

**Comment Form — 1<sup>st</sup> Posting of SAR for Revisions to Vegetation Management FAC-003-1**

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Please use this form to submit comments on the Vegetation Management SAR. Comments must be submitted by **February 14, 2007**. You may submit the completed form by e-mail to [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with the words "Vegetation Management" in the subject line. If you have questions, please contact Richard Schneider at [richard.schneider@nerc.net](mailto:richard.schneider@nerc.net) or by telephone at 609-452-8060.

<b>Individual Commenter Information</b>		
<b>(Complete this page for comments from one organization or individual.)</b>		
Name:	Ron Falsetti	
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NERC Region	<input type="checkbox"/>	Registered Ballot Body Segment
<input type="checkbox"/> ERCOT	<input type="checkbox"/>	1 — Transmission Owners
<input type="checkbox"/> FRCC	<input checked="" type="checkbox"/>	2 — RTOs, ISOs,
<input type="checkbox"/> MRO	<input type="checkbox"/>	3 — Load-serving Entities
<input checked="" type="checkbox"/> NPCC	<input type="checkbox"/>	4 — Transmission-dependent Utilities
<input type="checkbox"/> RFC	<input type="checkbox"/>	5 — Electric Generators
<input type="checkbox"/> SERC	<input type="checkbox"/>	6 — Electricity Brokers, Aggregators, and Marketers
<input type="checkbox"/> SPP	<input type="checkbox"/>	7 — Large Electricity End Users
<input type="checkbox"/> WECC	<input type="checkbox"/>	8 — Small Electricity End Users
<input type="checkbox"/> NA – Not Applicable	<input type="checkbox"/>	9 — Federal, State, Provincial Regulatory or other Government Entities
	<input type="checkbox"/>	10 — Regional Reliability Organizations, Regional Entities



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### Background Information:

FAC-003-1 is a relatively new standard that was approved in 2006. FAC-003 has some “fill-in-the-blank” components to eliminate. In addition, the following comments submitted by FERC and stakeholders need to be addressed in the refinement of the standard:

#### FERC NOPR

- Develop a minimum vegetation inspection cycle that allows variation for physical differences, as discussed above; and
- Remove the applicability to transmission lines operated at 200 kV and above so that the Reliability Standard applies to bulk power system transmission lines that have an impact of reliability as determined by the ERO.

#### FERC staff report

- Objections to use of IEEE standard

#### Stakeholder Comments

- Reliability Coordinator vs. Regional Reliability Organization
- Too weak on compliance
- Format inconsistencies

The improvements to the standard should bring the standard’s format and elements into conformance with the latest version of the *Reliability Standards Development Procedure* and the ERO Rules of Procedure.

The development may include other improvements to the standards deemed appropriate by the drafting team, with the consensus of stakeholders, consistent with establishing high quality, enforceable and technically sufficient bulk power system reliability standards.

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**You do not have to answer all questions. Enter All Comments in Simple Text Format.**

*Insert a "check" mark in the appropriate boxes by double-clicking the gray areas.*

1. Do you agree that there is a reliability-related need to address the proposed revisions to FAC-003-1 — Transmission Vegetation Management? If not, please explain in the comment area.

Yes

No

Comments:

2. Do you agree with the scope of the SAR? If not, please explain in the comment area.

Yes

No

Comments:

With respect to the item in the Brief Description section under FERC NOPR:

"Remove the applicability to transmission lines operated at 200 kV and above so that the Reliability Standard applies to Bulk Power System transmission lines that have an impact on reliability as determined by the ERO." It is the IESO's view that requiring the ERO to make these determinations, is inappropriate. We believe the standard should remain applicable to lines 200 kV and above and lines below 200 kV as determined by the Reliability Coordinator, similar to the PRC-023 standard.

The IESO also suggests that it be made clear in the SAR that it will be a complete review of the subject requirements: to include the addition, deletion and modification of requirements, as agreed to by public consensus.

3. Are there additional revisions, beyond those identified in the SAR that should be addressed within the scope of this project?

Yes

No

Comments: