

Data Submitted (UTC 11): 1/11/2021 9:07:45 PM

First name: Matt

Last name: Gingerich

Organization: NV Energy

Title: Manager, Land Resources

Comments: Powerline Operating Plans and Agreements (FSH 2709.11 Chapter 80)

Operating plans have been beneficial to NV Energy, and we support this directive. The operating plans provide guidance for both maintenance and vegetation management, and the ability to conduct these activities ensures the safe and reliable operation of the utility's facilities. Standing approval to conduct these activities, based on the plans, eliminates the need for case by case reviews which burden both the utility and the USFS.

Development and approval of operating plans will save time and money.

It is also noted that some needs may arise outside of the operations plan, such as natural disasters or customer driven projects, that may warrant specific review. The operating plans should outline the process and provide direction for those to be reviewed individually.

Under Paragraph 87 of the proposed directive, Class I activities require "a telephone call or email" for notice and require "prior acknowledgement from the authorized office by telephone or email." Class II activities require notice in the form of either an annual schedule of work for the year, or "an email or letter" for a single project or "an email" for a project already identified in an annual schedule of work which must be transmitted in the email. Acknowledgement for Class II activities other than road use permits is in the form of an "email or letter" from the authorized officer. Class I and II activities are described in the proposed directive as having either minimal or no "ground disturbance or impacts on vegetation inside and outside of the linear right-of-way." Therefore, requiring USFS authorization beyond what has already been approved in an operating plan only serves to delay needed routine maintenance. It is therefore suggested that these additional authorization requirements be removed.

Lastly, implementation of the proposed directive will require additional efforts by the USFS, and these additional efforts will be borne by already strained staffing resources. In order to effectively implement the new requirements, USFS should also ensure that sufficient resources exist in order to sufficiently carry them out.

NV Energy appreciates the opportunity to provide comments on this directive.

Thankyou.