FAC-003-1 Mapping to Proposed NERC Reliability Standard FAC-003-2 RBS Draft 4

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Standard Development Roadmap	Modified per proposed SCPSC format for RBS	Standard Development Timeline	
Definitions of Terms Used in Standard	During the first comment period, the SDT received several comments noting that many utilities typically combine the vegetation inspection with other maintenance inspections. Due to the comments, the SDT proposed a modified Vegetation Inspection definition to document the acceptability of this industry practice. As noted in the "Guidelines and Technical Basis" section, this broader definition facilitates a Transmission Owner's ability to meet the requirement and the added clarification aides compliance understanding to meet Requirement 6.	Vegetation Inspection The systematic examination of vegetation conditions on a maintained transmission line Right-of-Way which may be combined with a general line inspection. The current glossary definition of this NERC term is modified to allow both maintenance inspections and vegetation inspections to be performed concurrently. Current definition of Vegetation Inspection: The systematic examination of a transmission corridor to document vegetation conditions.	
Effective Dates: 5.1. One calendar year from the date of adoption by the NERC Board of Trustees for Requirements 1 and 2. 5.2. Sixty calendar days from the date of adoption by the NERC Board of Trustees for Requirements 3 and 4.	In order to fully implement any new standard or requirement it is necessary to factor in a reasonable transitional period. As with the current version of FAC-003, the proposed version allows a reasonable time period before the standard is fully applicable. In addition to standardizing the implementation date to coincide with the beginning of a calendar month, the new version improves upon the current standard by recognizing that new lines may be added by the Planning Coordinator at any given time in the future. These new lines will necessarily require an extended effective date before the standard is applicable.	1. First calendar day of the first calendar quarter one year after applicable regulatory authority approval for all requirements 2. First calendar day of the first calendar quarter one year following Board of Trustees adoption unless governmental authority withholds approval 3. First calendar day of the first calendar quarter that is at least one year following Board of Trustees adoption Exceptions: A line operated below 200kV, designated by the Planning Coordinator as an element of an IROL or as a Major WECC transfer path, becomes subject to this standard 12 months after the date the Planning Coordinator or WECC initially designates the lines as being subject to this standard. An existing transmission line operated at 200kV or higher that is newly acquired by an asset owner and was not previously subject to this standard, becomes subject to this standard 12	

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		months after the acquisition date of the line.
Title: Transmission Vegetation Management Program		1. Title: Transmission Vegetation Management
2. Number: FAC-003-1		2. Number: FAC-003-2
3. Purpose: To improve the reliability of the electric transmission systems by preventing outages from vegetation located on transmission rights-of-way (ROW) and minimizing outages from vegetation located adjacent to ROW, maintaining clearances between transmission lines and vegetation on and along transmission ROW, and reporting vegetation related outages of the transmission systems to the respective Regional Reliability Organizations (RRO) and the North American Electric Reliability Council (NERC).	The SDT tightened up the Purpose statement to remove unnecessary wording and to remove redundant verbiage also contained in the Applicability section. The SDT also removed from the Purpose any mention of the reporting of vegetation-caused outages, in part because the Standard no longer requires reporting of outages due to vegetation falling from outside the right of way. The new, shorter Purpose statement is more goal-oriented as a Purpose statement should be, instead of containing rambling verbiage that re-states tasks and activities covered elsewhere in the Applicability or Requirements. The new Purpose statement is better because it provides clarity to industry stakeholders that only a narrow class of vegetation issues lead to large-scale blackouts. For instance, no cascading-style outage – anytime or anywhere – has ever been caused by a tree falling into a transmission line. This Purpose statement appropriately focuses the Standard's requirements on the areas of vegetation management that pose significant risk of cascading blackouts.	3. Objective: To improve the reliability of the electric Transmission system by preventing those vegetation related outages that could lead to Cascading.
4. Applicability:	The Drafting team divided the Applicability section into two parts (entity and facility) in order to provide structural	4. Applicability: 4.1. Functional Entities:
 4.1. Transmission Owner 4.2. Regional Reliability Organization 4.3. This Standard shall apply to all transmission lines operated at 200 kV and above and to any lower voltage lines designated by the RRO as critical to the reliability of 	clarity. This improvement in readability makes this structure better than that existing in Version 1. In the Functional Entity section, the team removed the RRO as directed by FERC since the RRO(s) have no Requirement compliance responsibilities. Additionally, the data reporting which was why the RRO had been included in this section, is no longer a Requirement.	 4.1.1 Transmission Owners 4.2. Facilities: Defined below, including but not limited to those that cross lands owned by federal¹, state, provincial, public, private, or tribal entities: 4.2.1. Transmission lines operated at 200k

