

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY D/B/A AES INDIANA (“AES INDIANA”) FOR)
AUTHORITY TO INCREASE RATES AND CHARGES FOR)
ELECTRIC UTILITY SERVICE, AND FOR APPROVAL)
OF RELATED RELIEF, INCLUDING (1) REVISED)
DEPRECIATION RATES, (2) ACCOUNTING RELIEF,)
INCLUDING DEFERRALS AND AMORTIZATIONS, (3))
INCLUSION OF CAPITAL INVESTMENTS, (4) RATE)
ADJUSTMENT MECHANISM PROPOSALS, INCLUDING)
NEW ECONOMIC DEVELOPMENT RIDER, (5) REMOTE)
DISCONNECT/RECONNECT PROCESS, AND (6) NEW)
SCHEDULES OF RATES, RULES AND REGULATIONS)
FOR SERVICE.)

CAUSE NO. 45911

INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR

PUBLIC’S EXHIBIT NO. 3

REDACTED TESTIMONY OF OUCC WITNESS

ROOPALI SANKA

OCTOBER 12, 2023

Respectfully submitted,



T. Jason Haas
Attorney No. 34983-29
Deputy Consumer Counselor

**CONFIDENTIAL TESTIMONY OF OUCC WITNESS ROOPALI SANKA
INDIANAPOLIS POWER & LIGHT COMPANY D/B/A AES INDIANA
CAUSE NO. 45911**

CONFIDENTIAL INFORMATION IS IDENTIFIED WITH [REDACTED]

I. INTRODUCTION

1 **Q: Please state your name and business address.**

2 A: My name is Roopali Sanka, and my business address is 115 West Washington
3 Street, Suite 1500 South, Indianapolis, Indiana 46204.

4 **Q: By whom are you employed and in what capacity?**

5 A: I am employed as a Utility Analyst in the Indiana Office of Utility Consumer
6 Counselor's ("OUCC") Electric Division. A summary of my educational
7 background and experience is included in Appendix A attached to my testimony.

8 **Q: What is the purpose of your testimony?**

9 A: My testimony addresses Indianapolis Power and Light Company d/b/a/ AES
10 Indiana's ("AES Indiana," "Petitioner," or "Company") proposed pro forma
11 adjustment of \$10.2 million to increase its test year distribution vegetation
12 management ("VM") expense of \$15 million to a total pro forma expense of \$25.2
13 million.¹ My testimony explains why Petitioner's pro forma adjustment is
14 excessive, and recommends a pro forma adjustment of \$3,858,427 for a total pro
15 forma distribution VM expense of \$18,891,120. OUCC witness Wes R. Blakley
16 addresses the vegetation management reserve.

¹ Direct Testimony of Chadwick Bocook, page 4 lines 18-20; AES Indiana Financial Exhibit AESI-OPER, Schedule OM12.

1 **Q: Please describe the review and analysis you conducted to prepare your**
2 **testimony.**

3 A: I reviewed AES Indiana's verified petition and relevant direct testimony, exhibits,
4 and attachments. I submitted data requests ("DR"), both formal and informal, and
5 reviewed Petitioner's responses to the OUCC's DRs and responses to DRs from
6 other parties. I participated in a tech-to-tech call with AES Indiana staff on
7 September 29, 2023, and had discussions with current and former OUCC staff
8 members. I reviewed AES Indiana's Annual Vegetation Management Reports filed
9 in Cause No. 43663 for the years 2018-2022. I also reviewed the testimony of
10 OUCC witness Eric Hand and the Commission's Final Order from AES Indiana's
11 last rate case (Cause No. 45029).

12 **Q: To the extent you do not address a specific item in your testimony, should it be**
13 **construed to mean you agree with AES Indiana's proposal?**

14 A: No. The exclusion from my testimony of any topics, issues, or items AES Indiana
15 proposes does not indicate my approval of those topics, issues, or items. Rather, the
16 scope of my testimony is limited to the specific items addressed herein.

II. VEGETATION MANAGEMENT

17 **Q: Please explain what AES Indiana's VM Program ("VMP") entails.**

18 A: Vegetation management is necessary to maintain proper clearance between AES
19 Indiana's facilities and the surrounding vegetation to minimize electrical hazards
20 and prevent outages caused by vegetation interference, and, therefore, increase
21 reliability.² AES Indiana's stated objective is to perform routine VM near electrical

² Bocook Direct, page 3, lines 19-21.

1 lines on a four-year rotation or cycle.³ AES Indiana's VMP is separated into
2 distribution voltage VM ("DVM") and transmission voltage VM. Petitioner is not
3 requesting a pro forma adjustment for its test year transmission VM expense.

4 **Q: What amount is AES Indiana requesting for vegetation management expense?**

5 A: AES Indiana is requesting a \$10.2 million (68%) pro forma adjustment to increase
6 the 2022 vegetation management test year expense from \$15 million to \$25.2
7 million,⁴ as shown in Table 1.

8 **Table 1: Total Distribution Vegetation Management Expense⁵**

Year	Total Expense	Percentage difference (%)
2019	\$ 12,557,123	
2020	\$ 12,195,732	-3%
2021	\$ 11,768,237	-4%
2022	\$ 15,032,693	28%
Pro Forma Proposed	\$ 25,247,000	68%

9

10 **Q: Why is AES Indiana requesting an increase in its vegetation VM expense**
11 **compared to the test year?**

12 A: AES Indiana witness Chadwick Bocook provides three reasons for the requested
13 increase:

- 14 1) Increased contractor labor costs (up 3%),⁶
15 2) More trimming caused by changing trimming specifications (overhang removal
16 specification instead of the fifteen-foot box specification),⁷ and

³ Attachment RS-3, IURC Cause No. 43663, AES Indiana's 2022 Annual Vegetation Management Report, Exhibit B, page 3, March 31, 2023.

⁴ Bocook Direct, page 4, lines 18-20.

⁵ Bocook Direct, page 6, Table 1, Second Revisions to Direct Testimony (Sept. 19, 2023), shows the annual vegetation management costs for 2019-2022. These amounts are higher than the \$11 million currently included in rates. Amounts in excess of the \$11 million are not recovered.

⁶ Bocook Direct, page 5, line 6.

⁷ Bocook Direct, page 5, lines 7-11.

1 3) Increased annual circuit maintenance of 322 additional circuit miles over and
2 above the circuit miles for the test year.⁸

3 **Q: Please explain the increase in distribution VM circuit maintenance.**

4 A: AES Indiana proposes to perform annual distribution VM circuit maintenance on a
5 total of 912 miles, which is approximately one fourth of the total miles for the
6 distribution overhead lines managed.⁹ In addition, the prior method for circuit
7 maintenance was tree trimming to a fifteen-foot box specification, as described
8 below. This specification would result in a rate per mile of
9 <<<CONFIDENTIAL>>> [REDACTED] <<<CONFIDENTIAL>>>.¹⁰ However, AES
10 Indiana has changed its method for circuit maintenance to increase the specification
11 from a fifteen-foot box specification to an overhang removal specification, as
12 described below. The new tree-trimming specification will cost approximately
13 <<<CONFIDENTIAL>>> [REDACTED] <<<CONFIDENTIAL>>>¹¹ per mile, which is
14 more than double the prior cost per mile.

15 **Q: Please explain the difference between the fifteen-foot box trim specification**
16 **and the overhang trim specification.**

17 A: A box trim specification requires trimming a certain distance on either side and
18 above the distribution circuit overhead line, essentially trimming a tunnel the
19 overhead lines pass through, which allows overhanging limbs. The fifteen-foot box
20 trim specification sets the distance at fifteen feet. The overhang trim specification

⁸ Bocook Direct, page 5, line 19.

⁹ Attachment RS-3, IURC Cause No. 43663, AES Indiana's 2022 Annual Vegetation Management Report, Exhibit B, page 6, March 31, 2023.

¹⁰ Bocook Direct, page 5, line 10.

¹¹ Bocook Direct, page 5, line 10, Second Revisions to Direct Testimony (Sept. 19, 2023). This amount was revised from [REDACTED] in the original version of his testimony.

1 requires removing all overhead vegetation (up to the sky), clearing all vegetation
2 above the lines, and removing fifteen feet on either side of the line.

3 **Q: Between the fifteen-foot box trim and the new overhang trim, which VM**
4 **specification is more intensive, and what will be the effect?**

5 A: The new overhang trim specification requires more time and effort in comparison
6 to the fifteen-foot box trim specification, resulting in a higher cost per mile. If this
7 new trim specification requires more manpower and time to perform the
8 distribution circuit VM, it is unlikely AES Indiana will complete its annual goal of
9 performing circuit maintenance on all 912 line miles.¹² As shown in Table 2, the
10 five-year average number of miles for which AES Indiana has performed VM
11 between 2018-2022 is 660 distribution circuit line miles (the median is 604 miles).
12 Based on my review, it is reasonable for the Company's DVM budget to remain
13 consistent with the 660 line-mile average.

14 **Q: What are the OUCC's concerns regarding Petitioner's VMP?**

15 A: While the OUCC does not have concerns regarding the VMP transmission budget,
16 the OUCC is concerned with the 68% pro forma adjustment proposed for the test
17 year distribution VMP expense.

18 Table 2 below shows the total number of AES Indiana distribution system line miles
19 upon which vegetation management was performed during each of the last five
20 calendar years as shown in AES Indiana's supplemental response to OUCC DR 10-

21 1.

¹² Attachment RS-3, IURC Cause No. 43663, AES Indiana's 2022 Annual Vegetation Management Report, Exhibit B, page 6, March 31, 2023.

1

Table 2¹³

<u>AES Indiana DVM by Year</u>		
<u>Year</u>	<u>Total DVM Miles</u>	<u>Total System Miles (Overhead Primary Distribution)</u>
<u>2018</u>	<u>604</u>	<u>3,686</u>
<u>2019</u>	<u>776</u>	<u>3,686</u>
<u>2020</u>	<u>818</u>	<u>3,686</u>
<u>2021</u>	<u>512</u>	<u>3,646</u>
<u>2022</u>	<u>589</u>	<u>3,646</u>
<u>Average</u>	<u>660</u>	<u>3,670</u>

2

3 Total DVM miles: Total number of distribution line miles for which VM was performed.

4 **Q: Are any aspects of these numbers particularly concerning?**

5 A: Yes. The total annual numbers for 2021 and 2022 are significantly lower than those
6 for the two immediately preceding years.

7 **Q: Is Petitioner on track to perform vegetation management on more or fewer
8 distribution miles in 2023?**

9 A: As of this summer, significantly fewer. Per information provided to the OUCC in
10 discovery, AES Indiana performed vegetation management on 130 miles of
11 distribution lines during the six-month period covering January 2023 through June

¹³Attachment RS-3, Cause No. 43663. AES Indiana's Annual Vegetation Management Reports from 2018-2022; Attachment RS-1, AES Indiana's Supplemental Response to OUCC DR 10-1; Attachment RS-2, AES Indiana's Response to IG DR 4-11.

1 2023. If the same pace were kept through the rest of the year, 2023 would compare
 2 to each of the five previous years as follows:

<u>AES Indiana DVM by Year</u>		
<u>Year</u>	<u>Total DVM Miles</u>	<u>Total System Miles</u> <u>(Overhead Primary</u> <u>Distribution)</u>
<u>2018</u>	<u>604</u>	<u>3,686</u>
<u>2019</u>	<u>776</u>	<u>3,686</u>
<u>2020</u>	<u>818</u>	<u>3,686</u>
<u>2021</u>	<u>512</u>	<u>3,646</u>
<u>2022</u>	<u>589</u>	<u>3,646</u>
<u>2023*</u>	<u>260</u>	<u> </u>
<u>Average</u>	<u>660</u>	<u>3,670</u>

3 * Extrapolated from AES Indiana's supplemental response to OUCC DR 10-1

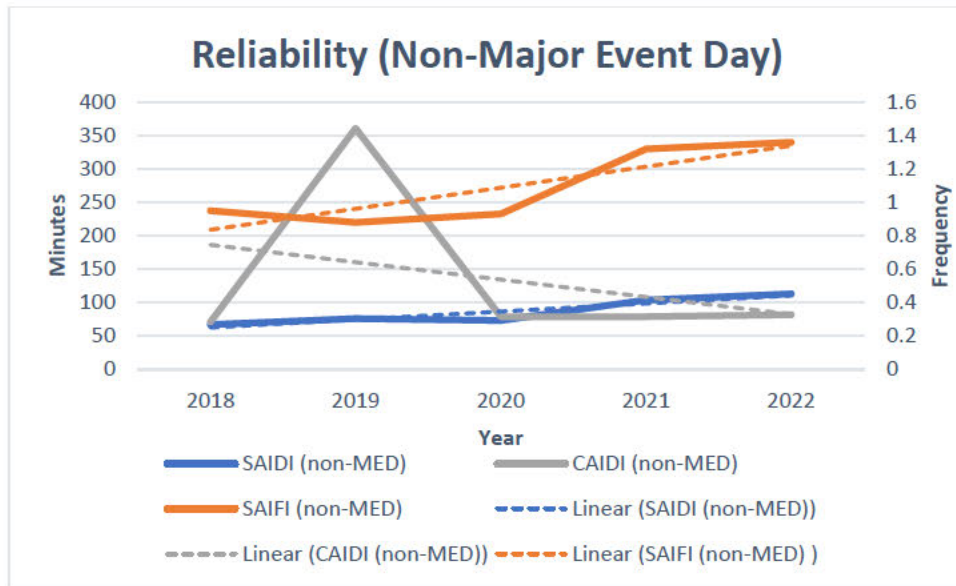
4 **Q: With or without the extrapolated figure for 2023, do the numbers show a**
 5 **decline and should this decline factor into Petitioner's requested increase?**

6 **A:** Yes. The data shows reduced levels of distribution line maintenance in 2021 and
 7 2022 when compared to 2019 and 2020. Such a trend does not demonstrate support
 8 for a 68% pro forma adjustment. The lack of support is further confirmed by
 9 Petitioner's reliability performance metrics.

10 **Q: Since the Order in Cause No. 45029, do Petitioner's System Average**
 11 **Interruption Frequency Index ("SAIFI"), System Average Interruption**
 12 **Duration Index ("SAIDI"), and Customer Average Interruption Duration**
 13 **index ("CAIDI") metrics demonstrate improved service and reliability from**
 14 **AES Indiana's VM efforts?**

1 A: The chart below shows the average trendline of each AES Indiana reliability
 2 metrics on non-major event days (day-to-day operation) between the years 2018-
 3 2022. Although CAIDI has slightly improved, SAIDI and SAIFI have not. There
 4 has been a steady increase in both SAIDI and SAIFI even though a prior increased
 5 vegetation line clearance box trim specification from 10 feet to 15 feet was made
 6 in AES Indiana's prior rate case.¹⁴ With implementing the new overhang trim
 7 method, which is meant to improve reliability,¹⁵ there should be improvement in
 8 all the reliability metrics future reports filed under Cause No. 44576.

9 **Chart 1¹⁶**



10

11 **Q: Is AES Indiana's VM pro forma adjustment appropriate?**

¹⁴ Cause No. 45029, Final Order pages 14-15 (Oct. 31, 2018).

¹⁵ Bocoook Direct, page 5, lines 7-8.

¹⁶ Cause No. 44576, 2022 Annual Performance Report, pages 14-16 (March 31, 2023).

1 A: No. AES Indiana's \$25.2 million¹⁷ pro-forma proposed vegetation management
2 expense is \$10.2 million higher than the \$15 million¹⁸ 2022 historical test year
3 amount. AES Indiana's annual average expense for distribution VM between 2018
4 and 2022 is \$12,888,446.25, significantly below the pro-forma VM expense
5 amount proposed in this Cause. And, as discussed above, the average number of
6 line miles on which distribution VM has been performed is also significantly below
7 the increased proposed distribution line miles. AES Indiana's proposed pro forma
8 adjustment is not consistent compared to its historical practices, expenses, and line-
9 miles achieved.

10 **Q: What do you recommend regarding the distribution VM program expense?**

11 A: I recommend a pro forma adjustment of \$3,858,427 for a pro forma total of
12 \$18,891,120. This represents a \$6,355,571 reduction to Petitioner's proposed pro
13 forma adjustment of VM expense. This value was determined by taking the product
14 of the cost/mile that AES Indiana uses in its calculation, which is used by AES
15 Indiana in their Confidential Workpaper OM 12-WP 2 Pro Forma Tree Trimming
16 – Revised, and the average number of distribution line-miles that AES Indiana
17 performed vegetation management on during the past five years, as shown in Table
18 2 above, with the addition of AES Indiana's pro forma contractor circuit planning
19 expense and pro forma other vegetation management expense.¹⁹ While this will
20 alleviate ratepayers' financial burden by reducing rate pressure caused by AES

¹⁷ Bocoook Direct, page 4, line 20.

¹⁸ Bocoook Direct, page 6, line 1.

¹⁹ Second Revisions to Direct Testimony, Confidential Workpaper OM12-WP2 Pro Forma Tree Trimming – Revised (Sept. 19, 2023).

1 Indiana's proposed pro forma adjustment, this will also allow for a more gradual
2 and manageable approach for AES Indiana to achieve its objective.

3 **III. RECOMMENDATIONS**

4 **Q: Please summarize your recommendations to the Commission in this cause.**

5 A: The OUCC recommends the Commission reduce the distribution VM pro forma
6 expense from \$25.2 million to \$18.9 million to achievably perform annual circuit
7 maintenance on 660 line-miles.

8 **Q: Does this conclude your testimony?**

9 A: Yes.

APPENDIX TO TESTIMONY OF
OUCW WITNESS ROOPALI SANKA

1 **Q: Please describe your educational background and experience.**

2 A: I hold a bachelor's degree in Energy Engineering from Indiana University Purdue
3 University of Indianapolis. In August 2022, I began my employment with the
4 OUCW as a Utility Analyst II in the electric division and work on demand side
5 management ("DSM"); evaluation, measurement, & verification ("EM&V");
6 certificates of public convenience and necessity ("CPCN"). Additionally, I attended
7 Scott Hempling's 'Fundamentals of Utility Law' course in the first quarter of 2023,
8 and I attended the 2022 Indiana Energy Conference in October 2022, which focused
9 on the current and future challenges facing the energy market.

