

## Comment Form for Version 1 of “Transmission System Vegetation Management” SAR

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Note – This form is to comment on Version 1 of the “**Transmission System Vegetation Management**” SAR.

The latest version of this SAR (Transmission System Vegetation Management) is posted on the Standards web site at: [ftp://www.nerc.com/pub/sys/all\\_updl/standards/sar/Trans\\_Sys\\_Veg\\_Mgt\\_SAR\\_V1\\_052004.doc](ftp://www.nerc.com/pub/sys/all_updl/standards/sar/Trans_Sys_Veg_Mgt_SAR_V1_052004.doc)

E-mail this form between May 20 and June 21, 2004 to: [sarcomm@nerc.com](mailto:sarcomm@nerc.com) with “Comments” in the subject line.

If you have any questions about this Standards Draft Comment Form, please contact the Director of

### **Background:**

Version 1 of the “**Transmission System Vegetation Management**” SAR was developed by the Vegetation Management Task Force of the NERC Planning Committee’s Transmission Issues Subcommittee. The purpose of this SAR is to guide the development of a transmission system vegetation management standard that has as a goal the elimination of transmission outages from vegetation located on transmission rights-of-way (ROW), and minimizing outages from vegetation located adjacent to ROW. It will also establish a requirement to report vegetation related transmission outages for transmission lines above 200 kV

***Please review Version 1 of the SAR and complete this Comment Form to provide feedback to the SAR Drafting Team on the development of a Transmission System Vegetation Management Standard.***

**Commenter Information (For Individual Commenters)**

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Key to Industry Segment #'s:

- 1 – Trans. Owners**
- 2 – RTO's, ISO's, RRC's**
- 3 – LSE's**
- 4 – TDU's**
- 5 - Generators**
- 6 - Brokers, Aggregators, and Marketers
- 7 - Large Electricity End Users**
- 8 - Small Electricity Users**
- 9 - Federal, State, and Provincial  
Regulatory or other Govt. Entities



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2. If your answer to (1) is Yes, do you support the concepts for a standard described in this SAR? If not, please comment.

Yes

No

Comments:

- Development of New Line Routes: Long-term vegetation management plans for a particular installation should be addressed only in the maintenance stage because in the design stage the route can be modified until all the permits are received.
- Personnel Qualifications: The standard is oriented toward reliability. No personnel qualifications should be required in the document. The qualifications will vary between utilities and from personnel to personnel in the same utility. For example managers are budget oriented and should not be required to be certified in Vegetation management; in some other cases it may be required that a lineman would have to remove a tree too closed to an energized line, again he should not be certified because his main job is of an other nature.
- Field Audits: The standard should limit field audits only to Bulk Power System (BPS) transmission lines that have exhibited a level of performance below a normal threshold, i.e., failing to meet a performance metric that is yet to be determined (see Section 7, Other Comments). In addition, NYSRC recommends that random "spot checks" excluding "Danger Trees" be allowable and we further recommend that they are conducted triennially.

3. The Vegetation Management Task Force believes there should be a standard that defines acceptable clearances between vegetation and energized conductors, and this clearance standard should be the basis for any standard that is part of a transmission owner's vegetation management program. Do you agree that a clearance standard is necessary? If not, please comment.

Yes

No

Comments: In the absence of existing more stringent local or regulatory standards, a minimum clearance standard is necessary. This standard should take into consideration local or regulatory standards that have already been established and proven to be effective. It should also avoid the development of conflicting standards.

4. If your answer to (3) was yes, please suggest an appropriate standard(s). If your organization, State, or Regional Reliability Council has such a clearance standard, please provide a copy or a reference to such a standard.

Comments:

The New York Public Service Commission has "clearance standards".

5. The Vegetation Management Task Force believes funding that is based on the scope of the vegetation management program and the objectives to be achieved by the program is an essential

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component of a vegetation management annual work plan. Do you agree with this concept? If not, please provide comments.

Yes

No

Comments:

6. How would you recommend a transmission vegetation management standard be implemented after approval?

Comments:

We suggest that the NERC standard allow the TOs sufficient time to develop formalized procedures and trimming cycles, documentation of the progress and allow a reasonable and practical transition time for the industry, from the date it becomes effective, to achieve full compliance.

7. Do you have any other comments on this SAR?

Comments:

The standard only should apply to BPS transmission lines.

Consistency in reporting format should be sought for all entities that are requesting vegetation outage and trimming information. NERC should develop a single repository for all outage information and be capable of disseminating the information properly and to the correct entities. Given that an implementation plan and associated time period for coming into compliance is warranted, this might be a feasible solution.

The NYSRC also feels that an amount of flexibility must be afforded the TO due to a number of issues relating to trimming. Most notable are:

- Trees on adjacent property private, public or state owned;
- Railroad shared transmission ROWs that are difficult and costly to schedule outages on;
- More restrictive siting for transmission due to potentially increased clearances.

The NYSRC suggests that in the development of the actual Standard, consideration be given when developing the levels of non-compliance to exclude tree related outages caused by extreme system conditions such as hurricanes.

The standard should identify compliance metrics and performance thresholds for these metrics. These metrics should include frequency and duration of vegetation related transmission outages. The metrics should be reported for all transmission lines to which the standard applies.

A vegetation related transmission outage is an unplanned event that involves contact with or flashover to vegetation. These shall include flashovers to vegetation which are induced by lightning strikes.