 $^{^{1}\,\,}$ EPAct 2005 section 1211c: "Access approvals by Federal agencies"

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	In the Facility section, the team added specific references to specific land types on which Transmission rights-of-way may exist. This change was made to make it clear where the Standard applies in response to industry comments indicating confusion with the existing Standard which did not specifically address the issue. This addition is an improvement from Version 1 since the issue will	4.2.2.	or higher. Overhead transmission lines operated below 200kV having been identified as included in the definition of an Interconnection Reliability Operating Limit (IROL) under NERC Standard FAC 014 by the Planning Coordinator.
	now be clearly addressed. Additionally, the team modified the entity to identify sub- 200 kV lines which are covered by this standard. In keeping with the removal of the RRO from the Standards, the team received valuable input from industry and FERC staff. It became clear that for the time horizon needed for	4.2.3.	,
	the activities associated with vegetation management, the Planning Coordinator had the appropriate wide-area view and time horizon. FERC staff expressed a strong preference for NERC standards to be consistent in the determination of sub-200 kV lines that are sufficiently important to be covered by this standard and others that have the 200 kV bright lines. Thus the team chose to use an existing identification process (found in Standard FAC-014). These changes make this version much better than Version 1 because a responsible entity has been identified and an already FERC-approved NERC Standard process replaces an undefined process in Version 1.	4.2.4.	This Standard does not apply to Facilities identified above (4.2.1 through 4.2.3) located in the fenced area of a switchyard, station or substation.
	The FERC Order also outlined that NERC should determine if the identification "net" caught all the sub-200 kV lines of importance. The Drafting team identified that WECC has developed a classification of lines that have importance to the Western Interconnection. Therefore, the Drafting team added those lines. This addition makes this version better than Version 1 by including important lines that might otherwise be potentially omitted.		
July 14 2010	Finally, the Drafting team added the exclusions in 4.2.4 in response to significant industry comments for clarity in interpretation and implementation of the standard. The ambiguity of the existing Standard has led to confusion in industry and in compliance. This addition makes this version better than Version 1 because it clearly describes which facilities are applicable which will eliminate the confusion.		3

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		4.3. Enforcement: The reliability obligations of the applicable entities and facilities are contained within the technical requirements of this standard. [Straw proposal]
	Vegetation-related Sustained Outages that occur due to natural disasters are beyond the control of the Transmission Owner. These events are not classified as vegetation-related Sustained Outages and are therefore exempt from the Standard. Transmission lines are not designed to withstand the impacts of natural disasters such as flood, drought, earthquake, major storms, fire, hurricane, tornado, landslides, ice storms, etc. In the aftermath of catastrophic system damage from natural disasters the Transmission Owner's focus is on electric system restoration for public safety and critical support infrastructure. Sustained Outages due to human or animal activity are beyond the control of the Transmission Owner. These outages are not classified as vegetation-related Sustained Outages and are therefore exempt from the Standard. Examples of these events may include new plantings by outside parties of tall vegetation under the transmission line planted since the last Vegetation Inspection, tree contacts with line initiated by vehicles, logging activities, etc. This clarification of which outages are not applicable is an improvement to the language in requirement R3.2 in Version 1 and maintains the same level of reliability. The term "active transmission line ROW" as defined in footnote 2 is included to differentiate between Sustained Outages caused by vegetation growing either within or outside the ROW. This is in contrast to the version I definition of a simple ROW. This change is important because all Sustained Outages from vegetation growing on the ROW are violations of the Standard while all "off-ROW" Sustained Outages are not. The inclusion of the active transmission line ROW definition aids in compliance reporting and monitoring and helps Transmission Owner's implement their ROW	4.4. Other: This Standard does not apply to any occurrence, non-occurrence, or other set of circumstances that are beyond the control of a Transmission Owner subject to this reliability standard, including acts of God, flood, drought, earthquake, major storms, fire, hurricane, tornado, landslides, ice storms, vehicle contact with tree, human activity involving: removal of, installation of, or digging around vegetation, animals severing trees, lightning, epidemic, strike, war, riot, civil disturbance, sabotage, vandalism, terrorism, wind shear, or fresh gale (or higher wind speed) that restricts or prevents performance to comply with this reliability standard's requirements. Nothing in this section should be construed to limit the Transmission Owner's right to exercise its full legal rights on the active transmission line ROW ² 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. However, it is not to be less than the width of the easement itself unless the easement exceeds distances as shown in Table 3 for various voltage classes.
huby 14, 2010	management programs. This clarification places a	