10 **Q: Have you previously testified before the Indiana Utility Regulatory**
11 **Commission?**

12 A: Yes.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

PETITION OF INDIANAPOLIS POWER & LIGHT)
COMPANY D/B/A AES INDIANA (“AES INDIANA”) FOR)
AUTHORITY TO INCREASE RATES AND CHARGES FOR)
ELECTRIC UTILITY SERVICE, AND FOR APPROVAL OF)
RELATED RELIEF, INCLUDING (1) REVISED)
DEPRECIATION RATES, (2) ACCOUNTING RELIEF,)
INCLUDING DEFERRALS AND AMORTIZATIONS, (3)) CAUSE NO. 45911
INCLUSION OF CAPITAL INVESTMENTS, (4) RATE)
ADJUSTMENT MECHANISM PROPOSALS, INCLUDING)
NEW ECONOMIC DEVELOPMENT RIDER, (5) REMOTE)
DISCONNECT/RECONNECT PROCESS, AND (6) NEW)
SCHEDULES OF RATES, RULES AND REGULATIONS FOR)
SERVICE.)

**INDIANAPOLIS POWER & LIGHT COMPANY D/B/A AES INDIANA’S
FIRST SUPPLEMENTAL OBJECTIONS AND RESPONSES TO THE
INDIANA OFFICE OF UTILITY CONSUMER COUNSELOR’S
TENTH SET OF DATA REQUESTS TO AES INDIANA**

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “Petitioner”), pursuant to 170 IAC 1-1.1-16 and the discovery provisions of Rules 26 through 37 of the Indiana Rules of Trial Procedure, by its counsel, hereby submits the following Supplemental Objections and Responses to the Indiana Office of Utility Consumer Counselor’s Tenth Set of Data Requests to AES Indiana (“Requests”).

Notes and General Objections

1. The general objections provided in AES Indiana’s previous response are hereby incorporated by reference in this response as if each had been restated here. Without waiving these objections, Petitioner supplements its response to the Requests in the manner set forth below.

Dated this 19th day of September, 2023.

As to objections,

A handwritten signature in blue ink, appearing to read "Jeffrey Peabody".

Teresa Morton Nyhart (No. 14044-49)
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Attorneys for
INDIANAPOLIS POWER & LIGHT COMPANY
D/B/A AES INDIANA

AES Indiana Supplemental Responses to OUCC DR Set 10-1

Data Request OUCC DR 10 - 1

Please provide, by year, the number of line miles, broken out by distribution and transmission, that AES Indiana has cleared through the vegetation management process for each calendar year ending 2017 through 2022 and the January 1, 2023 through June 30, 2023 period.

Objection:

AES Indiana objects to the request on the grounds and to the extent the request seeks an analysis, study, compilation, or calculation that AES Indiana has not performed and to which AES Indiana objects to performing. AES Indiana objects to the request on the grounds and to the extent the request exceeds the scope of this proceeding, particularly to the extent the request seeks information that is outside the historical period, test year, and adjustment period for this proceeding. AES Indiana further objects to the request on the ground and to the extent the request seeks information that is confidential, proprietary, competitively sensitive, and/or trade secret. Subject to and without waiver of the foregoing objection, AES Indiana provides the following response.

Response:

AES Indiana does not separately track vegetation management for transmission lines less than 200kV. The maintenance on these lines is performed at the same time the distribution maintenance is performed on the circuit. However, transmission lines greater than 200kV are managed in accordance with AES Indiana’s Transmission Vegetation Management Plan (TVMP).

Listed below is the number of line miles, per year, where vegetation management was performed on distribution lines and the transmission lines greater than 200kV. See also AES Indiana witness Bocook direct testimony Q/A 16 on pages 5-6 for distribution system vegetation management cost increases.

DISTRIBUTION		
YEAR	MILES	TRIM SPEC
2018	604	Box Trim
2019	776	Box Trim
2020	818	Box Trim
2021	512	Box Trim
2022	384	Box Trim
2022	237	Overhang Removal
2023 (Jan.-June)	130	Overhang Removal

TRANSMISSION >200kV	
YEAR	MILES
2018	149
2019	60
2020	104
2021	167
2022	59
2023 (Jan.-June)	0

Supplemental Response:

See updated table below:

DISTRIBUTION		
YEAR	MILES	TRIM SPEC
2018	604	Box Trim
2019	776	Box Trim
2020	818	Box Trim
2021	512	Box Trim
2022	408	Box Trim
2022	181	Overhang Removal
2023 (Jan.-June)	130	Overhang Removal

Data Request IG DR 4 - 11

Please refer to AES Indiana Witness Bocook's direct testimony. Please provide the miles trimmed per year for the last 4 years and the average cost per mile that ties to Table 1: AES Indiana Annual Vegetation Management Costs. Please explain any increases in the cost per mile over the last 4 years.

Objection:

AES Indiana objects to the Request on the grounds and to the extent the request seeks a compilation, analysis, or study that AES Indiana has not performed and to which AES Indiana objects to performing. AES Indiana further objects to the Request on the grounds and to the extent the Request solicits information that is confidential, proprietary, competitively sensitive and/or trade secret. Subject to and without waiver of the foregoing objections, AES Indiana provides the following response with the confidential information provided pursuant to the nondisclosure agreement between the parties.

Response:

Please see Table 1 below for the distribution miles trimmed for calendar years 2019 through 2022. Total distribution vegetation management ("DVM") costs are included in Table 1 on page 6 of witness Bocook's direct testimony and for reference, are also included in Table 1 below. The Total Average Cost/Mile in Table 1 below divides the total DVM costs by the number of miles. This Total Average Cost/Mile ties back to the total DVM costs included in Table 1 of witness Bocook's direct testimony.

Total DVM costs were further broken down in the test year into three categories: production trimming, contractor circuit planning, and other vegetation management. For the test year, AES Indiana only included production trimming in the average cost/mile calculation, which is representative of the average cost/mile of ongoing production trimming and is shown in OUCC DR 15-13, Confidential Attachment 1. This further breakdown of detail was only performed for the test year; therefore, AES Indiana is providing the *total* DVM average cost/mile in this response to show the trend from 2019 to 2022.

Increases in the cost per mile are attributable to the increase in contractor labor costs over the last four years. In addition, improving the trim specification to remove overhang on a portion of the miles trimmed in 2022 also increased the average cost per mile.

Table 1: AES Indiana Annual Distribution Miles Trimmed and Calculated Total Distribution Vegetation Management Average Cost/Mile

Year	Miles	Total Cost (1)	Total Average Cost/Mile (1)
2019	776	\$ 12,557,123	\$ 16,182
2020	818	\$ 12,195,732	\$ 14,909
2021	512	\$ 11,768,237	\$ 22,985
2022	590	\$ 15,032,693	\$ 25,479

(1) Total distribution vegetation management costs include production trimming, contractor circuit planning, and other vegetation management costs.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

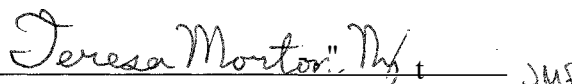
INVESTIGATION BY THE INDIANA UTILITY)
REGULATORY COMMISSION, UNDER IC §§)
8-1-2-58 AND 59, TO INVESTIGATE)
ELECTRIC UTILITY TREE-TRIMMING)
PRACTICES AND TARIFFS RELATING TO)
SERVICE QUALITY IN THE STATE OF)
INDIANA)
RESPONDENTS:)
ALL INDIANA JURISDICTIONAL)
ELECTRIC UTILITIES)

CAUSE NO. 43663

INDIANAPOLIS POWER & LIGHT COMPANY'S
SUBMISSION OF ANNUAL VEGETATION MANAGEMENT REPORT

Indianapolis Power & Light Company (IPL), by counsel, hereby submits its Annual Vegetation Management Report as required by the Commission's November 30, 2010, Order in this Cause.

Respectfully submitted,



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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Submission of Annual Vegetation Management Report* was served by email transmission, upon the following:

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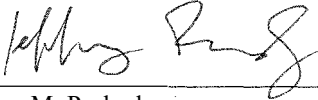
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Dated this 30th day of March, 2018.



Jeffrey M. Peabody

**Indianapolis Power & Light Company
Annual Vegetation Management Report
Cause No. 43663¹
Calendar Year 2017**

I. Vegetation Management Expenditures

2017	Budget	Actual	Storm Expenditures	Non-storm Expenditures
Line Clearing Services	\$7,393,545	\$6,378,712	\$705,931	\$5,672,781

II. Customer Complaints Related to Tree Trimming

IPL uses a multi-step notification process to provide advance notice to Customers of routine vegetation management on their premises. This process is outlined in IPL's Vegetation Management Program. The initial steps of this process occur two to three months prior to the scheduled pruning.² The final steps occur during the three week period leading up to the planned vegetation management. This process permits customer inquiries to be addressed in advance of the planned vegetation management and includes an opportunity for customers to meet with an IPL representative on-site to discuss the vegetation management. IPL also has a process in place to address customer questions that arise on the day of pruning or thereafter. IPL has successfully used its advance notification and customer inquiry procedures to avoid the escalation of customer contacts into actual complaints. The overwhelming majority of tree related inquiries made to IPL's Line Clearing Office are inquiries seeking information or clarifications on IPL's vegetation management operations. If follow up by an IPL representative (either from IPL's Line Clearing Department or IPL's Customer Advocate) is unsuccessful in addressing or answering customer inquiries then the matter is forwarded to IPL's Legal Department for handling via an internal complaint resolution process to ensure tracking and appropriate treatment. In 2017, no tree related matters were forwarded to this internal complaint resolution process. During this period, twelve (12) customers made complaints to the Commission's Consumer Affairs Division, all of which were determined by the Commission to be unsubstantiated. Further information regarding these matters is included in the attached Exhibit A. Customer satisfaction is important to IPL, as is the continued provision of safe, reliable and economic electric service. To this end, IPL

¹ The IURC Order dated November 30, 2010 (at 106) found that "utilities shall file a separate report by March 31, under this Cause, which outlines the utility's vegetation management budget and actual expenditures for the prior calendar year; the number of customer complaints related to tree trimming and the manner in which those complaints were addressed or resolved; and the tree-related outages as a percentage of total outages. Utilities shall also file their VMP [Vegetation Management Program] with the Commission, and any changes to that plan going forward." The Order did not establish a uniform standard for this report.

² As a result of the multi-step process, the initial steps of the advance notification process may have been made in 2017 for pruning scheduled to occur in 2018. When customer inquiries are received well in advance of the actual pruning, IPL responds to the customer but discussions regarding the proposed pruning at the customer's premises may occur closer to the proposed pruning date so that discussions may better reflect actual work plans for the specified location.

tracks data on customer inquiries to IPL's Line Clearing Department. Information regarding 2017 inquiries is included on Exhibit A as supplemental background information.

III. Tree Related Outages As a Percentage of Total Outages (SAIFI)

Tree (vegetation) related outages as a percent of total SAIFI in 2017 were 28.24% (including MED) and 25.85% without Major Events (excluding MED). There were three Major Event Days (MED) in 2017.

Note: As of January 2012, IPL began following the IEEE 1366 guidelines for Major Event Days (MED). The above percentages are shown Total (including) and without Major Events (excluding) MED as reported in IPL's Annual Electric Reliability Report submitted to the IURC Electric Division. A Major Event Day is declared when a SAIDI threshold is met as defined by IEEE 1366.

IV. Vegetation Management Program

The most recent version of IPL's Vegetation Management Program is attached as Exhibit B. A change was made in Section 4.0 (p. 6) where the map showing the overall service territory was removed. Additionally, changes were made to clearance distances in Sections 7.3, 7.4, and 7.5 (p. 7-8). Side clearance distance was changed to fifteen feet instead of "three year's clearance based on species growth rate". Overhang clearance in the same sections were also increased to address reliability issues. These changes were made to increase the effectiveness of our vegetation management program and are based on best management practices as well as investigating the causes of tree related outages over several years.

EXHIBIT A

**IURC Cause No. 43663
 Complaints to the IURC Consumer Affairs Division - 2017**

	Number of Inquiries or Complaints	Number per Resolution Category	Resolution Category
Debris left after recent outage restoration	1	1	IPL informed customer of vegetation management standards and debris from storms/outages are the customer's responsibility.
Customer did not want trees removed	0	0	
Customer dissatisfied with trimming process	9	9	IPL informed customer of three year trim cycle. Some of these were outages complaints. Customer believed trees were causing outages. We did advise of tree trim cycle, but we also took additional measures to prevent/reduce future outages.
Customer Reported Tree Limb on Line	1	1	1. IPL trimmed trees around secondary line and removed debris. 2. No tree limb on power line, turned out to be vines. 3. IPL informed Customer that trimming around service drop is the customer's responsibility.
Other	1	1	IPL confirmed that trimming notifications and proper procedures were followed. Customer wanted normal tree trimming debris picked up. We were slightly delayed by rain in picking up debris, but it was done.
Total complaints or inquiries received by IURC	12	12	

Customer Inquiries Received by IPL Line Clearing Department

	Number of Inquiries	Number per Category	Resolution Category
Brush Left	36	20	Brush left from production trimming beyond 48 hours is immediately picked up without delay. (Note: IPL's general practice is to remove routine tree debris within 2 business days of the trimming - with exception of Friday. The debris removal crew does not arrive until after the pruning has occurred. As a result, customers will sometimes inquire about debris removal immediately following the pruning even though the removal has already been scheduled).
		5	Brush left by AT&T contractor
		11	Brush left by other means - Explaining to the homeowner - brush was not the result of IPL production trimming. Expanding on possibly neglectful dumping. Could also be emergency/storm brush left. Emergency/storm brush left can be determined by getting homeowners address, looking in Clearion(in-house tree program) when property was last trimmed.
Crews left ruts in yard	2	2	Contractor fixed ruts
Customer claimed property damage by crew	6	6	Contractor repaired damage to the satisfaction of customer
Customer claimed the tree had poor shape or died after trimming	3	3	Resolved by Forester (explain that some trees die from being diseased or maturity of tree)
		0	Ash tree - died from emerald ash borer
Customer claimed crews need to rake property after trimming	0	0	IPL resolved same day
Customer requested no more trimming	3	3	IPL explained need for trimming

EXHIBIT A

Customer requested removal of debris following storm restoration and/or emergency work	18	18	IPL advised customer that storm and emergency debris is not removed by utility
Debris left in tree	0	0	Crew returned to remove hangers from tree
No Pre-notification	1	1	Site visit explaining the notification process
Other:	15	13	IPL advised - do not trim for phone/cable/open secondary/service lines/do not pick up debris after storm/outage restoration
		2	Cleared broken branch off secondary
Unspecified Inquiry	0	0	
Total Inquiries Received by IPL	84	84	

Customer Inquiries Indicating Customer Does Not Want Trimming ("Refusals")

Distribution -Reason for Refusal	Number of Inquiries	Number per Category	Resolution Category
Customer wanted self trim	6	2	IPL did not trim (could not resolve, customer not responding, etc)
		1	Tree(s) did not need trimmed
		3	Customer already had tree trimmed by private contractor prior to IPL meet
		0	IPL trimmed after meeting with customer
Customer wanted trees removed-not trimmed	0	0	IPL removed tree(s)
		0	IPL determined tree did not need trimmed-no removal
		0	IPL trimmed tree (did not remove) after meeting with customer
Customer wanted to know what was going to be trimmed	0	0	IPL trimmed after meeting with customer
		0	Tree(s) did not need trimmed
		0	
Customer concerned because of previous experience	8	6	IPL trimmed after meeting with customer
		0	Tree(s) did not need trimmed
		2	IPL did not trim (could not resolve, customer not responding, etc)
Customer concerned about aesthetics	3	1	IPL did not trim (could not resolve, customer not responding, etc)
		1	IPL trimmed after meeting with customer
		0	IPL removed trees at customer request
		0	Customer already had tree trimmed by private contractor
		1	Tree(s) did not need trimmed
Customer claimed nothing to trim on property	5	3	IPL confirmed nothing for IPL to trim on property
		1	Could not resolve - Nothing Done
		1	IPL trimmed after meeting with customer

EXHIBIT A

Customer concerned about landscaping (garden/flowers/ non-tree vegetation) or property damage(fence/driveway/swings, etc.)	0	0	IPL removed/trimmed after meeting with customer
		0	IPL did not trim (could not resolve, customer not responding, etc)
Other(non tree issue, no reason given)	6	4	IPL trimmed after meeting with customer
		0	Tree(s) did not need trimmed
		2	IPL did not trim (could not resolve, customer not responding, etc)
Customer concerned with race of workforce	0	0	IPL trimmed after meeting with customer
Customer refused to allow IPL on "private property"	6	4	IPL did not trim (could not resolve, customer not responding, etc)
		2	IPL trimmed after meeting with customer
Customer concerned with health of tree	0	0	IPL trimmed after meeting with customer
		0	Not trimmed because customer did not agree with what needed trimmed
		0	Tree(s) did not need trimmed
Customer stopped trimming (not a refusal during notification process)	0	0	IPL did not finish trimming (could not resolve)
		0	IPL finished trimming
Total Inquiries Received by IPL concerning REFUSALS	34	34	

IPL Distribution Vegetation Management

Program (DVMP)

ISSUED: March 30, 2018

Version 3.1

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1.0 Introduction

IPL's vegetation management program ("VMP"), commonly called line clearance, strives to balance safety, reliability, shareholder value, environmental stewardship, and customer satisfaction. The Line Clearing Department has the objective of meeting this mission by controlling the growth of vegetation near electrical lines using best management practices ("BMP's") while remaining compliant with federal, state, and local laws, regulations, and ordinances.

In general, IPL's VMP is separated into distribution voltage vegetation management and transmission voltage vegetation management. This document's primary focus is the management of vegetation near distribution voltage electrical lines; however, transmission line voltages between 34.5kV and 138kV will be briefly mentioned in this document. Vegetation management for transmission lines of 345kV is detailed in a separate document called the "Transmission Vegetation Management Program ("TVMP")".

IPL's objective is to perform routine vegetation management near distribution lines on a three (3) year rotation or cycle. To manage incompatible vegetation near electrical lines, IPL uses qualified contractors to monitor and control vegetation. Control practices will vary depending on multiple factors such as accessibility, property owner concerns, local ordinances, etc. The standards in this document will define the most common situations and methods used to control vegetation.

All contractors shall adhere to these standards to the extent included in written contracts.

2.0 Definitions

Action Threshold – the maximum acceptable levels of plant density and height that initiates implementation of a control method

ANSI A300 Standard – The performance parameters established by industry consensus as a rule for the measure of extent, quality, quantity, value or weight used to write specifications (TCIA, 2008).

ANSI Z133- Safety requirements for Arboricultural Operations

Brush – woody vegetation with stems less than four (4) inches diameter at approximately 4.5 ft. from ground-line.

Integrated Vegetation Management (IVM) – A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective (TCIA, 2006).

Minimum allowable clearance – distance from limb to conductor at the end of trimming cycle

Risk – likelihood of a conflict or tree failure occurring and affecting a target and the severity of the associated consequences, e.g. personal injury, disruption of electrical service

3.0 Federal, State, Local Laws

Contractors shall follow all of IPL's safety rules, IPL's vegetation management standards, OSHA regulations, ANSI A300 and ANSI Z133 standards, as well as remain compliant with all federal, state, county, and municipal laws, ordinances, and regulations while performing line clearing activities for IPL.

Governing bodies include but are not limited to:

Indiana Utility Regulatory Commission (IURC)

Office of Indiana State Chemist (OISC)

Marion County DPW/Code Enforcement

American National Standards Institute (ANSI)

Occupational Health and Safety Administration (OSHA)

Indiana Department of Environmental Management (IDEM)

4.0 Service Territory (Distribution)

Overall, the distribution system consists of approximately 3,686 line miles covering IPL's service territory of Marion county and parts of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Owen, Putnam, and Shelby counties. This service territory is divided into 2,020 half-mile by half-mile sections called Map Sections.

5.0 Routine Maintenance (Cycle)

IPL's contractors attempt to control vegetation in each map section on a three-year cycle. Approximately a third of the system, or 1,228 line miles, will be trimmed per year. The production plan is determined by IPL. Line Clearing staff and contractors shall follow this plan annually.

6.0 Notification

All cycle work is subject to the rules outlined in IURC rule 170 IAC 4-9. IPL and contractors conform to this by providing the following notifications:

1. Homeowner Association packet – *three months* prior to work being performed, a packet of information regarding the upcoming vegetation management work will be provided.
2. Bill attachment – *two months* prior to vegetation management work, a notice will be attached to the affected customer's monthly bill statement.
3. Individual letter – *one month* prior to vegetation management work a separate letter will be sent to all homes in a map section notifying the resident of upcoming tree trimming.
4. Public notice – *one month* prior to work a public notice is posted in the Indianapolis Star describing the boundaries where tree work will be performed during the month.
5. In-person visit #1– *a minimum of two weeks* prior to vegetation management a contractor forester will visit homes that will be affected by vegetation management activities. If no one is present at time of the visit, a light green door hanger will be left with contact information and a brief description of work to be performed in the area. A record will be kept in the current vegetation management system of the time and date notification was given.
6. In-person visit #2 – *Day of work*, a tree trimming contractor will knock on door to notify the resident of their presence and work to be performed.

At times, special requests are made to notify the owner/resident 24 hours prior to being on the property for such reasons to unlock a gate or because of dogs. It is the responsibility of the contractor foreman to contact the person making these requests.

7.0 Trimming Clearances

Trimming will be performed per ANSI A300 standards. If a tree cannot be trimmed to ANSI standards, the homeowner is made aware during the in-person notification process to obtain consent. If the homeowner does not agree to the trimming, removal at IPL's cost is offered; otherwise, this is considered a refusal and the dispute resolution process will begin as outlined in IURC rule 170 IAC 4-9.

IPL's standards for routine maintenance based on line size is as follows:

7.1 138kV Transmission

-) Minimum allowable clearance of 20 feet on side and under line.
-) No overhang.

7.2 34.5kV Sub-transmission

-) Minimum allowable clearance of 15 feet on side and under line.
-) No overhang.

7.3 Three phase primary lines

-) Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
-) Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.
-) Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
-) Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.4 Two-phase Primary

-) Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
-) Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.

-) Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
-) Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.5 Single phase primary

-) Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
-) Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15) overhang removal and work will be completed unless an objection is registered by the homeowner.
-) Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
-) Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.6 Secondary conductors

-) Secondary conductors with primary conductor over-build will have a minimum of two feet clearance.
-) Stand-alone secondary (no primary over-build) will not be trimmed during routine maintenance.
-) Uprooted trees or broken branches on secondary conductors should be removed.
-) Open wire secondary conductors that are sagging or in poor condition which could lead to reliability issues shall be reported to IPL Line Clearing staff. IPL staff will then forward issue to Engineering.

7.7 Service Drops

-) Trimming is not done on pole-to-pole or pole-to-house service drops.
-) Homeowner should be informed IPL will disconnect service so they or their contractor can maintain trees near these lines.

7.8 Street Light/APL Wires

-) Street light wires and automatic protective lighting (APL) will not be trimmed unless authorized by IPL Line Clearing staff.
-) Street light wire vegetation concerns should be forwarded to the Mayor's Action Center (317-327-4622).
-) APL's will be disconnected for the customer's convenience so their private contractor can perform the work. Owners of APL can call 317-261-8111 to request disconnection.

7.9 Special Circumstances

-) Brush removals under all primary lines should be pursued if trimming is necessary. Property owner permission is necessary for removal.
-) Vines on poles and guy wires shall be cut and treated to prevent regrowth.
-) Trees considered a risk to IPL primary lines shall be mitigated in a timely manner based upon likelihood of failure (e.g. imminent, probable). The property owner will be notified of work to be done and a time frame, even if the work will be done the same day (imminent threat situation).
-) Debris from routine maintenance will be removed within 48 hours. This debris will not be left over the weekend or on holidays.
-) Debris from storm damage or emergency situations will not be removed.

8.0 Vegetation Control Methods

-) Trimming - trimming shall be performed in accordance to ANSI A300 pruning standards. Trimming will be done from insulated aerial buckets when possible. When inaccessible from an aerial bucket truck, manual climbing of the tree(s) must be performed.
-) Removals – under certain circumstances, whole tree removals may be preferred or necessary. IPL Line Clearing staff will be notified and homeowner consent will be pursued in these cases. Stump removal is not offered by IPL
-) Mechanical removal of brush – certain areas may have dense areas of brush that may need removed to provide access. Mowing equipment may be used in these areas with IPL and property owner approval.
-) Herbicides – the use of EPA registered and approved herbicide may be used to control regrowth of removed trees and brush. In some cases, the use of herbicide may replace hand cutting of brush and must be approved by IPL Line Clearing staff.

9.0 Contractor Safety

Contractors must conform to the AES Global Safety Standard number AES-STD-OHS23: *Tree Trimming and Vegetation Safety Management*. Contractor will also review annually the IPL Contractor Safety video. New contractor employees will be required to view this video prior to working on the system.

10.0 Staffing

The DVMP is overseen by AES' Director of Maintenance, Inspections, and Contract Management. Locally, IPL's Line Clearing Department manages all aspects of the DVMP. Full time Line Clearing employees include – One Team Leader and two Contractor Coordinators, where all employees have various certifications and levels of education qualifying them to hold their positions. The Team Leader manages the entire UVM process, budgets, personnel and contractor/contract management. Each Contractor Coordinator manages various aspects of the daily UVM processes, including overseeing the contract vegetation managers.

IPL utilizes contract vegetation management service providers for inspection, notification, maintenance, and vegetation mitigation efforts. Contract terms vary from three years to five years, depending on contractor. Current contractors and responsibilities are:

- J Asplundh Tree Experts (5-year contract) – Annual transmission maintenance and notification.
- J Wright Tree Service (5-year contract) – Distribution Inspections, notification, routine maintenance, and mitigation efforts.
- J CN Utility Consultants (3-year contract) – Distribution Inspections and notification.

11.0 Customer Satisfaction

11.1 Notification

See section 6.0 for routine maintenance notification.

Notification will be given to customers when any vegetation work will be performed on a property. For line upgrades, new construction, or any other line maintenance where tree trimming is needed, one notification will be given by a contractor forester at least two weeks prior to tree work begins. For imminent risk trees, a minimum of a door hanger will be given the day of the work to inform the customer of the risk and why IPL had to trim.

11.2 Complaint & Dispute Resolution

Complaints and trimming disputes will be resolved by established procedures in IURC rule 170 IAC 4-9.

11.3 Customer requests – Time & Material

Customer requests shall be reviewed and the customer contacted within two business days after receipt by IPL Line Clearing. If Line Clearing determines tree work cannot hold until the time of routine maintenance, the work will be done within five business days.

11.4 Work Order – Time & Material

Work order trimming shall begin two business days after the two-week notification waiting period outlined in IURC rule 170 IAC 4-9.

11.5 Hours of Operation

Five eight-hour days or four ten-hour days, Monday through Friday between the hours of 7:00 a.m. and 5:30 p.m.

11.6 Inclement Weather

Crew personnel will be paid up to two hours per day for inclement weather. After two hours of inclement weather, and if it is determined crews cannot safely or productively continue working, the Company and the Contractor will mutually agree on the number of crews to be held or released. Crews will be allowed to make up time missed (due to inclement weather) between the hours of 7:00 a.m. and 5:30 p.m., Monday through Friday, provided sufficient daylight is available. If four or more hours have been missed due to inclement weather during the week, and the Company and the Contractor mutually agree, crews will be allowed to make up time on Saturday. Both Production and Time and Material crews will follow the outlined inclement weather policy.

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**INVESTIGATION BY THE INDIANA UTILITY)
REGULATORY COMMISSION, UNDER IC §§)
8-1-2-58 AND 59, TO INVESTIGATE)
ELECTRIC UTILITY TREE-TRIMMING)
PRACTICES AND TARIFFS RELATING TO)
SERVICE QUALITY IN THE STATE OF) CAUSE NO. 43663
INDIANA)
)
RESPONDENTS:)
ALL INDIANA JURISDICTIONAL)
ELECTRIC UTILITIES)**

**INDIANAPOLIS POWER & LIGHT COMPANY'S
SUBMISSION OF ANNUAL VEGETATION MANAGEMENT REPORT**

Indianapolis Power & Light Company (IPL), by counsel, hereby submits its Annual Vegetation Management Report as required by the Commission's November 30, 2010, Order in this Cause. This report also includes outage investigation information showing the number of outages caused by vegetation and the text of 170 IAC 4-9, as agreed to in the Stipulation and Settlement Agreement in IPL's most recent rate case, Cause No. 45029.

Respectfully submitted,



Jeffrey M. Peabody, Atty No. 28000-53,
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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Submission of Annual Vegetation Management Report* was served by email transmission, upon the following:

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Dated this 25th day of March, 2020.



Jeffrey M. Peabody

**Indianapolis Power & Light Company
Annual Vegetation Management Report
Cause No. 43663¹
Calendar Year 2019**

I. Vegetation Management Expenditures

2019	Budget	Actual	Storm Expenditures	Non-storm Expenditures
Line Clearing Services	\$13,101,009	\$15,254,248	\$1,719,523	\$13,534,725

II. Customer Complaints Related to Tree Trimming

IPL uses a multi-step notification process to provide advance notice to Customers of routine vegetation management on their premises. This process is outlined in IPL's Vegetation Management Program. The initial steps of this process occur two to three months prior to the scheduled pruning.² The final steps occur during the three-week period leading up to the planned vegetation management. This process permits customer inquiries to be addressed in advance of the planned vegetation management and includes an opportunity for customers to meet with an IPL representative on-site to discuss the vegetation management. IPL also has a process in place to address customer questions that arise on the day of pruning or thereafter. IPL has successfully used its advance notification and customer inquiry procedures to avoid the escalation of customer contacts into actual complaints. The majority of tree related inquiries made to IPL's Line Clearing Office are inquiries seeking information or clarifications on IPL's vegetation management operations. If follow up by an IPL representative (either from IPL's Line Clearing Department or IPL's Customer Advocate) is unsuccessful in addressing or answering customer inquiries, then the matter is forwarded to IPL's Legal Department for handling via an internal complaint resolution process to ensure tracking and appropriate treatment. In 2019, no tree related matters were forwarded to this internal complaint resolution process. During this period, fourteen (14) customers made complaints to the Commission's Consumer Affairs Division, all of which were determined by the Commission to be unsubstantiated. Further information regarding these matters is included in the attached Exhibit A. Customer satisfaction is important to IPL, as is the continued provision of safe, reliable and economic electric service. To this end, IPL

¹ The IURC Order dated November 30, 2010 (at 106) found that "utilities shall file a separate report by March 31, under this Cause, which outlines the utility's vegetation management budget and actual expenditures for the prior calendar year; the number of customer complaints related to tree trimming and the manner in which those complaints were addressed or resolved; and the tree-related outages as a percentage of total outages. Utilities shall also file their VMP [Vegetation Management Program] with the Commission, and any changes to that plan going forward." The Order did not establish a uniform standard for this report.

² As a result of the multi-step process, the initial steps of the advance notification process may have been made in 2019 for pruning scheduled to occur in 2020. When customer inquiries are received well in advance of the actual pruning, IPL responds to the customer but discussions regarding the proposed pruning at the customer's premises may occur closer to the proposed pruning date so that discussions may better reflect actual work plans for the specified location.

tracks data on customer inquiries to IPL's Line Clearing Department. Information regarding 2019 inquiries is included on Exhibit A as supplemental background information.

III. Tree Related Outages As a Percentage of Total Outages (SAIFI)

Tree (vegetation) related outages as a percent of total SAIFI in 2019 were 39.38% Total (including MED) for a total vegetation incident count of 3,578. Tree (vegetation) related outages as a percent of total SAIFI in 2019 were 29.24% without Major Events (excluding MED) for a vegetation incident count of 2039. There were 25 declared storms and twelve Major Event Days (MED) in 2019.

Note: As of January 2012, IPL began following the IEEE 1366 guidelines for Major Event Days (MED). The above percentages are shown Total (including) and without Major Events (excluding) MED as reported in IPL's Annual Electric Reliability Report submitted to the IURC Electric Division. A Major Event Day is declared when a SAIDI threshold is met as defined by IEEE 1366.

IV. Vegetation Management Program

The most recent version of IPL's Vegetation Management Program is attached as Exhibit B. No changes were made to the document submitted in 2019. IPL has attached the text of 170 IAC 4-9 for reference as Exhibit C.

EXHIBIT A

**IURC Cause No. 43663
 Complaints to the IURC Consumer Affairs Division - 2019**

	Number of Inquiries or Complaints	Number per Resolution Category	Resolution Category
Debris left after recent outage restoration	3	3	IPL informed customer of vegetation management standards and debris from storms/outages are the customer's responsibility. One of the three also included customer being concerned
Customer did not want trees removed	2	2	Customer did not want trees removed for improvement projects
Customer dissatisfied with trimming process	4	4	Many of these were outages complaints. Customers believed trees were causing outages. We did advise of tree trim cycle, but we also took additional measures to prevent/reduce future outages. All felt more aggressive trimming needed.
Customer Reported Tree Limb on Line	4	4	We removed one tree even though it was near a secondary line due to customer concerns. Once visit showed tree limb removed before we arrived. 2 involved limbs on service lines. We explained IPL's guidelines to customer-customer responsibility
Other	1	1	Customer wanted tree removed. Tree more than 10 feet from stand alone secondary pole. Customer responsibility. Explained guidelines to customer.
Total complaints or inquiries received by IURC	14	14	

Customer Inquiries Received by IPL Line Clearing Department - 2019

	Number of Inquiries	Number per Category	Resolution Category
Brush Left	32	10	Brush left from production trimming -picked up by contractor within 48 hrs of trimming, advised customer of policy that brush may be left up to 48 hrs.
		4	Debris left by others: 1 = Debris left by IPL line crew, not tree trimming contractor - service dispatch sent crew to clean up
		18	Storm Debris - storm debris policy explained - not cleaned up
Crews left ruts in yard	1	1	Ruts not from contractor - fixed by IPL line department
Customer claimed property damage by crew	6	2	Contractor was onsite at time and fixed the issue
		4	Damage not caused by IPL contractor
Customer claimed the tree had poor shape or died after trimming	4	4	Resolved by Forester (explain that some trees die from being diseased or maturity of tree)
Customer requested no more trimming	2	2	Trimming stopped, IPL resolved
Customer requested removal of debris following storm restoration and/or emergency work	3	3	IPL advised customer that storm and emergency debris is not removed by utility
No Pre-notification	1	1	City Tree- City was notified not adjacent property owner
Other:	5	5	Not IPL, Other utilities
Total Inquiries Received by IPL	54	54	

EXHIBIT A

Customer Inquiries Indicating Customer Does Not Want Trimming ("Refusals") - 2019

Distribution -Reason for Refusal	Number of Inquiries	Number per Category	Resolution Category
Customer wanted self trim	7	2	IPL did not trim (could not resolve, customer not responding, etc.)
		1	Tree(s) did not need trimmed
		3	Customer already had tree trimmed by private contractor prior to IPL meet
		1	IPL trimmed after meeting with customer
Customer wanted trees removed-not trimmed	1	1	IPL trimmed tree (did not remove) after meeting with customer
Customer wanted to know what was going to be trimmed	5	5	IPL trimmed after meeting with customer
Customer concerned because of previous experience	6	2	IPL trimmed after meeting with customer
		4	Tree(s) did not need trimmed
Customer concerned about aesthe ics	5	1	IPL did not trim (could not resolve, customer not responding, etc.)
		4	IPL trimmed after meeting with customer
Customer claimed nothing to trim on property	11	5	IPL confirmed nothing for IPL to trim on property (neighbors trees - do not enter property)
		1	Customer already had tree trimmed by private contractor
		1	Could not resolve - Nothing Done/ would not return IPL's call
		4	IPL trimmed after meeting with customer
Customer concerned about landscaping (garden/flowers/ non-tree vegetation) or property damage(fence/driveway/swings, etc.)	2	2	IPL removed/trimmed after meeting with customer
Other(non tree issue, no reason given)	10	2	IPL trimmed after meeting with customer
		6	Tree(s) did not need trimmed
		2	IPL did not trim (could not resolve, customer not responding, etc.)
Customer refused to allow IPL on "private property"	1	1	IPL trimmed after meeting with customer
Customer stopped trimming (not a refusal during notification process)	1	1	IPL did not finish trimming (could not resolve)
Total Inquiries Received by IPL concerning REFUSALS	49	49	

IPL Distribution Vegetation Management

Program (DVMP)

ISSUED: March 31, 2019

Version 3.2

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1.0 Introduction

IPL's vegetation management program ("VMP"), commonly called line clearance, strives to balance safety, reliability, shareholder value, environmental stewardship, and customer satisfaction. The Line Clearing Department has the objective of meeting this mission by controlling the growth of vegetation near electrical lines using best management practices ("BMP's") while remaining compliant with federal, state, and local laws, regulations, and ordinances.

