NERC
NORTH AMERICAN ELECTRIC RELIABILITY CORPORATION

Implementation Plan for FAC-003-X – Transmission Vegetation Management Program

Prerequisite Approvals

There are no other Reliability Standards or Standard Authorization Requests (SARs), in progress or approved, that must be implemented before this standard can be implemented.

Revision to Sections of Approved Standards and Definitions

There are no proposed revisions to requirements in other already approved standards. FAC-003-1 will be retired when FAC-003-2 becomes effective.

Compliance with Standard

There are no changes to the requirements applicable to Transmission Owners already in effect in FAC-003-1, and the expectation is that Transmission Owners will maintain their current state of compliance. Thus, the standard is effective for Transmission Owners upon approval, as detailed below.

The proposed changes to FAC-003-1 only address Generator Owner applicability and requirements (add Generator Owner to section 4.3 and add applicable Generator Owner to all requirements). Therefore, this implementation plan only identifies a compliance timeframe for Generator Owners to which this standard will apply.

To reach compliance with the standard, a Generator Owner will have to perform a full review of as-built drawings and determine which generation interconnection Facilities require a Transmission Vegetation Management Plan (TVMP) and inspection as specified by NERC Reliability Standard FAC-003-X. In general, Generator Owners do not have staff that are qualified and experienced to create a TVMP and implement annual plans for vegetation management. Once a complete inventory is created, the Generator Owner will begin the process of gathering information for the TVMP. In instances where the generation interconnection Facilities are owned by a partnership, a majority or operating partner will need to obtain partnership approval to proceed with procurement of a TVMP expert, and later a tree trimming crew. Typically, a request for proposal to hire TVMP consultant is initiated, which could take several weeks in order to obtain sufficient bids (and also satisfy Sarbanes Oxley requirements). Once all bids have been received, a contract with a TVMP consultant is signed. At this point, the TVMP consultant and Generator Owner staff will develop the TVMP, which needs to take into account local growth conditions, types of vegetation and other aspects required by FAC-003-X. Once the TVMP is developed, Generator Owner staff and the TVMP consultant will need to perform a Right-of-Way inspection, usually done using GPS, LIDAR and other tools by experienced and qualified staff.

Once a Right-of-Way inspection is completed and clearances are required, the Generator Owner will need to issue a request for proposal to hire a tree trimming crew that is qualified and experienced to perform required clearance trimming. Once all bids have been received, a contract with a tree trimming crew is signed. When the tree trimming

crew is acquired, the crew will need to familiarize themselves with the entity's TVMP and required clearances. The Generator Owner will typically need to schedule any required outages in order for the tree trimming crew to perform the needed clearance trimming. This action would also include the implementation of the work plan. During scheduled outages, if required, the tree trimming crew will perform any required clearances and document the activities.

Another typical action is the Generator Owner establishing a system for maintaining TVMP-related activities, including maintenance of inspection and clearance documentation. On an ongoing basis, in addition to performing inspections and clearances as required by the entity's TVMP, the Generator Owner will need to ensure that the training and qualification requirements for the standard are met. The entity will also need to maintain documentation of all FAC-003-X activities for compliance period of one year to meet compliance with the standard.

Again, due to a typical lack of experience and qualifications required by FAC-003-X, compliance with this standard by a Generator Owner may take as long as two years – in part because many entities will have generator interconnection Facilities in various parts of the country which may require several instances of TVMP and numerous Right-of-Way inspections.

Effective Date

There are three effective dates associated with this implementation plan:

The first effective date applies to Transmission Owners.

> In those jurisdictions where regulatory approval is required, all requirements applied to the Transmission Owner become effective upon approval. In those jurisdictions where no regulatory approval is required, all requirements applied to the Transmission Owner become effective upon Board of Trustees' adoption.

The second effective date allows Generator Owners time to prepare a formal transmission vegetation management program as outlined in Requirement R1.

> In those jurisdictions where regulatory approval is required, Requirement R1 applied to the Generator Owner becomes effective on the first calendar day of the first calendar quarter one year after the date of the order approving the standard from applicable regulatory authorities where such explicit approval for all requirements is required. In those jurisdictions where no regulatory approval is required, Requirement R3 becomes effective on the first day of the first calendar quarter one year following Board of Trustees adoption.

The third effective date allows entities time to comply with Requirements R2, R3, and R4.

In those jurisdictions where regulatory approval is required, Requirements R2, R3, and R4 applied to the Generator Owner become effective on the first calendar day of the first calendar quarter two years after the date of the order approving the standard from applicable regulatory authorities where such explicit approval for is required. In those jurisdictions where no regulatory approval is required, Requirements R2, R3, and R4 become effective on the first day of the first calendar quarter two years following Board of Trustees adoption.