minimum limit on the distance between the circuit and the ROW edge for use on ROW's where a transmission Owner has excessive ROW width that is far wider then is typically managed for that voltage class. Added new section titled, "Background" per SCPSC format. R1. The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications1. R1.1. The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or vegetation and experiment vegetation titled, "Background" per SCPSC format. R1. The TVMP have been replaced by R1, R2, R3, R4, R5 and R6. R2 in Version 1 is a documentation requirement defining what should be in a TVMP. The requirements in Version 2 vere crafted to be "results based" that	roposed Standard FAC-003-2 RBS Draft 4
R1. The Transmission Owner shall prepare, and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications1. R1.1 The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or Added new section titled, "Background" per SCPSC ("Star the reprevented by the story subparts outlining the TVMP have been replaced by R1, R2, R3, R4, R5 and R6. R1 in Version 1 is a documentation requirement defining what should be in a TVMP. The requirements in Version 2 were crafted to be "results based" that define the desired end result. The TVMP document in version 1 is replaced by the competency requirement R3 in version 2. The TO must demonstrate that it understands the complex relationship of conductor movement under thermal load and wind and a vegetation growing and moving in proximity to the line. In version 1 the TO can simply state that it mows or	
and keep current, a formal transmission vegetation management program (TVMP). The TVMP shall include the Transmission Owner's objectives, practices, approved procedures, and work specifications 1. R1.1. The TVMP shall define a schedule for and the type (aerial, ground) of ROW vegetation inspections. This schedule should be flexible enough to adjust for changing conditions. The inspection schedule shall be based on the anticipated growth of vegetation and any other environmental or replaced by R1, R2, R3, R4, R5 and R6. R1 in Version 1 is a documentation requirement defining what should be in a TVMP. The requirements in Version 2 were crafted to be "results based" that define the desired end result. The TVMP document in version 1 is replaced by the competency requirement R3 in version 2. The TO must demonstrate that it understands the complex relationship of conductor movement under thermal load and wind and a vegetation growing and moving in proximity to the line. In version 1 the TO can simply state that it mows or	IERC Vegetation Management Standard dard") uses a defense-in-depth approach to improve iability of the electric Transmission system by nting those vegetation related outages that could be Cascading. This Standard is
relationship of vegetation to the Transmission Owner's transmission lines. R1.2. The Transmission Owner, in the TVMP, shall identify and document clearances between vegetation and any overhead, ungrounded supply conductors, taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway. Specifically, the Transmission Owner shall establish TO must define the concepts used by an inspector or a tree crew in making decisions about which tree needs maintenance and how much should be removed. The improvement is that the TO's documentation can be evaluated to specific construction and maintenance standards. R1.1 has been moved to R6. It requires that each line be inspected annually and clarifies, through the definition of a Vegetation Inspection, that these inspection may be part of a broader line inspection. This improvement takes out the ambiguity of the frequency of inspections. R1.2 in version 1 requires that the TO document Coordinal	Operating Conditions). Types of encroachment encroachment into the Minimum Vegetation arance Distance (MVCD) as shown in Table 2, erved in real time, absent a Sustained Outage, encroachment due to a fall-in from inside the active smission line ROW that caused a vegetation-related tained Outage, encroachment due to blowing together of applicable is and vegetation located inside the active smission line ROW that caused a vegetation-related tained Outage, encroachment due to a grow-in that caused a etation-related Sustained Outage. Transmission Owner shall manage vegetation to incroachment that could result in a Sustained Outage tole lines that are not elements of an Interconnection Operating Limit (IROL) or Major Western Electricity ing Council (WECC) transfer path (operating within de Rated Electrical Operating Conditions). Types of