In general, IPL's VMP is separated into distribution voltage vegetation management and transmission voltage vegetation management. This document's primary focus is the management of vegetation near distribution voltage electrical lines; however, transmission line voltages between 34.5kV and 138kV will be briefly mentioned in this document. Vegetation management for transmission lines of 345kV is detailed in a separate document called the "Transmission Vegetation Management Program ("TVMP")".

IPL's objective is to perform routine vegetation management near distribution lines on a three (3) year rotation or cycle. To manage incompatible vegetation near electrical lines, IPL uses qualified contractors to monitor and control vegetation. Control practices will vary depending on multiple factors such as accessibility, property owner concerns, local ordinances, etc. The standards in this document will define the most common situations and methods used to control vegetation.

All contractors shall adhere to these standards to the extent included in written contracts.

2.0 Definitions

Action Threshold – the maximum acceptable levels of plant density and height that initiates implementation of a control method

ANSI A300 Standard – The performance parameters established by industry consensus as a rule for the measure of extent, quality, quantity, value or weight used to write specifications (TCIA, 2008).

ANSI Z133- Safety requirements for Arboricultural Operations

Brush – woody vegetation with stems less than four (4) inches diameter at approximately 4.5 ft. from ground-line.

Integrated Vegetation Management (IVM) – A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective (TCIA, 2006).

Minimum allowable clearance – distance from limb to conductor at the end of trimming cycle

Risk – likelihood of a conflict or tree failure occurring and affecting a target and the severity of the associated consequences, e.g. personal injury, disruption of electrical service

3.0 Federal, State, Local Laws

Contractors shall follow all of IPL's safety rules, IPL's vegetation management standards, OSHA regulations, ANSI A300 and ANSI Z133 standards, as well as remain compliant with all federal, state, county, and municipal laws, ordinances, and regulations while performing line clearing activities for IPL.

Governing bodies include but are not limited to:

Indiana Utility Regulatory Commission (IURC)

Office of Indiana State Chemist (OISC)

Marion County DPW/Code Enforcement

American National Standards Institute (ANSI)

Occupational Health and Safety Administration (OSHA)

Indiana Department of Environmental Management (IDEM)

4.0 Service Territory (Distribution)

Overall, the distribution system consists of approximately 3,686 line miles covering IPL's service territory of Marion county and parts of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Owen, Putnam, and Shelby counties. This service territory is divided into 2,020 half-mile by half-mile sections called Map Sections.

5.0 Routine Maintenance (Cycle)

IPL's contractors attempt to control vegetation in each map section on a three-year cycle. Approximately a third of the system, or 1,228 line miles, will be trimmed per year. The production plan is determined by IPL. Line Clearing staff and contractors shall follow this plan annually.

6.0 Notification

All cycle work is subject to the rules outlined in IURC rule 170 IAC 4-9. IPL and contractors conform to this by providing the following notifications:

1. Homeowner Association packet – *three months* prior to work being performed, a packet of information regarding the upcoming vegetation management work will be provided.
2. Bill attachment – *two months* prior to vegetation management work, a notice will be attached to the affected customer's monthly bill statement.
3. Individual letter – *one month* prior to vegetation management work a separate letter will be sent to all homes in a map section notifying the resident of upcoming tree trimming.
4. Public notice – *one month* prior to work a public notice is posted in the Indianapolis Star describing the boundaries where tree work will be performed during the month.
5. In-person visit #1 – *a minimum of two weeks* prior to vegetation management a contractor forester will visit homes that will be affected by vegetation management activities. If no one is present at time of the visit, a light green door hanger will be left with contact information and a brief description of work to be performed in the area. A record will be kept in the current vegetation management system of the time and date notification was given.
6. In-person visit #2 – *Day of work*, a tree trimming contractor will knock on door to notify the resident of their presence and work to be performed.

At times, special requests are made to notify the owner/resident 24 hours prior to being on the property for such reasons to unlock a gate or because of dogs. It is the responsibility of the contractor foreman to contact the person making these requests.

7.0 Trimming Clearances

Trimming will be performed per ANSI A300 standards. If a tree cannot be trimmed to ANSI standards, the homeowner is made aware during the in-person notification process to obtain consent. If the homeowner does not agree to the trimming, removal at IPL's cost is offered; otherwise, this is considered a refusal and the dispute resolution process will begin as outlined in IURC rule 170 IAC 4-9.

IPL's standards for routine maintenance based on line size is as follows:

7.1 138kV Transmission

- Minimum allowable clearance of 20 feet on side and under line.
- No overhang.

7.2 34.5kV Sub-transmission

- Minimum allowable clearance of 15 feet on side and under line.
- No overhang.

7.3 Three phase primary lines

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.4 Two-phase Primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 10 feet. More than 10 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of

additional (>10 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.

- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.5 Single phase primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 10 feet. More than 10 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>10) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.6 Secondary conductors

- Secondary conductors with primary conductor over-build will have a minimum of two feet clearance.
- Stand-alone secondary (no primary over-build) will not be trimmed during routine maintenance.
- Uprooted trees or broken branches on secondary conductors should be removed.
- Open wire secondary conductors that are sagging or in poor condition which could lead to reliability issues shall be reported to IPL Line Clearing staff. IPL staff will then forward issue to Engineering.

7.7 Service Drops

- Trimming is not done on pole-to-pole or pole-to-house service drops.
- Homeowner should be informed IPL will disconnect service so they or their contractor can maintain trees near these lines.

7.8 Street Light/APL Wires

- Street light wires and automatic protective lighting (APL) will not be trimmed unless authorized by IPL Line Clearing staff.
- Street light wire vegetation concerns should be forwarded to the Mayor's Action Center (317-327-4622).

- APL's will be disconnected for the customer's convenience so their private contractor can perform the work. Owners of APL can call 317-261-8111 to request disconnection.

7.9 Special Circumstances

- Brush removals under all primary lines should be pursued if trimming is necessary. Property owner permission is necessary for removal.
- Vines on poles and guy wires shall be cut and treated to prevent regrowth.
- Trees considered a risk to IPL primary lines shall be mitigated in a timely manner based upon likelihood of failure (e.g. imminent, probable). The property owner will be notified of work to be done and a time frame, even if the work will be done the same day (imminent threat situation).
- Debris from routine maintenance will be removed within 48 hours. This debris will not be left over the weekend or on holidays.
- Debris from storm damage or emergency situations will not be removed.

8.0 Vegetation Control Methods

- Trimming - trimming shall be performed in accordance to ANSI A300 pruning standards. Trimming will be done from insulated aerial buckets when possible. When inaccessible from an aerial bucket truck, manual climbing of the tree(s) must be performed.
- Removals – under certain circumstances, whole tree removals may be preferred or necessary. IPL Line Clearing staff will be notified and homeowner consent will be pursued in these cases. Stump removal is not offered by IPL
- Mechanical removal of brush – certain areas may have dense areas of brush that may need removed to provide access. Mowing equipment may be used in these areas with IPL and property owner approval.
- Herbicides – the use of EPA registered and approved herbicide may be used to control regrowth of removed trees and brush. In some cases, the use of herbicide may replace hand cutting of brush and must be approved by IPL Line Clearing staff.

9.0 Contractor Safety

Contractors must conform to the AES Global Safety Standard number AES-STD-OHS23: *Tree Trimming and Vegetation Safety Management*. Contractor will also review annually the IPL Contractor Safety video. New contractor employees will be required to view this video prior to working on the system.

10.0 Staffing

The DVMP is overseen by AES' Director of Maintenance, Inspections, and Contract Management. Locally, IPL's Line Clearing Department manages all aspects of the DVMP. Full time Line Clearing employees include – One Team Leader and two Contractor Coordinators, where all employees have various certifications and levels of education qualifying them to hold their positions. The Team Leader manages the entire UVM process, budgets, personnel and contractor/contract management. Each Contractor Coordinator manages various aspects of the daily UVM processes, including overseeing the contract vegetation managers.

IPL utilizes contract vegetation management service providers for inspection, notification, maintenance, and vegetation mitigation efforts. Contract terms vary from three years to five years, depending on contractor. Current contractors and responsibilities are:

- Asplundh Tree Experts (5-year contract) – Annual transmission maintenance and notification, distribution work orders (non-routine maintenance).
- Wright Tree Service (5-year contract) – Distribution Inspections, notification, routine maintenance, and mitigation efforts.
- CN Utility Consultants (3-year contract) – Distribution Inspections and notification.

11.0 Customer Satisfaction

11.1 Notification

See section 6.0 for routine maintenance notification.

Notification will be given to customers when any vegetation work will be performed on a property. For line upgrades, new construction, or any other line maintenance where tree trimming is needed, one notification will be given by a contractor forester at least two weeks prior to tree work begins. For imminent risk trees, a minimum of a door hanger will be given the day of the work to inform the customer of the risk and why IPL had to trim.

11.2 Complaint & Dispute Resolution

Complaints and trimming disputes will be resolved by established procedures in IURC rule 170 IAC 4-9.

11.3 Customer requests – Time & Material

Customer requests shall be reviewed and the customer contacted within two business days after receipt by IPL Line Clearing. If Line Clearing determines tree work cannot hold until the time of routine maintenance, the work will be done within five business days.

11.4 Work Order – Time & Material

Work order trimming shall begin two business days after the two-week notification waiting period outlined in IURC rule 170 IAC 4-9.

11.5 Hours of Operation

Five eight-hour days or four ten-hour days, Monday through Friday between the hours of 7:00 a.m. and 5:30 p.m.

11.6 Inclement Weather

Crew personnel will be paid up to two hours per day for inclement weather. After two hours of inclement weather, and if it is determined crews cannot safely or productively continue working, the Company and the Contractor will mutually agree on the number of crews to be held or released. Crews will be allowed to make up time missed (due to inclement weather) between the hours of 7:00 a.m. and 5:30 p.m., Monday through Friday, provided sufficient daylight is available. If four or more hours have been missed due to inclement weather during the week, and the Company and the Contractor mutually agree, crews will be allowed to make up time on Saturday. Both Production and Time and Material crews will follow the outlined inclement weather policy.

INDIANA UTILITY REGULATORY COMMISSION

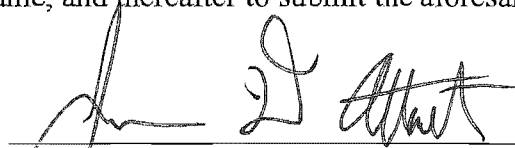
Final Rulemaking


IURC RM #10-04
LSA #12-42(F)

Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

Upon prior publication of notice, a public hearing was held on May 24, 2012, at 6:00 p.m. Eastern Daylight Time, at the PNC Center, 101 West Washington Street, IURC Conference Center, Judicial Courtroom 222, Indianapolis, Indiana, as required by the provisions of I.C. 4-22-2-1, *et seq.* On July 11, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of the Indiana Utility Regulatory Commission was present and adopted the Final Rule. On August 24, 2012, the Commission recalled the rule and made changes to comply with form and legality. On August 29, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of said Commission were present and adopted the foregoing Revised Rule.


The Secretary is hereby directed to submit the aforesaid rule to the Attorney General and Governor of Indiana, for their approval of same, and thereafter to submit the aforesaid rule to the publisher, Indiana Register.

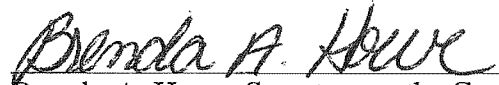

James D. Atterholt, Chairman


Kari E. A. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

ATTEST:

Brenda A. Howe, Secretary to the Commission

Date: AUG 29 2012

Rule Signature Page


Rule#: LSA #12-42(F)
Agency: Indiana Utility Regulatory Commission
Subject: Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

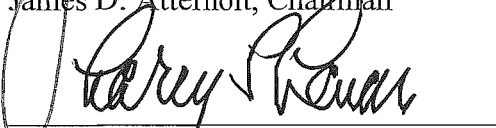
ADOPTED:

By the Indiana Utility Regulatory Commission

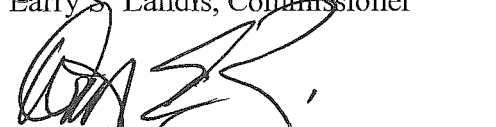
Date: 'AUG 29 2012


James D. Atterholt, Chairman


Kari A. E. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

APPROVED AS TO FORM AND LEGALITY:

By: _____
Gregory F. Zoeller
Attorney General, State of Indiana

Date: _____

APPROVED:

By: _____
Mitchell E. Daniels, Jr.
Governor, State of Indiana

Date: _____

ACCEPTED FOR FILING:

By: _____
Indiana Register
Legislative Services Agency

Date: _____

TITLE 170 INDIANA UTILITY REGULATORY COMMISSION

**Final Rule
LSA Document #12-42(£)**

DIGEST

Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Effective 30 days after filing with the Publisher.

170 IAC 4-9

SECTION 1. 170 IAC 4-9 IS ADDED TO READ AS FOLLOWS:

Rule 9. Vegetation Management Standards

**170 IAC 4-9-1 Applicability; incorporation by reference of commission order
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 1. (a) This rule applies to an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders. This rule does not apply to an electric public utility subject to the jurisdiction of the commission that is organized as a rural electric membership corporation under IC 8-1-13 or a nonprofit corporation organized under IC 23-1-17.

(b) The commission through this rule implements the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Copies of the orders are available for review and copying at the Indiana Utility Regulatory Commission, 101 West Washington Street, Suite IS00E, Indianapolis, Indiana 46204. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-1*)

**170 IAC 4-9-2 Definitions
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 2. The following definitions apply throughout this rule:

- (1) "Brush" means vegetation with stems less than six (6) inches diameter at breast height.**
- (2) "Business days" means days other than:
(A) Saturday;**

- (B) Sunday; or
 - (C) a legal holiday observed by the state of Indiana.
 - (3) "Commission" means the Indiana utility regulatory commission.
 - (4) "Customer" means the following:
 - (A) For purposes of notice, "customer" has the meaning set forth in 170 IAC 16-1-2(3) or may include the occupant of the property.
 - (B) For purposes of the disputes, "customer" has the meaning set forth in 170 IAC 16-1-2(3) but also includes the property owner.
 - (5) "Emergency or storm event":
 - (A) means:
 - (i) a condition dangerous or hazardous to:
 - (AA) health;
 - (BB) life;
 - (CC) physical safety; or
 - (DD) propertyexists or is imminent;
 - (ii) an interruption of utility service; or
 - (iii) the need to immediately repair or clear utility facilities; and
 - (B) includes:
 - (i) circumstances that exist that make it impractical or impossible for a utility to comply with the provisions of the rule, including, but not limited to:
 - (AA) floods;
 - (BB) ice;
 - (CC) snow;
 - (DD) storms;
 - (EE) tornadoes;
 - (FF) winds; and
 - (GG) other acts of God;
 - (ii) falling trees;
 - (iii) trees causing outages; and
 - (iv) trees showing evidence of:
 - (AA) burning; or
 - (BB) otherwise having been in direct contact with electric conductors.
 - (6) "Implied consent" means the property owner or customer has not contacted the utility to deny consent within two (2) weeks after receiving notice that tree trimming will occur.
 - (7) "In person" means:
 - (A) person to person delivery of verbal or written notice by an authorized utility representative to a customer, or
 - (B) hand delivery of a door hanger or similar document accompanied by an attempt by the authorized utility representative to speak with the resident through actions including knocking on the door or ringing the door bell, with delivery documented in writing or

computerized entry by the authorized utility representative making the hand delivered-

- (8) "Power line compatible vegetation" means a plant that at maturity will not reach a height greater than twelve (12) feet.
- (9) "Public safety situation" means the following:
- (A) The existence of a vegetation condition that could reasonably be expected to cause imminent physical harm to electrical equipment necessary for the provision of electric service, including the following:
 - (i) Trees that are unstable to the point of representing a danger to utility equipment, facilities, or personnel in the course of repairs to said equipment or facilities due to disease, damage, or soil erosion. Personnel may include, but is not limited to safety workers such as fire, police, emergency medical personnel, utility line and repair crews.
 - (ii) Trees that lean to a degree that they can touch power lines.
 - (iii) Trees that have burn marks or other indicators that they have previously touched a power line.
 - (B) A condition in vegetation unrelated to normal growth that would result in contact with power lines or high voltage equipment and cause imminent physical harm to the public if not immediately mitigated.
- (10) "Telephone call" means:
- (A) making an attempt to contact the customer via the telephone number the utility has on file; and
 - (i) making verbal telephone contact; or
 - (ii) leaving a message on
 - (AA) voicemail;
 - (BB) an answering machine; or
 - (CC) an answering service,if available.
 - (C) If an attempt is unsuccessful in either making verbal telephone contact with the customer or leaving a telephonic message as described in clause (A), a second attempt must be made.
- (11) "Utility" means an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders.
- (12) "Vegetation management" means the cutting or removal of vegetation or the prevention of vegetative growth to accomplish one (1) of the following:
- (A) The maintenance of safe conditions around utility facilities.
 - (B) Ensuring reliable electric service.
 - (C) Preventing hazards caused by the encroachment of vegetation on utility facilities and to provide utility access to facilities.
- (13) "Written notice" means notice sent from the utility to the customer in one (1) of the following manners:
- (A) By electronic mail.

