

If the Transmission Owner has applicable lines operated at nominal voltage levels not listed in Table 2, then the TO should use the next largest clearance distance based on the next highest nominal voltage in the table to determine an acceptable distance.

**Requirement R3:**

R3 is a competency based requirement concerned with the maintenance strategies, procedures, processes, or specifications, a Transmission Owner uses for vegetation management.

An adequate transmission vegetation management program formally establishes the approach the Transmission Owner uses to plan and perform vegetation work to prevent transmission Sustained Outages and minimize risk to the transmission system. The approach provides the basis for evaluating the intent, allocation of appropriate resources, and the competency of the Transmission

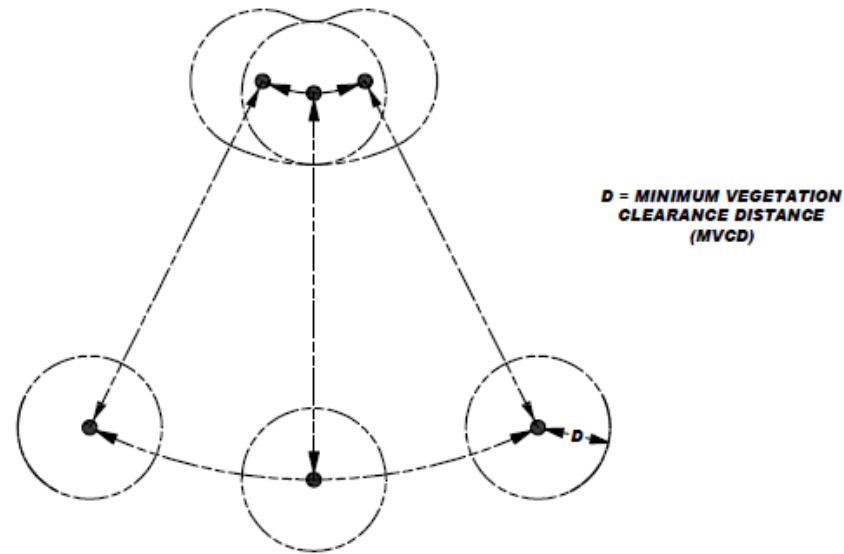


Owner in managing vegetation. There are many acceptable approaches to manage vegetation and avoid Sustained Outages. However, the Transmission Owner must be able to show the documentation of its approach and how it conducts work to maintain clearances.

An example of one approach commonly used by industry is ANSI Standard A300, part 7. However, regardless of the approach a utility uses to manage vegetation, any approach a Transmission Owner chooses to use will generally contain the following elements:

1. *the maintenance strategy used (such as minimum vegetation-to-conductor distance or maximum vegetation height) to ensure that MVCD clearances are never violated.*
2. *the work methods that the Transmission Owner uses to control vegetation*
3. *a stated Vegetation Inspection frequency*
4. *an annual work plan*

The conductor's position in space at any point in time is continuously changing in reaction to a number of different loading variables. Changes in vertical and horizontal conductor positioning are the result of thermal and physical loads applied to the line. Thermal loading is a function of line current and the combination of numerous variables influencing ambient heat dissipation including wind velocity/direction, ambient air temperature and precipitation. Physical loading applied to the conductor affects sag and sway by combining physical factors such as ice and wind loading. The movement of the transmission line conductor and the MVCD is illustrated in Figure 1 below. In the Technical Reference document more figures and explanations of conductor dynamics are provided.



**Figure 1**

A cross-section view of a single conductor at a given point along the span is shown with six possible conductor positions due to movement resulting from thermal and mechanical loading.

**Requirement R4:**

R4 is a risk-based requirement. It focuses on preventative actions to be taken by the Transmission Owner for the mitigation of Fault risk when a vegetation threat is confirmed. R4 involves the notification of potentially threatening vegetation conditions, without any intentional delay, to the control center holding switching authority for that specific transmission line. Examples of acceptable unintentional delays may include communication system problems (for example, cellular service or two-way radio disabled), crews located in remote field locations with no communication access, delays due to severe weather, etc.

