

## **Normes de fiabilité (version anglaise)**



## **A. Introduction**

1. **Title:** Disturbance Control Standard – Contingency Reserve for Recovery from a Balancing Contingency Event
2. **Number:** BAL-002-3
3. **Purpose:** To ensure the Balancing Authority or Reserve Sharing Group balances resources and demand and returns the Balancing Authority's or Reserve Sharing Group's Area Control Error to defined values (subject to applicable limits) following a Reportable Balancing Contingency Event.
4. **Applicability:**
  - 4.1. **Responsible Entity**
    - 4.1.1. **Balancing Authority**
      - 4.1.1.1. A Balancing Authority that is a member of a Reserve Sharing Group is the Responsible Entity only in periods during which the Balancing Authority is not in active status under the applicable agreement or governing rules for the Reserve Sharing Group.
    - 4.1.2. **Reserve Sharing Group**
5. **Effective Date:** See the Implementation Plan for BAL-002-3.

## **B. Requirements and Measures**

- R1. The Responsible Entity experiencing a Reportable Balancing Contingency Event shall: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
  - 1.1. within the Contingency Event Recovery Period, demonstrate recovery by returning its Reporting ACE to at least the recovery value of:
    - zero (if its Pre-Reporting Contingency Event ACE Value was positive or equal to zero); however, any Balancing Contingency Event that occurs during the Contingency Event Recovery Period shall reduce the required recovery: (i) beginning at the time of, and (ii) by the magnitude of, such individual Balancing Contingency Event,or,
    - its Pre-Reporting Contingency Event ACE Value (if its Pre-Reporting Contingency Event ACE Value was negative); however, any Balancing Contingency Event that occurs during the Contingency Event Recovery Period shall reduce the required recovery: (i) beginning at the time of, and (ii) by the magnitude of, such individual Balancing Contingency Event.
  - 1.2. document all Reportable Balancing Contingency Events using CR Form 1.

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**1.3.** deploy Contingency Reserve, within system constraints, to respond to all Reportable Balancing Contingency Events, however, it is not subject to compliance with Requirement R1 part 1.1 if the Responsible Entity:

**1.3.1** is (i) a Balancing Authority or (ii) a Reserve Sharing Group with at least one member that:

- is experiencing a Reliability Coordinator declared Energy Emergency Alert Level, and
- is utilizing its Contingency Reserve to mitigate an operating emergency in accordance with its emergency Operating Plan, and
- has depleted its Contingency Reserve to a level below its Most Severe Single Contingency, and
- has, during communications with its Reliability Coordinator in accordance with the Energy Emergency Alert procedures, (i) notified the Reliability Coordinator of the conditions described in the preceding two bullet points preventing the Responsible Entity from complying with Requirement R1 part 1.1, and (ii) provided the Reliability Coordinator with an ACE recovery plan, including target recovery time

or,

**1.3.2** the Responsible Entity experiences:

- multiple Contingencies where the combined MW loss exceeds its Most Severe Single Contingency and that are defined as a single Balancing Contingency Event, or
- multiple Balancing Contingency Events within the sum of the time periods defined by the Contingency Event Recovery Period and Contingency Reserve Restoration Period whose combined magnitude exceeds the Responsible Entity's Most Severe Single Contingency.

**M1.** Each Responsible Entity shall have, and provide upon request, as evidence, a CR Form 1 with date and time of occurrence to show compliance with Requirement R1. If Requirement R1 part 1.3 applies, then dated documentation that demonstrates compliance with Requirement R1 part 1.3 must also be provided.

**R2.** Each Responsible Entity shall develop, review and maintain annually, and implement an Operating Process as part of its Operating Plan to determine its Most Severe Single Contingency and make preparations to have Contingency Reserve equal to, or greater than the Responsible Entity's Most Severe Single Contingency available for maintaining system reliability. *[Violation Risk Factor: High] [Time Horizon: Operations Planning]*

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- M2.** Each Responsible Entity will have the following documentation to show compliance with Requirement R2:
- a dated Operating Process;
  - evidence to indicate that the Operating Process has been reviewed and maintained annually; and,
  - evidence such as Operating Plans or other operator documentation that demonstrate that the entity determines its Most Severe Single Contingency and that Contingency Reserves equal to or greater than its Most Severe Single Contingency are included in this process.
- R3.** Each Responsible Entity, following a Reportable Balancing Contingency Event, shall restore its Contingency Reserve to at least its Most Severe Single Contingency, before the end of the Contingency Reserve Restoration Period, but any Balancing Contingency Event that occurs before the end of a Contingency Reserve Restoration Period resets the beginning of the Contingency Event Recovery Period. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M3.** Each Responsible Entity will have documentation demonstrating its Contingency Reserve was restored within the Contingency Reserve Restoration Period, such as historical data, computer logs or operator logs.

### C. Compliance

#### 1. Compliance Monitoring Process

##### 1.1. Compliance Enforcement Authority

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

##### 1.2. Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The Responsible Entity shall retain data or evidence to show compliance for the current year, plus three previous calendar years, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

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If a Responsible Entity is found noncompliant, it shall keep information related to the noncompliance until found compliant, or for the time period specified above, whichever is longer.

The Compliance Enforcement Authority shall keep the last audit records and all subsequent requested and submitted records.

### **1.3. Compliance Monitoring and Assessment Processes:**

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

### **1.4. Additional Compliance Information**

The Responsible Entity may use Contingency Reserve for any Balancing Contingency Event and as required for any other applicable standards.

**Table of Compliance Elements**

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1.</b>	<p>The Responsible Entity achieved less than 100% but at least 90% of required recovery from a Reportable Balancing Contingency Event during the Contingency Event Recovery Period</p> <p>OR</p> <p>The Responsible Entity failed to use CR Form 1 to document a Reportable Balancing Contingency Event.</p>	<p>The Responsible Entity achieved less than 90% but at least 80% of required recovery from a Reportable Balancing Contingency Event during the Contingency Event Recovery Period.</p>	<p>The Responsible Entity achieved less than 80% but at least 70% of required recovery from a Reportable Balancing Contingency Event during the Contingency Event Recovery Period.</p>	<p>The Responsible Entity achieved less than 70% of required recovery from a Reportable Balancing Contingency Event during the Contingency Event Recovery Period.</p>
<b>R2.</b>	<p>The Responsible Entity developed and implemented an Operating Process to determine its Most Severe Single Contingency and to have Contingency Reserve equal to, or greater than the Responsible Entity’s Most Severe Single Contingency but failed to maintain</p>	N/A	<p>The Responsible Entity developed an Operating Process to determine its Most Severe Single Contingency and to have Contingency Reserve equal to, or greater than the Responsible Entity’s Most Severe Single Contingency but failed to implement the Operating Process.</p>	<p>The Responsible Entity failed to develop an Operating Process to determine its Most Severe Single Contingency and to have Contingency Reserve equal to, or greater than the Responsible Entity’s Most Severe Single Contingency.</p>

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	annually the Operating Process.			
<b>R3.</b>	The Responsible Entity restored less than 100% but at least 90% of required Contingency Reserve following a Reportable Balancing Contingency Event during the Contingency Event Restoration Period.	The Responsible Entity restored less than 90% but at least 80% of required Contingency Reserve following a Reportable Balancing Contingency Event during the Contingency Event Restoration Period.	The Responsible Entity restored less than 80% but at least 70% of required Contingency Reserve following a Reportable Balancing Contingency Event during the Contingency Event Restoration Period.	The Responsible Entity restored less than 70% of required Contingency Reserve following a Reportable Balancing Contingency Event during the Contingency Event Restoration Period.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

CR Form 1

BAL-002-3 Rationales



## Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
0	February 14, 2006	Revised graph on page 3, "10 min." to "Recovery time." Removed fourth bullet.	Errata
1	September 9, 2010	Filed petition for revisions to BAL-002 Version 1 with the Commission	Revision
1	January 10, 2011	FERC letter ordered in Docket No. RD10-15-00 approving BAL-002-1	
1	April 1, 2012	Effective Date of BAL-002-1	
1a	November 7, 2012	Interpretation adopted by the NERC Board of Trustees	
1a	February 12, 2013	Interpretation submitted to FERC	
2	November 5, 2015	Adopted by NERC Board of Trustees	Complete revision
2	January 19, 2017	FERC Order approved BAL-002-2. Docket No. RM16-7-000	
2	October 2, 2017	FERC letter Order issued approving raising the VRF for Requirement R1 and R2 from Medium to High. Docket No. RD17-6-000.	
3	August 16, 2018	Adopted by NERC Board of Trustees	Revisions to address two FERC directives from Order No. 835
3	September 25, 2018	FERC Order approving BAL-002-3. Docket No. RD18-7-000	



## A. Introduction

1. **Title:** Balancing Authority Control
2. **Number:** BAL-005-1
3. **Purpose:** This standard establishes requirements for acquiring data necessary to calculate Reporting Area Control Error (Reporting ACE). The standard also specifies a minimum periodicity, accuracy, and availability requirement for acquisition of the data and for providing the information to the System Operator.
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1. Balancing Authority

**Effective Date:** See Implementation Plan for BAL-005-1

## B. Requirements and Measures

- R1. The Balancing Authority shall use a design scan rate of no more than six seconds in acquiring data necessary to calculate Reporting ACE. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- M1. Each Balancing Authority will have dated documentation demonstrating that the data necessary to calculate Reporting ACE was designed to be scanned at a rate of no more than six seconds. Acceptable evidence may include historical data, dated archive files; or data from other databases, spreadsheets, or displays that demonstrate compliance.
- R2. A Balancing Authority that is unable to calculate Reporting ACE for more than 30-consecutive minutes shall notify its Reliability Coordinator within 45 minutes of the beginning of the inability to calculate Reporting ACE. [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
- M2. Each Balancing Authority will have dated records to show when it was unable to calculate Reporting ACE for more than 30 consecutive minutes and that it notified its Reliability Coordinator within 45 minutes of the beginning of the inability to calculate Reporting ACE. Such evidence may include, but is not limited to, dated voice recordings, operating logs, or other communication documentation.
- R3. Each Balancing Authority shall use frequency metering equipment for the calculation of Reporting ACE: [*Violation Risk Factor: Medium*] [*Time Horizon: Real-time Operations*]
  - 3.1. that is available a minimum of 99.95% for each calendar year; and,
  - 3.2. with a minimum accuracy of 0.001 Hz.

- M3.** The Balancing Authority shall have evidence such as dated documents or other evidence in hard copy or electronic format showing the frequency metering equipment used for the calculation of Reporting ACE had a minimum availability of 99.95% for each calendar year and had a minimum accuracy of 0.001 Hz to demonstrate compliance with Requirement R3.
- R4.** The Balancing Authority shall make available to the operator information associated with Reporting ACE including, but not limited to, quality flags indicating missing or invalid data. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M4.** Each Balancing Authority Area shall have evidence such as a graphical display or dated alarm log that provides indication of data validity for the real-time Reporting ACE based on both the calculated result and all of the associated inputs therein.
- R5.** Each Balancing Authority's system used to calculate Reporting ACE shall be available a minimum of 99.5% of each calendar year. *[Violation Risk Factor: Medium] [Time Horizon: Operations Assessment]*
- M5.** Each Balancing Authority will have dated documentation demonstrating that the system necessary to calculate Reporting ACE has a minimum availability of 99.5% for each calendar year. Acceptable evidence may include historical data, dated archive files; or data from other databases, spreadsheets, or displays that demonstrate compliance.
- R6.** Each Balancing Authority that is within a multiple Balancing Authority Interconnection shall implement an Operating Process to identify and mitigate errors affecting the accuracy of scan rate data used in the calculation of Reporting ACE for each Balancing Authority Area. *[Violation Risk Factor: Medium] [Time Horizon: Same-day Operations]*
- M6.** Each Balancing Authority shall have a current Operating Process meeting the provisions of Requirement R6 and evidence to show that the process was implemented, such as dated communications or incorporation in System Operator task verification.
- R7.** Each Balancing Authority shall ensure that each Tie-Line, Pseudo-Tie, and Dynamic Schedule with an Adjacent Balancing Authority is equipped with: *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*
- 7.1.** a common source to provide information to both Balancing Authorities for the scan rate values used in the calculation of Reporting ACE; and,
- 7.2.** a time synchronized common source to determine hourly megawatt-hour values agreed-upon to aid in the identification and mitigation of errors.
- M7.** The Balancing Authority shall have dated evidence such as voice recordings or transcripts, operator logs, electronic communications, or other equivalent evidence that will be used to demonstrate a common source for the components used in the calculation of Reporting ACE with its Adjacent Balancing Authority.

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### 1.2. Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The applicable entity shall keep data or evidence to show compliance for the current year, plus three previous calendar years.