(B) By U.S. mail or another mail delivery system, including inside utility bills.

(C) By in person delivery of written notice to the customer's premises, including, but not limited to, a door hanger. (Indiana Utility Regulatory Commission; 170 IAC 4-9-2)

170 IAC 4-9-3 Easements and right of way

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 3. (a) This rule does not modify properly rights. Utilities must have or obtain the following legal authority and must provide documentation in accordance with subsection (b):

- (1) easements;**
- (2) rights of way;**
- (3) statutory authority;**
- (4) other legal authority; or**
- (5) the express or implied consent of the property owner or customer;**

prior to trimming vegetation. The utility's ability to secure a prescriptive easement may be presented to the customer to obtain consent, but is not independent legal authority.

(b) Upon request by the customer within five (5) business days of the customer's receipt of the notice required under section 4 of this rule, the utility will provide one (1) of the following prior to vegetation management:

- (1) A copy of the easement or public right of way document that gives the utility the legal right to enter the customer's property to perform vegetation management.**
- (2) If an easement or public right of way document is not reasonably available, a copy of the authority that gives the utility the legal right to enter the customer's property to perform vegetation management. (Indiana Utility Regulatory Commission; 170 IAC 4-9-3)**

170 IAC 4-9-4 Notice requirements for routine vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 4.(a) At least two (2) calendar weeks prior to engaging in routine vegetation management, the utility must provide notice to customers and property owners whose vegetation will be subject to the vegetation management except under the following circumstances:

- (1) The utility has:**
 - (A) a written easement;**
 - (B) government permit;**
 - (C) contractual agreement; or**
 - (D) court order;**

that expressly gives the utility the right to conduct vegetation management activities.

(2) An emergency or storm event occurs.

(b) A utility must provide notice to a customer in the following manner:

(1) At least one (1) attempt to contact must be:

- (i) in person; or
- (ii) via telephone call.

(2) At least one (1) attempt to contact must include written notice.

(c) Written and in person notice shall include, at minimum, the following information:

(1) The fact that vegetation management is scheduled to occur.

(2) An explanation of

- (A) what vegetation management is; and
- (B) why it is necessary for safe and reliable electric service.

(3) The fact that nonproperty owners living or working on the property who receive the notice are strongly encouraged to notify the property owner as soon as possible that vegetation management is scheduled to occur.

(4) The fact that receipt of this notice by the occupant initiates the two (2) week window for calculating implied consent by the customer.

(5) The estimated date that vegetation management is scheduled to occur.

(6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to vegetation management.

(d) Written notice will also include the following:

(1) The heading, "TREE TRIMMING NOTICE".

(2) The date the written notice was hand delivered or mailed.

(3) The website address of the commission's vegetation management administrative rule, this rule.

(4) The commission's website at <http://www.in.gov/iurc>.

(5) The utility's vegetation management website address.

(6) A reference to an educational resource for planting around electrical facilities, like the Arbor Day Foundation's right tree, right place program and the website address, if available.

(7) A website address and telephone number for customers to obtain the name of the contractor, if used by the utility, that will deliver the in person notice or conduct vegetation management.

(8) A statement that the utility's representative shall carry identification when delivering the in person notice or conducting vegetation management.

(e) The customer may, within three (3) calendar days of receiving the notice in subsection (a), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the customer requests a more specific time, the supervisor shall endeavor to work with the customer to give a precise time.

(f) A utility must provide notice to a property owner by publishing notice in at least one (1) newspaper of general circulation in the county in which the property is located.

The notice must include the following:

- (1) The fact that vegetation management is scheduled to occur.**
- (2) The area where vegetation management is scheduled to occur by listing at least one (1) of the following:
 - (i) The street name and block.**
 - (ii) The name of the subdivision.**
 - (iii) The intersecting roads bounding the area.**
 - (iv) The specific address of each property.****
- (4) The fact that publication of this notice initiates the two (2) week window for calculating implied consent by the property owner.**
- (5) The estimated date that vegetation management is scheduled to occur.**
- (6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer property owner inquiries related to vegetation management.**

(g) The property owner who receives notice by publication may, within three (3) calendar days of the notice being published as outlined in subsection (f), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the property owner requests a more specific time, the supervisor shall endeavor to work with the property owner to give a precise time. (*Indiana Utility Regulatory Commission.: 170 IAC 4-9-4*)

170 IAC 4-9-5 Notice requirements for line upgrades

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 5.(a) At least sixty (60) calendar days prior to a utility changing a distribution or transmission line to a higher voltage level, the utility must give notice to the affected customer if the change in the line will change the area in which vegetation management will be necessary as a result of safe clearance requirements.

(b) Notice shall be provided in the same manner as in section 4(b) of this rule.

(c) Notice shall include, at minimum, the following information:

- (1) The fact that line upgrades are scheduled to occur.**
- (2) An explanation of what line upgrades are.**
- (3) An explanation as to why line upgrades are necessary for safe and reliable electric service.**
- (4) The fact that nonproperty owners living or working on the property and receiving the notice are strongly encouraged to notify the property owner as soon as possible that line upgrades are scheduled to occur.**
- (5) The estimated date that line upgrades are scheduled to occur.**
- (6) The estimated length of time construction will continue.**
- (7) New vegetation restrictions on the property as a result of the line upgrades.**

(8) Changes to the property owner's easement or right of way as a result of the line upgrades.

(9) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to line upgrades. (Indiana Utility Regulatory Commission; 170 IAC 4-9-5)

170 IAC 4-9-6 Emergency or public safety trimming
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 6. In cases of emergency or public safety, utilities may, without customer consent, remove more than twenty-five percent (25%) of a tree or trim beyond existing easement or right-of-way boundaries in order to remedy the emergency or public safety situation. (Indiana Utility Regulatory Commission; 170 IAC 4-9-6)

170 IAC 4-9-7 Vegetation management standards
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 7. (a) Utilities, their agents, and contractors shall apply and adhere to the guidelines of:

- (1) American National Standards Institute ANSI A300;**
- (2) the National Electric Safety Code;**
- (3) the Shigo Guide; and**
- (4) the International Society of Arboriculture Best Management Practices.**

(b) There is not a uniform clearance requirement, but line clearances should take into consideration the:

- (1) characteristics of the locality;**
- (2) electrical facility; and**
- (3) health of the tree.**

(c) Except in situations of emergency or public safety, if a tree would have more than twenty-five percent (25%) of its canopy removed, the utility or its agent or contractor shall do one (1) of the following actions:

- (1) Obtain consent from the property owner.**
- (2) If the property owner and utility or its agent or contractor cannot mutually agree on how the tree can be trimmed to provide sufficient clearance in order to maintain reliable electric service, the utility or its agent or contractor shall take one (1) of the following actions:**
 - (A) Remove the tree, at the utility's expense, as long as the utility has secured the requisite easements to allow its personnel onto the owner's property.**
 - (B) Inform the customer that it will need to make non-ANSI standards cuts in order to provide clearance.**

(d) Brush that is under or near a utility's electrical facilities may be removed by the utility without the consent of the customer only when its removal is necessary for safe and reliable service.

(e) Debris associated with routine maintenance, in a maintained area, absent intervening inclement weather that may pull crews from maintenance activities, shall be removed within three (3) calendar days or left on the property as agreed to in writing by the owner.

(f) Utilities and their agents and contractors are not required to clear debris caused by storms and other natural occurrences like tree failures.

(g) A utility shall file a separate report regarding tree-related outages by March 31 annually and whenever the utility makes a change to its vegetation management plan. The report shall include the following information:

- (1) The utility's vegetation management budget.**
- (2) Actual expenditures for the prior calendar year.**
- (3) The number of customer complaints related to tree trimming.**
- (4) The manner in which complaints were addressed or resolved.**
- (5) Tree-related outages as a percentage of total outages. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-7*)**

170 IAC 4-9-8 Dispute resolution process prior to vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 8. (a) To temporarily stay the proposed vegetation management on the customer's property or rental property, a customer must notify the utility of the customer's objection to the proposed vegetation management within five (5) business days of the customer's receipt of the notice required under section 4 of this rule. Questions or requests for information are not customer objections.

(b) A utility must respond to a customer's objection:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing;**

within three (3) business days.

(c) If the initial utility representative cannot resolve the customer's objection regarding proposed vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the customer shall be provided with the following:

- (1) The website location of the commission's vegetation management administrative rule, this rule.**
- (2) Contact information, including, at minimum, a telephone number, for the commission's consumer affairs division.**

(d) No temporary stay of vegetation management shall be available when one (1) of the following occurs:

- (1) An emergency, storm event, or public safety situation exists.**
- (2) The customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call.**

(3) More than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a).

(4) A final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission, 170 IAC 4-9-8*)

170 IAC 4-9-9 Dispute resolution process during vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 9. (a) Upon request of the customer, the utility shall temporarily stay vegetation management on the customer's premises during the vegetation management only if one (1) of the following occurs or is disputed:

(1) The utility failed to provide the notice required under section 4 of this rule.

(2) The utility is engaging in vegetation management outside the scope of a written or recorded agreement between the customer and the utility.

(3) The utility did not have authority to enter the customer's property.

(4) The utility did not exercise due diligence to secure an easement or right of way document in accordance with section 3(b)(2).

(b) At least one (1) member of the work crew must have the authority from the utility to discuss and attempt to resolve customer objections and must respond to the customer's inquiry or complaint. If the work crew cannot resolve the customer's objection regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the utility shall provide to the customer the information required in 170 IAC 16-1-4(c)(5).

(c) A utility may proceed with the vegetation management where:

(1) an emergency exists;

(2) the customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call;

(3) more than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a);

(4) the customer failed to take timely action to seek further review of a decision of the commission's consumer affairs division or its director under 170 IAC 16-1-5(d) or 170 IAC 16-1-6(a); or

(5) a final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-9*)

170 IAC 4-9-10 Dispute resolution process after vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 10. (a) A customer may contact the utility regarding vegetation management on the customer's premises after the vegetation management occurred if one (1) of the following occurs:

- (1) The utility failed to provide the notice required under section 4 of this rule.**
- (2) The utility engaged in vegetation management outside the scope of an agreement between the customer and the utility.**
- (3) The utility did not have authority to enter the customer's property.**
- (4) The utility failed to follow the vegetation management pruning standards required by the commission or by the utility's own vegetation management policy.**
- (5) Another reason permitted by law.**

(b) A utility must respond within three (3) business days of receiving a customer's inquiry or dispute:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing.**

(c) If the initial utility representative cannot resolve the customer's dispute regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the dispute. If the utility is unsuccessful in resolving the dispute, the customer shall be provided the information required in 170 IAC 16-1-5 and will be informed that disputes over monetary damages can only be resolved by a civil court, not the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-10*)

170 IAC 4-9-11 Customer education process
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 11. A utility shall develop and implement an education plan to inform and educate customers on the following:

- (1) Tree and vegetation selection and placement around electric facilities.**
- (2) The public importance of vegetation management to avoid:**
 - (A) electric interruptions;**
 - (B) injuries; and**
 - (C) fatalities.**
- (3) The need for, and benefit of, preventing tree contact with power lines.**
- (4) The importance of cooperation between customers and their utility in accomplishing the essential public task of power line maintenance.**
- (5) The critical importance of the public service of vegetation management to:**
 - (A) protect electric service reliability; and**
 - (B) avoid injuries and fatalities from electrocution.**

(6) Trimming cycles a utility chooses to implement, including how the chosen trim cycle impacts clearance distance and the extent to which a tree's appearance will be impacted based upon that chosen cycle. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-11*)

170 IAC 4-9-12 Tree replacement program

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 12. Where a tree will be removed, a utility may offer to provide the customer with:

(1) a power line compatible vegetation;

(2) other replacement plant; or

(3) monetary compensation or credit at an amount agreed to by the parties;

provided that the customer agrees not to plant a tree that will encroach into the utility's facilities at a future date and consents to the removal by the utility if that kind of a tree is planted. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-12*)

170 IAC 4-9-13 Utility representative identification

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 13. Employees or contractors performing:

(1) vegetation management; or

(2) in person notification for vegetation management;

on behalf of the utility shall carry identification and provide it for inspection by the customer upon request. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-13*)

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**INVESTIGATION BY THE INDIANA UTILITY)
REGULATORY COMMISSION, UNDER IC §§)
8-1-2-58 AND 59, TO INVESTIGATE)
ELECTRIC UTILITY TREE-TRIMMING)
PRACTICES AND TARIFFS RELATING TO)
SERVICE QUALITY IN THE STATE OF) CAUSE NO. 43663
INDIANA)
)
)
RESPONDENTS:)
ALL INDIANA JURISDICTIONAL)
ELECTRIC UTILITIES)**

**PETITIONER’S SUBMISSION OF ANNUAL
VEGETATION MANAGEMENT REPORT**

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “IPL”), by counsel, hereby submits its Annual Vegetation Management Report as required by the Commission’s November 30, 2010, Order in this Cause. This report also includes outage investigation information showing the number of outages caused by vegetation and the text of 170 IAC 4-9, as agreed to in the Stipulation and Settlement Agreement in IPL’s most recent rate case, Cause No. 45029.

Respectfully submitted,



Jeffrey M. Peabody, Atty No. 28000-53,
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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Submission of Annual Vegetation Management Report* was served by email transmission, upon the following:

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Dated this 31st day of March, 2021.



Jeffrey M. Peabody

Indianapolis Power & Light Company
Annual Vegetation Management Report
Cause No. 43663¹
Calendar Year 2020

I. Vegetation Management Expenditures

2020	Budget	Actual	Storm Expenditures	Non-storm Expenditures
Line Clearing Services	\$13,101,009	\$14,902,088	\$1,817,784	\$13,084,304

II. Customer Complaints Related to Tree Trimming

IPL uses a multi-step notification process to provide advance notice to Customers of routine vegetation management on their premises. This process is outlined in IPL's Vegetation Management Program. The initial steps of this process occur two to three months prior to the scheduled pruning.² The final steps occur during the three-week period leading up to the planned vegetation management. This process permits customer inquiries to be addressed in advance of the planned vegetation management and includes an opportunity for customers to meet with an IPL representative on-site to discuss the vegetation management. IPL also has a process in place to address customer questions that arise on the day of pruning or thereafter. IPL has successfully used its advance notification and customer inquiry procedures to avoid the escalation of customer contacts into actual complaints. The majority of tree related inquiries made to IPL's Line Clearing Office are inquiries seeking information or clarifications on IPL's vegetation management operations. If follow up by an IPL representative (either from IPL's Line Clearing Department or IPL's Customer Advocate) is unsuccessful in addressing or answering customer inquiries, then the matter is forwarded to IPL's Legal Department for handling via an internal complaint resolution process to ensure tracking and appropriate treatment. In 2020, no tree related matters were forwarded to this internal complaint resolution process. During this period, eight customers made complaints to the Commission's Consumer Affairs Division, all of which were determined by the Commission to be unsubstantiated. Further information regarding these matters is included in the attached Exhibit A. Customer satisfaction is important to IPL, as is the continued provision of safe, reliable and economic electric service. To this end, IPL tracks data on customer inquiries to IPL's Line Clearing Department. Information regarding 2020 inquiries is included on Exhibit A as supplemental background information

¹ The IURC Order dated November 30, 2010 (at 106) found that "utilities shall file a separate report by March 31, under this Cause, which outlines the utility's vegetation management budget and actual expenditures for the prior calendar year; the number of customer complaints related to tree trimming and the manner in which those complaints were addressed or resolved; and the tree-related outages as a percentage of total outages. Utilities shall also file their Vegetation Management Program (VMP) with the Commission, and any changes to that plan going forward." The Order did not establish a uniform standard for this report.

² As a result of the multi-step process, the initial steps of the advance notification process may have been made in 2020 for pruning scheduled to occur in 2021. When customer inquiries are received well in advance of the actual pruning, IPL responds to the customer but discussions regarding the proposed pruning at the customer's premises may occur closer to the proposed pruning date so that discussions may better reflect actual work plans for the specified location.

III. Tree Related Outages as a Percentage of Total Outages (SAIFI)

Tree (vegetation) related outages as a percent of total SAIFI in 2020 were 25.55% Total (including MED)³ for a total vegetation incident count of 2,343. Tree (vegetation) related outages as a percent of total SAIFI in 2020 were 14.10% without Major Events (excluding MED) for a vegetation incident count of 1,551. There were 16 declared storms and six Major Event Days (MED) in 2020.

IV. Vegetation Management Program

The most recent version of IPL's Vegetation Management Program is attached as Exhibit B. One change was made in 2020 to Section 5 of the document, adding a note that IPL will be switching to circuit trimming in April of 2021 and no longer will be trimming by Map Section. IPL has attached the text of 170 IAC 4-9 for reference as Exhibit C.

³ As of January 2012, IPL began following the IEEE 1366 Guidelines for Major Event Days (MED). The above percentages are shown Total (including) and without Major Events (excluding) MED as reported in IPL's Annual Electric Reliability Report submitted to the IURC Electric Division. A Major Event Day is declared when a SAIDI threshold is met as defined by IEEE 1366.