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maintain a set of clearances identified herein as Clearance 2 to prevent flashover between vegetation and overhead ungrounded supply conductors.

R1.2.1. Clearance 1 — The Transmission Owner shall determine and document appropriate clearance distances to be achieved at the time of transmission vegetation management work based upon local conditions and the expected time frame in which the Transmission Owner plans to return for future vegetation management work. Local conditions may include, but are not

limited to: operating voltage, appropriate vegetation management techniques, fire risk, reasonably anticipated tree and conductor movement, species types and growth rates, species failure characteristics, local climate and rainfall patterns, line terrain and elevation, location of the vegetation within the span, and worker approach distance requirements.

Clearance 1 distances shall be

below.

R1.2.2. Clearance 2 — The Transmission Owner shall determine and document specific radial clearances to be maintained between vegetation and conductors under all rated electrical operating conditions. These minimum clearance distances are necessary to prevent flashover between vegetation and conductors and will vary due to such factors as altitude and operating voltage.

greater than those defined by Clearance 2

These Transmission Owner-specific minimum clearance distances shall be no less than those set forth in the Institute of Electrical and Electronics Engineers (IEEE) Standard 516-

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over" distances derived scientifically from the Gallet equations. FERC, in order 693, along with several commenters questioned the use of the MAID tables in Version 1. Version 2 offers appropriate clearances that are based in science. In addition, there are separate requirements for lines that could be part of an IROL/WECC transfer path event and those that are not. This allows for different Violation Risk Factors.

R1.3 of Version1 required that personnel in the TVMP be qualified. The requirement did not clearly specify what the qualification would be and left it up to the TO. This is considered a 'fill in the blank' requirement and was eliminated.

R1.4 in version 1 required the TO to have a mitigation plan where clearances could not be attained. This is replaced in Version 2 by R5. The new wording resolves the confusion in using the term mitigation plan (an enforcement mitigation plan vs. a vegetation mitigation plan). It also allows for different VRF and VSL from the other components of version 1 R1.

R1.5 the imminent threat process in version 1 is replaced by R4 in version 2. It is an improvement over version 1 in that reporting is directed to the switching authority which has direct ability to take action.

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- 1. An encroachment into the Minimum Vegetation Clearance Distance (MVCD) as shown in Table 2, observed in real time, absent a Sustained Outage,
- An encroachment due to a fall-in from inside the active transmission line ROW that caused a vegetationrelated Sustained Outage,
- 3. An encroachment due to blowing together of applicable lines and vegetation located inside the active transmission line ROW that caused a vegetation-related Sustained Outage,
- 4. An encroachment due to a grow-in that caused a vegetation-related Sustained Outage.

Rationale (R1 and R2)

The MVCD is a calculated minimum distance stated in feet (meters) to prevent spark-over between conductors and vegetation, for various altitudes and operating voltages. The distances in Table 2 were derived using a proven transmission design method.

R3. Each Transmission Owner shall document the procedures, processes, or specifications it uses to prevent the encroachment of vegetation into the MVCD. Such documentation will incorporate the dynamics of a transmission line conductor's movement throughout its Rating and Rated Electrical Operating Conditions and the inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency, for the Transmission Owner's applicable lines.

