



## Department of Energy

Bonneville Power Administration  
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EXECUTIVE OFFICE

July 11, 2008

In reply refer to: T/Ditt2

To: Interested Stakeholders:

On July 3, 2008, responding to a tree contact with a line in a Bonneville Power Administration (BPA) right-of-way, the Western Electricity Coordinating Council (WECC) issued a directive to BPA to conduct a comprehensive inspection within 90 days of all BPA transmission rights-of-way critical to bulk power reliability. This is the second tree contact in a BPA right-of-way within 12 months. WECC enforces regulations for utilities managing transmission in the Western Interconnection.

Let us first state unequivocally that we recognize we are stewards of an extremely important asset through our responsibilities to operate and maintain 75 percent of the region's high-voltage transmission system. We recognize we are accountable for maintaining our rights-of-way. BPA's transmission service area spans one of the largest geographic grid areas in the nation and traverses some of the most rugged terrain. We take our reliability responsibilities seriously and are extremely concerned by these events.

We are making an extraordinary effort not only to comply with the letter of the WECC directive but also to go above and beyond it. In keeping with our commitment to transparency and candor, we are providing the following information on this incident.

### **Background**

The Energy Policy Act of 2005 assigned regulatory responsibility to the Federal Energy Regulatory Commission (FERC) to assure reliability of the bulk electric power system. FERC assigned important implementation responsibilities to the North American Electric Reliability Corporation (NERC) – which assumed the role of the nation's Electric Reliability Organization – and to regional reliability councils such as WECC.

Together, these entities developed standards for a variety of actions that impact system reliability, including vegetation management. Vegetation management is critically important to reliability because a single tree contacting a power line can have a devastating impact on reliable system operations. Vegetation that grows too high can contact transmission lines, particularly during hot weather and when lines are heavily loaded, which can cause the lines to sag. This contact can lead to a fault or outage on the line. A tree contact on the BPA system was a significant initiating event for the 1996 West Coast blackout. Tree contacts were a root cause of the 2003 Midwest-Northeast blackout as well.

The newly developed standards went into place in June 2007, making compliance with NERC's regulations for controlling vegetation along power line rights-of-way mandatory. The regional reliability councils are NERC's enforcement arm, and violations of the mandatory standards may be subject to sanctions or fines. FERC ultimately acts on any sanctions.

### **The incidents**

In July 2007, BPA experienced a tree contact on its Marion-Alvey 500-kV line. Fortunately, the incident did not create a system problem, and no customer outages occurred. We responded by performing a thorough root cause analysis. The analysis showed that trees that had been identified as potential danger trees by air patrols had not been cut. In response, we developed a mitigation action plan designed to assure identified danger trees and other tall vegetation are cut promptly. Progress measures and reporting mechanisms were developed and implemented with monthly review at the senior executive level.

In addition, we conducted extensive communication within the Agency to emphasize the importance of identifying and cutting trees and other vegetation that could come into contact with power lines. On the basis of the root cause analysis and subsequent action plan, we provided our mitigation and measurement plan to WECC in February, noting that we were confident we could maintain compliance with the standards.

Then, on June 28, 2008, we had another tree contact on our system, this time on the Big Eddy-Chemawa 230-kV line. It occurred on a hot Saturday morning when the line was lightly loaded. Again, fortunately, this incident did not create a system or customer problem. But for us it was a deeply disturbing event. We immediately launched another root cause analysis, and one thing is already clear. A clump of trees well exceeding our height standard stood in an otherwise clear right-of-way, and our transmission line came into contact with one of them. These trees had not been reported by either ground or air patrols.

We are stunned, embarrassed and shaken by the event.

Because the root cause analysis is under way, we will not attempt to explain the reason for the event until the investigation is complete. However, we are fast-tracking the analysis and expect to complete it very soon.

## **Actions we are taking**

Not surprisingly, the WECC directive displays concern over BPA assertions that our rights-of-way are in compliance with reliability standards. The directive requires that within 90 days BPA complete thorough and comprehensive inspection of approximately 8,500 miles of BPA transmission rights-of-way (the equivalent of approximately 15,000 circuit miles) that are critical to bulk power reliability. We are also to provide weekly interim reports on our progress. The assessment that our rights-of-way meet vegetation management standards must be certified by senior management at BPA.

We intend to comply with the WECC directive and are in the process of employing all available resources to get this done. We have canceled leave and have crews working extended days, including weekends. All personnel qualified to perform this work have been in the field since July 3, and this extraordinary effort will continue until all elements of the directive have been met. The only limiting factors are consideration for the safety of our people and assuring emergency response coverage in all of our operations and maintenance areas.

Since the tree contact on June 28, we have taken aggressive steps to remove any newly identified vegetation threats found on our transmission system. Crews are patrolling the transmission lines from dawn until dark, and our aircraft also are on continuous patrol during daylight hours. We have asked for standby assistance should we need it from other Northwest utilities and the Western Area Power Administration.

To address our own concerns that we can confidently certify that our rights-of-way are clear, our line personnel are taking digital photographs of the entire 8,500 miles of rights-of-way. A review of all photos to assure compliance and documentation will be done by a first-level supervisor and followed up by two levels of management review. Additionally, two levels of executive review will follow that to fully assure our compliance. Reviewing and transferring this data requires a completely new set of procedures and processes that had previously not existed at BPA.

## **Looking ahead**

Any sanction or fine will be determined through a process that will include WECC, NERC, and FERC. We will work through this process at the appropriate time.

Our fundamental objective right now is to prove to our customers and the regulatory community that we can appropriately manage these rights-of-way consistent with all standards. As stated earlier, our highest priority is not only to comply but also to go above and beyond the WECC directive.

We intend to add this issue to the agenda for the next meeting of the Transmission Steering Policy Committee on Aug. 12 so transmission customers and other stakeholders can pursue any questions they may have. We also welcome input on additional actions we can take that would help to address this problem. We will keep customers and stakeholders informed as to our actions in response to this event.

As the largest transmission owner in the Pacific Northwest and a critical partner in the Western Interconnection, BPA understands the serious consequences vegetation threats pose. We take full responsibility for ensuring the reliability of our transmission grid, and we are taking unprecedented measures to identify and remove vegetation threats along our transmission lines to ensure we are in strict compliance with the vegetation standards systemwide.

Sincerely,

/s/ Stephen J. Wright – *July 11, 2008*

/s/ Vickie A. VanZandt – *July 11, 2008*

Stephen J. Wright  
Administrator and Chief Executive Officer

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