

**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

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| Revisions to Reliability Standard for |) | Docket No. RM12-4-000 |
| Transmission Vegetation Management |) | |
| |) | |

COMMENTS OF IDAHO POWER COMPANY

Idaho Power Company (“Idaho Power” or “Company”) submits these Comments regarding the Notice of Proposed Rulemaking issued by the Federal Energy Regulatory Commission (“FERC” or “Commission”) in the above-captioned proceeding. *Revisions to Reliability Standard for Transmission Vegetation Management*, 141 FERC ¶ 61,046, (October 18, 2012) (“NOPR”). Idaho Power is an investor-owned public utility engaged in the business of generating, purchasing, transmitting, and distributing electrical energy throughout approximately 24,000 square miles of service area in southern Idaho and eastern Oregon. As a public utility subject to FERC jurisdiction, Idaho Power is required to comply with reliability standards applicable to the Bulk Power System as prescribed by the Commission. Therefore, Idaho Power has a direct interest in this rulemaking proceeding.

I. INTRODUCTION

The Commission proposes to approve Reliability Standard FAC-003-2 (“Transmission Vegetation Management”), submitted by the North American Electric Reliability Corporation (“NERC”), the Commission-certified Electric Reliability Organization. The proposed Reliability Standard would expand the applicability of the standard to include overhead transmission lines that are operated below 200 kilovolts (“kV”), if they are either an element of an Interconnection Reliability Operating Limit (“IROL”) or an element of a Major Western Electricity Coordinating Council (“WECC”)

Transfer Path. In addition, the proposed Reliability Standard incorporates a new minimum annual vegetation inspection requirement, and incorporates new minimum Vegetation Clearance Distances ("MVCD") into the text of the standard. The Commission also proposes to approve the three definitions, the implementation plan, and the Violation Severity Levels associated with the proposed Reliability Standard. Finally, the Commission proposes to direct that NERC revise the Violation Risk Factor for Requirement R2 and approve the remainder of the Violation Risk Factors.

II. COMMENTS

With the comments set forth below, Idaho Power is in general support of the Commission's proposal to approve the reliability standards as set forth in the NOPR.

A. Applicability.

The Commission seeks input on how FAC-003-2 will be applied to an IROL in paragraph 64 of the NOPR. Idaho Power believes that the Reliability Standard should require that the planning coordinator communicates IROL status to transmission owners and operators. If the planning coordinator identifies an IROL, but does not communicate it, there is a reliability gap. Idaho Power believes that it is reasonable to hold a transmission owner responsible for vegetation management on lines that can become IROLs during studied credible contingencies; however, it does not seem reasonable to hold a transmission owner responsible for vegetation management on lines that become IROLs during unstudied or unanticipated system conditions.

B. Requirements R1 and R2.

In paragraph 72 of the NOPR, the Commission seeks input on the Electric Power Research Institute's ("EPRI") project on minimum clearance values or similar testing. Idaho Power is not aware of other similar testing. However, the Company supports the effort to gather empirical data on actual flashover distances between vegetation and

conductors. Idaho Power believes such data is necessary to confirm MVCD calculations or indicate a need for their revision.

In paragraph 73 of the NOPR, the Commission seeks input on the Commission proposal to direct NERC to conduct testing, obtain data, and submit a report on the MVCD. Idaho Power agrees with the need to develop empirical evidence that either confirms the MVCD values or provides reason to revise the standard. Idaho Power suggests directing NERC to conduct or commission testing and provide a report within one year of approval of FAC 003-2, which should give NERC appropriate time to make necessary adjustments prior to full implementation of the standard.

C. Enforceability.

The Commission solicits comments on whether submitted materials should be consolidated in paragraph 91 of the NOPR. Idaho Power is in support of consolidating the reference material into one place.

In paragraph 92 of the NOPR, the Commission seeks input on how NERC should treat a delay in communication. Idaho Power believes that the cause of the reporting delay must be assessed and that reporting or administrative process issues that lead to a delay in reporting could be addressed via the find, fix, and track process. Degrees of failure could be addressed in the Violation Severity Levels ("VSL"), with failure to report an issue that results in an outage as the most severe VSL. Idaho Power believes that the surrounding circumstances need to be taken into account when assigning a VSL.

D. Reporting Requirements.

In paragraph 94 of the NOPR, the Commission solicits input on courses of action available to ensure compliance. Idaho Power believes the other courses of action include Regional Entity audits, spot checks, and investigations of vegetation caused outages. These are normal processes that apply to compliance with all reliability

standards and, while the Commission is notified of these processes through other mechanisms, Idaho Power believes they are preferable over direct notification to the Commission.

E. Definitions.

The Commission seeks comments on the definition of Right-of-Way ("ROW") in paragraph 96 of the NOPR. Idaho Power is in agreement with the proposed new definition of ROW.

In paragraph 101, the Commission seeks input on NERC's enforcement approach to a fall-in of danger timber. Idaho Power believes that if a transmission operator has a robust program to identify and address danger trees and diligently follows that program, any fall-in would not be a violation. Idaho Power believes that this is consistent with NERC's approach to move away from a zero-defects approach to enforcement. Trees can become danger trees for multiple reasons and these reasons may not be identified until the next time the line is patrolled per the transmission operator's program. It does not seem reasonable to hold the transmission operator responsible for events beyond its control, including, but not limited to, weather, fire, or human activity that may cause a tree to become a problem.

F. Implementation Plan.

In paragraph 107 of the NOPR, the Commission discusses the Public Reporting Burden imposed by the proposed Reliability Standard FAC-003-2. Idaho Power believes that FAC-003-2 will not require the Company to add any transmission lines to its Transmission Vegetation Management Program ("TVMP") that are not already included. Therefore, the Company does not project any significant increase in outage reporting from the new standard. If and when additional Major WECC Transfer Paths

are identified in its service area, Idaho Power may need to add lines under 200 kV, which would then increase the reporting burden and extent of the Company's TVMP.

III. CONCLUSION

Idaho Power submits these Comments for the Commission's consideration. For the reasons and with caveats and explanations as set forth above, Idaho Power requests that the Commission approve the proposed Reliability Standard FAC-003-2.

Respectfully submitted this 19th day of December 2012.



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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of December 2012 a true and correct copy of the within and foregoing COMMENTS OF IDAHO POWER COMPANY was served electronically upon the following named parties:

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