EXHIBIT A

IURC Cause No. 43663
 Complaints to the IURC Consumer Affairs Division - 2020

	Number of Inquiries or Complaints	Number per Resolution Category	Resolution Category
Debris left after recent outage restoration	1	1	IPL informed customer of vegetation management standards and debris from storms/outages are the customer's responsibility.
Customer did not want trees removed	1	1	Customer advised did not want vegetation removed and advised we gave no notice. Supplied documentation of notice.
Customer dissatisfied with trimming process	3	3	1. Customer feels trees/vegetation behind property led to outages. PL determined that not to be the case. 2.Customer adv neighbor will not keep up with vegetation removal and wants IPL to do so. Power lines clear in this situation. 3. Believes that outages are due to IPL not trimming trees.--Outage not tree related.
Other	3	3	Both customers advised we left debris after normal trimming.. 1) Contractor accidentally trimmed in wrong neighborhood so wasn't on pick up list. We went out to clean debris. 2) Determined that debris was from outage-not normal maintenace. 3) Customer adv we left debris after normal trimming--determined debris left from repairing outage-adv debris from storms/outages are customer's responsibility
Total complaints or inquiries received by IURC	8	8	

Customer Inquiries Received by IPL Line Clearing Department - 2020

	Number of Inquiries	Number per Category	Resolution Category
Brush Left	36	15	Brush left from production trimming -picked up by contractor within 48 hrs of trimming, advised customer of policy that brush may be left up to 48 hrs.
		5	Debris left by others: 1 = homeowner admitted he cut himself and wanted the crews to pick up when they were in neighborhood 3 = other utility cut and left debris 1=people dumping debris under our lines and homeowner wanted us to clean since it was IPL easement
		16	Nothing Found or already resolved (debris can be left up to 48 hrs, calls prior to the 48 hrs and crews returning)
Crews left ruts in yard			Ruts not from contractor - fixed by PL line department
Customer claimed property damage by crew	13	11	Contractor fixed the issue
		2	Damage not caused by PL contractor 1= cable line cut
Customer claimed the tree had poor shape or died after trimming	2	1	IPL removed tree
		1	nothing found
Customer requested no more trimming	1	1	Trimming stopped, PL resolved- worried about aesthetics
Customer requested removal of debris following storm restoration and/or emergency work	56	56	IPL advised customer that storm and emergency debris is not removed by utility
Tree cut down without permission	1	1	Not PL - no primary lines present
Other:	2	2	Not PL. 2= cable company needs to trim
Total Inquiries Received by IPL	111	111	

EXHIBIT A

Customer Inquiries Indicating Customer Does Not Want Trimming ("Refusals") - 2020

Distribution -Reason for Refusal	Number of Inquiries	Number per Category	Resolution Category
Customer wanted self trim	17	5	Tree(s) did not need trimmed
		5	Customer already had tree trimmed by private contractor prior to IPL meet
		1	COV D concerns- trees determine to be non emergency until can meet customer in person
		6	IPL trimmed after meeting with customer
Customer concerned because of previous experience	3	1	COV D concerns- trees determine to be non emergency until can meet customer in person
		2	Tree(s) did not need trimmed
Customer concerned about aesthetics	30	10	IPL did not trim (could not resolve, customer not responding, etc.) 5=did not respond 5= did not need
		2	COV D concerns- trees determine to be non emergency until can meet customer in person
		18	IPL trimmed after meeting with customer
Customer claimed nothing to trim on property	4	4	IPL confirmed nothing for PL to trim on property (neighbors trees - do not enter property)
Other(non tree issue, no reason given)	7	5	COV D concerns- trees determine to be non emergency until can meet customer in person
		2	Tree(s) did not need trimmed
Customer refused to allow PL on "private property"	8	2	IPL trimmed after meeting with customer
		6	COV D concerns- trees determine to be non emergency until can meet customer in person
Customer stopped trimming (not a refusal during notification process)	2	2	IPL did not finish trimming (could not resolve)
Total Inquiries Received by IPL concerning REFUSALS	71	71	

IPL Distribution Vegetation Management

Program (DVMP)

ISSUED: March 30, 2020

Version 3.3

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1.0 Introduction

IPL's vegetation management program ("VMP"), commonly called line clearance, strives to balance safety, reliability, shareholder value, environmental stewardship, and customer satisfaction. The Line Clearing Department has the objective of meeting this mission by controlling the growth of vegetation near electrical lines using best management practices ("BMP's") while remaining compliant with federal, state, and local laws, regulations, and ordinances.

In general, IPL's VMP is separated into distribution voltage vegetation management and transmission voltage vegetation management. This document's primary focus is the management of vegetation near distribution voltage electrical lines; however, transmission line voltages between 34.5kV and 138kV will be briefly mentioned in this document. Vegetation management for transmission lines of 345kV is detailed in a separate document called the "Transmission Vegetation Management Program ("TVMP")".

IPL's objective is to perform routine vegetation management near distribution lines on a three (3) year rotation or cycle. To manage incompatible vegetation near electrical lines, IPL uses qualified contractors to monitor and control vegetation. Control practices will vary depending on multiple factors such as accessibility, property owner concerns, local ordinances, etc. The standards in this document will define the most common situations and methods used to control vegetation.

All contractors shall adhere to these standards to the extent included in written contracts.

2.0 Definitions

Action Threshold – the maximum acceptable levels of plant density and height that initiates implementation of a control method

ANSI A300 Standard – The performance parameters established by industry consensus as a rule for the measure of extent, quality, quantity, value or weight used to write specifications (TCIA, 2008).

ANSI Z133- Safety requirements for Arboricultural Operations

Brush – woody vegetation with stems less than four (4) inches diameter at approximately 4.5 ft. from ground-line.

Integrated Vegetation Management (IVM) – A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective (TCIA, 2006).

Minimum allowable clearance – distance from limb to conductor at the end of trimming cycle

Risk – likelihood of a conflict or tree failure occurring and affecting a target and the severity of the associated consequences, e.g. personal injury, disruption of electrical service

3.0 Federal, State, Local Laws

Contractors shall follow all of IPL's safety rules, IPL's vegetation management standards, OSHA regulations, ANSI A300 and ANSI Z133 standards, as well as remain compliant with all federal, state, county, and municipal laws, ordinances, and regulations while performing line clearing activities for IPL.

Governing bodies include but are not limited to:

Indiana Utility Regulatory Commission (IURC)

Office of Indiana State Chemist (OISC)

Marion County DPW/Code Enforcement

American National Standards Institute (ANSI)

Occupational Health and Safety Administration (OSHA)

Indiana Department of Environmental Management (IDEM)

4.0 Service Territory (Distribution)

Overall, the distribution system consists of approximately 3,686 line miles covering IPL's service territory of Marion county and parts of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Owen, Putnam, and Shelby counties. This service territory is divided into 2,020 half-mile by half-mile sections called Map Sections.

5.0 Routine Maintenance (Cycle)

IPL's contractors attempt to control vegetation in each map section on a three-year cycle. Approximately a third of the system, or 1,228 line miles, will be trimmed per year. The production plan is determined by IPL. Line Clearing staff and contractors shall follow this plan annually. In April of 2021, IPL will be moving away from map section trimming and will be trimming by circuit.

6.0 Notification

All cycle work is subject to the rules outlined in IURC rule 170 IAC 4-9. IPL and contractors conform to this by providing the following notifications:

1. Homeowner Association packet – *three months* prior to work being performed, a packet of information regarding the upcoming vegetation management work will be provided.
2. Bill attachment – *two months* prior to vegetation management work, a notice will be attached to the affected customer's monthly bill statement.
3. Individual letter – *one month* prior to vegetation management work a separate letter will be sent to all homes in a map section notifying the resident of upcoming tree trimming.
4. Public notice – *one month* prior to work a public notice is posted in the Indianapolis Star describing the boundaries where tree work will be performed during the month.
5. In-person visit #1– *a minimum of two weeks* prior to vegetation management a contractor forester will visit homes that will be affected by vegetation management activities. If no one is present at time of the visit, a light green door hanger will be left with contact information and a brief description of work to be performed in the area. A record will be kept in the current vegetation management system of the time and date notification was given.
6. In-person visit #2 – *Day of work*, a tree trimming contractor will knock on door to notify the resident of their presence and work to be performed.

At times, special requests are made to notify the owner/resident 24 hours prior to being on the property for such reasons to unlock a gate or because of dogs. It is the responsibility of the contractor foreman to contact the person making these requests.

7.0 Trimming Clearances

Trimming will be performed per ANSI A300 standards. If a tree cannot be trimmed to ANSI standards, the homeowner is made aware during the in-person notification process to obtain consent. If the homeowner does not agree to the trimming, removal at IPL's cost is offered; otherwise, this is considered a refusal and the dispute resolution process will begin as outlined in IURC rule 170 IAC 4-9.

IPL's standards for routine maintenance based on line size is as follows:

7.1 138kV Transmission

- Minimum allowable clearance of 20 feet on side and under line.
- No overhang.

7.2 34.5kV Sub-transmission

- Minimum allowable clearance of 15 feet on side and under line.
- No overhang.

7.3 Three phase primary lines

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.4 Two-phase Primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 10 feet. More than 10 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of

additional (>10 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.

- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.5 Single phase primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists.
- Overhang clearance a minimum of 10 feet. More than 10 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>10) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.6 Secondary conductors

- Secondary conductors with primary conductor over-build will have a minimum of two feet clearance.
- Stand-alone secondary (no primary over-build) will not be trimmed during routine maintenance.
- Uprooted trees or broken branches on secondary conductors should be removed.
- Open wire secondary conductors that are sagging or in poor condition which could lead to reliability issues shall be reported to IPL Line Clearing staff. IPL staff will then forward issue to Engineering.

7.7 Service Drops

- Trimming is not done on pole-to-pole or pole-to-house service drops.
- Homeowner should be informed IPL will disconnect service so they or their contractor can maintain trees near these lines.

7.8 Street Light/APL Wires

- Street light wires and automatic protective lighting (APL) will not be trimmed unless authorized by IPL Line Clearing staff.
- Street light wire vegetation concerns should be forwarded to the Mayor's Action Center (317-327-4622).

- APL's will be disconnected for the customer's convenience so their private contractor can perform the work. Owners of APL can call 317-261-8111 to request disconnection.

7.9 Special Circumstances

- Brush removals under all primary lines should be pursued if trimming is necessary. Property owner permission is necessary for removal.
- Vines on poles and guy wires shall be cut and treated to prevent regrowth.
- Trees considered a risk to IPL primary lines shall be mitigated in a timely manner based upon likelihood of failure (e.g. imminent, probable). The property owner will be notified of work to be done and a time frame, even if the work will be done the same day (imminent threat situation).
- Debris from routine maintenance will be removed within 48 hours. This debris will not be left over the weekend or on holidays.
- Debris from storm damage or emergency situations will not be removed.

8.0 Vegetation Control Methods

- Trimming - trimming shall be performed in accordance to ANSI A300 pruning standards. Trimming will be done from insulated aerial buckets when possible. When inaccessible from an aerial bucket truck, manual climbing of the tree(s) must be performed.
- Removals – under certain circumstances, whole tree removals may be preferred or necessary. IPL Line Clearing staff will be notified and homeowner consent will be pursued in these cases. Stump removal is not offered by IPL
- Mechanical removal of brush – certain areas may have dense areas of brush that may need removed to provide access. Mowing equipment may be used in these areas with IPL and property owner approval.
- Herbicides – the use of EPA registered and approved herbicide may be used to control regrowth of removed trees and brush. In some cases, the use of herbicide may replace hand cutting of brush and must be approved by IPL Line Clearing staff.

9.0 Contractor Safety

Contractors must conform to the AES Global Safety Standard number AES-STD-OHS23: *Tree Trimming and Vegetation Safety Management*. Contractor will also review annually the IPL Contractor Safety video. New contractor employees will be required to view this video prior to working on the system.

10.0 Staffing

The DVMP is overseen by AES' Director of Maintenance, Inspections, and Contract Management. Locally, IPL's Line Clearing Department manages all aspects of the DVMP. Full time Line Clearing employees include – One Team Leader and two Contractor Coordinators, where all employees have various certifications and levels of education qualifying them to hold their positions. The Team Leader manages the entire UVM process, budgets, personnel and contractor/contract management. Each Contractor Coordinator manages various aspects of the daily UVM processes, including overseeing the contract vegetation managers.

IPL utilizes contract vegetation management service providers for inspection, notification, maintenance, and vegetation mitigation efforts. Contract terms vary from three years to five years, depending on contractor. Current contractors and responsibilities are:

- Asplundh Tree Experts (5-year contract) – Annual transmission maintenance and notification, distribution work orders (non-routine maintenance).
- Wright Tree Service (5-year contract) – Distribution Inspections, notification, routine maintenance, and mitigation efforts.
- CN Utility Consultants (3-year contract) – Distribution Inspections and notification.

11.0 Customer Satisfaction

11.1 Notification

See section 6.0 for routine maintenance notification.

Notification will be given to customers when any vegetation work will be performed on a property. For line upgrades, new construction, or any other line maintenance where tree trimming is needed, one notification will be given by a contractor forester at least two weeks prior to tree work begins. For imminent risk trees, a minimum of a door hanger will be given the day of the work to inform the customer of the risk and why IPL had to trim.

11.2 Complaint & Dispute Resolution

Complaints and trimming disputes will be resolved by established procedures in IURC rule 170 IAC 4-9.

11.3 Customer requests – Time & Material

Customer requests shall be reviewed and the customer contacted within two business days after receipt by IPL Line Clearing. If Line Clearing determines tree work cannot hold until the time of routine maintenance, the work will be done within five business days.

11.4 Work Order – Time & Material

Work order trimming shall begin two business days after the two-week notification waiting period outlined in IURC rule 170 IAC 4-9.

11.5 Hours of Operation

Five eight-hour days or four ten-hour days, Monday through Friday between the hours of 7:00 a.m. and 5:30 p.m.

11.6 Inclement Weather

Crew personnel will be paid up to two hours per day for inclement weather. After two hours of inclement weather, and if it is determined crews cannot safely or productively continue working, the Company and the Contractor will mutually agree on the number of crews to be held or released. Crews will be allowed to make up time missed (due to inclement weather) between the hours of 7:00 a.m. and 5:30 p.m., Monday through Friday, provided sufficient daylight is available. If four or more hours have been missed due to inclement weather during the week, and the Company and the Contractor mutually agree, crews will be allowed to make up time on Saturday. Both Production and Time and Material crews will follow the outlined inclement weather policy.

INDIANA UTILITY REGULATORY COMMISSION

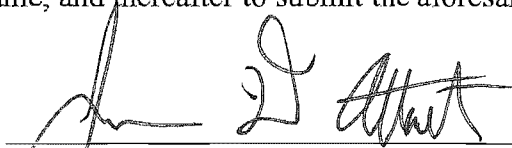
Final Rulemaking


IURC RM #10-04
LSA #12-42(F)

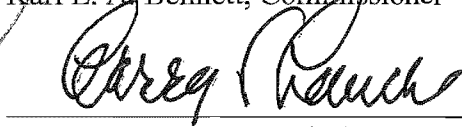
Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

Upon prior publication of notice, a public hearing was held on May 24, 2012, at 6:00 p.m. Eastern Daylight Time, at the PNC Center, 101 West Washington Street, IURC Conference Center, Judicial Courtroom 222, Indianapolis, Indiana, as required by the provisions of I.C. 4-22-2-1, *et seq.* On July 11, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of the Indiana Utility Regulatory Commission was present and adopted the Final Rule. On August 24, 2012, the Commission recalled the rule and made changes to comply with form and legality. On August 29, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of said Commission were present and adopted the foregoing Revised Rule.

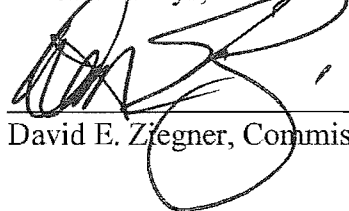
The Secretary is hereby directed to submit the aforesaid rule to the Attorney General and Governor of Indiana, for their approval of same, and thereafter to submit the aforesaid rule to the publisher, Indiana Register.

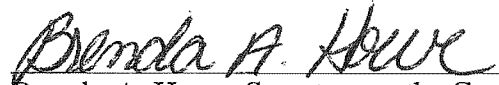

James D. Atterholt, Chairman


Kari E. A. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

ATTEST:

Brenda A. Howe, Secretary to the Commission

Date: AUG 29 2012

Rule Signature Page


Rule#: LSA #12-42(F)
Agency: Indiana Utility Regulatory Commission
Subject: Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

ADOPTED:

By the Indiana Utility Regulatory Commission


Date: 'AUG 29 2012


James D. Atterholt, Chairman


Kari A. E. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

APPROVED AS TO FORM AND LEGALITY:

By: _____
Gregory F. Zoeller
Attorney General, State of Indiana

Date: _____

APPROVED:

By: _____
Mitchell E. Daniels, Jr.
Governor, State of Indiana

Date: _____

ACCEPTED FOR FILING:

By: _____
Indiana Register
Legislative Services Agency

Date: _____

TITLE 170 INDIANA UTILITY REGULATORY COMMISSION

**Final Rule
LSA Document #12-42(£)**

DIGEST

Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Effective 30 days after filing with the Publisher.

170 IAC 4-9

SECTION 1. 170 IAC 4-9 IS ADDED TO READ AS FOLLOWS:

Rule 9. Vegetation Management Standards

**170 IAC 4-9-1 Applicability; incorporation by reference of commission order
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 1. (a) This rule applies to an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders. This rule does not apply to an electric public utility subject to the jurisdiction of the commission that is organized as a rural electric membership corporation under IC 8-1-13 or a nonprofit corporation organized under IC 23-1-17.

(b) The commission through this rule implements the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Copies of the orders are available for review and copying at the Indiana Utility Regulatory Commission, 101 West Washington Street, Suite IS00E, Indianapolis, Indiana 46204. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-1*)

**170 IAC 4-9-2 Definitions
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 2. The following definitions apply throughout this rule:

- (1) "Brush" means vegetation with stems less than six (6) inches diameter at breast height.**
- (2) "Business days" means days other than:
(A) Saturday;**

- (B) Sunday; or
 - (C) a legal holiday observed by the state of Indiana.
- (3) "Commission" means the Indiana utility regulatory commission.
- (4) "Customer" means the following:
 - (A) For purposes of notice, "customer" has the meaning set forth in 170 IAC 16-1-2(3) or may include the occupant of the property.
 - (B) For purposes of the disputes, "customer" has the meaning set forth in 170 IAC 16-1-2(3) but also includes the property owner.
- (5) "Emergency or storm event":
 - (A) means:
 - (i) a condition dangerous or hazardous to:
 - (AA) health;
 - (BB) life;
 - (CC) physical safety; or
 - (DD) propertyexists or is imminent;
 - (ii) an interruption of utility service; or
 - (iii) the need to immediately repair or clear utility facilities; and
 - (B) includes:
 - (i) circumstances that exist that make it impractical or impossible for a utility to comply with the provisions of the rule, including, but not limited to:
 - (AA) floods;
 - (BB) ice;
 - (CC) snow;
 - (DD) storms;
 - (EE) tornadoes;
 - (FF) winds; and
 - (GG) other acts of God;
 - (ii) falling trees;
 - (iii) trees causing outages; and
 - (iv) trees showing evidence of:
 - (AA) burning; or
 - (BB) otherwise having been in direct contact with electric conductors.
- (6) "Implied consent" means the property owner or customer has not contacted the utility to deny consent within two (2) weeks after receiving notice that tree trimming will occur.
- (7) "In person" means:
 - (A) person to person delivery of verbal or written notice by an authorized utility representative to a customer, or
 - (B) hand delivery of a door hanger or similar document accompanied by an attempt by the authorized utility representative to speak with the resident through actions including knocking on the door or ringing the door bell, with delivery documented in writing or

computerized entry by the authorized utility representative making the hand delivered-

- (8) "Power line compatible vegetation" means a plant that at maturity will not reach a height greater than twelve (12) feet.
- (9) "Public safety situation" means the following:
- (A) The existence of a vegetation condition that could reasonably be expected to cause imminent physical harm to electrical equipment necessary for the provision of electric service, including the following:
 - (i) Trees that are unstable to the point of representing a danger to utility equipment, facilities, or personnel in the course of repairs to said equipment or facilities due to disease, damage, or soil erosion. Personnel may include, but is not limited to safety workers such as fire, police, emergency medical personnel, utility line and repair crews.
 - (ii) Trees that lean to a degree that they can touch power lines.
 - (iii) Trees that have burn marks or other indicators that they have previously touched a power line.
 - (B) A condition in vegetation unrelated to normal growth that would result in contact with power lines or high voltage equipment and cause imminent physical harm to the public if not immediately mitigated.
- (10) "Telephone call" means:
- (A) making an attempt to contact the customer via the telephone number the utility has on file; and
 - (i) making verbal telephone contact; or
 - (ii) leaving a message on
 - (AA) voicemail;
 - (BB) an answering machine; or
 - (CC) an answering service,if available.
 - (C) If an attempt is unsuccessful in either making verbal telephone contact with the customer or leaving a telephonic message as described in clause (A), a second attempt must be made.
- (11) "Utility" means an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders.
- (12) "Vegetation management" means the cutting or removal of vegetation or the prevention of vegetative growth to accomplish one (1) of the following:
- (A) The maintenance of safe conditions around utility facilities.
 - (B) Ensuring reliable electric service.
 - (C) Preventing hazards caused by the encroachment of vegetation on utility facilities and to provide utility access to facilities.
- (13) "Written notice" means notice sent from the utility to the customer in one (1) of the following manners:
- (A) By electronic mail.

(B) By U.S. mail or another mail delivery system, including inside utility bills.

(C) By in person delivery of written notice to the customer's premises, including, but not limited to, a door hanger. (Indiana Utility Regulatory Commission; 170 IAC 4-9-2)

170 IAC 4-9-3 Easements and right of way

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 3. (a) This rule does not modify properly rights. Utilities must have or obtain the following legal authority and must provide documentation in accordance with subsection (b):

- (1) easements;**
- (2) rights of way;**
- (3) statutory authority;**
- (4) other legal authority; or**
- (5) the express or implied consent of the property owner or customer;**

prior to trimming vegetation. The utility's ability to secure a prescriptive easement may be presented to the customer to obtain consent, but is not independent legal authority.

(b) Upon request by the customer within five (5) business days of the customer's receipt of the notice required under section 4 of this rule, the utility will provide one (1) of the following prior to vegetation management:

- (1) A copy of the easement or public right of way document that gives the utility the legal right to enter the customer's property to perform vegetation management.**
- (2) If an easement or public right of way document is not reasonably available, a copy of the authority that gives the utility the legal right to enter the customer's property to perform vegetation management. (Indiana Utility Regulatory Commission; 170 IAC 4-9-3)**

170 IAC 4-9-4 Notice requirements for routine vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 4.(a) At least two (2) calendar weeks prior to engaging in routine vegetation management, the utility must provide notice to customers and property owners whose vegetation will be subject to the vegetation management except under the following circumstances:

- (1) The utility has:**
 - (A) a written easement;**
 - (B) government permit;**
 - (C) contractual agreement; or**
 - (D) court order;**

that expressly gives the utility the right to conduct vegetation management activities.

(2) An emergency or storm event occurs.

(b) A utility must provide notice to a customer in the following manner:

(1) At least one (1) attempt to contact must be:

- (i) in person; or
- (ii) via telephone call.

(2) At least one (1) attempt to contact must include written notice.

(c) Written and in person notice shall include, at minimum, the following information:

(1) The fact that vegetation management is scheduled to occur.

(2) An explanation of

- (A) what vegetation management is; and
- (B) why it is necessary for safe and reliable electric service.

(3) The fact that nonproperty owners living or working on the property who receive the notice are strongly encouraged to notify the property owner as soon as possible that vegetation management is scheduled to occur.

(4) The fact that receipt of this notice by the occupant initiates the two (2) week window for calculating implied consent by the customer.

(5) The estimated date that vegetation management is scheduled to occur.

(6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to vegetation management.

(d) Written notice will also include the following:

(1) The heading, "TREE TRIMMING NOTICE".

(2) The date the written notice was hand delivered or mailed.

(3) The website address of the commission's vegetation management administrative rule, this rule.

(4) The commission's website at <http://www.in.gov/iurc>.

(5) The utility's vegetation management website address.

(6) A reference to an educational resource for planting around electrical facilities, like the Arbor Day Foundation's right tree, right place program and the website address, if available.

(7) A website address and telephone number for customers to obtain the name of the contractor, if used by the utility, that will deliver the in person notice or conduct vegetation management.

(8) A statement that the utility's representative shall carry identification when delivering the in person notice or conducting vegetation management.

(e) The customer may, within three (3) calendar days of receiving the notice in subsection (a), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the customer requests a more specific time, the supervisor shall endeavor to work with the customer to give a precise time.

(f) A utility must provide notice to a property owner by publishing notice in at least one (1) newspaper of general circulation in the county in which the property is located.

The notice must include the following:

- (1) The fact that vegetation management is scheduled to occur.**
- (2) The area where vegetation management is scheduled to occur by listing at least one (1) of the following:
 - (i) The street name and block.**
 - (ii) The name of the subdivision.**
 - (iii) The intersecting roads bounding the area.**
 - (iv) The specific address of each property.****
- (4) The fact that publication of this notice initiates the two (2) week window for calculating implied consent by the property owner.**
- (5) The estimated date that vegetation management is scheduled to occur.**
- (6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer property owner inquiries related to vegetation management.**

(g) The property owner who receives notice by publication may, within three (3) calendar days of the notice being published as outlined in subsection (f), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the property owner requests a more specific time, the supervisor shall endeavor to work with the property owner to give a precise time. (*Indiana Utility Regulatory Commission.: 170 IAC 4-9-4*)

170 IAC 4-9-5 Notice requirements for line upgrades

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 5.(a) At least sixty (60) calendar days prior to a utility changing a distribution or transmission line to a higher voltage level, the utility must give notice to the affected customer if the change in the line will change the area in which vegetation management will be necessary as a result of safe clearance requirements.

(b) Notice shall be provided in the same manner as in section 4(b) of this rule.

(c) Notice shall include, at minimum, the following information:

- (1) The fact that line upgrades are scheduled to occur.**
- (2) An explanation of what line upgrades are.**
- (3) An explanation as to why line upgrades are necessary for safe and reliable electric service.**
- (4) The fact that nonproperty owners living or working on the property and receiving the notice are strongly encouraged to notify the property owner as soon as possible that line upgrades are scheduled to occur.**
- (5) The estimated date that line upgrades are scheduled to occur.**
- (6) The estimated length of time construction will continue.**
- (7) New vegetation restrictions on the property as a result of the line upgrades.**

(8) Changes to the property owner's easement or right of way as a result of the line upgrades.

(9) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to line upgrades. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-5*)

170 IAC 4-9-6 Emergency or public safety trimming
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 6. In cases of emergency or public safety, utilities may, without customer consent, remove more than twenty-five percent (25%) of a tree or trim beyond existing easement or right-of-way boundaries in order to remedy the emergency or public safety situation. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-6*)

170 IAC 4-9-7 Vegetation management standards
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 7. (a) Utilities, their agents, and contractors shall apply and adhere to the guidelines of:

- (1) American National Standards Institute ANSI A300;**
- (2) the National Electric Safety Code;**
- (3) the Shigo Guide; and**
- (4) the International Society of Arboriculture Best Management Practices.**

(b) There is not a uniform clearance requirement, but line clearances should take into consideration the:

- (1) characteristics of the locality;**
- (2) electrical facility; and**
- (3) health of the tree.**

(c) Except in situations of emergency or public safety, if a tree would have more than twenty-five percent (25%) of its canopy removed, the utility or its agent or contractor shall do one (1) of the following actions:

- (1) Obtain consent from the property owner.**
- (2) If the property owner and utility or its agent or contractor cannot mutually agree on how the tree can be trimmed to provide sufficient clearance in order to maintain reliable electric service, the utility or its agent or contractor shall take one (1) of the following actions:
 - (A) Remove the tree, at the utility's expense, as long as the utility has secured the requisite easements to allow its personnel onto the owner's property.**
 - (B) Inform the customer that it will need to make non-ANSI standards cuts in order to provide clearance.****

(d) Brush that is under or near a utility's electrical facilities may be removed by the utility without the consent of the customer only when its removal is necessary for safe and reliable service.

(e) Debris associated with routine maintenance, in a maintained area, absent intervening inclement weather that may pull crews from maintenance activities, shall be removed within three (3) calendar days or left on the property as agreed to in writing by the owner.

(f) Utilities and their agents and contractors are not required to clear debris caused by storms and other natural occurrences like tree failures.

(g) A utility shall file a separate report regarding tree-related outages by March 31 annually and whenever the utility makes a change to its vegetation management plan. The report shall include the following information:

- (1) The utility's vegetation management budget.**
- (2) Actual expenditures for the prior calendar year.**
- (3) The number of customer complaints related to tree trimming.**
- (4) The manner in which complaints were addressed or resolved.**
- (5) Tree-related outages as a percentage of total outages. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-7*)**

170 IAC 4-9-8 Dispute resolution process prior to vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 8. (a) To temporarily stay the proposed vegetation management on the customer's property or rental property, a customer must notify the utility of the customer's objection to the proposed vegetation management within five (5) business days of the customer's receipt of the notice required under section 4 of this rule. Questions or requests for information are not customer objections.

(b) A utility must respond to a customer's objection:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing;**

within three (3) business days.

(c) If the initial utility representative cannot resolve the customer's objection regarding proposed vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the customer shall be provided with the following:

- (1) The website location of the commission's vegetation management administrative rule, this rule.**
- (2) Contact information, including, at minimum, a telephone number, for the commission's consumer affairs division.**

(d) No temporary stay of vegetation management shall be available when one (1) of the following occurs:

- (1) An emergency, storm event, or public safety situation exists.**
- (2) The customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call.**

(3) More than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a).

(4) A final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission, 170 IAC 4-9-8*)

170 IAC 4-9-9 Dispute resolution process during vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 9. (a) Upon request of the customer, the utility shall temporarily stay vegetation management on the customer's premises during the vegetation management only if one (1) of the following occurs or is disputed:

(1) The utility failed to provide the notice required under section 4 of this rule.

(2) The utility is engaging in vegetation management outside the scope of a written or recorded agreement between the customer and the utility.

(3) The utility did not have authority to enter the customer's property.

(4) The utility did not exercise due diligence to secure an easement or right of way document in accordance with section 3(b)(2).

(b) At least one (1) member of the work crew must have the authority from the utility to discuss and attempt to resolve customer objections and must respond to the customer's inquiry or complaint. If the work crew cannot resolve the customer's objection regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the utility shall provide to the customer the information required in 170 IAC 16-1-4(c)(5).

(c) A utility may proceed with the vegetation management where:

(1) an emergency exists;

(2) the customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call;

(3) more than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a);

(4) the customer failed to take timely action to seek further review of a decision of the commission's consumer affairs division or its director under 170 IAC 16-1-5(d) or 170 IAC 16-1-6(a); or

(5) a final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-9*)

170 IAC 4-9-10 Dispute resolution process after vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 10. (a) A customer may contact the utility regarding vegetation management on the customer's premises after the vegetation management occurred if one (1) of the following occurs:

- (1) The utility failed to provide the notice required under section 4 of this rule.**
- (2) The utility engaged in vegetation management outside the scope of an agreement between the customer and the utility.**
- (3) The utility did not have authority to enter the customer's property.**
- (4) The utility failed to follow the vegetation management pruning standards required by the commission or by the utility's own vegetation management policy.**
- (5) Another reason permitted by law.**

(b) A utility must respond within three (3) business days of receiving a customer's inquiry or dispute:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing.**

(c) If the initial utility representative cannot resolve the customer's dispute regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the dispute. If the utility is unsuccessful in resolving the dispute, the customer shall be provided the information required in 170 IAC 16-1-5 and will be informed that disputes over monetary damages can only be resolved by a civil court, not the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-10*)

170 IAC 4-9-11 Customer education process

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 11. A utility shall develop and implement an education plan to inform and educate customers on the following:

- (1) Tree and vegetation selection and placement around electric facilities.**
- (2) The public importance of vegetation management to avoid:**
 - (A) electric interruptions;**
 - (B) injuries; and**
 - (C) fatalities.**
- (3) The need for, and benefit of, preventing tree contact with power lines.**
- (4) The importance of cooperation between customers and their utility in accomplishing the essential public task of power line maintenance.**
- (5) The critical importance of the public service of vegetation management to:**
 - (A) protect electric service reliability; and**
 - (B) avoid injuries and fatalities from electrocution.**

(6) Trimming cycles a utility chooses to implement, including how the chosen trim cycle impacts clearance distance and the extent to which a tree's appearance will be impacted based upon that chosen cycle. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-11*)

170 IAC 4-9-12 Tree replacement program

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 12. Where a tree will be removed, a utility may offer to provide the customer with:

(1) a power line compatible vegetation;

(2) other replacement plant; or

(3) monetary compensation or credit at an amount agreed to by the parties;

provided that the customer agrees not to plant a tree that will encroach into the utility's facilities at a future date and consents to the removal by the utility if that kind of a tree is planted. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-12*)

170 IAC 4-9-13 Utility representative identification

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 13. Employees or contractors performing:

(1) vegetation management; or

(2) in person notification for vegetation management;

on behalf of the utility shall carry identification and provide it for inspection by the customer upon request. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-13*)

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**INVESTIGATION BY THE INDIANA UTILITY)
REGULATORY COMMISSION, UNDER IC §§)
8-1-2-58 AND 59, TO INVESTIGATE)
ELECTRIC UTILITY TREE-TRIMMING)
PRACTICES AND TARIFFS RELATING TO)
SERVICE QUALITY IN THE STATE OF) CAUSE NO. 43663
INDIANA)
)
)
RESPONDENTS:)
ALL INDIANA JURISDICTIONAL)
ELECTRIC UTILITIES)**

**PETITIONER’S SUBMISSION OF ANNUAL
VEGETATION MANAGEMENT REPORT**

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “IPL”), by counsel, hereby submits its Annual Vegetation Management Report as required by the Commission’s November 30, 2010, Order in this Cause. This report also includes outage investigation information showing the number of outages caused by vegetation and the text of 170 IAC 4-9, as agreed to in the Stipulation and Settlement Agreement in IPL’s most recent rate case, Cause No. 45029.

Respectfully submitted,



Jeffrey M. Peabody, Atty No. 28000-53,
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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Submission of Annual Vegetation Management Report* was served by email transmission, upon the following:

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Dated this 31st day of March, 2022.



Jeffrey M. Peabody

**AES Indiana
Annual Vegetation
Management Report
Cause No. 43663¹
Calendar Year 2021**

I. Vegetation Management Expenditures

2021	Budget	Actual	Storm Expenditures	Non-storm Expenditures
Line Clearing Services	\$13,325,230	\$15,270,050	\$2,609,161	\$12,660,889

II. Customer Complaints Related to Tree Trimming

AES Indiana uses a multi-step notification process to provide advance notice to Customers of routine vegetation management on their premises. This process is outlined in AES Indiana's Vegetation Management Program. The initial steps of this process occur two to three months prior to the scheduled pruning.² The final steps occur during the three-week period leading up to the planned vegetation management. This process permits customer inquiries to be addressed in advance of the planned vegetation management and includes an opportunity for customers to meet with an AES Indiana representative on-site to discuss the vegetation management. AES Indiana also has a process in place to address customer questions that arise on the day of pruning or thereafter. AES Indiana has successfully used its advance notification and customer inquiry procedures to avoid the escalation of customer contacts into actual complaints. The majority of tree related inquiries made to AES Indiana's Line Clearing Office are inquiries seeking information or clarifications on AES Indiana's vegetation management operations. If follow up by an AES Indiana representative (either from AES Indiana's Line Clearing Department or AES Indiana's Customer Advocate) is unsuccessful in addressing or answering customer inquiries, then the matter is forwarded to AES Indiana's Legal Department for handling via an internal complaint resolution process to ensure tracking and appropriate treatment. In 2021, no tree related matters were forwarded to this internal complaint resolution process. During this period, 16 customers made complaints to the Commission's Consumer Affairs Division, all of which were determined by the Commission to be unsubstantiated. Further information regarding these matters is included in the attached Exhibit A. Customer satisfaction is important to AES Indiana, as is the continued provision of safe, reliable, and economic electric service. To this end, AES

¹ The IURC Order dated November 30, 2010 (at 106) found that "utilities shall file a separate report by March 31, under this Cause, which outlines the utility's vegetation management budget and actual expenditures for the prior calendar year; the number of customer complaints related to tree trimming and the manner in which those complaints were addressed or resolved; and the tree-related outages as a percentage of total outages. Utilities shall also file their Vegetation Management Program (VMP) with the Commission, and any changes to that plan going forward." The Order did not establish a uniform standard for this report.