Confirmation is key that a threat actually exists due to vegetation. This confirmation could be in the form of a Transmission Owner’s employee who personally identifies such a threat in the field. Confirmation could also be made by sending out an employee to evaluate a situation reported by a landowner.

Vegetation-related conditions that warrant a response include vegetation that is near or encroaching into the MVCD (a grow-in issue) or vegetation that could fall into the transmission conductor (a fall-in issue). A knowledgeable verification of the risk would include an assessment of the possible sag or movement of the conductor while operating between no-load conditions and its rating.

The Transmission Owner has the responsibility to ensure the proper communication between field personnel and the control center to allow the control center to take the appropriate action until or as the vegetation threat is relieved. Appropriate actions may include a temporary reduction in the line loading, switching the line out of service, or other preparatory actions in recognition of the increased risk of outage on that circuit. The notification of the threat should be communicated in terms of minutes or hours as opposed to a longer time frame for corrective action plans (see R5).

All potential grow-in or fall-in vegetation-related conditions will not necessarily cause a Fault at any moment. For example, some Transmission Owners may have a danger tree identification program that identifies trees for removal with the potential to fall near the line. These trees would not require notification to the control center unless they pose an immediate fall-in threat.

**Requirement R5:**

R5 is a risk-based requirement. It focuses upon preventative actions to be taken by the Transmission Owner for the mitigation of Sustained Outage risk when temporarily constrained from performing vegetation maintenance. The intent of this requirement is to deal with situations that prevent the Transmission Owner from performing planned vegetation management work and, as a result, have the potential to put the transmission line at risk. Constraints to performing vegetation maintenance work as planned could result from legal injunctions filed by property owners, the discovery of easement stipulations which limit the Transmission Owner's rights, or other circumstances.

This requirement is not intended to address situations where the transmission line is not at potential risk and the work event can be rescheduled or re-planned using an alternate work methodology. For example, a land owner may prevent the planned use of chemicals on non-threatening, low growth vegetation but agree to the use of mechanical clearing. In this case the Transmission Owner is not under any immediate time constraint for achieving the management objective, can easily reschedule work using an alternate approach, and therefore does not need to take interim corrective action.

However, in situations where transmission line reliability is potentially at risk due to a constraint, the Transmission Owner is required to take an interim corrective action to mitigate the potential risk to the transmission line. A wide range of actions can be taken to address various situations. General considerations include:

- Identifying locations where the Transmission Owner is constrained from performing planned vegetation maintenance work which potentially leaves the transmission line at risk.
- Developing the specific action to mitigate any potential risk associated with not performing the vegetation maintenance work as planned.
- Documenting and tracking the specific action taken for the location.
- In developing the specific action to mitigate the potential risk to the transmission line the Transmission Owner could consider location specific measures such as modifying the inspection and/or maintenance intervals. Where a legal constraint would not allow any vegetation work, the interim corrective action could include limiting the loading on the transmission line.
- The Transmission Owner should document and track the specific corrective action taken at each location. This location may be indicated as one span, one tree or a combination of spans on one property where the constraint is considered to be temporary.

**Requirement R6:**

R6 is a risk-based requirement. This requirement sets a minimum time period for completing Vegetation Inspections. The provision that Vegetation Inspections can be performed in conjunction with general line inspections facilitates a Transmission Owner's ability to meet this requirement. However, the Transmission Owner may determine that more frequent vegetation specific inspections are needed to maintain reliability levels, based on factors such as anticipated growth rates of the local vegetation, length of the local growing season, limited ROW width, and local rainfall. Therefore it is expected that some transmission lines may be designated with a higher frequency of inspections.

The VSLs for Requirement R6 have levels ranked by the failure to inspect a percentage of the applicable lines to be inspected. To calculate the appropriate VSL the Transmission Owner may choose units such as: circuit, pole line, line miles or kilometers, etc.

For example, when a Transmission Owner operates 2,000 miles of applicable transmission lines this Transmission Owner will be responsible for inspecting all the 2,000 miles of lines at least once during the calendar year. If one of the included lines was 100 miles long, and if it was not inspected during the year, then the amount failed to inspect would be  $100/2000 = 0.05$  or 5%. The "Low VSL" for R6 would apply in this example.

