

August 12, 2015

Ms. Kimberly D. Bose
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

**Re: Electric Power Research Institute 2015 Technical Report
Docket No. RM12-4-000**

Dear Secretary Bose:

The North American Electric Reliability Corporation (“NERC”)¹ hereby submits the 2015 Technical Report prepared by the Electric Power Research Institute entitled *Supplemental Testing to Confirm or Refine Gap Factor Utilized in Calculation of Minimum Vegetation Clearance Distances (“MVCD”): Tests: Results and Analysis* (“EPRI Report”). This report explains testing that was performed to determine the switching impulse strength of the air gap between a conductor and natural trees to validate revision of the gap factor to 1.0 in order to determine the MCVD in the NERC FAC-003-2 Reliability Standard.

Also attached is a summary prepared by NERC staff of the EPRI Report. As explained in NERC’s summary, NERC anticipates using the findings from the EPRI report to initiate a Standards Authorization Request to adjust the MVCD values in the FAC-003-2 standard. NERC staff anticipates that this work will be completed by the end of the first quarter 2016.

Should you have any questions, please do not hesitate to contact the undersigned.

¹ The Commission certified NERC as the electric reliability organization (“ERO”) in accordance with Section 215 of the FPA on July 20, 2006. *N. Am. Elec. Reliability Corp.*, 116 FERC ¶ 61,062 (2006).

Respectfully submitted,

/s/ Holly A. Hawkins

Holly A. Hawkins

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CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing document upon all parties listed on the official service list compiled by the Secretary in this proceeding.

Dated at Washington, D.C. this 12th day of August, 2015.

/s/ Holly A. Hawkins

Holly A. Hawkins

Associate General Counsel for the North American
Electric Reliability Corporation