

Summary Considerations FAC-003-2
Second Industry Comment Period (9/10/09 to 10/24/09)

Background:

On January 14, 2010, the NERC Standards Committee endorsed the use of Project 2007-07 Vegetation Management as the prototype for the proof-of-concept for using the results-based criteria for developing a reliability standard. The results-based initiative is intended to focus the collective effort of NERC and industry participants on improving the clarity and quality of NERC reliability standards by developing performance, risk and competency-based requirements that accomplish a reliability objective through a defense-in-depth strategy, while eliminating documentation-driven requirements that do not have an impact on bulk power system reliability.

The Standards Committee directed the Vegetation Management SDT to stop work in refining its second draft of the Vegetation Management standard but to inform stakeholders on how the team had used stakeholder comments to refine the technical requirements carried over into draft 3 of the standard.

This report provides a copy of each of the questions that was posted for stakeholder comment with the second draft of FAC-003-2, and a summary indicating how the drafting team used stakeholder comments submitted in response to that question. The questions included in the second comment form provided explicit references to either background information provided in the comment form or to specific requirements or other elements in the standard and have been paraphrased here.

All questions asked and all comments provided by stakeholders have been posted at the following site:

http://www.nerc.com/filez/standards/Vegetation-Management_Project_2007-7.html

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Question 1

In response to industry comments, the Requirement for documentation of a TVMP was revised to clarify that the objective of the TVMP is to improve reliability by preventing Sustained Outages due to vegetation. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R1:

- R1.** Each Transmission Owner shall have a documented transmission vegetation management program that describes how it conducts work on its Active Transmission Line Rights of Way to prevent Sustained Outages due to vegetation, considering all possible locations the conductor may occupy under the effects of sag and sway throughout its operating range under rated conditions. The transmission vegetation management program shall: *[Violation Risk Factor – Lower][Time Horizon – Long-term planning]*
- 1.1.** Specify the methods that the Transmission Owner may use to control vegetation.¹
 - 1.2.** Specify a Vegetation Inspection frequency of at least once per calendar year that takes into account local² and environmental factors.
 - 1.3.** Require an annual work plan. An annual work plan shall:
 - 1.3.1.** Identify the applicable lines to be maintained
 - 1.3.2.** Identify the work to be performed and methods to be used
 - 1.3.3.** Be flexible to adjust to changing conditions and to findings from Vegetation Inspections. Adjustments to the plan within the year are permissible.
 - 1.3.4.** Take into consideration permitting and scheduling requirements from landowners or regulatory authorities.
 - 1.4.** Require a process or procedure for response to an imminent threat of a vegetation-related Sustained Outage. The process or procedure shall specify actions which shall include communication of the threat to the responsible control center.
 - 1.5.** Specify an interim corrective action process for use when the Transmission Owner is temporarily constrained from performing vegetation maintenance as planned.
 - 1.6.** Specify the maintenance strategies used (such as minimum vegetation-to-conductor distance or maximum vegetation height) to ensure that Table 1 clearances in Attachment 1 are never violated. The maintenance strategies shall consider the sag and sway of the conductor throughout its operating range under rated conditions.

Summary Consideration: The vast majority of comments for this Question related to the Annual Vegetation Inspection frequency. Those commenters believed that a once/year mandate was too prescriptive and preferred to let the Transmission Owner choose a frequency.

¹ ANSI A300, Tree Care Operations – Tree, Shrub, and Other Woody Plant Maintenance – Standard Practices, while not a requirement of this standard, is considered to be an industry best practice.

² Local factors include items such as treatment cycle, extent and type of treatment, and their relationship to the normal growth rate.

After reviewing Order 693 in its entirety, the SDT set the frequency at once/year to avoid a fill-in-the-blank requirement and establish a reasonable frequency for most regions. However, the SDT also made it explicitly clear that this Vegetation Inspection can be combined with other line inspections to allow maximum flexibility in meeting this requirement. The vast majority of other comments dealt with specific wording in the Draft 2, Requirement 1. In an effort to be less prescriptive, the new Draft has removed most of the text that commenters wanted changed.

Question 2

In response to industry comments, the Requirement for implementation of Imminent Threat process/procedure was revised. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R2:

R2. Each Transmission Owner shall implement its imminent threat process or procedure when the Transmission Owner has actual knowledge of such a threat, obtained through normal operating practices. [*Violation Risk Factor – Medium*][*Time Horizon – Real Time*]

Summary Consideration: Ninety percent of respondents agreed with Requirement 2 (Implementation of the Imminent Threat Process). No major themes of disagreement surfaced. Two respondents expressed confusion between the NERC defined term “Operating Process” and the language “operating practices” used in R2. Two respondents preferred more specificity in the requirement for audit purposes, one respondent suggested changing “actual knowledge” to “confirmed” and one respondent expressed concerns about proving a negative. Two other respondents had comments that were more appropriate for questions 1 & 4 and are answered there.

The SDT considered all comments and essentially retained all the previous language in the new draft. Of note, the term “actual knowledge” was changed to “verified knowledge” based on the guidelines for Requirements with the new standard format. This change still retains its meaning that the Transmission Owner “confirmed” the potential threat prior to initiating the Imminent Threat process.

Proposed requirement in Draft 3 of FAC-003-2:

R5. Each Transmission Owner shall take interim corrective action when it is temporarily constrained from performing planned vegetation work, where a Transmission Line is put at potential risk due to the constraint.

Question 3

In response to industry comments, the Requirement for conducting Vegetation Inspections was revised. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R3:

R3. Each Transmission Owner shall conduct Vegetation Inspections of all applicable lines (as measured in line miles) in accordance with the frequency specified in its transmission vegetation management program, unless constrained by natural disasters. When constrained by a natural disaster, the Transmission Owner shall conduct the Vegetation Inspection(s) within six months or a period agreed to by its Regional Entity, whichever is greater.
[Violation Risk Factor – Medium][Time Horizon – Operations Planning]

Summary Consideration: Eight commenters perceived an inconsistency in the inspection frequency required between Requirement 1.2 and Requirement R3. Eleven (11) respondents felt an inspection frequency of longer than once per calendar year should be acceptable, the required frequency for inspection was unclear, or that the requirement should simply state an inspection interval of once per calendar year. Five comments (5) noted that the Requirement R3 exception for non performance due to natural disasters should be expanded, re-organized, or re-worded to be more clear or include a number of additional situations including disease or species epidemics. Several entities (6) expressed a concern over the use of the term “line miles” in the performance measures for this requirement. Finally, a few comments (2) were received that suggested the phrase “all applicable lines” be removed from the requirement.

With this new Draft, the Standards Drafting Team has removed 1.2 which eliminates any perceived confusion. After reviewing Order 693 in its entirety, the SDT re-established the frequency at once/year to avoid a fill-in-the-blank requirement and establish a reasonable frequency for most regions. However, the SDT also made it explicitly clear that this Vegetation Inspection can be combined with other line inspections to allow maximum flexibility in meeting this requirement. The FAC-003-2 Draft 3 includes a general, and more inclusive, Force Majeure section which applies to the entire Standard. The Standards Drafting Team responded to industry comments about the term “line miles”. There is now more explanation of this term in the VSL for R6.”

Question 4

In response to industry comments, the Requirement for preventing vegetation encroachments was revised. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R4:

R4. Each Transmission Owner shall prevent encroachment of vegetation into the Minimum Vegetation Clearance Distances (MVCD) listed in FAC-003-2 - Attachment 1 for its applicable lines as observed in real-time operating between no-load and their Rating, with the following exceptions: [*Violation Risk Factor – Medium*][*Time Horizon – Real Time*]

- Encroachment into the MVCD listed in FAC-003-2-Attachment 1 resulting from natural disasters.³
- Encroachment into the MVCD listed in FAC-003-2-Attachment 1 resulting from human or animal activity.⁴
- Encroachment into the MVCD listed in FAC-003-2-Attachment 1 resulting from falling vegetation.

Summary Consideration: Fifty-two percent (32 of 62) of the respondents disagreed with various aspects of Requirement 4 (Preventing Vegetation Encroachments). A major theme from 19 responses requested clarification on the fall-in tree exemption particularly when a fall-in tree may be lodged in another tree. The following six minor themes were identified:

- Requested the use of the word “critical” rather than “minimum” to aide with public perception (7 responses)
- Clarification on operating beyond emergency ratings (7 responses)
- Clarification on what is meant by “observed in real-time”(6 responses)
- Requested a force majeure exemption be added (5 responses)
- Requested observations be done by qualified observers (4 responses)
- Requested to eliminate R4 (4 responses).
- Requested an interpolation in the clearance tables for altitude(2 responses)
- Identified “Double Jeopardy” concern between Requirement 4 and the outage Requirements(1 response)

The SDT considered all comments and determined that two of these were significant enough to change the standard - the SDT combined the outage requirements (R5, R6, R7 and R8) with the encroachment requirement (R4). The SDT determined the other comments could be adequately addressed as modifications for clarity to the Technical Reference Document.

