



## **TRANSMITTER'S COMMENTS ON THE IESO'S DRAFT VEGETATION CONTACT INCIDENTS STANDARD**

### **Transmitter 1 Comments: (March 17, 2006)**

I restate my comments about the monthly reporting obligation that I offered in January. It appears this is not going to be changed for now, but I want to suggest that there could be another method with less involvement of follow-ups by sender/ IESO reps.

From January 2006:

"I would also ask why "monthly confirmation of compliance" is necessary ? Why can you not adopt a position that as long as the transmitter has reported (and achieved) annually 100% compliance, then that is satisfactory. If transmitter cannot report 100% compliance annually; that initiates " monthly "reporting until 12 consecutive 100% compliance monthly reports are received."

### **Transmitter 2 Comments: (March 23, 2006)**

The amended form 1527 is to be used once the new Version 1 of the NERC Standard FAC-003-1 "Transmission Vegetation Management Program", replacing Version 0 of the same Standard, becomes effective on April 7<sup>th</sup>, 2006.

### **IESO Response:**

The IESO is proposing to have the amended form in place for reporting of vegetation related outages, commencing April 1, 2006, to eliminated potential confusion with having 2 forms during the same reporting period.

The inclusion of Page 7 section in Appendix A to indicate whether the reported incident(s) are non-reportable to NPCC and NERC and the reasons for their exclusion is definitely a step in the right direction.

In addition to the above, we believe that form 1527 should clearly separate the NERC, NPCC and IESO requirements in Parts 2 and 3 of the form.

Requirements, Measures and Certification of Compliance should be structured in increments. The Requirements section should be structured as follows:

1. NERC Standard

Reproduce Requirement R3 in FAC-003-1

2. NPCC Standard

Regional differences introduced by NPCC, such as:

- monthly confirmation of compliance

3. IESO Requirement

Additional local IESO-controlled grid requirements, such as:

- Inclusion of lower voltage lines deemed critical by the IESO (“red” or “yellow” categories).
- Reporting on outages originated by natural disasters and human or animal activities, which are not part of the FAC-003-1 Standard.

Similar demarcation for Measures and Compliance Levels are proposed.

Clear demarcation of Requirements, Measures and Compliance Certification would clearly remove confusion from the form. As proposed, the form does not provide a clear indication on whether a non-compliance level is (or is not) to be forwarded to the Region.

**IESO Response:**

While the IESO appreciates the concerns expressed and will endeavor to provide delineation of the various standards authority's requirements, measures and elements of compliance, to the extent practicable, it is IESO's view, establishing reporting requirements in a manner similar to that applied to the Ontario Market Rules and associated Market Manuals provides a clearer direction to market participant with respect to what must be reported to the IESO. It is our view, it is impractical in some instances, confusing to market participants and inefficient to establish the specific individual reporting requirements as illustrated.

Rather, the IESO requirements, measures and compliance elements, as established, through market rules, market manuals or associated IESO forms are designed to ensure the NERC and NPCC requirements as well as those of the IESO's are all satisfied, without specifically specifying which is which.

In furtherance of clarifying the requirements, the IESO endeavors to translate these NERC/NPCC requirements into terminology more akin to that used in the market rules and manuals with corresponding references to the same.

In addition to the above, we have the following specific comments to the proposed form:

- (a) 48-hours reporting:

- It is not clear whether the 48 hours notification is a requirements introduced by NPCC or by the IESO. We have been unable to find such requirement in the NERC Standards and NPCC Documents.

**IESO Response:**

Chapter 5, Section 6.3.5 of the market rules sets out provisions to require a market participant to provide a detailed description of a forced outage event that impacts the reliability of ICG within 48 hours or within such longer period of time as may be agreed to by the IESO in any given case.

In addition, during the development of the NPCC Vegetation Related Outage Reporting form, there were discussions within CMAS to adopt the 48 hours reporting for vegetation-related incidents, in accordance with NPCC document B22, S3.2.2 and 3.2.3, to be consistent with other event driven standards. The CMAS subsequently agreed to continue with the existing monthly reporting and the final version of the NPCC form was posted March 27, 2006.

- We believe that the reporting of vegetation related events within 48 hours using the full form is not practical and does not add value from the compliance viewpoint. We believe that reporting within the 48 hours time frame should be limited to an e-mail notification with a minimal assessment of the operational impact. Details such as weather conditions, percent loading and other comments/information should be left for submission in the complete form 1527 by the 12<sup>th</sup> of the month following the event.

**IESO Response:**

While the IESO generally supports the views expressed above regarding added value from the compliance viewpoint, maintaining the reliability of the ICG remains IESO's primary responsibilities, which includes appropriate investigation of events affecting the ICG. Given this and the concerns expressed, the IESO has agreed to extend the reporting requirement to 10 calendar days.

Accordingly, form 1527 has been updated, requiring transmission owners to report vegetation related incidents within 10 calendar days following the start of the vegetation related incident instead of the 48 hours previously proposed.

There may, however, be situations where the IESO will still require a 48 hour detailed report for vegetation related incidents deemed to be significant by the IESO.

(b) Information to be provided:

- Percent Loading, and Weather Data: Standard FAC-003-1 only specifies, in Requirement R1.2, that the Transmission Owner must calculate clearances "taking into consideration transmission line voltage, the effects of ambient temperature on conductor sag under maximum design loading, and the effects of wind velocities on conductor sway." We believe the inclusion of this information in the form is not necessary. Furthermore, Requirement R3.2 in the proposed Form 1527 is not consistent with the NERC Standard, or unclear as to its purpose. Requirement R3.2 in the proposed form seems to exclude incidents where the loading is greater than

the operating limit. We believe that vegetation related incidents must be reported as such, regardless of what the loading level of the line was at the time of the event.

**IESO Response:**

The NERC form and the recently revised NPCC reporting form issued March 27 both require the percent loading data to be provided.

With respect to the “Weather Data”, this data is necessary for assessing if the incident is reportable to NPCC.

With regard to the exclusion of contact incidents where the line loading is greater than the operating limit, the exclusion was intentional for the following reasons:

- Clearance 1 in FAC-003-1 are determined based on the maximum design loading which establishes a value for conductor sag at those operating conditions, which can therefore be documented and implemented as per the standard requirement R1.2.1; and
- Vegetation outages resulting from loading greater than the operating limit go beyond the scope of the vegetation management program and are to be investigated and reported as limit violation outages. Thus avoiding dual reporting and associated non-compliance implications with 2 standards.
- We suggest adding columns/boxes to the table in Appendix A to be checked if the incident is not reportable to NERC/NPCC, outside ROW, weather, animal/human activity, etc., leaving the second page in Appendix A only for comments and additional information.

**IESO Response:**

The IESO agrees with the suggestion and the form will be modified to accommodate your suggestion.

(c) Frequency of Reporting

- Standard FAC-003-0 has some reference to the requirements of monthly reporting (Clause 1.4.1.1 in Section D compliance). However, FAC-003-1 only refers to quarterly reports (Requirement R3 and Measure M3). We believe the quarterly reporting is sufficient for Compliance purposes.

**IESO Response:**

See comments provided to item a) above.