#### 1.3. Compliance Monitoring and Assessment Processes:

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Assessment Processes” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

#### 1.4. Additional Compliance Information

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.	Real-time Operations	Medium	N/A	N/A	N/A	Balancing Authority was using a design scan rate of greater than six seconds to acquire the data necessary to calculate Reporting ACE.
R2.	Real-time Operations	Medium	The Balancing Authority failed to notify its Reliability Coordinator within 45 minutes of the beginning of the inability to calculate Reporting ACE but notified its Reliability Coordinator in less than or equal to 50 minutes from the beginning of the	The Balancing Authority failed to notify its Reliability Coordinator within 50 minutes of the beginning of an inability to calculate Reporting ACE but notified its Reliability Coordinator in less than or equal to 55 minutes from the beginning of an	The Balancing Authority failed to notify its Reliability Coordinator within 55 minutes of the beginning of an inability to calculate Reporting ACE but notified its Reliability Coordinator in less than or equal to 60 minutes from the beginning of an	The Balancing Authority failed to notify its Reliability Coordinator within 60 minutes of the beginning of an inability to calculate Reporting ACE.

			inability to calculate Reporting ACE.	inability to calculate Reporting ACE.	inability to calculate Reporting ACE.	
R3.	Real-time Operations	Medium	The Balancing Authority's frequency metering equipment used for the calculation of Reporting ACE was available less than 99.95% of the calendar year but was available greater than or equal to 99.94 % of the calendar year.	The Balancing Authority's frequency metering equipment used for the calculation of Reporting ACE was available less than 99.94% of the calendar year but was available greater than or equal to 99.93 % of the calendar year.	The Balancing Authority's frequency metering equipment used for the calculation of Reporting ACE was available less than 99.93% of the calendar year but was available greater than or equal to 99.92 % of the calendar year.	The Balancing Authority's frequency metering equipment used for the calculation of Reporting ACE was available less than 99.92% of the calendar year Or The Balancing Authority's frequency metering equipment used for the calculation of Reporting ACE failed to have a minimum accuracy of 0.001 Hz.
R4.	Real-time Operations	Medium	N/A	N/A	N/A	The Balancing Authority failed to make available information indicating missing or invalid data associated with

						Reporting ACE to its operators.
R5.	Operations Assessment	Medium	The Balancing Authority's system used for the calculation of Reporting ACE was available less than 99.5% of the calendar year but was available greater than or equal to 99.4 % of the calendar year.	The Balancing Authority's system used for the calculation of Reporting ACE was available less than 99.4% of the calendar year but was available greater than or equal to 99.3 % of the calendar year.	The Balancing Authority's system used for the calculation of Reporting ACE was available less than 99.3% of the calendar year but was available greater than or equal to 99.2 % of the calendar year.	The Balancing Authority's system used for the calculation of Reporting ACE was available less than 99.2% of the calendar year.
R6.	Same-day Operations	Medium	N/A	N/A	N/A	The Balancing Authority failed to implement an Operating Process to identify and mitigate errors affecting the scan-rate accuracy of data used in the calculation of Reporting ACE.
R7.	Operations Planning	Medium	N/A	N/A	N/A	The Balancing Authority failed to use a common source for Tie-Lines, Pseudo-ties and Dynamic



						<p><b>Schedules with its Adjacent Balancing Authorities</b></p> <p><b>Or</b></p> <p><b>The Balancing Authority failed to use a time synchronized common source for hourly megawatt hour values that are agreed-upon to aid in the identification and mitigation of errors.</b></p>
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**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

Version History

Version	Date	Action	Change Tracking
0	February 8, 2005	Adopted by NERC Board of Trustees	New
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed “Proposed” from Effective Date	Errata
0a	December 19, 2007	Added Appendix 1 – Interpretation of R17 approved by BOT on May 2, 2007	Addition
0a	January 16, 2008	Section F: added “1.”; changed hyphen to “en dash.” Changed font style for “Appendix 1” to Arial	Errata
0b	February 12, 2008	Replaced Appendix 1 – Interpretation of R17 approved by BOT on February 12, 2008 (BOT approved retirement of Interpretation included in BAL-005-0a)	Replacement
0.1b	October 29, 2008	BOT approved errata changes; updated version number to “0.1b”	Errata
0.1b	May 13, 2009	FERC approved – Updated Effective Date	Addition
0.2b	March 8, 2012	Errata adopted by Standards Committee; (replaced Appendix 1 with the FERC-approved revised interpretation of R17 and corrected standard version referenced in Interpretation by changing from “BAL-005-1” to “BAL-005-0)	Errata
0.2b	September 13, 2012	FERC approved – Updated Effective Date	Addition

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0.2b	February 7, 2013	R2 and associated elements approved by NERC Board of Trustees for retirement as part of the Paragraph 81 project (Project 2013-02) pending applicable regulatory approval.	
0.2b	November 21, 2013	R2 and associated elements approved by FERC for retirement as part of the Paragraph 81 project (Project 2013-02) effective January 21, 2014.	
1	February 11, 2016	Adopted by NERC Board of Trustees	Complete re-write of standard
1	September 20, 2017	FERC Order No. 836 approved BAL-005-1.	

### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon Board approval, the text from the rationale boxes will be moved to this section.

**Rationale for Requirement R1:** Real-time operation of a Balancing Authority requires real-time information. A sufficient scan rate is key to an Operator's trust in real-time information. Without a sufficient scan rate, an operator may question the accuracy of data during events, which would degrade the operator's ability to maintain reliability.

**Rationale for Requirement R2:** The RC is responsible for coordinating the reliability of bulk electric systems for member BA's. When a BA is unable to calculate its ACE for an extended period of time, this information must be communicated to the RC within 15 minutes thereafter so that the RC has sufficient knowledge of system conditions to assess any unintended reliability consequences that may occur on the wide area.

**Rationale for Requirement R3:** Frequency is the basic measurement for interconnection health, and a critical component for calculating Reporting ACE. Without sufficient available frequency data the BA operator will lack situational awareness and will be unable to make correct decisions when maintaining reliability.

**Rationale for Requirement R4:** System operators utilize Reporting ACE as a primary metric to determine operating actions or instructions. When data inputs into the ACE calculation are incorrect, the operator should be made aware through visual display. When an operator questions the validity of data, actions are delayed and the probability of adverse events occurring can increase.

**Rationale for Requirement R5:** Reporting ACE is an essential measurement of the BA's contribution to the reliability of the Interconnection. Since Reporting ACE is a measure of the BA's reliability performance for BAL-001, and BAL-002, it is critical that Reporting ACE be sufficiently available to assure reliability.

**Rationale for Requirement R6:** Reporting ACE is a measure of the BA's reliability performance for BAL-001, and BAL-002. Without a process to address persistent errors in the ACE calculation, the operator can lose trust in the validity of Reporting ACE resulting in delayed or incorrect decisions regarding the reliability of the bulk electric system.

**Rationale for Requirement R7:** Reporting ACE is an essential measurement of the BA's contribution to the reliability of the Interconnection. Common source data is critical to calculating Reporting ACE that is consistent between Balancing Authorities. When data sources are not common, confusion can be created between BAs resulting in delayed or incorrect operator action.

## Supplemental Material

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The intent of Requirement R7 Part 7.1 is to provide accuracy in the measurement and calculations used in Reporting ACE. It specifies the need for common metering points for instantaneous values for the tie-line megawatt flow values between Balancing Authority Areas. Common data source requirements also apply to instantaneous values for pseudo-ties and dynamic schedules, and can extend to more than two Balancing Authorities that participate in allocating shares of a generation resource in supplementary regulation, for example.

The intent of Requirement R7 Part 7.2 is to enable accuracy in the measurements and calculations used in Reporting ACE. It specifies the need for common metering points for hourly accumulated values for the time synchronized tie line MWh values agreed-upon between Balancing Authority Areas. These time synchronized agreed-upon values are necessary for use in the Operating Process required in R6 to identify and mitigate errors in the scan-rate values used in Reporting ACE.



## A. Introduction

1. **Title:** Communications
2. **Number:** COM-001-3
3. **Purpose:** To establish Interpersonal Communication capabilities necessary to maintain reliability.
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1. Transmission Operator
    - 4.1.2. Balancing Authority
    - 4.1.3. Reliability Coordinator
    - 4.1.4. Distribution Provider
    - 4.1.5. Generator Operator
5. **Effective Date:** See Implementation Plan

## B. Requirements and Measures

- R1. Each Reliability Coordinator shall have Interpersonal Communication capability with the following entities (unless the Reliability Coordinator detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply): *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
  - 1.1. All Transmission Operators and Balancing Authorities within its Reliability Coordinator Area.
  - 1.2. Each adjacent Reliability Coordinator within the same Interconnection.
- M1. Each Reliability Coordinator shall have and provide upon request evidence that it has Interpersonal Communication capability with all Transmission Operators and Balancing Authorities within its Reliability Coordinator Area and with each adjacent Reliability Coordinator within the same Interconnection, which could include, but is not limited to:
  - physical assets, or
  - dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R1.)
- R2. Each Reliability Coordinator shall designate an Alternative Interpersonal Communication capability with the following entities: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*

- 2.1. All Transmission Operators and Balancing Authorities within its Reliability Coordinator Area.
      - 2.2. Each adjacent Reliability Coordinator within the same Interconnection.
- M2. Each Reliability Coordinator shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with all Transmission Operators and Balancing Authorities within its Reliability Coordinator Area and with each adjacent Reliability Coordinator within the same Interconnection, which could include, but is not limited to:
  - physical assets, or
  - dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R2.)
- R3. Each Transmission Operator shall have Interpersonal Communication capability with the following entities (unless the Transmission Operator detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply): *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
  - 3.1. Its Reliability Coordinator.
  - 3.2. Each Balancing Authority within its Transmission Operator Area.
  - 3.3. Each Distribution Provider within its Transmission Operator Area.
  - 3.4. Each Generator Operator within its Transmission Operator Area.
  - 3.5. Each adjacent Transmission Operator synchronously connected.
  - 3.6. Each adjacent Transmission Operator asynchronously connected.
- M3. Each Transmission Operator shall have and provide upon request evidence that it has Interpersonal Communication capability with its Reliability Coordinator, each Balancing Authority, Distribution Provider, and Generator Operator within its Transmission Operator Area, and each adjacent Transmission Operator asynchronously or synchronously connected, which could include, but is not limited to:
  - Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communication. (R3.)
- R4. Each Transmission Operator shall designate an Alternative Interpersonal Communication capability with the following entities: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
  - 4.1. Its Reliability Coordinator.



- 4.2. Each Balancing Authority within its Transmission Operator Area.
  - 4.3. Each adjacent Transmission Operator synchronously connected.
  - 4.4. Each adjacent Transmission Operator asynchronously connected.
- M4.** Each Transmission Operator shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with its Reliability Coordinator, each Balancing Authority within its Transmission Operator Area, and each adjacent Transmission Operator asynchronously and synchronously connected, which could include, but is not limited to:
- Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R4.)
- R5.** Each Balancing Authority shall have Interpersonal Communication capability with the following entities (unless the Balancing Authority detects a failure of its Interpersonal Communication capability in which case Requirement R10 shall apply): *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- 5.1. Its Reliability Coordinator.
  - 5.2. Each Transmission Operator that operates Facilities within its Balancing Authority Area.
  - 5.3. Each Distribution Provider within its Balancing Authority Area.
  - 5.4. Each Generator Operator that operates Facilities within its Balancing Authority Area.
  - 5.5. Each Adjacent Balancing Authority.
- M5.** Each Balancing Authority shall have and provide upon request evidence that it has Interpersonal Communication capability with its Reliability Coordinator, each Transmission Operator and Generator Operator that operates Facilities within its Balancing Authority Area, each Distribution Provider within its Balancing Authority Area, and each adjacent Balancing Authority, which could include, but is not limited to:
- Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R5.)

- R6.** Each Balancing Authority shall designate an Alternative Interpersonal Communication capability with the following entities: *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- 6.1.** Its Reliability Coordinator.
  - 6.2.** Each Transmission Operator that operates Facilities within its Balancing Authority Area.
  - 6.3.** Each Adjacent Balancing Authority.
- M6.** Each Balancing Authority shall have and provide upon request evidence that it designated an Alternative Interpersonal Communication capability with its Reliability Coordinator, each Transmission Operator that operates Facilities within its Balancing Authority Area, and each adjacent Balancing Authority, which could include, but is not limited to:
- Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R6.)
- R7.** Each Distribution Provider shall have Interpersonal Communication capability with the following entities (unless the Distribution Provider detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply): *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- 7.1.** Its Balancing Authority.
  - 7.2.** Its Transmission Operator.
- M7.** Each Distribution Provider shall have and provide upon request evidence that it has Interpersonal Communication capability with its Transmission Operator and its Balancing Authority, which could include, but is not limited to:
- Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R7.)
- R8.** Each Generator Operator shall have Interpersonal Communication capability with the following entities (unless the Generator Operator detects a failure of its Interpersonal Communication capability in which case Requirement R11 shall apply): *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- 8.1.** Its Balancing Authority.
  - 8.2.** Its Transmission Operator.

- M8.** Each Generator Operator shall have and provide upon request evidence that it has Interpersonal Communication capability with its Balancing Authority and its Transmission Operator, which could include, but is not limited to:
- Physical assets, or
  - Dated evidence, such as, equipment specifications and installation documentation, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R8.)
- R9.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall test its Alternative Interpersonal Communication capability at least once each calendar month. If the test is unsuccessful, the responsible entity shall initiate action to repair or designate a replacement Alternative Interpersonal Communication capability within 2 hours. *[Violation Risk Factor: Medium][Time Horizon: Real-time Operations, Same-day Operations]*
- M9.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have and provide upon request evidence that it tested, at least once each calendar month, its Alternative Interpersonal Communication capability designated in Requirements R2, R4, or R6. If the test was unsuccessful, the entity shall have and provide upon request evidence that it initiated action to repair or designated a replacement Alternative Interpersonal Communication capability within 2 hours. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R9.)
- R10.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall notify entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasts 30 minutes or longer. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M10.** Each Reliability Coordinator, Transmission Operator, and Balancing Authority shall have and provide upon request evidence that it notified entities as identified in Requirements R1, R3, and R5, respectively within 60 minutes of the detection of a failure of its Interpersonal Communication capability that lasted 30 minutes or longer. Evidence could include, but is not limited to: dated and time-stamped test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R10.)
- R11.** Each Distribution Provider and Generator Operator that detects a failure of its Interpersonal Communication capability shall consult each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine a mutually agreeable action for the

restoration of its Interpersonal Communication capability. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*

- M11.** Each Distribution Provider and Generator Operator that detected a failure of its Interpersonal Communication capability shall have and provide upon request evidence that it consulted with each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine mutually agreeable action to restore the Interpersonal Communication capability. Evidence could include, but is not limited to: dated operator logs, voice recordings, transcripts of voice recordings, or electronic communications. (R11.)
- R12.** Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have internal Interpersonal Communication capabilities for the exchange of information necessary for the Reliable Operation of the BES. This includes communication capabilities between Control Centers within the same functional entity, and/or between a Control Center and field personnel. *[Violation Risk Factor: High] [Time Horizon: Real-time Operations]*
- M12.** Each Reliability Coordinator, Transmission Operator, Generator Operator, and Balancing Authority shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
- physical assets, or
  - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.
- R13.** Each Distribution Provider shall have internal Interpersonal Communication capabilities for the exchange of information necessary for the Reliable Operation of the BES. This includes communication capabilities between control centers within the same functional entity, and/or between a control center and field personnel. *[Violation Risk Factor: Medium] [Time Horizon: Real-time Operations]*
- M13.** Each Distribution Provider shall have and provide upon request evidence that it has internal Interpersonal Communication capability, which could include, but is not limited to:
- physical assets, or
  - dated evidence, such as, equipment specifications and installation documentation, operating procedures, test records, operator logs, voice recordings, transcripts of voice recordings, or electronic communications.

## Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

#### 1.2. Evidence Retention

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation:

- The Reliability Coordinator for Requirements R1, R2, R9, and R10, Measures M1, M2, M9, and M10 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.
- The Transmission Operator for Requirements R3, R4, R9, and R10, Measures M3, M4, M9, and M10 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.
- The Balancing Authority for Requirements R5, R6, R9, and R10, Measures M5, M6, M9, and M10 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.
- The Distribution Provider for Requirements R7 and R11, Measures M7 and M11 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.
- The Generator Operator for Requirements R8 and R11, Measures M8 and M11 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.
- Responsible entities under Requirement R12, Measure M12 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.

- Responsible entities under Requirement R13, Measure M13 shall retain written documentation for the most recent twelve calendar months and voice recordings for the most recent 90 calendar days.

**1.3. Compliance Monitoring and Enforcement Program**

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

Violation Severity Levels

R #	Violation Severity Levels			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1.</b>	<b>N/A</b>	<b>N/A</b>	The Reliability Coordinator failed to have Interpersonal Communication capability with one of the entities listed in Requirement R1, Parts 1.1 or 1.2, except when the Reliability Coordinator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.	The Reliability Coordinator failed to have Interpersonal Communication capability with two or more of the entities listed in Requirement R1, Parts 1.1 or 1.2, except when the Reliability Coordinator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.
<b>R2.</b>	<b>N/A</b>	<b>N/A</b>	The Reliability Coordinator failed to designate Alternative Interpersonal Communication capability with one of the entities listed in Requirement R2, Parts 2.1 or 2.2.	The Reliability Coordinator failed to designate Alternative Interpersonal Communication capability with two or more of the entities listed in Requirement R2, Parts 2.1 or 2.2.
<b>R3.</b>	<b>N/A</b>	<b>N/A</b>	The Transmission Operator failed to have Interpersonal Communication capability	The Transmission Operator failed to have Interpersonal Communication capability

			with one of the entities listed in Requirement R3, Parts 3.1, 3.2, 3.3, 3.4, 3.5, or 3.6, except when the Transmission Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.	with two or more of the entities listed in Requirement R3, Parts 3.1, 3.2, 3.3, 3.4, 3.5, or 3.6, except when the Transmission Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R10.
<b>R4.</b>	<b>N/A</b>	<b>N/A</b>	The Transmission Operator failed to designate Alternative Interpersonal Communication capability with one of the entities listed in Requirement R4, Parts 4.1, 4.2, 4.3, or 4.4.	The Transmission Operator failed to designate Alternative Interpersonal Communication capability with two or more of the entities listed in Requirement R4, Parts 4.1, 4.2, 4.3, or 4.4.
<b>R5.</b>	<b>N/A</b>	<b>N/A</b>	The Balancing Authority failed to have Interpersonal Communication capability with one of the entities listed in Requirement R5, Parts 5.1, 5.2, 5.3, 5.4, or 5.5, except when the Balancing Authority detected a failure of its Interpersonal Communication capability in	The Balancing Authority failed to have Interpersonal Communication capability with two or more of the entities listed in Requirement R5, Parts 5.1, 5.2, 5.3, 5.4, or 5.5, except when the Balancing Authority detected a failure of its Interpersonal Communication capability in



			accordance with Requirement R10.	accordance with Requirement R10.
<b>R6.</b>	<b>N/A</b>	<b>N/A</b>	The Balancing Authority failed to designate Alternative Interpersonal Communication capability with one of the entities listed in Requirement R6, Parts 6.1, 6.2, or 6.3.	The Balancing Authority failed to designate Alternative Interpersonal Communication capability with two or more of the entities listed in Requirement R6, Parts 6.1, 6.2, or 6.3.
<b>R7.</b>	<b>N/A</b>	<b>N/A</b>	The Distribution Provider failed to have Interpersonal Communication capability with one of the entities listed in Requirement R7, Parts 7.1 or 7.2, except when the Distribution Provider detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.	The Distribution Provider failed to have Interpersonal Communication capability with two or more of the entities listed in Requirement R7, Parts 7.1 or 7.2, except when the Distribution Provider detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.
<b>R8.</b>	<b>N/A</b>	<b>N/A</b>	The Generator Operator failed to have Interpersonal Communication capability with one of the entities listed in Requirement R8, Parts 8.1 or 8.2, except when	The Generator Operator failed to have Interpersonal Communication capability with two or more of the entities listed in Requirement R8, Parts 8.1 or

			a Generator Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.	8.2, except when a Generator Operator detected a failure of its Interpersonal Communication capability in accordance with Requirement R11.
<b>R9.</b>	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 2 hours and less than or equal to 4 hours upon an unsuccessful test.	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 4 hours and less than or equal to 6 hours upon an unsuccessful test.	The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 6 hours and less than or equal to 8 hours upon an unsuccessful test.	The Reliability Coordinator, Transmission Operator, or Balancing Authority failed to test the Alternative Interpersonal Communication capability once each calendar month.  OR The Reliability Coordinator, Transmission Operator, or Balancing Authority tested the Alternative Interpersonal Communication capability but failed to initiate action to repair or designate a replacement Alternative Interpersonal Communication in more than 8 hours upon an unsuccessful test.
<b>R10.</b>	The Reliability Coordinator, Transmission Operator, or	The Reliability Coordinator, Transmission Operator, or	The Reliability Coordinator, Transmission Operator, or	The Reliability Coordinator, Transmission Operator, or

	Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal Communication capability in more than 60 minutes but less than or equal to 70 minutes.	Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal Communication capability in more than 70 minutes but less than or equal to 80 minutes.	Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal Communication capability in more than 80 minutes but less than or equal to 90 minutes.	Balancing Authority failed to notify the entities identified in Requirements R1, R3, and R5, respectively upon the detection of a failure of its Interpersonal Communication capability in more than 90 minutes.
<b>R11.</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	The Distribution Provider or Generator Operator that detected a failure of its Interpersonal Communication capability failed to consult with each entity affected by the failure, as identified in Requirement R7 for a Distribution Provider or Requirement R8 for a Generator Operator, to determine a mutually agreeable action for the restoration of the Interpersonal Communication capability.
<b>R12.</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	The Reliability Coordinator, Transmission Operator, Generator Operator, or Balancing Authority failed to

				have internal Interpersonal Communication capability for the exchange of operating information.
<b>R13.</b>	<b>N/A</b>	<b>N/A</b>	<b>N/A</b>	The Distribution Provider failed to have internal Interpersonal Communication capability for the exchange of operating information.

**Regional Variances**

None.

**Associated Documents**

None.

## Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
0	August 8, 2005	Removed "Proposed" from Effective Date	Errata
1	November 1, 2006	Adopted by Board of Trustees	Revised
1	April 4, 2007	Regulatory Approval — Effective Date	New
1	April 6, 2007	Requirement 1, added the word "for" between "facilities" and "the exchange."	Errata
1.1	October 29, 2008	BOT adopted errata changes; updated version number to "1.1"	Errata
2	November 7, 2012	Adopted by Board of Trustees	Revised in accordance with SAR for Project 2006-06, Reliability Coordination (RC SDT). Replaced R1 with R1-R8; R2 replaced by R9; R3 included within new R1; R4 remains enforce pending Project 2007-02; R5 redundant with EOP-008-0, retiring R5 as redundant with EOP-008-0, R1; retiring R6, relates to ERO procedures; R10 & R11, new.
2	April 16, 2015	FERC Order issued approving COM-001-2	
2.1	August 25, 2015	Changed numbered parts under	2.1
2.1	November 13, 2015	FERC Order issued approving errata to COM-001-2.1	Errata to correct inadvertent numbering errors in the parts to Requirement R6.

**COM-001-3 Communications**

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3	August 11, 2016	Adopted by the NERC Board of Trustees	New
3	October 28, 2016	FERC letter Order issued approving COM-001-3. Docket No. RD16-9-000.	

### Rationale

#### **Rationale for Requirement R12:**

The focus of the requirement is on the *capabilities* that an entity must have for the purpose of exchanging information necessary for the Reliable Operation of the BES. That is, the entity must have the capability to communicate internally by, “any medium that allows two or more individuals to interact, consult, or exchange information.” The standard does not prescribe the specific type of capability (*i.e.*, hardware or software). The determination of the appropriate type of capability is left to the entity. Regardless, the entity must have the capability to exchange information *whenever* the internal Interpersonal Communications may directly impact operations of the BES. Therefore, the applicable entities must have the capability to exchange information between Control Centers of that functional entity. For example, a TOP with multiple control centers that are geographical separated must have the capability to communicate internally between or among those control centers. The communication capability may occur through any medium that supports Interpersonal Communication, such as land line telephone, cellular device, Voice Over Internet Protocol (VOIP), satellite telephone, radio, or electronic message. Also, applicable entities must have the capability to exchange information between a Control Center and field personnel. For example, a TOP system operator providing instruction to a field personnel to perform a reliability activity, such as switching Facilities.

In the course of normal control center operation, system operators within a single Control Center communicate as needed to ensure the reliability of the BES, including face-to-face communications. These internal communications are ongoing and occur throughout the day as part of day-to-day operations. However, these types of communications are not the focus of this requirement. The focus is on the capability of an entity to communicate internally where face-to-face communications are not available.

#### **Rationale for Requirement R13:**

The NERC Glossary definition for “Control Center” was not used in this requirement because Distribution Provider is not listed as an entity within the definition. The Glossary definition for “Control Center” is, “[o]ne or more facilities hosting operating personnel that monitor and control the Bulk Electric System (BES) in real-time to perform the reliability tasks, including their associated data centers, of: 1) a Reliability Coordinator, 2) a Balancing Authority, 3) a Transmission Operator for transmission Facilities at two or more locations, or 4) a Generator Operator for generation Facilities at two or more locations.” Therefore in this requirement, control center is intended to mean the Distribution Provider facilities hosting operating personnel performing the operational functions of the Distribution Provider that are necessary for the Reliable Operation of the BES, often referred to as a distribution control center, or distribution center. Examples of Distribution Providers exchanging information necessary for the Reliable Operation of the BES include Distribution Providers included in restoration plans, load shed plans, load reconfiguration, and voltage control plans. The Distribution Provider must have the capability to exchange information *whenever* the internal Interpersonal Communications may directly impact operations of the BES. Therefore, the Distribution

## Supplemental Material

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Provider must have the capability to exchange information between control centers as necessary. For example, a Distribution Provider with multiple control centers that are geographical separated, where face-to-face communications are not available, must have the capability to communicate internally between or among those control centers.



## A. Introduction

1. **Title:** Facility Interconnection Requirements
2. **Number:** FAC-001-3
3. **Purpose:** To avoid adverse impacts on the reliability of the Bulk Electric System, Transmission Owners and applicable Generator Owners must document and make Facility interconnection requirements available so that entities seeking to interconnect will have the necessary information.
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1 Transmission Owner
    - 4.1.2 Applicable Generator Owner
      - 4.1.2.1 Generator Owner with a fully executed Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner's existing Facility that is used to interconnect to the Transmission system.
5. **Effective Date:** See Implementation Plan for FAC-001-3.

## B. Requirements and Measures

- R1.** Each Transmission Owner shall document Facility interconnection requirements, update them as needed, and make them available upon request. Each Transmission Owner's Facility interconnection requirements shall address interconnection requirements for: *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*
  - 1.1. generation Facilities;
  - 1.2. transmission Facilities; and
  - 1.3. end-user Facilities.
- M1.** Each Transmission Owner shall have evidence (such as dated, documented Facility interconnection requirements) that it met all requirements in Requirement R1.
- R2.** Each applicable Generator Owner shall document Facility interconnection requirements and make them available upon request within 45 calendar days of full execution of an Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner's existing Facility that is used to interconnect to the Transmission system. *[Violation Risk Factor: Lower] [Time Horizon: Long-term Planning]*
- M2.** Each applicable Generator Owner shall have evidence (such as dated, documented Facility interconnection requirements) that it met all requirements in Requirement R2.

- R3.** Each Transmission Owner shall address the following items in its Facility interconnection requirements: *[Violation Risk Factor: Lower] [Time Horizon: Long-Term Planning]*
- 3.1.** Procedures for coordinated studies of new or materially modified existing interconnections and their impacts on affected system(s).
  - 3.2.** Procedures for notifying those responsible for the reliability of affected system(s) of new or materially modified existing interconnections.
  - 3.3.** Procedures for confirming with those responsible for the reliability of affected systems of new or materially modified transmission Facilities are within a Balancing Authority Area’s metered boundaries.
- M3.** Each Transmission Owner shall have evidence (such as dated, documented Facility interconnection requirements addressing the procedures) that it met all requirements in Requirement R3.
- R4.** Each applicable Generator Owner shall address the following items in its Facility interconnection requirements: *[Violation Risk Factor: Lower] [Time Horizon: Long-Term Planning]*
- 4.1.** Procedures for coordinated studies of new interconnections and their impacts on affected system(s).
  - 4.2.** Procedures for notifying those responsible for the reliability of affected system(s) of new interconnections.
  - 4.3.** Procedures for confirming with those responsible for the reliability of affected systems of new or materially modified generation Facilities are within a Balancing Authority Area’s metered boundaries.
- M4.** Each applicable Generator Owner shall have evidence (such as dated, documented Facility interconnection requirements addressing the procedures) that it met all requirements in Requirement R4.

## **C. Compliance**

### **1. Compliance Monitoring Process**

#### **1.1. Compliance Enforcement Authority**

As defined in the NERC Rules of Procedure, “Compliance Enforcement Authority” (CEA) means NERC or the Regional Entity in their respective roles of monitoring and enforcing compliance with the NERC Reliability Standards.

#### **1.2. Evidence Retention**

The following evidence retention periods identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the CEA may ask an entity to provide other evidence to show that it was compliant for the full time period since the last audit.

The applicable Functional Entity shall keep data or evidence to show compliance as identified below unless directed by its CEA to retain specific evidence for a longer period of time as part of an investigation:

The responsible entities shall retain documentation as evidence for three years.