**Requirement R7:**

R7 is a risk-based requirement. The Transmission Owner is required to complete its an annual work plan for vegetation management to accomplish the purpose of this standard. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made and documented provided they do not put the transmission system at risk. The annual work plan requirement is not intended to necessarily require a “span-by-span”, or even a “line-by-line” detailed description of all work to be performed. It is only intended to require that the Transmission Owner provide evidence of annual planning and execution of a vegetation management maintenance approach which successfully prevents encroachment of vegetation into the MVCD.

For example, when a Transmission Owner identifies 1,000 miles of applicable transmission lines to be completed in the Transmission Owner’s annual plan, the Transmission Owner will be responsible completing those identified miles. If a Transmission Owner makes a modification to the annual plan that does not put the transmission system at risk of an encroachment the annual plan may be modified. If 100 miles of the annual plan is deferred until next year the calculation to determine what percentage was completed for the current year would be:  $1000 - 100$  (deferred miles) = 900 modified annual plan, or  $900 / 900 = 100\%$  completed annual miles.

If a Transmission Owner only completed 875 of the total 1000 miles with no acceptable documentation for modification of the annual plan the calculation for failure to complete the annual plan would be:  $1000 - 875 = 125$  miles failed to complete then,  $125$  miles (not completed) /  $1000$  total annual plan miles = 12.5% failed to complete.

The ability to modify the work plan allows the Transmission Owner to change priorities or treatment methodologies during the year as conditions or situations dictate. For example recent line inspections may identify unanticipated high priority work, weather conditions (drought) could make herbicide application ineffective during the plan year, or a major storm could require redirecting local resources away from planned maintenance. This situation may also include complying with mutual assistance agreements by moving resources off the Transmission Owner’s system to work on another system. Any of these examples could result in acceptable deferrals or additions to the annual work plan provided that they do not put the transmission system at risk of a vegetation encroachment.

In general, the vegetation management maintenance approach should use the full extent of the Transmission Owner’s easement, fee simple and other legal rights allowed. A comprehensive approach that exercises the full extent of legal rights on the ROW is superior to incremental management because in the long term it reduces the overall potential for encroachments, and it ensures that future planned work and future planned inspection cycles are sufficient.

When developing the annual work plan the Transmission Owner should allow time for procedural requirements to obtain permits to work on federal, state, provincial, public, tribal lands. In some cases the lead time for obtaining permits may necessitate preparing work plans more than a year prior to work start dates. Transmission Owners may also need to consider those special landowner requirements as documented in easement instruments.

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. Therefore, deferrals or relevant changes to the annual plan shall be documented. Depending on the planning and documentation format used by the Transmission Owner, evidence of successful annual work plan execution could consist of signed-off work orders, signed contracts, printouts from work management systems, spreadsheets of planned versus completed work, timesheets, work inspection reports, or paid invoices. Other evidence may include photographs, and walk-through reports.

FAC-003 — TABLE 2 — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Alternating Current** Voltages (feet)

( AC ) Nominal System Voltage (KV)	( AC ) Maximum System Voltage (kV) <sup>8</sup>	MVCD (feet)	MVCD (feet)	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet	MVCD feet
		Over sea level up to 500 ft	Over 500 ft up to 1000 ft	Over 1000 ft up to 2000 ft	Over 2000 ft up to 3000 ft	Over 3000 ft up to 4000 ft	Over 4000 ft up to 5000 ft	Over 5000 ft up to 6000 ft	Over 6000 ft up to 7000 ft	Over 7000 ft up to 8000 ft	Over 8000 ft up to 9000 ft	Over 9000 ft up to 10000 ft	Over 10000 ft up to 11000 ft
765	800	8.2ft	8.33ft	8.61ft	8.89ft	9.17ft	9.45ft	9.73ft	10.01ft	10.29ft	10.57ft	10.85ft	11.13ft
500	550	5.15ft	5.25ft	5.45ft	5.66ft	5.86ft	6.07ft	6.28ft	6.49ft	6.7ft	6.92ft	7.13ft	7.35ft
345	362	3.19ft	3.26ft	3.39ft	3.53ft	3.67ft	3.82ft	3.97ft	4.12ft	4.27ft	4.43ft	4.58ft	4.74ft
287	302	3.88ft	3.96ft	4.12ft	4.29ft	4.45ft	4.62ft	4.79ft	4.97ft	5.14ft	5.32ft	5.50ft	5.68ft
230	242	3.03ft	3.09ft	3.22ft	3.36ft	3.49ft	3.63ft	3.78ft	3.92ft	4.07ft	4.22ft	4.37ft	4.53ft
161*	169	2.05ft	2.09ft	2.19ft	2.28ft	2.38ft	2.48ft	2.58ft	2.69ft	2.8ft	2.91ft	3.03ft	3.14ft
138*	145	1.74ft	1.78ft	1.86ft	1.94ft	2.03ft	2.12ft	2.21ft	2.3ft	2.4ft	2.49ft	2.59ft	2.7ft
115*	121	1.44ft	1.47ft	1.54ft	1.61ft	1.68ft	1.75ft	1.83ft	1.91ft	1.99ft	2.07ft	2.16ft	2.25ft
88*	100	1.18ft	1.21ft	1.26ft	1.32ft	1.38ft	1.44ft	1.5ft	1.57ft	1.64ft	1.71ft	1.78ft	1.86ft
69*	72	0.84ft	0.86ft	0.90ft	0.94ft	0.99ft	1.03ft	1.08ft	1.13ft	1.18ft	1.23ft	1.28ft	1.34ft

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)

<sup>7</sup> The distances in this Table are the minimums required to prevent Flash-over; however prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at time of vegetation maintenance.

<sup>8</sup> Where applicable lines are operated at nominal voltages other than those listed, The Transmission Owner should use the maximum system voltage to determine the appropriate clearance for that line.

TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Alternating Current** Voltages (meters)

( AC ) Nominal System Voltage (KV)	( AC ) Maximum System Voltage (kV) <sup>8</sup>	MVCD meters  Over sea level up to 152.4 m	MVCD meters  Over 152.4 m up to 304.8 m	MVCD meters  Over 304.8 m up to 609.6m	MVCD meters  Over 609.6m up to 914.4m	MVCD meters  Over 914.4m up to 1219.2m	MVCD meters  Over 1219.2m up to 1524m	MVCD meters  Over 1524 m up to 1828.8 m	MVCD meters  Over 1828.8m up to 2133.6m	MVCD meters  Over 2133.6m up to 2438.4m	MVCD meters  Over 2438.4m up to 2743.2m	MVCD meters  Over 2743.2m up to 3048m	MVCD meters  Over 3048m up to 3352.8m
765	800	2.49m	2.54m	2.62m	2.71m	2.80m	2.88m	2.97m	3.05m	3.14m	3.22m	3.31m	3.39m
500	550	1.57m	1.6m	1.66m	1.73m	1.79m	1.85m	1.91m	1.98m	2.04m	2.11m	2.17m	2.24m
345	362	0.97m	0.99m	1.03m	1.08m	1.12m	1.16m	1.21m	1.26m	1.30m	1.35m	1.40m	1.44m
287	302	1.18m	0.88m	1.26m	1.31m	1.36m	1.41m	1.46m	1.51m	1.57m	1.62m	1.68m	1.73m
230	242	0.92m	0.94m	0.98m	1.02m	1.06m	1.11m	1.15m	1.19m	1.24m	1.29m	1.33m	1.38m
161*	169	0.62m	0.64m	0.67m	0.69m	0.73m	0.76m	0.79m	0.82m	0.85m	0.89m	0.92m	0.96m
138*	145	0.53m	0.54m	0.57m	0.59m	0.62m	0.65m	0.67m	0.70m	0.73m	0.76m	0.79m	0.82m
115*	121	0.44m	0.45m	0.47m	0.49m	0.51m	0.53m	0.56m	0.58m	0.61m	0.63m	0.66m	0.69m
88*	100	0.36m	0.37m	0.38m	0.40m	0.42m	0.44m	0.46m	0.48m	0.50m	0.52m	0.54m	0.57m
69*	72	0.26m	0.26m	0.27m	0.29m	0.30m	0.31m	0.33m	0.34m	0.36m	0.37m	0.39m	0.41m