³ Examples include, but are not limited to, 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.

⁴ Examples include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or agricultural activities, or removal or digging of vegetation.

Question 5

In response to industry comments, the Requirement for preventing Sustained Outages due to grow-ins on IROL or Major WECC Transfer Paths was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R5:

R5. Each Transmission Owner shall prevent Sustained Outages⁵ of applicable lines that are identified as an element of an Interconnection Reliability Operating Limit (IROL) (or Major WECC Transfer Path) due to vegetation growing into a conductor operating between no-load and its Rating, with the following exceptions: [*Violation Risk Factor – High*][*Time Horizon – Real Time*]

- Sustained Outages of applicable lines that result from natural disasters.
- Sustained Outages of applicable lines that result from human or animal activity.

Summary Consideration: Commenters generally agreed with R5 in draft 2. The most significant issues that the SDT needed to consider were: the addition of other exclusionary conditions, the prima facie double jeopardy that exists with this requirement and R4, the lack of robust VSLs, and the need for further clarity on terms and concepts (e.g. rating, minimum).

Finally, a few commenters noted that this requirement is structured unlike other conventional NERC standard requirements in that it does not say what must be accomplished for reliability (and compliance) but rather says what must NOT be done.

The SDT considered these comments and determined that two of these were significant enough to change the standard - the SDT combined the outage requirements (R5, R6, R7 and R8) with the encroachment requirement (R4), with one combined Requirement for IROLs/Major WECC Transfer Paths and another combined Requirement for all other lines. A broadened Force Majeure section was added to the applicability section of the standard. Additionally, the new R1 and R2 in this Draft were reworded to describe what must be done.

⁵ Multiple Sustained Outages on an individual line, if caused by the same vegetation, shall be considered as one outage regardless of the actual number of outages within a 24-hour period.

Question 6

In response to industry comments, the Requirement for preventing Sustained Outages due to grow-ins on non-IROL or Major WECC Transfer Paths was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R6:

R6. Each Transmission Owner shall prevent Sustained Outages of applicable lines that are not an element of an IROL (or major WECC Transfer Path) due to vegetation growing into a conductor operating between no-load and its Rating, with the following exceptions:

[Violation Risk Factor – Medium][Time Horizon – Real Time]

- Sustained Outages of applicable lines that result from natural disasters.
- Sustained Outages of applicable lines that result from human or animal activity.

Summary Consideration: Commenters generally agreed with R6 in draft 2. The most significant issues that the SDT needed to consider were: the addition of other exclusionary conditions, the prima facie double jeopardy that exists with this requirement and R4, the lack of robust VSLs, and the need for further clarity on terms and concepts (e.g. rating, minimum).

Finally, a few commenters noted that this requirement is structured unlike other conventional NERC standard requirements in that it does not say what must be accomplished for reliability (and compliance) but rather says what must NOT be done.

The SDT considered these comments and determined that two of these were significant enough to change the standard and have combined the outage requirements (R5, R6, R7 and R8) with this encroachment requirement (R4), with one combined Requirement for IROLs/Major WECC Transfer Paths and another combined Requirement for all other lines. A broadened Force Majeure section was added to the applicability section of the standard. Additionally, the new R1 and R2 in this Draft were reworded to describe what must be done.

Question 7

In response to industry comments, the Requirement for preventing Sustained Outages due to blowing together of vegetation and transmission line conductors was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R7:

R7. Each Transmission Owner shall prevent Sustained Outages of applicable lines due to the blowing together of vegetation and a conductor within an Active Transmission Line Right of Way (operating within design blow-out conditions) with the following exception:

[Violation Risk Factor – Medium][Time Horizon – Real Time]

- Sustained Outages of applicable lines that result from natural disasters or wind-blown debris.

Summary Consideration: Approximately 70% of the respondents agreed with Requirement R7. Among the commenters who disagreed, a major comment issue pertains to the definition of the Active Transmission Line ROW which is further split into two sub issues.