If a responsible entity is found non-compliant, it shall keep information related to the non-compliance until mitigation is complete and approved or for the time specified above, whichever is longer.

The CEA shall keep the last audit records and all requested and submitted subsequent audit records.

**1.3. Compliance Monitoring and Assessment Processes:**

Compliance Audit

Self-Certification

Spot Check

Compliance Investigation

Self-Reporting

Complaint

**1.4. Additional Compliance Information**

None

Table of Compliance Elements

R #	Time Horizon	VRF	Violation Severity Levels			
			Lower VSL	Moderate VSL	High VSL	Severe VSL
<b>R1</b>	Long-term Planning	Lower	N/A	<p>The Transmission Owner documented Facility interconnection requirements and updated them as needed, but failed to make them available upon request.</p> <p>OR</p> <p>The Transmission Owner documented Facility interconnection requirements and made them available upon request, but failed to update them as needed.</p> <p>OR</p> <p>The Transmission Owner documented Facility interconnection requirements, updated them as needed, and made them available upon request, but</p>	<p>The Transmission Owner documented Facility interconnection requirements, but failed to update them as needed and failed to make them available upon request.</p> <p>OR</p> <p>The Transmission Owner documented Facility interconnection requirements, updated them as needed, and made them available upon request, but failed to address interconnection requirements for two of the Facilities as specified in R1, Parts 1.1, 1.2, or 1.3.</p>	<p>The Transmission Owner did not document Facility interconnection requirements.</p>

**FAC-001-3 — Facility Interconnection Requirements**

				failed to address interconnection requirements for one of the Facilities as specified in R1, Parts 1.1, 1.2, or 1.3.		
<b>R2</b>	Long-term Planning	Lower	The applicable Generator Owner failed to document Facility interconnection requirements and make them available upon request until more than 45 calendar days but less than or equal to 60 calendar days after full execution of an Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission system.	The applicable Generator Owner failed to document Facility interconnection requirements and make them available upon request until more than 60 calendar days but less than or equal to 70 calendar days after full execution of an Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission system.	The applicable Generator Owner failed to document Facility interconnection requirements and make them available upon request until more than 70 calendar days but less than or equal to 80 calendar days after full execution of an Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission system.	The applicable Generator Owner failed to document Facility interconnection requirements and make them available upon request until more than 80 calendar days after full execution of an Agreement to conduct a study on the reliability impact of interconnecting a third party Facility to the Generator Owner’s existing Facility that is used to interconnect to the Transmission system.

**FAC-001-3 — Facility Interconnection Requirements**

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<b>R3</b>	Long-term Planning	Lower	N/A	The Transmission Owner failed to address one part of Requirement R3 Part 3.1 through Part 3.3.	The Transmission Owner failed to address two parts of Requirement R3 Part 3.1 through Part 3.3.	The Transmission Owner failed to address Requirement R3 Part 3.1 through Part 3.3.
<b>R4</b>	Long-term Planning	Lower	N/A	The Generator Owner failed to address one part of Requirement R4 Part 4.1 through Part 4.3.	The Generator Owner failed to address two parts of Requirement R4 Part 4.1 through Part 4.3.	The Generator Owner failed to address Requirement R4 Part 4.1 through Part 4.3.

**D. Regional Variances**

None.

**E. Interpretations**

None.

**F. Associated Documents**

None.

Version History

Version	Date	Action	Change Tracking
0	April 1, 2005	Effective Date	New
1		Added requirements for Generator Owner and brought overall standard format up to date.	Revision under Project 2010-07
1	February 9, 2012	Adopted by the Board of Trustees	
1	September 19, 2013	A FERC order was issued on September 19, 2013, approving FAC-001-1. This standard became enforceable on November 25, 2013 for Transmission Owners. For Generator Owners, the standard becomes enforceable on January 1, 2015.	
2		Revisions to implement the recommendations of the FAC Five-Year Review Team.	Revision under Project 2010-02
2	August 14, 2014	Adopted by the Board of Trustees	
2	November 6, 2014	FERC letter order issued approving FAC-001-2.	
3	February 11, 2016	Adopted by the Board of Trustees	Moved BAL-005-0.2b Requirement R1 into FAC-001-3 Requirements R3 and R4
3	September 20, 2017	FERC Order No. 836 issued approving FAC-001-3	

### Guidelines and Technical Basis

Entities should have documentation to support the technical rationale for determining whether an existing interconnection was “materially modified.” Recognizing that what constitutes a “material modification” will vary from entity to entity, the intent is for this determination to be based on engineering judgment.

#### **Requirement R3:**

Originally the Parts of R3, with the exception of the first two bullets, which were added by the Project 2010-02 drafting team, this list has been moved to the Guidelines and Technical Basis section to provide entities with the flexibility to determine the Facility interconnection requirements that are technically appropriate for their respective Facilities. Including them as Parts of R3 was deemed too prescriptive, as frequently some items in the list do not apply to all applicable entities – and some applicable entities will have requirements that are not included in this list.

Each Transmission Owner and applicable Generator Owner should consider the following items in the development of Facility interconnection requirements:

- Procedures for requesting a new Facility interconnection or material modification to an existing interconnection
- Data required to properly study the interconnection
- Voltage level and MW and MVAR capacity or demand at the point of interconnection
- Breaker duty and surge protection
- System protection and coordination
- Metering and telecommunications
- Grounding and safety issues
- Insulation and insulation coordination
- Voltage, Reactive Power (including specifications for minimum static and dynamic reactive power requirements), and power factor control
- Power quality impacts
- Equipment ratings
- Synchronizing of Facilities
- Maintenance coordination
- Operational issues (abnormal frequency and voltages)
- Inspection requirements for new or materially modified existing interconnections
- Communications and procedures during normal and emergency operating conditions



### Rationale

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon Board approval, the text from the rationale boxes will be moved to this section.

**Rationale for Requirement R3.3:** Consistent with the Functional Model, there cannot be an assumption that the entity owning the transmission will be the same entity providing the BA function. It is the responsibility of the party interconnecting to make appropriate arrangements with a Balancing Authority to ensure its Facilities are within the BA's metered boundaries, which also serves to facilitate the process of the coordination between the two entities that will be required under numerous other standards upon the start of operation. Under 3.3, the Transmission Owner is responsible for confirming that the party interconnecting has made appropriate provisions with a Balancing Authority to operate within its metered boundaries.

**Rationale for Requirement R4.3:** Consistent with the Functional Model, there cannot be an assumption that the entity owning the generation will be the same entity providing the BA function. It is the responsibility of the party interconnecting to make appropriate arrangements with a Balancing Authority to ensure its Facilities are within the BA's metered boundaries, which also serves to facilitate the process of the coordination between the two entities that will be required under numerous other standards upon the start of operation. Under 4.3, the Generator Owner is responsible for confirming that the party interconnecting has made appropriate provisions with a Balancing Authority to operate within its metered boundaries.



## A. Introduction

1. **Title:** Transmission Vegetation Management
2. **Number:** FAC-003-4
3. **Purpose:** To maintain a reliable electric transmission system by using a defense-in-depth strategy to manage vegetation located on transmission rights of way (ROW) and minimize encroachments from vegetation located adjacent to the ROW, thus preventing the risk of those vegetation-related outages that could lead to Cascading.
4. **Applicability:**
  - 4.1. **Functional Entities:**
    - 4.1.1. Applicable Transmission Owners
      - 4.1.1.1. Transmission Owners that own Transmission Facilities defined in 4.2.
    - 4.1.2. Applicable Generator Owners
      - 4.1.2.1. Generator Owners that own generation Facilities defined in 4.3.
  - 4.2. **Transmission Facilities:** Defined below (referred to as “applicable lines”), including but not limited to those that cross lands owned by federal<sup>1</sup>, state, provincial, public, private, or tribal entities:
    - 4.2.1. Each overhead transmission line operated at 200kV or higher.
    - 4.2.2. Each overhead transmission line operated below 200kV identified as an element of an IROL under NERC Standard FAC-014 by the Planning Coordinator.
    - 4.2.3. Each overhead transmission line operated below 200 kV identified as an element of a Major WECC Transfer Path in the Bulk Electric System by WECC.
    - 4.2.4. Each overhead transmission line identified above (4.2.1. through 4.2.3.) located outside the fenced area of the switchyard, station or substation and any portion of the span of the transmission line that is crossing the substation fence.
  - 4.3. **Generation Facilities:** Defined below (referred to as “applicable lines”), including but not limited to those that cross lands owned by federal<sup>2</sup>, state, provincial, public, private, or tribal entities:

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<sup>1</sup> EPAAct 2005 section 1211c: “Access approvals by Federal agencies.”

<sup>2</sup> *Id.*

**4.3.1.** Overhead transmission lines that (1) extend greater than one mile or 1.609 kilometers beyond the fenced area of the generating station switchyard to the point of interconnection with a Transmission Owner's Facility or (2) do not have a clear line of sight<sup>3</sup> from the generating station switchyard fence to the point of interconnection with a Transmission Owner's Facility and are:

**4.3.1.1.** Operated at 200kV or higher; or

**4.3.1.2.** Operated below 200kV identified as an element of an IROL under NERC Standard FAC-014 by the Planning Coordinator; or

**4.3.1.3.** Operated below 200 kV identified as an element of a Major WECC Transfer Path in the Bulk Electric System by WECC.

**5. Effective Date:** See Implementation Plan

**6. Background:** This standard uses three types of requirements to provide layers of protection to prevent vegetation related outages that could lead to Cascading:

- a) Performance-based defines a particular reliability objective or outcome to be achieved. In its simplest form, a results-based requirement has four components: *who, under what conditions (if any), shall perform what action, to achieve what particular bulk power system performance result or outcome?*
- b) Risk-based preventive requirements to reduce the risks of failure to acceptable tolerance levels. A risk-based reliability requirement should be framed as: *who, under what conditions (if any), shall perform what action, to achieve what particular result or outcome that reduces a stated risk to the reliability of the bulk power system?*
- c) Competency-based defines a minimum set of capabilities an entity needs to have to demonstrate it is able to perform its designated reliability functions. A competency-based reliability requirement should be framed as: *who, under what conditions (if any), shall have what capability, to achieve what particular result or outcome to perform an action to achieve a result or outcome or to reduce a risk to the reliability of the bulk power system?*

The defense-in-depth strategy for reliability standards development recognizes that each requirement in a NERC reliability standard has a role in preventing system failures, and that these roles are complementary and reinforcing. Reliability standards should not be viewed as a body of unrelated requirements, but rather should be viewed as part of a portfolio of requirements designed to achieve an overall defense-in-depth strategy and comport with the quality objectives of a reliability standard.

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<sup>3</sup> "Clear line of sight" means the distance that can be seen by the average person without special instrumentation (e.g., binoculars, telescope, spyglasses, etc.) on a clear day.

This standard uses a defense-in-depth approach to improve the reliability of the electric Transmission system by:

- Requiring that vegetation be managed to prevent vegetation encroachment inside the flash-over clearance (R1 and R2);
- Requiring documentation of the maintenance strategies, procedures, processes and specifications used to manage vegetation to prevent potential flash-over conditions including consideration of 1) conductor dynamics and 2) the interrelationships between vegetation growth rates, control methods and the inspection frequency (R3);
- Requiring timely notification to the appropriate control center of vegetation conditions that could cause a flash-over at any moment (R4);
- Requiring corrective actions to ensure that flash-over distances will not be violated due to work constraints such as legal injunctions (R5);
- Requiring inspections of vegetation conditions to be performed annually (R6); and
- Requiring that the annual work needed to prevent flash-over is completed (R7).

For this standard, the requirements have been developed as follows:

- Performance-based: Requirements 1 and 2
- Competency-based: Requirement 3
- Risk-based: Requirements 4, 5, 6 and 7

R3 serves as the first line of defense by ensuring that entities understand the problem they are trying to manage and have fully developed strategies and plans to manage the problem. R1, R2, and R7 serve as the second line of defense by requiring that entities carry out their plans and manage vegetation. R6, which requires inspections, may be either a part of the first line of defense (as input into the strategies and plans) or as a third line of defense (as a check of the first and second lines of defense). R4 serves as the final line of defense, as it addresses cases in which all the other lines of defense have failed.

Major outages and operational problems have resulted from interference between overgrown vegetation and transmission lines located on many types of lands and ownership situations. Adherence to the standard requirements for applicable lines on any kind of land or easement, whether they are Federal Lands, state or provincial lands, public or private lands, franchises, easements or lands owned in fee, will reduce and manage this risk. For the purpose of the standard the term “public lands” includes municipal lands, village lands, city lands, and a host of other governmental entities.

This standard addresses vegetation management along applicable overhead lines and does not apply to underground lines, submarine lines or to line sections inside an electric station boundary.

This standard focuses on transmission lines to prevent those vegetation related outages that could lead to Cascading. It is not intended to prevent customer outages due to tree contact with lower voltage distribution system lines. For example, localized customer service might be disrupted if vegetation were to make contact with a 69kV transmission line supplying power to a 12kV distribution station. However, this standard is not written to address such isolated situations which have little impact on the overall electric transmission system.

Since vegetation growth is constant and always present, unmanaged vegetation poses an increased outage risk, especially when numerous transmission lines are operating at or near their Rating. This can present a significant risk of consecutive line failures when lines are experiencing large sags thereby leading to Cascading. Once the first line fails the shift of the current to the other lines and/or the increasing system loads will lead to the second and subsequent line failures as contact to the vegetation under those lines occurs. Conversely, most other outage causes (such as trees falling into lines, lightning, animals, motor vehicles, etc.) are not an interrelated function of the shift of currents or the increasing system loading. These events are not any more likely to occur during heavy system loads than any other time. There is no cause-effect relationship which creates the probability of simultaneous occurrence of other such events. Therefore these types of events are highly unlikely to cause large-scale grid failures. Thus, this standard places the highest priority on the management of vegetation to prevent vegetation grow-ins.