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)



TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>7</sup>  
For **Direct Current** Voltages feet (meters)

(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)	(DC) Nominal Pole to Ground Voltage (kV)
	Over sea level up to 500 ft	Over 500 ft up to 1000 ft	Over 1000 ft up to 2000 ft	Over 2000 ft up to 3000 ft	Over 3000 ft up to 4000 ft	Over 4000 ft up to 5000 ft	Over 5000 ft up to 6000 ft	Over 6000 ft up to 7000 ft	Over 7000 ft up to 8000 ft	Over 8000 ft up to 9000 ft	Over 9000 ft up to 10000 ft	Over 10000 ft up to 11000 ft
	(Over sea level up to 152.4 m)	(Over 152.4 m up to 304.8 m)	(Over 304.8 m up to 609.6m)	(Over 609.6m up to 914.4m)	(Over 914.4m up to 1219.2m)	(Over 1219.2m up to 1524m)	(Over 1524 m up to 1828.8 m)	(Over 1828.8m up to 2133.6m)	(Over 2133.6m up to 2438.4m)	(Over 2438.4m up to 2743.2m)	(Over 2743.2m up to 3048m)	(Over 3048m up to 3352.8m)
±750	14.12ft (4.30m)	14.31ft (4.36m)	14.70ft (4.48m)	15.07ft (4.59m)	15.45ft (4.71m)	15.82ft (4.82m)	16.2ft (4.94m)	16.55ft (5.04m)	16.91ft (5.15m)	17.27ft (5.26m)	17.62ft (5.37m)	17.97ft (5.48m)
±600	10.23ft (3.12m)	10.39ft (3.17m)	10.74ft (3.26m)	11.04ft (3.36m)	11.35ft (3.46m)	11.66ft (3.55m)	11.98ft (3.65m)	12.3ft (3.75m)	12.62ft (3.85m)	12.92ft (3.94m)	13.24ft (4.04m)	13.54ft (4.13m)
±500	8.03ft (2.45m)	8.16ft (2.49m)	8.44ft (2.57m)	8.71ft (2.65m)	8.99ft (2.74m)	9.25ft (2.82m)	9.55ft (2.91m)	9.82ft (2.99m)	10.1ft (3.08m)	10.38ft (3.16m)	10.65ft (3.25m)	10.92ft (3.33m)
±400	6.07ft (1.85m)	6.18ft (1.88m)	6.41ft (1.95m)	6.63ft (2.02m)	6.86ft (2.09m)	7.09ft (2.16m)	7.33ft (2.23m)	7.56ft (2.30m)	7.80ft (2.38m)	8.03ft (2.45m)	8.27ft (2.52m)	8.51ft (2.59m)
±250	3.50ft (1.07m)	3.57ft (1.09m)	3.72ft (1.13m)	3.87ft (1.18m)	4.02ft (1.23m)	4.18ft (1.27m)	4.34ft (1.32m)	4.5ft (1.37m)	4.66ft (1.42m)	4.83ft (1.47m)	5.00ft (1.52m)	5.17ft (1.58m)

**Notes:**

The SDT determined that the use of IEEE 516-2003 in version 1 of FAC-003 was a misapplication. The SDT consulted specialists who advised that the Gallet Equation would be a technically justified method. The explanation of why the Gallet approach is more appropriate is explained in the paragraphs below.

The drafting team sought a method of establishing minimum clearance distances that uses realistic weather conditions and realistic maximum transient over-voltages factors for in-service transmission lines.

The SDT considered several factors when looking at changes to the minimum vegetation to conductor distances in FAC-003-1:

- avoid the problem associated with referring to tables in another standard (IEEE-516-2003)
- transmission lines operate in non-laboratory environments (wet conditions)
- transient over-voltage factors are lower for in-service transmission lines than for inadvertently re-energized transmission lines with trapped charges.