- The first sub issue relates to a desire for a more descriptive definition of Active ROW.
- The other sub issue suggests the elimination of Active ROW.

A minority comment area pertains to altering the requirement to become more performance based with a graduated set of VSLs.

The SDT believes that the definition of “active transmission right-of-way” is appropriate for meeting the objectives of the Standard. This topic is addressed in the *Guideline and Technical Basis* section of this of FAC-003-2 Draft 3. The SDT considered the other comments and determined that two of these were significant enough to change the standard - the SDT combined the outage requirements (R5, R6, R7 and R8) with this encroachment requirement (R4), with one combined Requirement for IROLs/Major WECC Transfer Paths and another combined Requirement for all other lines. A broadened Force Majeure section was added to the applicability section of the standard. Additionally, the new R1 and R2 in this Draft were reworded to describe what must be done.

Question 8

In response to industry comments, the Requirement for preventing Sustained Outages due to fall-ins of vegetation was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R8:

R8. Each Transmission Owner shall prevent Sustained Outages of applicable lines due to vegetation falling into a conductor from within an Active Transmission Line Right of Way with the following exceptions: *[Violation Risk Factor – Medium] [Time Horizon – Real Time]*

- Sustained Outages of applicable lines that result from natural disasters or wind-blown debris.
- Sustained Outages of applicable lines that result from human or animal activity.

Summary Consideration: Approximately 78% of the respondents agreed with the Requirement R8. Among the commenters who disagree, a major comment pertains to the definition of Active Transmission Line ROW which is further split up into two sub issues.

- The first sub issue relates to a desire for a more descriptive/quantitative definition of the Active Transmission Line ROW.
- The other sub issue suggests the elimination of Active Transmission Line ROW.

A minority comment area pertains to altering the requirement to become more performance based with a graduated set of VSL's.

The SDT believes that the definition of “active transmission right-of-way” is appropriate for meeting the objectives of the Standard. This topic is addressed in the *Guideline and Technical Basis* section of FAC-003-2 Draft 3. The SDT considered the other comments and determined that two of these were significant enough to change the standard and have combined the outage requirements (R5, R6, R7 and R8) with this encroachment requirement (R4), with one combined Requirement for IROLs/Major WECC Transfer Paths and another combined Requirement for all other lines. A broadened Force Majeure section was added to the applicability section of the standard. Additionally, the new R1 and R2 in this Draft were reworded to describe what must be done.

Question 9

In response to industry comments, the Requirement for implementation of annual work plan was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R9:

R9. Each Transmission Owner shall implement its annual work plan for vegetation management to accomplish the purpose of this standard. [*Violation Risk Factor – Medium*] [*Time Horizon – Operations Planning*]

Summary Consideration: A majority of commenters requested the restoration of the phrase “subject to legal rights,” citing that doing so would improve the ability of TO’s in expediting approvals for access. A few comments objected to the phrase “to accomplish the purpose of the standard” citing it was superfluous. A minority of comments pertained to the extent and effect of the phrase “within the year”. Commenters pointed out that carryover work into the next year is not possible with the requirement 1.3 as written.

In response to overwhelming industry comments from the first posting of the draft standard, the SDT removed the words “within the extent of its easements and/or legal rights”. The concern expressed by the first commenters pertained to avoiding the situation where the expectation is for the transmission Owner to exercise its fullest legal rights when not needed. The SDT did remove the two phrases for clarity and in keeping with the guidelines for this new form of standard development. And sections 1.3.3 and 1.3.4 which were subject to misinterpretation have been removed.

Question 10

In response to industry comments, the Requirement for the preparation of list for sub 200kV transmission lines by the Planning Coordinator was developed. Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R10:

R10. Each Planning Coordinator shall prepare and review annually, a list of lines that are operated below 200kV, if any, which are subject to this standard. Each Planning Coordinator shall consult with its Transmission Owner(s) and neighboring Planning Coordinators to obtain input to develop the list. *[Violation Risk Factor – Lower]*
[Time Horizon – Long-term Planning]

Summary Consideration: An overwhelming majority of respondents agreed with this requirement as found in the second draft. For those commenters that disagreed with the requirement, three concepts arose. First, some commenters note that a similar identification of important circuit exists in FAC-014 and as such this requirement is unnecessary. The second issue expressed involves the interaction between the TO and the PC. There was concern that the word “consult” was ambiguous and that the mere preparation of the list did not ensure that the TO would be provided the list. The last group opined that this requirement for the actual preparation of the list could be combined with the requirement to establish a methodology (R11) since either one is toothless without the other.