## **B. Requirements and Measures**

- R1.** Each applicable Transmission Owner and applicable Generator Owner shall manage vegetation to prevent encroachments into the Minimum Vegetation Clearance Distance (MVCD) of its applicable line(s) which are either an element of an IROL, or an element of a Major WECC Transfer Path; operating within their Rating and all Rated Electrical Operating Conditions of the types shown below<sup>4</sup> [*Violation Risk Factor: High*] [*Time Horizon: Real-time*]:

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<sup>4</sup> This requirement does not apply to circumstances that are beyond the control of an applicable Transmission Owner or applicable Generator Owner subject to this reliability standard, including natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, wind shear, fresh gale, major storms as defined either by the applicable Transmission Owner or applicable Generator Owner or an applicable regulatory body, ice storms, and floods; human or animal activity such as logging, animal severing tree, vehicle contact with tree, or installation, removal, or digging of vegetation. Nothing in this footnote should be construed to limit the Transmission Owner's or applicable Generator Owner's right to exercise its full legal rights on the ROW.

- 1.1.** An encroachment into the MVCD as shown in FAC-003-Table 2, observed in Real-time, absent a Sustained Outage,<sup>5</sup>
  - 1.2.** An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>6</sup>
  - 1.3.** An encroachment due to the blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage<sup>7</sup>,
  - 1.4.** An encroachment due to vegetation growth into the MVCD that caused a vegetation-related Sustained Outage.<sup>8</sup>
- M1.** Each applicable Transmission Owner and applicable Generator Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R1. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R1)
- R2.** Each applicable Transmission Owner and applicable Generator Owner shall manage vegetation to prevent encroachments into the MVCD of its applicable line(s) which are not either an element of an IROL, or an element of a Major WECC Transfer Path; operating within its Rating and all Rated Electrical Operating Conditions of the types shown below<sup>9</sup> [*Violation Risk Factor: High*] [*Time Horizon: Real-time*]:
- 2.1.** An encroachment into the MVCD, observed in Real-time, absent a Sustained Outage,<sup>10</sup>
  - 2.2.** An encroachment due to a fall-in from inside the ROW that caused a vegetation-related Sustained Outage,<sup>11</sup>
  - 2.3.** An encroachment due to the blowing together of applicable lines and vegetation located inside the ROW that caused a vegetation-related Sustained Outage,<sup>12</sup>
  - 2.4.** An encroachment due to vegetation growth into the line MVCD that caused a vegetation-related Sustained Outage.<sup>13</sup>

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<sup>5</sup> If a later confirmation of a Fault by the applicable Transmission Owner or applicable Generator Owner shows that a vegetation encroachment within the MVCD has occurred from vegetation within the ROW, this shall be considered the equivalent of a Real-time observation.

<sup>6</sup> Multiple Sustained Outages on an individual line, if caused by the same vegetation, will be reported as one outage regardless of the actual number of outages within a 24-hour period.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.*

<sup>9</sup> See footnote 4.

<sup>10</sup> See footnote 5.

<sup>11</sup> See footnote 6.

<sup>12</sup> *Id.*

<sup>13</sup> *Id.*

- M2.** Each applicable Transmission Owner and applicable Generator Owner has evidence that it managed vegetation to prevent encroachment into the MVCD as described in R2. Examples of acceptable forms of evidence may include dated attestations, dated reports containing no Sustained Outages associated with encroachment types 2 through 4 above, or records confirming no Real-time observations of any MVCD encroachments. (R2)
- R3.** Each applicable Transmission Owner and applicable Generator Owner shall have documented maintenance strategies or procedures or processes or specifications it uses to prevent the encroachment of vegetation into the MVCD of its applicable lines that accounts for the following: *[Violation Risk Factor: Lower] [Time Horizon: Long Term Planning]*:
- 3.1.** Movement of applicable line conductors under their Rating and all Rated Electrical Operating Conditions;
  - 3.2.** Inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency.
- M3.** The maintenance strategies or procedures or processes or specifications provided demonstrate that the applicable Transmission Owner and applicable Generator Owner can prevent encroachment into the MVCD considering the factors identified in the requirement. (R3)
- R4.** Each applicable Transmission Owner and applicable Generator Owner, without any intentional time delay, shall notify the control center holding switching authority for the associated applicable line when the applicable Transmission Owner and applicable Generator Owner has confirmed the existence of a vegetation condition that is likely to cause a Fault at any moment *[Violation Risk Factor: Medium] [Time Horizon: Real-time]*.
- M4.** Each applicable Transmission Owner and applicable Generator Owner that has a confirmed vegetation condition likely to cause a Fault at any moment will have evidence that it notified the control center holding switching authority for the associated transmission line without any intentional time delay. Examples of evidence may include control center logs, voice recordings, switching orders, clearance orders and subsequent work orders. (R4)
- R5.** When an applicable Transmission Owner and an applicable Generator Owner are constrained from performing vegetation work on an applicable line operating within its Rating and all Rated Electrical Operating Conditions, and the constraint may lead to a vegetation encroachment into the MVCD prior to the implementation of the next annual work plan, then the applicable Transmission Owner or applicable Generator Owner shall take corrective action to ensure continued vegetation management to prevent encroachments *[Violation Risk Factor: Medium] [Time Horizon: Operations Planning]*.



- M5.** Each applicable Transmission Owner and applicable Generator Owner has evidence of the corrective action taken for each constraint where an applicable transmission line was put at potential risk. Examples of acceptable forms of evidence may include initially-planned work orders, documentation of constraints from landowners, court orders, inspection records of increased monitoring, documentation of the de-rating of lines, revised work orders, invoices, or evidence that the line was de-energized. (R5)
- R6.** Each applicable Transmission Owner and applicable Generator Owner shall perform a Vegetation Inspection of 100% of its applicable transmission lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.) at least once per calendar year and with no more than 18 calendar months between inspections on the same ROW<sup>14</sup> [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*].
- M6.** Each applicable Transmission Owner and applicable Generator Owner has evidence that it conducted Vegetation Inspections of the transmission line ROW for all applicable lines at least once per calendar year but with no more than 18 calendar months between inspections on the same ROW. Examples of acceptable forms of evidence may include completed and dated work orders, dated invoices, or dated inspection records. (R6)
- R7.** Each applicable Transmission Owner and applicable Generator Owner shall complete 100% of its annual vegetation work plan of applicable lines to ensure no vegetation encroachments occur within the MVCD. Modifications to the work plan in response to changing conditions or to findings from vegetation inspections may be made (provided they do not allow encroachment of vegetation into the MVCD) and must be documented. The percent completed calculation is based on the number of units actually completed divided by the number of units in the final amended plan (measured in units of choice - circuit, pole line, line miles or kilometers, etc.). Examples of reasons for modification to annual plan may include [*Violation Risk Factor: Medium*] [*Time Horizon: Operations Planning*]:
- 7.1.** Change in expected growth rate/environmental factors
  - 7.2.** Circumstances that are beyond the control of an applicable Transmission Owner or applicable Generator Owner<sup>15</sup>
  - 7.3.** Rescheduling work between growing seasons
  - 7.4.** Crew or contractor availability/Mutual assistance agreements

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<sup>14</sup> When the applicable Transmission Owner or applicable Generator Owner is prevented from performing a Vegetation Inspection within the timeframe in R6 due to a natural disaster, the TO or GO is granted a time extension that is equivalent to the duration of the time the TO or GO was prevented from performing the Vegetation Inspection.

<sup>15</sup> Circumstances that are beyond the control of an applicable Transmission Owner or applicable Generator Owner include but are not limited to natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, ice storms, floods, or major storms as defined either by the TO or GO or an applicable regulatory body.

- 7.5. Identified unanticipated high priority work
  - 7.6. Weather conditions/Accessibility
  - 7.7. Permitting delays
  - 7.8. Land ownership changes/Change in land use by the landowner
  - 7.9. Emerging technologies
- M7.** Each applicable Transmission Owner and applicable Generator Owner has evidence that it completed its annual vegetation work plan for its applicable lines. Examples of acceptable forms of evidence may include a copy of the completed annual work plan (as finally modified), dated work orders, dated invoices, or dated inspection records.  
(R7)

## C. Compliance

### 1. Compliance Monitoring Process

#### 1.1. Compliance Enforcement Authority:

“Compliance Enforcement Authority” means NERC or the Regional Entity, or any entity as otherwise designated by an Applicable Governmental Authority, in their respective roles of monitoring and/or enforcing compliance with mandatory and enforceable Reliability Standards in their respective jurisdictions.

#### 1.2. Evidence Retention:

The following evidence retention period(s) identify the period of time an entity is required to retain specific evidence to demonstrate compliance. For instances where the evidence retention period specified below is shorter than the time since the last audit, the Compliance Enforcement Authority may ask an entity to provide other evidence to show that it was compliant for the full-time period since the last audit.

The applicable entity shall keep data or evidence to show compliance as identified below unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- The applicable Transmission Owner and applicable Generator Owner retains data or evidence to show compliance with Requirements R1, R2, R3, R5, R6 and R7, for three calendar years.
- The applicable Transmission Owner and applicable Generator Owner retains data or evidence to show compliance with Requirement R4, Measure M4 for most recent 12 months of operator logs or most recent 3 months of voice recordings or transcripts of voice recordings, unless directed by its Compliance Enforcement Authority to retain specific evidence for a longer period of time as part of an investigation.

- If an applicable Transmission Owner or applicable Generator Owner is found non-compliant, it shall keep information related to the non-compliance until found compliant or for the time period specified above, whichever is longer.

### 1.3. Compliance Monitoring and Enforcement Program

As defined in the NERC Rules of Procedure, “Compliance Monitoring and Enforcement Program” refers to the identification of the processes that will be used to evaluate data or information for the purpose of assessing performance or outcomes with the associated Reliability Standard.

### 1.4. Additional Compliance Information

**Periodic Data Submittal:** The applicable Transmission Owner and applicable Generator Owner will submit a quarterly report to its Regional Entity, or the Regional Entity’s designee, identifying all Sustained Outages of applicable lines operated within their Rating and all Rated Electrical Operating Conditions as determined by the applicable Transmission Owner or applicable Generator Owner to have been caused by vegetation, except as excluded in footnote 2, and including as a minimum the following:

- The name of the circuit(s), the date, time and duration of the outage; the voltage of the circuit; a description of the cause of the outage; the category associated with the Sustained Outage; other pertinent comments; and any countermeasures taken by the applicable Transmission Owner or applicable Generator Owner.

A Sustained Outage is to be categorized as one of the following:

- Category 1A — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, that are identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 1B — Grow-ins: Sustained Outages caused by vegetation growing into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, by vegetation inside and/or outside of the ROW;
- Category 2A — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 2B — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, from within the ROW;
- Category 3 — Fall-ins: Sustained Outages caused by vegetation falling into applicable lines from outside the ROW;
- Category 4A — Blowing together: Sustained Outages caused by vegetation and applicable lines that are identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW;

- Category 4B — Blowing together: Sustained Outages caused by vegetation and applicable lines, but are not identified as an element of an IROL or Major WECC Transfer Path, blowing together from within the ROW.

The Regional Entity will report the outage information provided by applicable Transmission Owners and applicable Generator 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.

Violation Severity Levels (Table 1)

R #	Table 1: Violation Severity Levels (VSL)			
	Lower VSL	Moderate VSL	High VSL	Severe VSL
R1.			The responsible entity failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-4-Table 2 was observed in real time absent a Sustained Outage.	The responsible entity failed to manage vegetation to prevent encroachment into the MVCD of a line identified as an element of an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• <i>A fall-in from inside the active transmission line ROW</i></li> <li>• <i>Blowing together of applicable lines and vegetation located inside the active transmission line ROW</i></li> <li>• <i>A grow-in</i></li> </ul>
R2.			The responsible entity failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of	The responsible entity failed to manage vegetation to prevent encroachment into the MVCD of a line not identified as an element of

			an IROL or Major WECC transfer path and encroachment into the MVCD as identified in FAC-003-4-Table 2 was observed in real time absent a Sustained Outage.	an IROL or Major WECC transfer path and a vegetation-related Sustained Outage was caused by one of the following: <ul style="list-style-type: none"> <li>• <i>A fall-in from inside the active transmission line ROW</i></li> <li>• <i>Blowing together of applicable lines and vegetation located inside the active transmission line ROW</i></li> <li>• <i>A grow-in</i></li> </ul>
<b>R3.</b>		The responsible entity has maintenance strategies or documented procedures or processes or specifications but has not accounted for the inter-relationships between vegetation growth rates, vegetation control methods, and inspection frequency, for the responsible entity's applicable lines. (Requirement R3, Part 3.2.)	The responsible entity has maintenance strategies or documented procedures or processes or specifications but has not accounted for the movement of transmission line conductors under their Rating and all Rated Electrical Operating Conditions, for the responsible entity's applicable lines. (Requirement R3, Part 3.1.)	The responsible entity does not have any maintenance strategies or documented procedures or processes or specifications used to prevent the encroachment of vegetation into the MVCD, for the responsible entity's applicable lines.
<b>R4.</b>			The responsible entity experienced a confirmed	The responsible entity experienced a confirmed

			vegetation threat and notified the control center holding switching authority for that applicable line, but there was intentional delay in that notification.	vegetation threat and did not notify the control center holding switching authority for that applicable line.
<b>R5.</b>				The responsible entity did not take corrective action when it was constrained from performing planned vegetation work where an applicable line was put at potential risk.
<b>R6.</b>	The responsible entity failed to inspect 5% or less of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.)	The responsible entity failed to inspect more than 5% up to and including 10% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The responsible entity failed to inspect more than 10% up to and including 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).	The responsible entity failed to inspect more than 15% of its applicable lines (measured in units of choice - circuit, pole line, line miles or kilometers, etc.).
<b>R7.</b>	The responsible entity failed to complete 5% or less of its annual vegetation work plan for its applicable lines (as finally modified).	The responsible entity failed to complete more than 5% and up to and including 10% of its annual vegetation work plan for its applicable lines (as finally modified).	The responsible entity failed to complete more than 10% and up to and including 15% of its annual vegetation work plan for its applicable lines (as finally modified).	The responsible entity failed to complete more than 15% of its annual vegetation work plan for its applicable lines (as finally modified).

### D. Regional Variances

None.

### E. Associated Documents

- [FAC-003-4 Implementation Plan](#)

### Version History

Version	Date	Action	Change Tracking
1	January 20, 2006	1. Added “Standard Development Roadmap.” 2. Changed “60” to “Sixty” in section A, 5.2. 3. Added “Proposed Effective Date: April 7, 2006” to footer. 4. Added “Draft 3: November 17, 2005” to footer.	New
1	April 4, 2007	Regulatory Approval - Effective Date	New
2	November 3, 2011	Adopted by the NERC Board of Trustees	New
2	March 21, 2013	FERC Order issued approving FAC-003-2 (Order No. 777)  FERC Order No. 777 was issued on March 21, 2013 directing NERC to “conduct or contract testing to obtain empirical data and submit a report to the Commission providing the results of the testing.” <sup>16</sup>	Revisions

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<sup>16</sup> Revisions to Reliability Standard for Transmission Vegetation Management, Order No. 777, 142 FERC ¶ 61,208 (2013)



**FAC-003-4 Transmission Vegetation Management**

2	May 9, 2013	Board of Trustees adopted the modification of the VRF for Requirement R2 of FAC-003-2 by raising the VRF from “Medium” to “High.”	Revisions
3	May 9, 2013	FAC-003-3 adopted by Board of Trustees	Revisions
3	September 19, 2013	A FERC order was issued on September 19, 2013, approving FAC-003-3. This standard became enforceable on July 1, 2014 for Transmission Owners. For Generator Owners, R3 became enforceable on January 1, 2015 and all other requirements (R1, R2, R4, R5, R6, and R7) became enforceable on January 1, 2016.	Revisions
3	November 22, 2013	Updated the VRF for R2 from “Medium” to “High” per a Final Rule issued by FERC	Revisions
3	July 30, 2014	Transferred the effective dates section from FAC-003-2 (for Transmission Owners) into FAC-003-3, per the FAC-003-3 implementation plan	Revisions
4	February 11, 2016	Adopted by Board of Trustees. Adjusted MVCD values in Table 2 for alternating current systems, consistent with findings reported in report filed on August 12, 2015 in Docket No. RM12-4-002 consistent with FERC’s directive in Order No. 777, and based on empirical testing results for flashover distances between conductors and vegetation.	Revisions
4	March 9, 2016	Corrected subpart 7.10 to M7, corrected value of .07 to .7	Errata
4	April 26, 2016	FERC Letter Order approving FAC-003-4. Docket No. RD16-4-000.	

**FAC-003 — TABLE 2 — Minimum Vegetation Clearance Distances (MVCD)<sup>17</sup>  
For Alternating Current Voltages (feet)**

( AC ) Nominal System Voltage (kV) <sup>+</sup>	( AC ) Maximum System Voltage (kV) <sup>18</sup>	MVCD (feet) Over sea level up to 500 ft	MVCD feet Over 500 ft up to 1000 ft	MVCD feet Over 1000 ft up to 2000 ft	MVCD feet Over 2000 ft up to 3000 ft	MVCD feet Over 3000 ft up to 4000 ft	MVCD feet Over 4000 ft up to 5000 ft	MVCD feet Over 5000 ft up to 6000 ft	MVCD feet Over 6000 ft up to 7000 ft	MVCD feet Over 7000 ft up to 8000 ft	MVCD feet Over 8000 ft up to 9000 ft	MVCD feet Over 9000 ft up to 10000 ft	MVCD feet Over 10000 ft up to 11000 ft	MVCD feet Over 11000 ft up to 12000 ft	MVCD feet Over 12000 ft up to 13000 ft	MVCD feet Over 13000 ft up to 14000 ft	MVCD feet Over 14000 ft up to 15000 ft
765	800	11.6ft	11.7ft	11.9ft	12.1ft	12.2ft	12.4ft	12.6ft	12.8ft	13.0ft	13.1ft	13.3ft	13.5ft	13.7ft	13.9ft	14.1ft	14.3ft
500	550	7.0ft	7.1ft	7.2ft	7.4ft	7.5ft	7.6ft	7.8ft	7.9ft	8.1ft	8.2ft	8.3ft	8.5ft	8.6ft	8.8ft	8.9ft	9.1ft
345	362 <sup>19</sup>	4.3ft	4.3ft	4.4ft	4.5ft	4.6ft	4.7ft	4.8ft	4.9ft	5.0ft	5.1ft	5.2ft	5.3ft	5.4ft	5.5ft	5.6ft	5.7ft
287	302	5.2ft	5.3ft	5.4ft	5.5ft	5.6ft	5.7ft	5.8ft	5.9ft	6.1ft	6.2ft	6.3ft	6.4ft	6.5ft	6.6ft	6.8ft	6.9ft
230	242	4.0ft	4.1ft	4.2ft	4.3ft	4.3ft	4.4ft	4.5ft	4.6ft	4.7ft	4.8ft	4.9ft	5.0ft	5.1ft	5.2ft	5.3ft	5.4ft
161*	169	2.7ft	2.7ft	2.8ft	2.9ft	2.9ft	3.0ft	3.0ft	3.1ft	3.2ft	3.3ft	3.3ft	3.4ft	3.5ft	3.6ft	3.7ft	3.8ft
138*	145	2.3ft	2.3ft	2.4ft	2.4ft	2.5ft	2.5ft	2.6ft	2.7ft	2.7ft	2.8ft	2.8ft	2.9ft	3.0ft	3.0ft	3.1ft	3.2ft
115*	121	1.9ft	1.9ft	1.9ft	2.0ft	2.0ft	2.1ft	2.1ft	2.2ft	2.2ft	2.3ft	2.3ft	2.4ft	2.5ft	2.5ft	2.6ft	2.7ft
88*	100	1.5ft	1.5ft	1.6ft	1.6ft	1.7ft	1.7ft	1.8ft	1.8ft	1.8ft	1.9ft	1.9ft	2.0ft	2.0ft	2.1ft	2.2ft	2.2ft
69*	72	1.1ft	1.1ft	1.1ft	1.2ft	1.2ft	1.2ft	1.2ft	1.3ft	1.3ft	1.3ft	1.4ft	1.4ft	1.4ft	1.5ft	1.6ft	1.6ft

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)

<sup>+</sup> Table 2 – Table of MVCD values at a 1.0 gap factor (in U.S. customary units), which is located in the EPRI report filed with FERC on August 12, 2015. (The 14000-15000 foot values were subsequently provided by EPRI in an updated Table 2 on December 1, 2015, filed with the FAC-003-4 Petition at FERC)

<sup>17</sup> The distances in this Table are the minimums required to prevent Flash-over; however prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at time of vegetation maintenance.

<sup>18</sup> Where applicable lines are operated at nominal voltages other than those listed, the applicable Transmission Owner or applicable Generator Owner should use the maximum system voltage to determine the appropriate clearance for that line.

<sup>19</sup> The change in transient overvoltage factors in the calculations are the driver in the decrease in MVCDs for voltages of 345 kV and above. Refer to pp.29-31 in the Supplemental Materials for additional information.

**TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>20</sup>**  
**For Alternating Current Voltages (meters)**

( AC ) Nominal System Voltage (KV) <sup>+</sup>	( AC ) Maximum System Voltage (kV) <sup>21</sup>	MVCD meters  Over sea level up to 153 m	MVCD meters  Over 153m up to 305m	MVCD meters  Over 305m up to 610m	MVCD meters  Over 610m up to 915m	MVCD meters  Over 915m up to 1220m	MVCD meters  Over 1220m up to 1524m	MVCD meters  Over 1524m up to 1829m	MVCD meters  Over 1829m up to 2134m	MVCD meters  Over 2134m up to 2439m	MVCD meters  Over 2439m up to 2744m	MVCD meters  Over 2744m up to 3048m	MVCD meters  Over 3048m up to 3353m	MVCD meters  Over 3353m up to 3657m	MVCD meters  Over 3657m up to 3962m	MVCD meters  Over 3962 m up to 4268 m	MVCD meters  Over 4268m up to 4572m
765	800	3.6m	3.6m	3.6m	3.7m	3.7m	3.8m	3.8m	3.9m	4.0m	4.0m	4.1m	4.1m	4.2m	4.2m	4.3m	4.4m
500	550	2.1m	2.2m	2.2m	2.3m	2.3m	2.3m	2.4m	2.4m	2.5m	2.5m	2.5m	2.6m	2.6m	2.7m	2.7m	2.7m
345	362 <sup>22</sup>	1.3m	1.3m	1.3m	1.4m	1.4m	1.4m	1.5m	1.5m	1.5m	1.6m	1.6m	1.6m	1.6m	1.7m	1.7m	1.8m
287	302	1.6m	1.6m	1.7m	1.7m	1.7m	1.7m	1.8m	1.8m	1.9m	1.9m	1.9m	2.0m	2.0m	2.0m	2.1m	2.1m
230	242	1.2m	1.3m	1.3m	1.3m	1.3m	1.3m	1.4m	1.4m	1.4m	1.5m	1.5m	1.5m	1.6m	1.6m	1.6m	1.6m
161*	169	0.8m	0.8m	0.9m	0.9m	0.9m	0.9m	0.9m	1.0m	1.0m	1.0m	1.0m	1.0m	1.1m	1.1m	1.1m	1.1m
138*	145	0.7m	0.7m	0.7m	0.7m	0.7m	0.7m	0.8m	0.8m	0.8m	0.9m	0.9m	0.9m	0.9m	0.9m	1.0m	1.0m
115*	121	0.6m	0.6m	0.6m	0.6m	0.6m	0.6m	0.6m	0.7m	0.7m	0.7m	0.7m	0.7m	0.8m	0.8m	0.8m	0.8m
88*	100	0.4m	0.4m	0.5m	0.5m	0.5m	0.5m	0.6m	0.6m	0.6m	0.6m	0.6m	0.6m	0.6m	0.6m	0.7m	0.7m
69*	72	0.3m	0.3m	0.3m	0.4m	0.4m	0.4m	0.4m	0.4m	0.4m	0.4m	0.4m	0.4m	0.4m	0.5m	0.5m	0.5m

\* Such lines are applicable to this standard only if PC has determined such per FAC-014 (refer to the Applicability Section above)

+ Table 2 – Table of MVCD values at a 1.0 gap factor (in U.S. customary units), which is located in the EPRI report filed with FERC on August 12, 2015. (The 14000-15000 foot values were subsequently provided by EPRI in an updated Table 2 on December 1, 2015, filed with the FAC-003-4 Petition at FERC)

<sup>20</sup> The distances in this Table are the minimums required to prevent Flash-over; however prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at time of vegetation maintenance.

<sup>21</sup> Where applicable lines are operated at nominal voltages other than those listed, the applicable Transmission Owner or applicable Generator Owner should use the maximum system voltage to determine the appropriate clearance for that line.

<sup>22</sup> The change in transient overvoltage factors in the calculations are the driver in the decrease in MVCDs for voltages of 345 kV and above. Refer to pp.29-31 in the supplemental materials for additional information.

**TABLE 2 (CONT) — Minimum Vegetation Clearance Distances (MVCD)<sup>23</sup>**  
 For **Direct Current** Voltages feet (meters)

( DC ) Nominal Pole to Ground Voltage (kV)	MVCD meters  Over sea level up to 500 ft  (Over sea level up to 152.4 m)	MVCD meters  Over 500 ft up to 1000 ft  (Over 152.4 m up to 304.8 m)	MVCD meters  Over 1000 ft up to 2000 ft  (Over 304.8 m up to 609.6m)	MVCD meters  Over 2000 ft up to 3000 ft  (Over 609.6m up to 914.4m)	MVCD meters  Over 3000 ft up to 4000 ft  (Over 914.4m up to 1219.2m)	MVCD meters  Over 4000 ft up to 5000 ft  (Over 1219.2m up to 1524m)	MVCD meters  Over 5000 ft up to 6000 ft  (Over 1524 m up to 1828.8 m)	MVCD meters  Over 6000 ft up to 7000 ft  (Over 1828.8m up to 2133.6m)	MVCD meters  Over 7000 ft up to 8000 ft  (Over 2133.6m up to 2438.4m)	MVCD meters  Over 8000 ft up to 9000 ft  (Over 2438.4m up to 2743.2m)	MVCD meters  Over 9000 ft up to 10000 ft  (Over 2743.2m up to 3048m)	MVCD meters  Over 10000 ft up to 11000 ft  (Over 3048m up to 3352.8m)
±750	14.12ft (4.30m)	14.31ft (4.36m)	14.70ft (4.48m)	15.07ft (4.59m)	15.45ft (4.71m)	15.82ft (4.82m)	16.2ft (4.94m)	16.55ft (5.04m)	16.91ft (5.15m)	17.27ft (5.26m)	17.62ft (5.37m)	17.97ft (5.48m)
±600	10.23ft (3.12m)	10.39ft (3.17m)	10.74ft (3.26m)	11.04ft (3.36m)	11.35ft (3.46m)	11.66ft (3.55m)	11.98ft (3.65m)	12.3ft (3.75m)	12.62ft (3.85m)	12.92ft (3.94m)	13.24ft (4.04m)	13.54ft (4.13m)
±500	8.03ft (2.45m)	8.16ft (2.49m)	8.44ft (2.57m)	8.71ft (2.65m)	8.99ft (2.74m)	9.25ft (2.82m)	9.55ft (2.91m)	9.82ft (2.99m)	10.1ft (3.08m)	10.38ft (3.16m)	10.65ft (3.25m)	10.92ft (3.33m)
±400	6.07ft (1.85m)	6.18ft (1.88m)	6.41ft (1.95m)	6.63ft (2.02m)	6.86ft (2.09m)	7.09ft (2.16m)	7.33ft (2.23m)	7.56ft (2.30m)	7.80ft (2.38m)	8.03ft (2.45m)	8.27ft (2.52m)	8.51ft (2.59m)
±250	3.50ft (1.07m)	3.57ft (1.09m)	3.72ft (1.13m)	3.87ft (1.18m)	4.02ft (1.23m)	4.18ft (1.27m)	4.34ft (1.32m)	4.5ft (1.37m)	4.66ft (1.42m)	4.83ft (1.47m)	5.00ft (1.52m)	5.17ft (1.58m)

<sup>23</sup> The distances in this Table are the minimums required to prevent Flash-over; however prudent vegetation maintenance practices dictate that substantially greater distances will be achieved at time of vegetation maintenance.

## Guideline and Technical Basis

### Effective dates:

The Compliance section is standard language used in most NERC standards to cover the general effective date and covers the vast majority of situations. A special case covers effective dates for (1) lines initially becoming subject to the Standard, (2) lines changing in applicability within the standard.

The special case is needed because the Planning Coordinators may designate lines below 200 kV to become elements of an IROL or Major WECC Transfer Path in a future Planning Year (PY). For example, studies by the Planning Coordinator in 2015 may identify a line to have that designation beginning in PY 2025, ten years after the planning study is performed. It is not intended for the Standard to be immediately applicable to, or in effect for, that line until that future PY begins. The effective date provision for such lines ensures that the line will become subject to the standard on January 1 of the PY specified with an allowance of at least 12 months for the applicable Transmission Owner or applicable Generator Owner to make the necessary preparations to achieve compliance on that line. A line operating below 200kV designated as an element of an IROL or Major WECC Transfer Path may be removed from that designation due to system improvements, changes in generation, changes in loads or changes in studies and analysis of the network.

<u>Date that Planning Study is completed</u>	<u>PY the line will become an IROL element</u>	<u>Effective Date</u>		
		<u>Date 1</u>	<u>Date 2</u>	<u>The later of Date 1 or Date 2</u>
05/15/2011	2012	05/15/2012	01/01/2012	05/15/2012
05/15/2011	2013	05/15/2012	01/01/2013	01/01/2013
05/15/2011	2014	05/15/2012	01/01/2014	01/01/2014
05/15/2011	2021	05/15/2012	01/01/2021	01/01/2021

### Defined Terms:

#### Explanation for revising the definition of ROW:

The current NERC glossary definition of Right of Way has been modified to include Generator Owners and to address the matter set forth in Paragraph 734 of FERC Order 693. The Order pointed out that Transmission Owners may in some cases own more property or rights than are needed to reliably operate transmission lines. This definition represents a slight but significant departure from the strict legal definition of “right of way” in that this definition is based on engineering and construction considerations that establish the width of a corridor from a technical basis. The pre-2007 maintenance records are included in the current definition to allow the use of such vegetation widths if there were no engineering or construction standards that

referenced the width of right of way to be maintained for vegetation on a particular line but the evidence exists in maintenance records for a width that was in fact maintained prior to this standard becoming mandatory. Such widths may be the only information available for lines that had limited or no vegetation easement rights and were typically maintained primarily to ensure public safety. This standard does not require additional easement rights to be purchased to satisfy a minimum right of way width that did not exist prior to this standard becoming mandatory.

### **Explanation for revising the definition of Vegetation Inspection:**

The current glossary definition of this NERC term was modified to include Generator Owners and to allow both maintenance inspections and vegetation inspections to be performed concurrently. This allows potential efficiencies, especially for those lines with minimal vegetation and/or slow vegetation growth rates.

### **Explanation of the derivation of the MVCD:**

The MVCD is a calculated minimum distance that is derived from the Gallet equation. This is a method of calculating a flash over distance that has been used in the design of high voltage transmission lines. Keeping vegetation away from high voltage conductors by this distance will prevent voltage flash-over to the vegetation. See the explanatory text below for Requirement R3 and associated Figure 1. Table 2 of the Standard provides MVCD values for various voltages and altitudes. The table is based on empirical testing data from EPRI as requested by FERC in Order No. 777.

### **Project 2010-07.1 Adjusted MVCDs per EPRI Testing:**

In Order No. 777, FERC directed NERC to undertake testing to gather empirical data validating the appropriate gap factor used in the Gallet equation to calculate MVCDs, specifically the gap factor for the flash-over distances between conductors and vegetation. See, Order No. 777, at P 60. NERC engaged industry through a collaborative research project and contracted EPRI to complete the scope of work. In January 2014, NERC formed an advisory group to assist with developing the scope of work for the project. This team provided subject matter expertise for developing the test plan, monitoring testing, and vetting the analysis and conclusions to be submitted in a final report. The advisory team was comprised of NERC staff, arborists, and industry members with wide-ranging expertise in transmission engineering, insulation coordination, and vegetation management. The testing project commenced in April 2014 and continued through October 2014 with the final set of testing completed in May 2015. Based on these testing results conducted by EPRI, and consistent with the report filed in FERC Docket No. RM12-4-000, the gap factor used in the Gallet equation required adjustment from 1.3 to 1.0. This resulted in increased MVCD values for all alternating current system voltages identified. The adjusted MVCD values, reflecting the 1.0 gap factor, are included in Table 2 of version 4 of FAC-003.

The air gap testing completed by EPRI per FERC Order No. 777 established that trees with large spreading canopies growing directly below energized high voltage conductors create the

greatest likelihood of an air gap flash over incident and was a key driver in changing the gap factor to a more conservative value of 1.0 in version 4 of this standard.

### **Requirements R1 and R2:**

R1 and R2 are performance-based requirements. The reliability objective or outcome to be achieved is the management of vegetation such that there are no vegetation encroachments within a minimum distance of transmission lines. Content-wise, R1 and R2 are the same requirements; however, they apply to different Facilities. Both R1 and R2 require each applicable Transmission Owner or applicable Generator Owner to manage vegetation to prevent encroachment within the MVCD of transmission lines. R1 is applicable to lines that are identified as an element of an IROL or Major WECC Transfer Path. R2 is applicable to all other lines that are not elements of IROLs, and not elements of Major WECC Transfer Paths.

The separation of applicability (between R1 and R2) recognizes that inadequate vegetation management for an applicable line that is an element of an IROL or a Major WECC Transfer Path is a greater risk to the interconnected electric transmission system than applicable lines that are not elements of IROLs or Major WECC Transfer Paths. Applicable lines that are not elements of IROLs or Major WECC Transfer Paths do require effective vegetation management, but these lines are comparatively less operationally significant.

Requirements R1 and R2 state that if inadequate vegetation management allows vegetation to encroach within the MVCD distance as shown in Table 2, it is a violation of the standard. Table 2 distances are the minimum clearances that will prevent spark-over based on the Gallet equations. These requirements assume that transmission lines and their conductors are operating within their Rating. If a line conductor is intentionally or inadvertently operated beyond its Rating and Rated Electrical Operating Condition (potentially in violation of other standards), the occurrence of a clearance encroachment may occur solely due to that condition. For example, emergency actions taken by an applicable Transmission Owner or applicable Generator Owner or Reliability Coordinator to protect an Interconnection may cause excessive sagging and an outage. Another example would be ice loading beyond the line's Rating and Rated Electrical Operating Condition. Such vegetation-related encroachments and outages are not violations of this standard.

Evidence of failures to adequately manage vegetation include real-time observation of a vegetation encroachment into the MVCD (absent a Sustained Outage), or a vegetation-related encroachment resulting in a Sustained Outage due to a fall-in from inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to the blowing together of the lines and vegetation located inside the ROW, or a vegetation-related encroachment resulting in a Sustained Outage due to a grow-in. Faults which do not cause a Sustained outage and which are confirmed to have been caused by vegetation encroachment within the MVCD are considered the equivalent of a Real-time observation for violation severity levels.

With this approach, the VSLs for R1 and R2 are structured such that they directly correlate to the severity of a failure of an applicable Transmission Owner or applicable Generator Owner to manage vegetation and to the corresponding performance level of the Transmission Owner's

vegetation program's ability to meet the objective of "preventing the risk of those vegetation related outages that could lead to Cascading." Thus violation severity increases with an applicable Transmission Owner's or applicable Generator Owner's inability to meet this goal and its potential of leading to a Cascading event. The additional benefits of such a combination are that it simplifies the standard and clearly defines performance for compliance. A performance-based requirement of this nature will promote high quality, cost effective vegetation management programs that will deliver the overall end result of improved reliability to the system.

Multiple Sustained Outages on an individual line can be caused by the same vegetation. For example initial investigations and corrective actions may not identify and remove the actual outage cause then another outage occurs after the line is re-energized and previous high conductor temperatures return. Such events are considered to be a single vegetation-related Sustained Outage under the standard where the Sustained Outages occur within a 24 hour period.

If the applicable Transmission Owner or applicable Generator Owner has applicable lines operated at nominal voltage levels not listed in Table 2, then the applicable TO or applicable GO should use the next largest clearance distance based on the next highest nominal voltage in the table to determine an acceptable distance.

### **Requirement R3:**

R3 is a competency based requirement concerned with the maintenance strategies, procedures, processes, or specifications, an applicable Transmission Owner or applicable Generator Owner uses for vegetation management.

An adequate transmission vegetation management program formally establishes the approach the applicable Transmission Owner or applicable Generator Owner uses to plan and perform vegetation work to prevent transmission Sustained Outages and minimize risk to the transmission system. The approach provides the basis for evaluating the intent, allocation of appropriate resources, and the competency of the applicable Transmission Owner or applicable Generator Owner in managing vegetation. There are many acceptable approaches to manage vegetation and avoid Sustained Outages. However, the applicable Transmission Owner or applicable Generator Owner must be able to show the documentation of its approach and how it conducts work to maintain clearances.

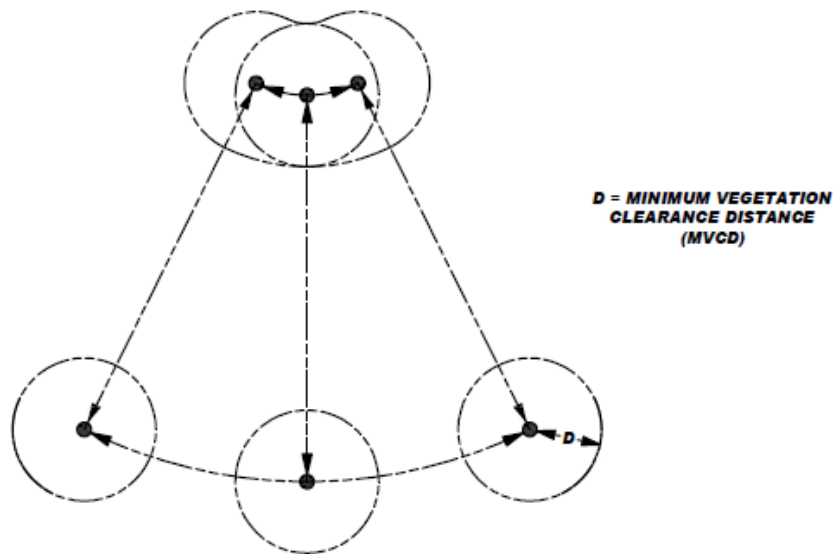
An example of one approach commonly used by industry is ANSI Standard A300, part 7. However, regardless of the approach a utility uses to manage vegetation, any approach an applicable Transmission Owner or applicable Generator Owner chooses to use will generally contain the following elements:

1. *the maintenance strategy used (such as minimum vegetation-to-conductor distance or maximum vegetation height) to ensure that MVCD clearances are never violated*



2. *the work methods that the applicable Transmission Owner or applicable Generator Owner uses to control vegetation*
3. *a stated Vegetation Inspection frequency*
4. *an annual work plan*

The conductor's position in space at any point in time is continuously changing in reaction to a number of different loading variables. Changes in vertical and horizontal conductor positioning are the result of thermal and physical loads applied to the line. Thermal loading is a function of line current and the combination of numerous variables influencing ambient heat dissipation including wind velocity/direction, ambient air temperature and precipitation. Physical loading applied to the conductor affects sag and sway by combining physical factors such as ice and wind loading. The movement of the transmission line conductor and the MVCD is illustrated in Figure 1 below.



**Figure 1**

A cross-section view of a single conductor at a given point along the span is shown with six possible conductor positions due to movement resulting from thermal and mechanical loading.

**Requirement R4:**

R4 is a risk-based requirement. It focuses on preventative actions to be taken by the applicable Transmission Owner or applicable Generator Owner for the mitigation of Fault risk when a vegetation threat is confirmed. R4 involves the notification of potentially threatening vegetation conditions, without any intentional delay, to the control center holding switching authority for that specific transmission line. Examples of acceptable unintentional delays may

include communication system problems (for example, cellular service or two-way radio disabled), crews located in remote field locations with no communication access, delays due to severe weather, etc.

Confirmation is key that a threat actually exists due to vegetation. This confirmation could be in the form of an applicable Transmission Owner or applicable Generator Owner employee who personally identifies such a threat in the field. Confirmation could also be made by sending out an employee to evaluate a situation reported by a landowner.

Vegetation-related conditions that warrant a response include vegetation that is near or encroaching into the MVCD (a grow-in issue) or vegetation that could fall into the transmission conductor (a fall-in issue). A knowledgeable verification of the risk would include an assessment of the possible sag or movement of the conductor while operating between no-load conditions and its rating.

The applicable Transmission Owner or applicable Generator Owner has the responsibility to ensure the proper communication between field personnel and the control center to allow the control center to take the appropriate action until or as the vegetation threat is relieved. Appropriate actions may include a temporary reduction in the line loading, switching the line out of service, or other preparatory actions in recognition of the increased risk of outage on that circuit. The notification of the threat should be communicated in terms of minutes or hours as opposed to a longer time frame for corrective action plans (see R5).

All potential grow-in or fall-in vegetation-related conditions will not necessarily cause a Fault at any moment. For example, some applicable Transmission Owners or applicable Generator Owners may have a danger tree identification program that identifies trees for removal with the potential to fall near the line. These trees would not require notification to the control center unless they pose an immediate fall-in threat.

### **Requirement R5:**

R5 is a risk-based requirement. It focuses upon preventative actions to be taken by the applicable Transmission Owner or applicable Generator Owner for the mitigation of Sustained Outage risk when temporarily constrained from performing vegetation maintenance. The intent of this requirement is to deal with situations that prevent the applicable Transmission Owner or applicable Generator Owner from performing planned vegetation management work and, as a result, have the potential to put the transmission line at risk. Constraints to performing vegetation maintenance work as planned could result from legal injunctions filed by property owners, the discovery of easement stipulations which limit the applicable Transmission Owner's or applicable Generator Owner's rights, or other circumstances.

This requirement is not intended to address situations where the transmission line is not at potential risk and the work event can be rescheduled or re-planned using an alternate work methodology. For example, a land owner may prevent the planned use of herbicides to control incompatible vegetation outside of the MVCD, but agree to the use of mechanical clearing. In

this case the applicable Transmission Owner or applicable Generator Owner is not under any immediate time constraint for achieving the management objective, can easily reschedule work using an alternate approach, and therefore does not need to take interim corrective action.