FAC-003-1 uses the minimum air insulation distance (MAID) without tools formula provided in IEEE 516-2003 to determine the minimum distance between a transmission line conductor and vegetation. The equations and methods provided in IEEE 516 were developed by an IEEE Task Force in 1968 from test data provided by thirteen independent laboratories. The distances provided in IEEE 516 Tables 5 and 7 are based on the withstand voltage of a dry rod-rod air gap, or in other words, dry laboratory conditions. Consequently, the validity of using these distances in an outside environment application has been questioned.

FAC-003-01 allowed Transmission Owners to use either Table 5 or Table 7 to establish the minimum clearance distances. Table 7 could be used if the Transmission Owner knew the maximum transient over-voltage factor for its system. Otherwise, Table 5 would have to be used. Table 5 represented minimum air insulation distances under the worst possible case for transient over-voltage factors. These worst case transient over-voltage factors were as follows: 3.5 for voltages up to 362 kV phase to phase; 3.0 for 500 - 550 kV phase to phase; and 2.5 for 765 to 800 kV phase to phase. These worst case over-voltage factors were also a cause for concern in this particular application of the distances.

In general, the worst case transient over-voltages occur on a transmission line that is inadvertently re-energized immediately after the line is de-energized and a trapped charge is still present. The intent of FAC-003 is to keep a transmission line that is *in service* from becoming de-energized (i.e. tripped out) due to spark-over from the line conductor to nearby vegetation. Thus, the worst case transient overvoltage assumptions are not appropriate for this application. Rather, the appropriate over voltage values are those that occur only while the line is energized.

Typical values of transient over-voltages of in-service lines, as such, are not readily available in the literature because they are negligible compared with the maximums. A conservative value for the maximum transient over-voltage that can occur anywhere along the length of an in-service ac line is approximately 2.0 per unit. This value is a conservative estimate of the transient over-

voltage that is created at the point of application (e.g. a substation) by switching a capacitor bank without pre-insertion devices (e.g. closing resistors). At voltage levels where capacitor banks are not very common (e.g. Maximum System Voltage of 362 kV), the maximum transient over-voltage of an in-service ac line are created by fault initiation on adjacent ac lines and shunt reactor bank switching. These transient voltages are usually 1.5 per unit or less.

Even though these transient over-voltages will not be experienced at locations remote from the bus at which they are created, in order to be conservative, it is assumed that all nearby ac lines are subjected to this same level of over-voltage. Thus, a maximum transient over-voltage factor of 2.0 per unit for transmission lines operated at 302 kV and below is considered to be a realistic maximum in this application. Likewise, for ac transmission lines operated at Maximum System Voltages of 362 kV and above a transient over-voltage factor of 1.4 per unit is considered a realistic maximum.

The Gallet Equations are an accepted method for insulation coordination in tower design. These equations are used for computing the required strike distances for proper transmission line insulation coordination. They were developed for both wet and dry applications and can be used with any value of transient over-voltage factor. The Gallet Equation also can take into account various air gap geometries. This approach was used to design the first 500 kV and 765 kV lines in North America.

If one compares the MAID using the IEEE 516-2003 Table 7 (table D.5 for English values) with the critical spark-over distances computed using the Gallet wet equations, for each of the nominal voltage classes and identical transient over-voltage factors, the Gallet equations yield a more conservative (larger) minimum distance value.

Distances calculated from either the IEEE 516 (dry) formulas or the Gallet “wet” formulas are not vastly different when the same transient overvoltage factors are used; the “wet” equations will consistently produce slightly larger distances than the IEEE 516 equations when the same transient overvoltage is used. While the IEEE 516 equations were only developed for dry conditions the Gallet equations have provisions to calculate spark-over distances for both wet and dry conditions.

While EPRI is currently trying to establish empirical data for spark-over distances to live vegetation, there are no spark-over formulas currently derived expressly for vegetation to conductor minimum distances. Therefore the SDT chose a proven method that has been used in other EHV applications. The Gallet equations relevance to wet conditions and the selection of a Transient Overvoltage Factor that is consistent with the absence of trapped charges on an in-service transmission line make this methodology a better choice.