After reviewing these comments as well as a complete analysis of Draft 2 with respect to the guidelines for this new results-based standard development process, the Requirements dealing with the Planning Coordinator have been removed. For sub-200 kV lines, the applicability will derive from identification of Transmission Lines associated with IROLs or as Major WECC Transfer Paths - analysis already exists for both of these.

Question 11

In response to industry comments, the Requirement for the Planning Coordinator to document method for identification of applicable sub-200kV transmission lines was developed.

Additionally the SDT assigned Time Horizons, Violation Risk Factors, and Violation Severity Levels. Do you agree? If not, please explain and propose an alternative.

Second draft of proposed R11:

R11. Each Planning Coordinator shall develop and document its method for assessing the reliability significance of sub-200kV transmission lines whose loss would place the grid at an unacceptable risk of instability, separation, or cascading failures. [*Violation Risk Factor – Lower*] [*Time Horizon – Long-term Planning*]

Summary Consideration: An overwhelming majority of respondents agreed with this requirement as found in the second draft. For those commenters that disagreed with the requirement the most common concern was that a similar identification of important circuit exists in FAC-014 and as such this requirement is unnecessary or duplicative. Two minor opinions also arose, one that all lines should be included in this standard, regardless of voltage, the other that no lines operating at voltage less than 200kV should be included.

After reviewing these comments as well as a complete analysis of Draft 2 with respect to the guidelines for this new results-based standard development process, the Requirements dealing with the Planning Coordinator have been removed. For sub-200 kV lines, the applicability will derive from identification of Transmission Lines associated with IROLs or as Major WECC Transfer Paths - analysis already exists for both of these.

Question 12

The SDT received suggestions from commenters to re-sequence the requirements contained in the standard to improve the logical flow of this document. The SDT submits for consideration a proposed alternative sequence. Do you agree with the proposed alternative sequencing? If not, please recommend a suggested sequence.

Summary Consideration: With only one exception, every commenter agreed that some re-sequencing was logical and appropriate. All others that disagreed with the SDT proposal included alternative sequences.

The SDT has rewritten the Requirements and re-sequenced those remaining by Results-based - type requirements, i.e., competency-based, risk-based, or performance-based.

Question 13

The Implementation Plan proposes an effective date that gives entities at least a year to become fully compliant. Do you agree with this implementation plan? If not, please indicate what should be changed and indicate why.

Summary Consideration: Most commenters felt that the proposed implementation was acceptable. However, a sizable number found this proposed Revision to be far superior to the current in-force standard and would like the SDT to consider options to expedite the implementation. One commenter indicated they would need more time.

The SDT has chosen to retain the implementation plan, rather than attempt an expedited schedule, with FAC-003-2 Draft 3.

Question 14

Do you have further questions about the standard that the Technical Reference document (White Paper) does not clear up? If so, please elaborate and propose additions.

Summary Consideration: The most prevalent comment requested revisions to the Diagrams to eliminate trees in impermissible areas. Another popular comment dealt with a change to the Active Transmission Line Right of Way. Some commenters wanted the SDT to address the Generator Interconnection Facility (GIF) issue. And finally, a few commenters wanted a change in the phrase “operating range” and in an expanded Force Majeure section.

The SDT will modify the Drawings as requested and they will be provided in the Technical Reference Document which is planned to be posted on March 23rd 2010.

The SDT slightly modified the definition of Active Transmission Line Right of Way as shown:

Active Transmission Line Right of Way — A strip or corridor of land that is occupied by active Transmission facilities. This corridor does not include the parts of the Right-of-Way that are unused or intended for other facilities.

The SDT is aware of the GIF issue, i.e. 200 kV, and above, circuits owned by Generator Owners which have in some instances been considered Transmission Lines. NERC created a team to address this issue for all NERC standards. The product of that team was a report of suggested changes that will be addressed by a NERC drafting team. As such this draft of FAC-003 does not include any of those recommendations as they may apply to this standard.

The phrase “operating range” has been re-written to use all NERC terms and a general Force Majeure section has been added to the applicability section of the standard.

