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February 22, 2009

**Notice to All SERC Registered Entities Owning Transmission Lines
Operated at 200 kV and Above**

Please see the attached clarification from the Regional Entities regarding the Public Notice issued by NERC dated December 17, 2008 requesting prompt reporting of vegetation-related transmission line outages.

The attached letter includes the Public Notice from NERC along with SERC's specific instructions for prompt self-reporting of vegetation-related transmission line outages.

Effective immediately, please begin using the attached SERC Reporting Procedure for Vegetation-related Outages when reporting vegetation-related outages to SERC. Thank you for your cooperation.

Ken Keels
Manager of Compliance Enforcement

Attachments: (1) REMG Letter
(2) NERC Public Notice - NERC Compliance Process #2008 – 001
(3) SERC Reporting Procedure for Vegetation-related Outages



REGIONAL ENTITY MANAGEMENT GROUP

Reporting of Vegetation-related Outages February 5, 2009

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

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

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

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

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

As NERC points out in its Notice, self-reporting is a necessary element of an effective internal company compliance program and is expected as highlighted by NERC in its Sanctions Guidelines¹ and by FERC in its Revised Policy Statement on Enforcement² and Policy Statement on Compliance³. As identified in these documents, prompt self-reporting of any possible violation of a FERC-approved NERC Reliability Standard, including those associated with a Category 1 or Category 2 outage, coupled with the entity’s prompt and voluntary action to remedy the possible violation, could be considered a mitigating factor in a potential enforcement action.

Please refer to the Regional Entity’s web site or contact the Regional Entity for its specific vegetation-related outage reporting procedure.

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

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

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



NORTH AMERICAN ELECTRIC
RELIABILITY CORPORATION

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

Version 1.0

December 17, 2008 | Public Process Announcement

Notice to all Transmission Owners

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

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

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

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

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

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



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Reporting of Vegetation-related Outages - February 5, 2009

General

- SERC encourages the immediate self-reporting of ANY vegetation-related outage (Grow-in, sag-in, or fall-in from inside the ROW), whether momentary or sustained.
- By their posting of a public notice, NERC requests the reporting of Category 1 and 2 outages to the Region within 48 hours using the procedure defined by the Region.

Reporting Procedure in SERC

- Entities should use the Self-reporting form to report vegetation-related outages. The form is available on the SERC website at <http://www.serc1.org/Application/ContentPageView.aspx?ContentId=62>
- When SERC receives the Self-Report form indicating a vegetation-related outage, it will post the FAC-003-1 Detailed Reporting Form on the entity's SERC portal to collect more detailed information regarding the event.
- The FAC-003-1 Detailed Reporting Form should be completed and submitted to SERC within 48 hours of the posting to facilitate correct and complete information being transferred to NERC.
- Any vegetation-related outage information entered into the portal in the manner described above will be automatically added to the quarterly vegetation management report so it does not need to be reported again at the time Entity completes the quarterly report.

Quarterly Reporting

- The existing quarterly reporting procedure will remain intact with the caveat that any outages self-reported earlier in the quarter will automatically be added to the quarterly report and thus should not be reported again in the quarterly report.
- All Category 3 outages and any Category 1 or 2 outages that were not previously self-reported should be included in the quarterly report to SERC.
- Summary report forms for the quarterly filings will be posted to the entity's portal page on the first day of the month following a calendar quarter and must be submitted to SERC by COB on the 20th of the month.

For any questions, please contact John Wolfmeyer (jwolfmeyer@serc1.org; 704-940-8216) or Ken Keels (kkeels@serc1.org; 704-940-8214).