
MEMORANDUM

To: ERCOT Region Registered Transmission Owners (TOs)
From: Texas Regional Entity
Date: March 2, 2009
Re: FAC-003 Vegetation Management Procedures

This memorandum is being sent to all registered Transmission Owners (TOs) in the ERCOT region. Currently this reporting procedure only applies to those TOs that have greater than 200kV transmission. All TOs should be following this procedure.

The only change at this time is the additional, event driven 48 hour self-report for category 1 and category 2 vegetation related outages.

Monthly reports will still be due on the 20th of the month for the preceding month. All vegetation related outages for the month including category 1 and category 2 outages previously reported (via the 48 hour self-report form) and any category 3 outages shall be reported via the current monthly reporting procedure.

Please see attached letter and procedural document.

Reporting of Vegetation-Related Outages February 5, 2009

On December 24, 2008, NERC issued an email directly to all Transmission Owners in which it referenced its *Public Notice – NERC Compliance Process #2008-001, Vegetation-related Transmission Outage Reporting*, dated December 17, 2008 (see attached). The Notice indicates that, “due to the potential severity of transmission outages caused by vegetation....NERC is encouraging each Transmission Owner to self-report all Category 1 and Category 2 transmission outages related to vegetation to the Regional Entity within 48 hours.” The Notice also states that such reporting should utilize the 48-hour reporting notice provided by the Regional Entity.

In order to clarify the expectations of the eight Regional Entities for reporting of vegetation-related transmission outages by owners of transmission lines operated at 200 kV and above, or any lower voltage lines designated by the region as critical to the reliability of the electric system in the region, the Regional Entities provide the following additional information.

Vegetation Management has been a high profile concern since it was identified as a cause of the August 14, 2003 Blackout. In accordance with NERC Reliability Standard FAC-003-1, Requirement 3, vegetation outage reporting has been done on a quarterly basis and has been limited to reporting of “sustained transmission line outages.” However, more timely reporting of vegetation-related transmission trips will help inform, in a timely manner, the Regional Entity and NERC of the actual and possible reliability impacts that such vegetation-related transmission line trips may pose to the bulk-power system and the actions taken or to be taken by the Transmission Owner in minimizing any further risk to the system.

Furthermore, the occurrence of a flashover between vegetation and overhead ungrounded supply conductors may represent evidence that the entity’s vegetation management program has not been executed in a manner to prevent outages from vegetation located within the right-of-way, as required in Requirement 2.

Therefore, NERC and the eight Regional Entities are encouraging registered entities to self-report all vegetation-related outages, whether momentary or sustained, within 48-hours of the Transmission Owner’s determination that the cause of the line trip was vegetation-related, using the process established by the Transmission Owner’s respective Regional Entity.

As NERC points out in its Notice, self-reporting is a necessary element of an effective internal company compliance program and is expected as highlighted by NERC in its Sanctions Guidelines¹ and by FERC in its Revised Policy Statement on Enforcement² and Policy Statement on

Compliance³. As identified in these documents, prompt self-reporting of any possible violation of a FERC-approved NERC Reliability Standard, including those associated with a Category 1 or Category 2 outage, coupled with the entity’s prompt and voluntary action to remedy the possible violation, could be considered a mitigating factor in a potential enforcement action.

The Texas Regional Entity’s vegetation-related outage reporting procedure is attached within this email.

¹ http://www.nerc.com/files/Appendix4B_Sanctions_Guidelines_Effective_20080115.pdf

² <http://www.ferc.gov/whats-new/comm-meet/2008/051508/M-1.pdf>

³ <http://www.ferc.gov/whats-new/comm-meet/2008/101608/M-3.pdf>



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

Public Notice - NERC Compliance Process #2008 – 001 Vegetation-related Transmission Outage Reporting

Version 1.0

December 17, 2008 | Public Process Announcement

Notice to all Transmission Owners

Due to the potential severity of transmission outages caused by vegetation associated with Standard FAC003-1, NERC is encouraging each Transmission Owner to self-report **all** Category 1 and Category 2 transmission outages related to vegetation to the Regional Entity within 48 hours utilizing the 48-hour vegetation reporting notice form provided by your appropriate Regional Entity. These forms can be found on the appropriate Regional Entity website and you should contact your Regional Entity if you have questions regarding the submission of this information.

Following this practice will help inform, in a timely manner, the Regional Entity and NERC of the actual and possible reliability impacts that such vegetation-related transmission outages may pose to the bulk power system and the actions taken or to be taken by the Transmission Owner in minimizing any further risk to the system.

Self-reporting is a necessary element of an effective internal company compliance program and is expected as highlighted by NERC in its [Sanctions Guidelines](#)¹ and by FERC in their [Policy Statement on Enforcement](#).² As identified in these documents, voluntary compliance with prompt self-reporting of any violation of a FERC-approved NERC Reliability Standard, including those associated with a Category 1 or Category 2 outage, could be considered a mitigating factor in a potential enforcement action.

All Category 3 vegetation-related transmission outages, and any Category 1 or Category 2 transmission outages not previously reported to the Regional Entity on a 48-hour form, are to continue to be reported on the quarterly vegetation outage reporting form provided by the Regional Entity.

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¹ http://www.nerc.com/files/Appendix4B_Sanctions_Guidelines_Effective_20080115.pdf

² <http://www.ferc.gov/whats-new/comm-meet/2008/051508/M-1.pdf>

ERCOT MONTHLY VEGETATION RELATED OUTAGE REPORT

Report Month and Year: _____

Transmission Operator: _____

Transmission Owner(s) Covered in this Report: _____

Transmission Owner Contact Information:

_____	_____	_____
Name	Phone	E-mail Address

Requirement: All vegetation-related transmission line trips on 200 kV lines and above or any other lower voltage lines designated by ERCOT ISO to be critical to the reliability of the electric system, will be reported by transmission owners. Transmission owners will forward this form to Texas Regional Entity on a Monthly basis by the 20th of the following month.

Transmission Owners should self-report all Category 1 and Category 2, 200kV and above transmission outages related to vegetation to the Texas Regional Entity within 48 hours via the [“Approved NERC Standards Self Reporting Form”](#).

Reporting Instructions

All sustained transmission line outages shall be reported where the cause of the outage is contact with vegetation, except:

- 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-hour period.

Outage Reporting Disclaimer

The following sustained transmission line outages caused by vegetation are not required to be reported:

- vegetation-related outages that result from vegetation falling into lines from outside the right-of-way that result from natural disasters shall not be considered reportable (examples of disasters that could create non-reportable outages include, but are not limited to, earthquakes, fires, tornados, hurricanes, landslides, wind shear, major storms as defined either by the transmission owner or an applicable regulatory body, ice storms, and floods).
- Vegetation-related outages due to human or animal activity shall not be considered reportable (examples of human or animal activity that could cause a non-reportable outages 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).

Categories for Vegetation Contact Outages Reporting

- Category 1- Grow-ins: Outages caused by vegetation growing into lines from inside and/or outside of the transmission right-of-way
- Category 2- Fall-ins: Outages caused by vegetation falling into lines from inside of the transmission right-of-way
- Category 3- Fall-ins: Outages caused by vegetation falling into lines from outside of the transmission right-of-way

CHECK IF NO VEGETATION RELATED OUTAGES IN THIS MONTH

The following information is required for 48 hour and monthly reports:

DATE:	TIME:	DURATION:	% LINE LOAD:	LINE AFFECTED:	CATEGORY:

List any remedial actions taken: