

FEDERAL ENERGY REGULATORY COMMISSION
WASHINGTON, D.C. 20426

OFFICE OF ELECTRIC RELIABILITY

North American Electric Reliability Corporation
Docket No. RD16-4-000

April 26, 2016

North American Electric Reliability Corporation
1325 G Street N.W., Suite 600
Washington, D.C. 20005

Attention: Candice Castaneda
Counsel for North American Electric Reliability Corporation

Reference: Petition of the North American Electric Reliability Corporation for
Approval of Proposed Reliability Standard FAC-003-4

Dear Ms. Castaneda:

On March 14, 2016, the North American Electric Reliability Corporation (NERC) filed a petition for Commission approval of proposed Reliability Standard FAC-003-4 (Transmission Vegetation Management). NERC seeks an effective date for the proposed Reliability Standard of the first day of the first calendar quarter three months after the effective date of the Commission's order approving the proposed Reliability Standard, and requests approval of the retirement of currently-effective Reliability Standard FAC-003-3.

NERC states in its petition that proposed Reliability Standard FAC-003-4 reflects revisions to the current Minimum Vegetation Clearance Distances (MVCDs) in Reliability Standard FAC-003-3 based on additional testing regarding the appropriate gap factor to be used to calculate clearance distances for vegetation. NERC explains that in response to the Commission's directive as part of its approval of an earlier version of the Reliability Standard, FAC-003-2, NERC contracted with the Electric Power Research Institute (EPRI) to conduct this testing.¹ As NERC notes, when the Commission

¹ NERC Petition at 7 (citing *Revisions to Reliability Standard for Transmission*

approved Reliability Standard FAC-003-2, the Commission stated that “it is important that NERC develop empirical evidence that either confirms assumptions used in calculating the MVCD values based on the Gallet equation, or gives reason to revisit the Reliability Standard.”²

NERC states in its petition that preliminary testing conducted by EPRI indicated that the gap factor used to calculate MVCDs should be adjusted from 1.3 to 1.0, which would result in MVCD values higher than those in currently-effective Reliability Standard FAC-003-3. NERC explains that it worked with EPRI to finalize the gap factor verification, submitting a final report to the Commission in August 2015. In addition, NERC states that the EPRI report was updated in anticipation of the instant petition.

NERC explains that the EPRI tests support the conclusion that MVCD values under currently-effective Reliability Standard FAC-003-3 are low and “demonstrate[] that the Gallet equation should apply a more conservative, lower gap factor of 1.0 to calculate MVCD values.”³ NERC further explains that proposed Reliability Standard FAC-003-4 proposes higher and more conservative MVCD values and, therefore, maintains that these revisions will “enhance reliability and provide additional confidence by applying a more conservative approach to determining the vegetation clearing distances.”⁴

NERC states that the revised clearances as reflected in Table 2 were moved into the text of the proposed Reliability Standard and that MVCD values were added for elevations up to 15,000 feet, but that no other substantive changes were made to the currently-effective Reliability Standard FAC-003-3.⁵

NERC’s filing was noticed on March 16, 2016, with interventions, comments and protests due on or before April 14, 2016.⁶ No comments were received.

Vegetation Management, Order No. 777, 142 FERC ¶ 61,208 (2013)).

² Order No. 777, 142 FERC ¶ 61,208 at P 3.

³ NERC Petition at 3.

⁴ *Id.*

⁵ *Id.* at 12, and n. 37 (describing certain non-substantive edits to the standard and implementation plan as compared to currently-effective Reliability Standard FAC-003-3).

⁶ On March 17, 2016, NERC filed a non-substantive correction to its March 14, 2016 petition.

NERC's uncontested petition is hereby approved pursuant to the relevant authority delegated to the Director, Office of Electric Reliability under 18 C.F.R. § 375.303 (2015), effective as of the date of this order.

This action shall not be construed as approving any other application, including proposed revisions of Electric Reliability Organization or Regional Entity rules or procedures pursuant to 18 C.F.R. § 375.303(a)(2)(i). Such action shall not be deemed as recognition of any claimed right or obligation associated therewith and such action is without prejudice to any findings or orders that have been or may hereafter be made by the Commission in any proceeding now pending or hereafter instituted by or against the Electric Reliability Organization or any Regional Entity.

This order constitutes final agency action. Requests for rehearing by the Commission may be filed within 30 days of the date of issuance of this order, pursuant to 18 C.F.R. § 385.713 (2015).

Sincerely,

Michael Bardee, Director
Office of Electric Reliability

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