However, in situations where transmission line reliability is potentially at risk due to a constraint, the applicable Transmission Owner or applicable Generator Owner is required to take an interim corrective action to mitigate the potential risk to the transmission line. A wide range of actions can be taken to address various situations. General considerations include:

- Identifying locations where the applicable Transmission Owner or applicable Generator Owner is constrained from performing planned vegetation maintenance work which potentially leaves the transmission line at risk.
- Developing the specific action to mitigate any potential risk associated with not performing the vegetation maintenance work as planned.
- Documenting and tracking the specific action taken for the location.
- In developing the specific action to mitigate the potential risk to the transmission line the applicable Transmission Owner or applicable Generator Owner could consider location specific measures such as modifying the inspection and/or maintenance intervals. Where a legal constraint would not allow any vegetation work, the interim corrective action could include limiting the loading on the transmission line.
- The applicable Transmission Owner or applicable Generator Owner should document and track the specific corrective action taken at each location. This location may be indicated as one span, one tree or a combination of spans on one property where the constraint is considered to be temporary.

### **Requirement R6:**

R6 is a risk-based requirement. This requirement sets a minimum time period for completing Vegetation Inspections. The provision that Vegetation Inspections can be performed in conjunction with general line inspections facilitates a Transmission Owner's ability to meet this requirement. However, the applicable Transmission Owner or applicable Generator Owner may determine that more frequent vegetation specific inspections are needed to maintain reliability levels, based on factors such as anticipated growth rates of the local vegetation, length of the local growing season, limited ROW width, and local rainfall. Therefore it is expected that some transmission lines may be designated with a higher frequency of inspections.

The VSLs for Requirement R6 have levels ranked by the failure to inspect a percentage of the applicable lines to be inspected. To calculate the appropriate VSL the applicable Transmission Owner or applicable Generator Owner may choose units such as: circuit, pole line, line miles or kilometers, etc.

For example, when an applicable Transmission Owner or applicable Generator Owner operates 2,000 miles of applicable transmission lines this applicable Transmission Owner or applicable

Generator Owner will be responsible for inspecting all the 2,000 miles of lines at least once during the calendar year. If one of the included lines was 100 miles long, and if it was not inspected during the year, then the amount failed to inspect would be  $100/2000 = 0.05$  or 5%. The “Low VSL” for R6 would apply in this example.

### **Requirement R7:**

R7 is a risk-based requirement. The applicable Transmission Owner or applicable Generator Owner is required to complete its annual work plan for vegetation management to accomplish the purpose of this standard. Modifications to 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. The annual work plan requirement is not intended to necessarily require a “span-by-span”, or even a “line-by-line” detailed description of all work to be performed. It is only intended to require that the applicable Transmission Owner or applicable Generator Owner provide evidence of annual planning and execution of a vegetation management maintenance approach which successfully prevents encroachment of vegetation into the MVCD.

When an applicable Transmission Owner or applicable Generator Owner identifies 1,000 miles of applicable transmission lines to be completed in the applicable Transmission Owner’s or applicable Generator Owner’s annual plan, the applicable Transmission Owner or applicable Generator Owner will be responsible completing those identified miles. If an applicable Transmission Owner or applicable Generator Owner makes a modification to the annual plan that does not put the transmission system at risk of an encroachment the annual plan may be modified. If 100 miles of the annual plan is deferred until next year the calculation to determine what percentage was completed for the current year would be:  $1000 - 100$  (deferred miles) = 900 modified annual plan, or  $900 / 900 = 100\%$  completed annual miles. If an applicable Transmission Owner or applicable Generator Owner only completed 875 of the total 1000 miles with no acceptable documentation for modification of the annual plan the calculation for failure to complete the annual plan would be:  $1000 - 875 = 125$  miles failed to complete then,  $125$  miles (not completed) /  $1000$  total annual plan miles = 12.5% failed to complete.

The ability to modify the work plan allows the applicable Transmission Owner or applicable Generator Owner to change priorities or treatment methodologies during the year as conditions or situations dictate. For example recent line inspections may identify unanticipated high priority work, weather conditions (drought) could make herbicide application ineffective during the plan year, or a major storm could require redirecting local resources away from planned maintenance. This situation may also include complying with mutual assistance agreements by moving resources off the applicable Transmission Owner’s or applicable Generator Owner’s system to work on another system. Any of these examples could result in acceptable deferrals or additions to the annual work plan provided that they do not put the transmission system at risk of a vegetation encroachment.

In general, the vegetation management maintenance approach should use the full extent of the applicable Transmission Owner’s or applicable Generator Owner’s easement, fee simple and

other legal rights allowed. A comprehensive approach that exercises the full extent of legal rights on the ROW is superior to incremental management because in the long term it reduces the overall potential for encroachments, and it ensures that future planned work and future planned inspection cycles are sufficient.

When developing the annual work plan the applicable Transmission Owner or applicable Generator Owner should allow time for procedural requirements to obtain permits to work on federal, state, provincial, public, tribal lands. In some cases the lead time for obtaining permits may necessitate preparing work plans more than a year prior to work start dates. Applicable Transmission Owners or applicable Generator Owners may also need to consider those special landowner requirements as documented in easement instruments.

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. Therefore, deferrals or relevant changes to the annual plan shall be documented. Depending on the planning and documentation format used by the applicable Transmission Owner or applicable Generator Owner, evidence of successful annual work plan execution could consist of signed-off work orders, signed contracts, printouts from work management systems, spreadsheets of planned versus completed work, timesheets, work inspection reports, or paid invoices. Other evidence may include photographs, and walk-through reports.

### **Notes:**

The SDT determined that the use of IEEE 516-2003 in version 1 of FAC-003 was a misapplication. The SDT consulted specialists who advised that the Gallet equation would be a technically justified method. The explanation of why the Gallet approach is more appropriate is explained in the paragraphs below.

The drafting team sought a method of establishing minimum clearance distances that uses realistic weather conditions and realistic maximum transient over-voltages factors for in-service transmission lines.

The SDT considered several factors when looking at changes to the minimum vegetation to conductor distances in FAC-003-1:

- avoid the problem associated with referring to tables in another standard (IEEE-516-2003)
- transmission lines operate in non-laboratory environments (wet conditions)
- transient over-voltage factors are lower for in-service transmission lines than for inadvertently re-energized transmission lines with trapped charges.

FAC-003-1 used the minimum air insulation distance (MAID) without tools formula provided in IEEE 516-2003 to determine the minimum distance between a transmission line conductor and vegetation. The equations and methods provided in IEEE 516 were developed by an IEEE Task Force in 1968 from test data provided by thirteen independent laboratories. The distances provided in IEEE 516 Tables 5 and 7 are based on the withstand voltage of a dry rod-rod air gap,

or in other words, dry laboratory conditions. Consequently, the validity of using these distances in an outside environment application has been questioned.

FAC-003-1 allowed Transmission Owners to use either Table 5 or Table 7 to establish the minimum clearance distances. Table 7 could be used if the Transmission Owner knew the maximum transient over-voltage factor for its system. Otherwise, Table 5 would have to be used. Table 5 represented minimum air insulation distances under the worst possible case for transient over-voltage factors. These worst case transient over-voltage factors were as follows: 3.5 for voltages up to 362 kV phase to phase; 3.0 for 500 - 550 kV phase to phase; and 2.5 for 765 to 800 kV phase to phase. These worst case over-voltage factors were also a cause for concern in this particular application of the distances.

In general, the worst case transient over-voltages occur on a transmission line that is inadvertently re-energized immediately after the line is de-energized and a trapped charge is still present. The intent of FAC-003 is to keep a transmission line that is in service from becoming de-energized (i.e. tripped out) due to spark-over from the line conductor to nearby vegetation. Thus, the worst case transient overvoltage assumptions are not appropriate for this application. Rather, the appropriate over voltage values are those that occur only while the line is energized.

Typical values of transient over-voltages of in-service lines are not readily available in the literature because they are negligible compared with the maximums. A conservative value for the maximum transient over-voltage that can occur anywhere along the length of an in-service ac line was approximately 2.0 per unit. This value was a conservative estimate of the transient over-voltage that is created at the point of application (e.g. a substation) by switching a capacitor bank without pre-insertion devices (e.g. closing resistors). At voltage levels where capacitor banks are not very common (e.g. Maximum System Voltage of 362 kV), the maximum transient over-voltage of an in-service ac line are created by fault initiation on adjacent ac lines and shunt reactor bank switching. These transient voltages are usually 1.5 per unit or less.

Even though these transient over-voltages will not be experienced at locations remote from the bus at which they are created, in order to be conservative, it is assumed that all nearby ac lines are subjected to this same level of over-voltage. Thus, a maximum transient over-voltage factor of 2.0 per unit for transmission lines operated at 302 kV and below was considered to be a realistic maximum in this application. Likewise, for ac transmission lines operated at Maximum System Voltages of 362 kV and above a transient over-voltage factor of 1.4 per unit was considered a realistic maximum.

The Gallet equations are an accepted method for insulation coordination in tower design. These equations are used for computing the required strike distances for proper transmission line insulation coordination. They were developed for both wet and dry applications and can be used with any value of transient over-voltage factor. The Gallet equation also can take into account various air gap geometries. This approach was used to design the first 500 kV and 765 kV lines in North America.

If one compares the MAID using the IEEE 516-2003 Table 7 (table D.5 for English values) with the critical spark-over distances computed using the Gallet wet equations, for each of the nominal voltage classes and identical transient over-voltage factors, the Gallet equations yield a more conservative (larger) minimum distance value.

Distances calculated from either the IEEE 516 (dry) formulas or the Gallet “wet” formulas are not vastly different when the same transient overvoltage factors are used; the “wet” equations will consistently produce slightly larger distances than the IEEE 516 equations when the same transient overvoltage is used. While the IEEE 516 equations were only developed for dry conditions the Gallet equations have provisions to calculate spark-over distances for both wet and dry conditions.

Since no empirical data for spark over distances to live vegetation existed at the time version 3 was developed, the SDT chose a proven method that has been used in other EHV applications. The Gallet equations relevance to wet conditions and the selection of a Transient Overvoltage Factor that is consistent with the absence of trapped charges on an in-service transmission line make this methodology a better choice.

The following table is an example of the comparison of distances derived from IEEE 516 and the Gallet equations.

**Comparison of spark-over distances computed using Gallet wet equations vs. IEEE 516-2003 MAID distances**

( AC ) Nom System Voltage (kV)	( AC ) Max System Voltage (kV)	Transient Over-voltage Factor (T)	Clearance (ft.) Gallet (wet) @ Alt. 3000 feet	Table 7 (Table D.5 for feet) IEEE 516-2003 MAID (ft) @ Alt. 3000 feet
765	800	2.0	14.36	13.95
500	550	2.4	11.0	10.07
345	362	3.0	8.55	7.47
230	242	3.0	5.28	4.2
115	121	3.0	2.46	2.1

### **Rationale:**

During development of this standard, text boxes were embedded within the standard to explain the rationale for various parts of the standard. Upon BOT approval, the text from the rationale text boxes was moved to this section.

### **Rationale for Applicability (section 4.2.4):**

The areas excluded in 4.2.4 were excluded based on comments from industry for reasons summarized as follows:

- 1) There is a very low risk from vegetation in this area. Based on an informal survey, no TOs reported such an event.
- 2) Substations, switchyards, and stations have many inspection and maintenance activities that are necessary for reliability. Those existing process manage the threat. As such, the formal steps in this standard are not well suited for this environment.
- 3) Specifically addressing the areas where the standard does and does not apply makes the standard clearer.

### **Rationale for Applicability (section 4.3):**

Within the text of NERC Reliability Standard FAC-003-3, “transmission line(s)” and “applicable line(s)” can also refer to the generation Facilities as referenced in 4.3 and its subsections.

### **Rationale for R1 and R2:**

Lines with the highest significance to reliability are covered in R1; all other lines are covered in R2.

Rationale for the types of failure to manage vegetation which are listed in order of increasing degrees of severity in non-compliant performance as it relates to a failure of an applicable Transmission Owner's or applicable Generator Owner's vegetation maintenance program:

1. This management failure is found by routine inspection or Fault event investigation, and is normally symptomatic of unusual conditions in an otherwise sound program.
2. This management failure occurs when the height and location of a side tree within the ROW is not adequately addressed by the program.
3. This management failure occurs when side growth is not adequately addressed and may be indicative of an unsound program.
4. This management failure is usually indicative of a program that is not addressing the most fundamental dynamic of vegetation management, (i.e. a grow-in under the line). If this type of failure is pervasive on multiple lines, it provides a mechanism for a Cascade.

### **Rationale for R3:**

The documentation provides a basis for evaluating the competency of the applicable Transmission Owner's or applicable Generator Owner's vegetation program. There may be many acceptable approaches to maintain clearances. Any approach must demonstrate that the



applicable Transmission Owner or applicable Generator Owner avoids vegetation-to-wire conflicts under all Ratings and all Rated Electrical Operating Conditions.

**Rationale for R4:**

This is to ensure expeditious communication between the applicable Transmission Owner or applicable Generator Owner and the control center when a critical situation is confirmed.

**Rationale for R5:**

Legal actions and other events may occur which result in constraints that prevent the applicable Transmission Owner or applicable Generator 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 applicable Transmission Owner and applicable Generator Owner to put interim measures in place, rather than do nothing.

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.

**Rationale for R6:**

Inspections are used by applicable Transmission Owners and applicable Generator Owners to assess the condition of the entire ROW. The information from the assessment can be used to determine risk, determine future work and evaluate recently-completed work. This requirement sets a minimum Vegetation Inspection frequency of once per calendar year but with no more than 18 months between inspections on the same ROW. Based upon average growth rates across North America and on common utility practice, this minimum frequency is reasonable. Transmission Owners should consider local and environmental factors that could warrant more frequent inspections.

**Rationale for R7:**

This requirement sets the expectation that the work identified in the annual work plan will be completed as planned. It allows modifications to the planned work for changing conditions, taking into consideration anticipated growth of vegetation and all other environmental factors, provided that those modifications do not put the transmission system at risk of a vegetation encroachment.