



8/15/2007

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Re: SERC Vegetation Management Subcommittee (VMS) Comments on TADS Report and Manual

In response to NERC's Request for *Public Comment on TADS Report and Manual* dated June 28, 2007, the following comments are provided per section *B. Comment Questions*. These comments represent the consensus of the SERC VMS members.

Question

2. Is the data being requested reasonable and obtainable? See Section 3 of the Report. If "no," please explain.

Answer: Not enough is known about the intended use of the data requested to determine if it is reasonable. The VMS feels that uncertainties related to reporting vegetation related momentary operations will be very misleading. We have dealt with this issue extensively over the last 3 years and conclude that the expenses of investigations necessary to provide consistency in such reporting would outweigh any perceived benefit of such an endeavor. Additionally, issues related to vegetation that is accidentally cut into lines by loggers, property owners and even rights-of-way workers have no value in determining the impact that trees have on grid instability or cascading blackouts. Storms, floods, land slides, forest fires and other disasters that damage vegetation that result in immediate or delayed interruptions should not be classified as caused by the vegetation.

Question

5. Is the implementation schedule for Phase I TADS for 2008 reasonable? See Section 5.3.1 of the Report. If 'no,' please explain.

Answer: No.

An undertaking of this magnitude will take significantly more time than proposed. The VMS suggests that 24-36 months be added to the proposed reporting deadlines.

Question

6. Are there ambiguities in the Manual that need clarification? If "yes," please explain.

Answer: Yes

- We recommend changing the definition of an automatic outage as follows:
Automatic Outage - Any loss of the ability to supply partial or continuous power flow through a system Element by valid or invalid action of protective systems and/or control systems.
Note: include single pole operations and events such as, dropping a pole in a breaker via a failed lift rod, switches burning clear on one pole and breakers mechanically falling off the latch.

- We recommend adding a definition to Section B. Outage Reporting Definitions to capture if maintenance intervention was necessary or not to allow operations to restore service. Such an attribute would apply only to automatic outages.
- Intervention Required Outage - Any automatic outage that required active intervention on the part of the utility to return the outage Element to service. Such active intervention includes any repairs to lines or equipment, removal of foreign interference, or removal of vegetation.
- The definition of Cause Codes Types for Vegetation is problematic. Currently in FAC-003-1 the definition of vegetation events excludes human errors for contractors inadvertently felling trees into lines. We recommend changes to be consistent with that standard.

Members of the SERC VMS who developed these comments:

Richard Dearman	Tennessee Valley Authority
Jerry Lindler	S.C. Electric & Gas Co.
Randy Gann	Alabama Power Company
Billy George	Duke Energy Carolinas
Marc Tunstall	Fayetteville Public Works Commission
Jack Gardner	Progress Energy
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