The following table is an example of the comparison of distances derived from IEEE 516 and the Gallet equations.

**Comparison of spark-over distances computed using Gallet wet equations vs. IEEE 516-2003 MAID distances**

( AC ) Nom System Voltage (kV)	( AC ) Max System Voltage (kV)	Transient Over-voltage Factor (T)	Clearance (ft.) Gallet (wet) @ Alt. 3000 feet	Table 7 (Table D.5 for feet) IEEE 516-2003 MAID (ft) @ Alt. 3000 feet
765	800	2.0	14.36	13.95
500	550	2.4	11.0	10.07
345	362	3.0	8.55	7.47
230	242	3.0	5.28	4.2
115	121	3.0	2.46	2.1

**Rationale:**

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

**Rationale for Applicability (section 4.2.4):**

The areas excluded in 4.2.4 were excluded based on comments from industry for reasons summarized as follows: 1) There is a very low risk from vegetation in this area. Based on an informal survey, no TOs reported such an event. 2) Substations, switchyards, and stations have many inspection and maintenance activities that are necessary for reliability. Those existing process manage the threat. As such, the formal steps in this standard are not well suited for this environment. 3) NERC has a project in place to address at a later date the applicability of this standard to Generation Owners. 4) Specifically addressing the areas where the standard does and does not apply makes the standard clearer.

**Rationale for R1 and R2:**

Lines with the highest significance to reliability are covered in R1; all other lines are covered in R2.

**Rationale for the types of failure to manage vegetation which are listed in order of increasing degrees of severity in non-compliant performance as it relates to a failure of a Transmission Owner's vegetation maintenance program:**

1. This management failure is found by routine inspection or Fault event investigation, and is normally symptomatic of unusual conditions in an otherwise sound program.
2. This management failure occurs when the height and location of a side tree within the ROW is not adequately addressed by the program.
3. This management failure occurs when side growth is not adequately addressed and may be indicative of an unsound program.
4. This management failure is usually indicative of a program that is not addressing the most fundamental dynamic of vegetation management, (i.e. a grow-in under the line). If this type of failure is pervasive on multiple lines, it provides a mechanism for a Cascade.

**Rationale for R3:**

The documentation provides a basis for evaluating the competency of the Transmission Owner's vegetation program. There may be many acceptable approaches to maintain clearances. Any approach must demonstrate that the Transmission Owner avoids vegetation-to-wire conflicts under all Ratings and all Rated Electrical Operating Conditions. See Figure 1 for an illustration of possible conductor locations.

**Rationale for R4:**

This is to ensure expeditious communication between the Transmission Owner and the control center when a critical situation is confirmed.

**Rationale for R5:**

Legal actions and other events may occur which result in constraints that prevent the Transmission Owner from performing planned vegetation maintenance work.

In cases where the transmission line is put at potential risk due to constraints, the intent is for the Transmission Owner to put interim measures in place, rather than do nothing.

The corrective action process is not intended to address situations where a planned work methodology cannot be performed but an alternate work methodology can be used.

**Rationale for R6:**

Inspections are used by Transmission Owners to assess the condition of the entire ROW. The information from the assessment can be used to determine risk, determine future work and evaluate recently-completed work. This requirement sets a minimum Vegetation Inspection frequency of once per calendar year but with no more than 18 months between inspections on the same ROW. Based upon average growth rates across North America and on common utility practice, this minimum frequency is reasonable. Transmission Owners should consider local and environmental factors that could warrant more frequent inspections.

**Rationale for R7:**

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. It allows modifications to the planned work for changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors, provided that those modifications do not put the transmission system at risk of a vegetation encroachment.

**Version History**

<b>Version</b>	<b>Date</b>	<b>Action</b>	<b>Change Tracking</b>
1	TBA	1. Added “Standard Development Roadmap.” 2. Changed “60” to “Sixty” in section A, 5.2. 3. Added “Proposed Effective Date: April 7, 2006” to footer. 4. Added “Draft 3: November 17, 2005” to footer.	01/20/06
1	April 4, 2007	Regulatory Approval - Effective Date	New
2	November 3, 2011	Adopted by the NERC Board of Trustees	