Rationale (R3)

Provide a basis for evaluation on the intent and competency of the Transmission Owner in maintaining vegetation. There may be many acceptable approaches to maintain clearances. However, the Transmission Owner should be able to state what its approach is and how it conducts work to maintain clearances. See Figure 1 for an illustration of possible conductor locations.

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2003 (Guide for Maintenance Methods on Energized Power Lines) and as specified in its Section 4.2.2.3, Minimum Air Insulation Distances without Tools in the Air Gap. R1.2.2.1 Where transmission system transient overvoltage factors are not		R4. Each Transmission Owner, without any intentional time delay, shall notify the control center holding switching authority for the associated transmission line when qualified personnel confirm the existence of a vegetation condition that is likely to cause a Fault at any moment.
known, clearances shall be derived from Table 5, IEEE 516-2003, phase-to-ground distances, with appropriate altitude correction factors applied. R1.2.2.2 Where transmission system		Rationale (R4) To ensure expeditious communication between qualified field personnel and proper operating personnel when a critical situation is confirmed. Qualified field personnel may include lineworkers and utility arborists.
transient overvoltage factors are known, clearances shall be derived from Table 7, IEEE 516-2003, phase-to-phase voltages, with appropriate altitude correction factors applied. R1.3. All personnel directly involved in the		R5. Each Transmission Owner shall take corrective action when it is constrained from performing planned vegetation work, where a transmission line is put at potential risk due to the constraint.
design and implementation of the TVMP shall		
hold appropriate qualifications and training, as defined by the Transmission Owner, to perform their duties.		Rationale (R5) Legal actions and other events may occur which result in
R1.4. Each Transmission Owner shall develop mitigation measures to achieve sufficient clearances for the protection of the transmission facilities when it identifies locations on the ROW where the Transmission Owner is restricted from attaining the clearances specified in Requirement 1.2.1.		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. For example, in the 2003 NE blackout a Transmission Owner was prevented by a court order from performing planned work. However, when the court order expired, the TO failed to take action to maintain the vegetation resulting in a
R1.5. Each Transmission Owner shall establish and document a process for the immediate communication of vegetation conditions that present an imminent threat of a transmission line outage. This is so that action (temporary reduction in line rating, switching line out of service, etc.) may be taken until the threat is relieved.		sustained outage that contributed to the cascade. 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.
R2. The Transmission Owner shall create and implement an annual plan for vegetation management work to ensure	The Standard Drafting Team revised the language in the existing standard which reads in part, "The Transmission Owner shall create and implement an annual plan" to	R7. Each Transmission Owner shall complete the work in an annual vegetation work plan to ensure no vegetation encroachments occur within the MVCD. Modifications to

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the reliability of the system. The plan shall describe the methods used, such as manual clearing, mechanical clearing, herbicide treatment, or other actions. The plan should be flexible enough to adjust to changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors that may have an impact on the reliability of the transmission systems. Adjustments to the plan shall be documented as they occur. The plan should take into consideration the time required to obtain permissions or permits from landowners or regulatory authorities. Each Transmission Owner shall have systems and procedures for documenting and tracking the planned vegetation management work and ensuring that the vegetation management work was completed according to work specifications.	"Each Transmission Owner shall complete the work in an annual vegetation work plan" setting an expectation that the work identified will be completed, as noted in the Rationale. In addition, the Team eliminated prescriptive language in R2 of the existing standard. The revised requirement is an improvement upon the current standard in that it clearly establishes the true intent of this requirement, completing the work in the plan and ensuring no vegetation encroaches into the MVCD.	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 of a vegetation encroachment. Examples of reasons for modification to annual plan may include: • Change in expected growth rate/ environmental factors • Major storms • 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 • Funding adjustments (increase or decrease) • Emerging technologies Rationale (R7) This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. An annual vegetation work plan allows for work to be modified for changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors, provided that the changes do not violate the encroachment within the MVCD.
R3. The Transmission Owner shall report quarterly to its RRO, or the RRO's designee, sustained transmission line outages determined by the Transmission Owner to have been caused by vegetation. R3.1. Multiple sustained outages on an individual line, if caused by the same vegetation, shall be reported as one outage regardless of the actual number of outages within a 24-	R3 Moved: In general, reporting requirement elements are moved to the Additional Compliance Information section of the standard. Reporting elements are, in themselves, documentation rudiments and do not add or subtract from electric system reliability. Format changes R3.1 Moved: Explanatory text moved to M1 and M2 Informational in nature. Format change. R3.2 Moved: The exclusions for reporting an outage were	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 transmission lines determined by the Transmission Owner to have been caused by vegetation that includes, as a minimum, the following: o The name of the circuit(s), the date, time and duration of the outage; the voltage of the circuit; a