Question 15

In response to industry comments, the applicability section is revised to replace Reliability Coordinator with Planning Coordinator. Do you agree with these changes? If not, please explain and propose an alternative.

Summary Consideration: The vast majority of commenters agreed the Planning Coordinator was the appropriate entity. A common concern of those who disagreed was that the Planning Coordinator role is not defined, not well defined, or duplicated in practice. (The SDT believes that this is registration/Functional Model problem not suited for resolution in this standard.) Only one commenter suggested the Reliability Coordinator was more appropriate for technical reasons, opining that the Reliability Coordinator was better suited to determine the importance of lines.

After reviewing these comments as well as a complete analysis of Draft 2 with respect to the guidelines for this new results-based standard development process, the Requirements dealing with the Planning Coordinator have been removed. For sub-200 kV lines, the applicability will derive from identification of Transmission Lines associated with IROLs or as Major WECC Transfer Paths - analysis already exists for both of these.

Question 16

In response to industry comments, changes were made to the definitions. Do you agree with these changes? If not, please explain and propose an alternative.

Definitions proposed with FAC-003-2 Draft 2:

Active Transmission Line Right of Way — A strip of land that is occupied by active transmission facilities. This corridor does not include the inactive or unused part of the Right of Way intended for other facilities.

Vegetation Inspection — The systematic examination of vegetation conditions on an Active Transmission Line Right of Way. This inspection may be combined with a general line inspection. The inspection includes the documentation of any vegetation that may pose a threat to reliability prior to the next planned inspection or maintenance work, considering the current location of the conductor and other possible locations of the conductor due to sag and sway for rated conditions.

Summary Consideration: A majority of commenters expressed a concern with the Active Transmission Line ROW definition ranging from unnecessary to requiring modification. Those who recommended modification cited an issue with the phrase “intended for other facilities”. The belief is this phrase might preclude certain parts of a ROW from being considered inactive. A minority comment pertains to the concern of abuse in the application of the concept of Active Transmission Line ROW.

The SDT has revised the definition to attempt to address some of the concerns and in keeping with the guidelines for this new results-based standard development process.

Active Transmission Line Right-of-Way

A strip or corridor of land that is occupied by active transmission facilities. This corridor does not include the parts of the Right-of-Way that are unused or intended for other facilities.

The majority of commenters held concern with two aspects of Vegetation Inspection definition. One concern relates to the phrase “poses a threat” and offered the alternative phrase “poses an unacceptable risk” in its place. The other concern questions the necessity of the last sentence of the definition which contains “requirement-like” text about documentation. The SDT changed the definition as shown below:

Vegetation Inspection

The systematic examination of vegetation conditions on an Active Transmission Line Right-of-Way and may be combined with a general line inspection.

Question 17

When compared to Version 1, does this proposed Version 2 of the standard either maintain or improve overall electric reliability? Please provide a technical basis for your response?

Summary Consideration: The majority of the commenters agreed that Draft 2 improved reliability. Of those who disagreed, the primary objection was the elimination of Clearance 1 and removal of the qualification requirement. The commenters cited a reduce leverage with landowners in the rationale for disagreement. A majority comment insists that the standard ought to require the application of best management practices. A majority comment insists that the standard ought to require the application of best management practices.

The SDT thanks the commenters for their support. With this new Draft, the essential concepts in Draft 2 are retained with wording better suited to the new Results-based standards development process. The SDT believes that the qualification issue is better left to a SAR team for PER standards. The SDT considered requiring ANSI A300 as part of this standard but opted to include it in the *Guideline and Technical Basis* section.

Question 18

Besides the comments you have already provided for the preceding questions, do you have further suggestions for improving this standard? If so, please elaborate.

Summary Consideration: Many commenters repeated concerns expressed in other sections. The most cited items were: the purpose statement, the definition of applicable lines, double jeopardy for encroachments and outages, the GO/GOP/DP line issue, the necessity for a general force majeure statement, and the reference to ANSI A300.

The SDT has replaced the purpose statement with an Objective statement retaining the same concept.

The Applicability section has been revised to address commenters concerns, except relating to Generator Interconnection Facilities. (Please see response to Question 14.)

The Double Jeopardy concerns were addressed by combining requirements to produce the new Draft R1 and R2.

A general Force Majeure section was added to the applicability section of the standard that covers all Requirements. The reference to ANSI 300 has been added to the *Guideline and Technical Basis* section.