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hour period. R3.2. The Transmission Owner is not required to report to the RRO, or the RRO's designee, certain sustained transmission line	placed in the Applicability Section – Other. The placement at the beginning of the Standard call attention to the overall impact to all requirements in the Standard	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.
outages caused by vegetation: (1) Vegetation related outages that result from vegetation falling into lines from outside the ROW that	R3.3 Moved: Outage information moved to Additional Compliance Information section. Informational in nature	A Sustained Outage is to be categorized as one of the following:
result from natural disasters shall not be considered reportable (examples of disasters that could create non-reportable outages	R3.4 Moved: Outage categories moved to Additional Compliance Information section. Informational in nature	o Category 1A — Grow-ins: Sustained Outages caused by vegetation growing into applicable transmission lines, that are identified as an element of
include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by	R3.4.1 Moved: Category 1 moved and expanded to differentiate between vegetation related sustained	an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the active transmission line ROW;
the Transmission Owner or an applicable regulatory body, ice storms, and floods), and	outages outside and within the ROW on IROL or Major WECC transfer path and non IROL lines or Major WECC transfer paths Category 1 outages were separated into	o Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable transmission lines, but are not identified as an
(2) Vegetation-related outages due to human or animal activity shall not be considered	1A and 1B.	element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the active
reportable (examples of human or animal activity that could cause a non-reportable	R3.4.2 Moved: Category 2 reporting moved to Additional Compliance Information section.	transmission line ROW; o Category 2 — Fall-ins: Sustained Outages caused
outage include, but are not limited to, logging, animal severing tree, vehicle contact with tree, arboricultural activities or horticultural or	R3.4.3 Eliminated: Category 3 reporting for fall-in outside	by vegetation falling into applicable transmission lines from within the active transmission line ROW; o Category ³ 4 — Blowing together: Sustained Outages
agricultural activities, or removal or digging of vegetation).	the right of way was eliminated. Vegetation fall-in's from outside the transmission right of way are not a standard violation and thus not a requirement. The reporting	caused by vegetation and applicable transmission lines blowing together from within the active
R3.3. The outage information provided by the Transmission Owner to the RRO, or the	requirement is currently for informational purposes only.	transmission line ROW. The Regional Entity will report the outage information provided
RRO's designee, shall include at a minimum: the name of the circuit(s) outaged, the date, time and duration of the outage; a description of the cause of the outage; other pertinent	Added Category 4: Sustained outages from vegetation and conductors blowing together created a new Category 4 classification. Information located within the Additional Compliance Information section.	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.
comments; and any countermeasures taken by the Transmission Owner.	·	3 Category 3 reporting is eliminated.
R3.4. An outage shall be categorized as one of the following:	No change in reliability.	
R3.4.1. Category 1 — Grow-ins: Outages caused by vegetation growing into lines from vegetation inside and/or outside of the ROW;		
R3.4.2. Category 2 — Fall-ins: Outages		

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caused by vegetation falling into lines from inside the ROW;		
R3.4.3. Category 3 — Fall-ins: Outages caused by vegetation falling into lines from outside the ROW.		
R4. The RRO shall report the outage information provided to it by Transmission Owner's, as required by Requirement 3, quarterly to NERC, as well as any actions taken by the RRO as a result of any of the reported outages.	R4. Eliminated: RRO is now the Regional Entity. The Regional Entity is instructed per the periodic data submittal within the Additional Compliance Information section to 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.	
	No change in reliability.	

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