² As a result of the multi-step process, the initial steps of the advance notification process may have been made in 2021 for pruning scheduled to occur in 2022. When customer inquiries are received well in advance of the actual pruning, AES Indiana responds to the customer but discussions regarding the proposed pruning at the customer's premises may occur closer to the proposed pruning date so that discussions may better reflect actual work plans for the specified location.

Indiana tracks data on customer inquiries to AES Indiana's Line Clearing Department. Information regarding 2021 inquiries is included on Exhibit A as supplemental background information.

I. Tree Related Outages as a Percentage of Total Outages (SAIFI)

Tree (vegetation) related outages as a percent of total SAIFI in 2021 were 29.50% Total (including MED) for a total vegetation incident count of 3,582. Tree (vegetation) related outages as a percent of total SAIFI in 2021 were 25.02% without Major Events (excluding MED) for a vegetation incident count of 2,699. There were 20 declared storms and eight Major Event Days (MED) in 2021.

II. Vegetation Management Program

The most recent version of AES Indiana's Vegetation Management Program is attached as Exhibit B. One change was made in 2021 to Section 5 of the document, adding a note that AES Indiana has switched to circuit trimming in April of 2021 and no longer will be trimming by Map Section. AES Indiana has attached the text of 170 IAC 4-9 for reference as Exhibit C.

EXHIBIT A

**IURC Cause No. 43663
 Complaints to the IURC Consumer Affairs Division - 2021**

	Number of Inquiries or Complaints	Number per Resolution Category	Resolution Category
Debris left after recent outage restoration	4	4	AES Indiana informed customer of vegetation management standards and debris from storms/outages are the customer's responsibility.
Customer did not want trees removed	1	1	Customer did not want trees removed for improvement projects
Customer dissatisfied with trimming process	1	1	Customer reached out to us prior to an outage to advise tree limb on service line. We advised customer responsibility but we will take down line for safety.
Customer Reported Tree Limb on Line	5	5	We trimmed two. Two were regarding telecom lines. One had already fallen and taken down service drop. Customer wanted removal faster than our estimated repair time.
Other	5	5	Debris related. One trimming was mislabeled as storm debris. It was corrected and debris picked up. One was normal trimming, and we picked up. Others involved debris most likely not related to aes Indiana trimming/we picked up as a courtesy.
Total complaints or inquiries received by IURC	16	16	

Customer Inquiries Received by AES Indiana Line Clearing Department - 2021

	Number of Inquiries	Number per Category	Resolution Category
Brush Left	28	21	Brush left from production trimming -picked up by contractor within 48 hrs of trimming, advised customer of policy that brush may be left up to 48 hrs.
		1	Debris left by others: 1 = Debris left by AES Indiana line crew, not tree trimming contractor - service dispatch sent crew to clean up
		6	Storm Debris - storm debris policy explained - not cleaned up
Crews left ruts in yard	13	3	Ruts not from contractor - fixed by AES Indiana line department
		1	Nothing found
		9	Ruts left from AES Contractors
Customer claimed property damage by crew	42	27	Contractor was onsite at time and fixed the issue
		5	AES Indiana Line Crews caused Damage
		3	Storm Debris - storm debris policy explained - not cleaned up
		7	Damage not caused by AES Indiana contractor
Customer claimed the tree had poor shape or died after trimming	10	8	Resolved by Forester (explain that some trees die from being diseased or maturity of tree)
		2	AES Indiana Removed the tree
Customer requested no more trimming	18	18	Trimming stopped, AES Indiana resolved
Customer requested removal of debris following storm restoration and/or emergency work	75	75	AES Indiana advised customer that storm and emergency debris is not removed by utility
No Pre-notification	4	2	City Tree- City was notified not adjacent property owner
		2	Property was notified before trimming.
Other:	3	3	Not AES Indiana, Other utilities
Total Inquiries Received by AES Indiana	193	193	

EXHIBIT A

Customer Inquiries Indicating Customer Does Not Want Trimming ("Refusals") - 2021

Distribution -Reason for Refusal	Number of Inquiries	Number per Category	Resolution Category
Customer wanted self trim	23	21	AES Indiana did not trim (could not resolve, customer not responding, etc.)
			Tree(s) did not need trimmed
		2	Customer already had tree trimmed by private contractor prior to AES Indiana meet AES Indiana trimmed after meeting with customer
Customer wanted trees removed-not trimmed			AES Indiana trimmed tree (did not remove) after meeting with customer
Customer wanted to know what was going to be trimmed			AES Indiana trimmed after meeting with customer
Customer concerned because of previous experience	9	2	AES Indiana trimmed after meeting with customer
		7	Tree(s) did not need trimmed
Customer concerned about aesthetics	8	6	AES Indiana did not trim (could not resolve, customer not responding, etc.)
		2	AES Indiana trimmed after meeting with customer
Customer claimed nothing to trim on property	11	10	AES Indiana confirmed nothing for AES Indiana to trim on property (neighbors trees - do not enter property)
			Customer already had tree trimmed by private contractor
		1	Could not resolve - Nothing Done/ would not return AES Indiana's call AES Indiana trimmed after meeting with customer
Customer concerned about landscaping (garden/flowers/ non-tree vegetation) or property damage(fence/driveway/swings, etc.)			AES Indiana removed/trimmed after meeting with customer
Other(non tree issue, no reason given)	15	1	AES Indiana trimmed after meeting with customer
			Tree(s) did not need trimmed
		14	AES Indiana did not trim (could not resolve, customer not responding, etc.)
Customer refused to allow AES Indiana on "private property"	5	1	AES Indiana trimmed after meeting with customer
		4	AES Indiana did not finish trimming (could not resolve)
Customer stopped trimming (not a refusal during notification process)	5	4	AES Indiana did not finish trimming (could not resolve)
		1	AES Indiana trimmed after meeting with customer
Total Inquiries Received by AES Indiana concerning REFUSALS	76	76	

Exhibit B

**AES Indiana Distribution Vegetation Management
Program (DVMP)
ISSUED: March 31, 2021
Version 3.4**

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1.0 Introduction

AES Indiana's vegetation management program ("VMP"), commonly called line clearance, strives to balance safety, reliability, shareholder value, environmental stewardship, and customer satisfaction. The Line Clearing Department has the objective of meeting this mission by controlling the growth of vegetation near electrical lines using best management practices ("BMP's") while remaining compliant with federal, state, and local laws, regulations, and ordinances.

In general, AES Indiana's VMP is separated into distribution voltage vegetation management and transmission voltage vegetation management. This document's primary focus is the management of vegetation near distribution voltage electrical lines; however, transmission line voltages between 34.5kV and 138kV will be briefly mentioned in this document. Vegetation management for transmission lines of 345kV is detailed in a separate document called the "Transmission Vegetation Management Program ("TVMP")".

AES Indiana's objective is to perform routine vegetation management near distribution lines on a four (4) year rotation or cycle. To manage incompatible vegetation near electrical lines, AES Indiana uses qualified contractors to monitor and control vegetation. Control practices will vary depending on multiple factors such as accessibility, property owner concerns, local ordinances, etc. The standards in this document will define the most common situations and methods used to control vegetation.

All contractors shall adhere to these standards to the extent included in written contracts.

2.0 Definitions

Action Threshold – the maximum acceptable levels of plant density and height that initiates implementation of a control method

ANSI A300 Standard – The performance parameters established by industry consensus as a rule for the measure of extent, quality, quantity, value or weight used to write specifications (TCIA, 2008).

ANSI Z133- Safety requirements for Arboricultural Operations

Brush – woody vegetation with stems less than six (6) inches diameter at approximately 4.5 ft. from ground-line.

Integrated Vegetation Management (IVM) – A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective (TCIA, 2006).

Minimum allowable clearance – distance from limb to conductor at the end of trimming work

Risk – likelihood of a conflict or tree failure occurring and affecting a target and the severity of the associated consequences, e.g. personal injury, disruption of electrical service

3.0 Federal, State, Local Laws

Contractors shall follow all of AES Indiana's safety rules, AES Indiana's vegetation management standards, OSHA regulations, ANSI A300 and ANSI Z133 standards, as well as remain compliant with all federal, state, county, and municipal laws, ordinances, and regulations while performing line clearing activities for AES Indiana.

Governing bodies include but are not limited to:

Indiana Utility Regulatory Commission (IURC)

Office of Indiana State Chemist (OISC)

Marion County DPW/Code Enforcement

American National Standards Institute (ANSI)

Occupational Health and Safety Administration (OSHA)

Indiana Department of Environmental Management (IDEM)

4.0 Service Territory (Distribution)

Overall, the distribution system consists of approximately 3,646 circuit miles covering AES Indiana's service territory of Marion County and parts of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Owen, Putnam, and Shelby counties. There are 424 circuits within the service territory.

5.0 Routine Maintenance (Cycle)

AES Indiana's contractors attempt to control vegetation on each circuit on a four-year cycle. Approximately a fourth of the system, or 912 circuit miles, will be trimmed per year. The production plan is determined by AES Indiana and will be determined by:

- Prioritizing circuits with reliability concerns and time since last trim.
- Rural circuits – scheduled to reduce exposure to driving in inclement weather.
- Grouping circuits together by substation.
- Annual plan is from April 1 to March 31 of following year.

Line Clearing staff and contractors shall follow this plan annually.

*In 2021 AES Indiana switched from section trimming to circuit trimming

6.0 Notification

All cycle work is subject to the rules outlined in IURC rule 170 IAC 4-9. AES Indiana and contractors conform to this by providing the following notifications:

1. Homeowner Association packet – *three months* prior to work being performed, a packet of information regarding the upcoming vegetation management work will be provided.
2. Bill attachment – *two months* prior to vegetation management work, a notice will be attached to the affected customer's monthly bill statement.
3. Individual letter – *one month* prior to vegetation management work a separate letter will be sent to all homes on a circuit, notifying the resident of upcoming tree trimming.
4. Public notice – *one month* prior to work a public notice is posted in the Indianapolis Star describing the boundaries where tree work will be performed during the month.
5. In-person visit #1 – *a minimum of two weeks* prior to vegetation management a contractor forester will visit homes that will be affected by vegetation management activities. If no one is present at time of the visit, a light green door hanger will be left with contact information and a brief description of work to be performed in the

area. A record will be kept in the current vegetation management system of the time and date notification was given.

6. In-person visit #2 – *Day of work*, a tree trimming contractor will knock on door to notify the resident of their presence and work to be performed.

At times, special requests are made to notify the owner/resident 24 hours prior to being on the property for such reasons to unlock a gate or because of dogs. It is the responsibility of the contractor foreman to contact the person making these requests.

7.0 Trimming Clearances

Trimming will be performed per ANSI A300 standards. If a tree cannot be trimmed to ANSI standards, the homeowner is made aware during the in-person notification process to obtain consent. If the homeowner does not agree to the trimming, removal at AES Indiana's cost is offered; otherwise, this is considered a refusal and the dispute resolution process will begin as outlined in IURC rule 170 IAC 4-9.

AES Indiana's standards for routine maintenance, by line rating, are as follows:

7.1 138kV Transmission

- Minimum allowable clearance of 20 feet on side and under line.
- No overhang.
- With distribution under-build- these will be planned and trimmed during distribution cycle work

7.2 34.5kV Sub-transmission

- Minimum allowable clearance of 15 feet on side and under line.
- No overhang.
- With distribution under-build- these will be planned and trimmed during distribution cycle work
- If determined idle, no work will be done

7.3 Three phase primary lines

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall

be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.

- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.4 Two-phase Primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.5 Single phase primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.6 Secondary conductors

- Secondary conductors with primary conductor over-build will have a minimum of three feet clearance.
- Stand-alone secondary (no primary over-build) will not be trimmed during routine maintenance.
- Uprooted trees or broken branches on secondary conductors should be removed.

- Open wire secondary conductors that are sagging or in poor condition which could lead to reliability issues shall be reported to AES Indiana Line Clearing staff. AES Indiana staff will then forward issue to Engineering.

7.7 Hazard Tree Mitigation

- Potential hazards are identified during the planning phase, by AES Indiana employees working throughout the territory, or by customer calls.
- Once the Line Clearing Department is notified of a potential hazard, a qualified AES Indiana employee or contractor will inspect the tree within 24 hours.
- A confirmed hazard tree will be mitigated in within 5 business days unless considered an Imminent Threat.
- Imminent Threat situations will be mitigated the same day
- A minimum of an in-person notification will be given. Permission is not necessary but if the homeowner refuses then no work will be done until resolved by AES Indiana.

7.8 Brush & Vines

- If brush needs to be trimmed, removal shall be pursued.
- 3-phase manual lines shall have a three (3) to four (4) foot path cut under conductors.
- Property owner notification and permission is necessary for removal unless deemed a reliability or safety issue.
- Vines on poles and guy wires shall be cut and treated to prevent regrowth.
- Landscape trees that are brush size shall not be cut unless signed permission is obtained.

7.9 Service Drops

- Trimming is not done on pole-to-pole or pole-to-house service drops.
- Homeowner should be informed AES Indiana will disconnect service so they or their contractor can maintain trees near these lines.

7.10 Street Light/APL Wires

- Street light wires and automatic protective lighting (APL) will not be trimmed unless authorized by AES Indiana Line Clearing staff.
- Street light wire vegetation concerns should be forwarded to the Mayor's Action Center (317-327-4622).
- APL's will be disconnected for the customer's convenience so their private contractor can perform the work. Owners of APL can call 317-261-8111 to request disconnection.

7.11 Debris

- Debris from routine maintenance will be removed within 48 hours. This debris shall not be left over the weekend or on holidays.
- Debris from storm damage or emergency situations will not be removed.
- Logs that cannot be chipped will be placed near the tree. Homeowner requests to pick up logs will be honored after two weeks.

8.0 Vegetation Control Methods

- Trimming - trimming shall be performed in accordance to ANSI A300 pruning standards. Trimming will be done from insulated aerial buckets when possible. When inaccessible from an aerial bucket truck, manual climbing of the tree(s) must be performed.
- Removals – under certain circumstances, whole tree removals may be preferred or necessary. AES Indiana Line Clearing staff will be notified and homeowner consent will be pursued in these cases. Stump removal is not offered by AES Indiana
- Mechanical removal of brush – certain areas may have dense areas of brush that may need removed to provide access. Mowing equipment may be used in these areas with IPL and property owner approval.
- Herbicides – the use of EPA registered and approved herbicides may be used to control regrowth of removed trees and brush. In some cases, the use of herbicide may replace hand cutting of brush and must be approved by AES Indiana Line Clearing staff.

9.0 Contractor Safety

Contractors must conform to the AES Global Safety Standard number AES-STD-OHS23: *Tree Trimming and Vegetation Safety Management*. Contractor will also review annually the AES Indiana Contractor Safety video. New contractor employees will be required to view this video prior to working on the system.

10.0 Staffing

The DVMP is overseen by AES' Director of Maintenance, Inspections, and Contract Management. Locally, AES Indiana's Line Clearing Department manages all aspects of the DVMP. Full-time Line Clearing employees include – One Manager and three Contractor Coordinators, where all employees have various certifications and levels of education qualifying them to hold their positions. The Manager manages the entire UVM process, budgets, personnel and contractor/contract management. Each Contractor Coordinator manages various aspects of the daily UVM processes, including overseeing the contract vegetation managers.

AES Indiana utilizes contract vegetation management service providers for inspection, notification, maintenance, and vegetation mitigation efforts. Contract terms vary from three years to five years, depending on contractor. Current contractors and responsibilities are:

- Asplundh Tree Experts* (5-year contract) – Annual transmission maintenance and notification, distribution work orders (non-routine maintenance).
- Wright Tree Service (5-year contract)* – Distribution Inspections, notification, routine maintenance, and mitigation efforts.
- CN Utility Consultants (3-year contract) – Distribution Inspections and notification.

*2021 is a contract year and these are subject to change

11.0 Customer Satisfaction

11.1 Notification

See section 6.0 for routine maintenance notification.

Notification will be given to customers when any vegetation work will be performed on a property. For line upgrades, new construction, or any other line maintenance where tree trimming is needed, one notification will be given by a contractor forester at least two weeks prior to tree work beginning. For imminent risk trees, a minimum of a door hanger will be given the day of the work to inform the customer of the risk and why AES Indiana had to trim.

11.2 Complaint & Dispute Resolution

Complaints and trimming disputes will be resolved by established procedures in IURC rule 170 IAC 4-9.

11.3 Customer requests – Time & Material

Customer requests shall be reviewed and the customer contacted within two business days after receipt by AES Indiana Line Clearing. If Line Clearing determines tree work

cannot hold until the time of routine maintenance, the work will be done within five business days.

11.4 Work Order – Time & Material

Work order trimming shall begin two business days after the two-week notification waiting period outlined in IURC rule 170 IAC 4-9.

11.5 Hours of Operation

Five eight-hour days or four ten-hour days, Monday through Friday between the hours of 7:00 a.m. and 5:30 p.m.

11.6 Inclement Weather

Crew personnel will be paid up to two hours per day for inclement weather. After two hours of inclement weather, and if it is determined crews cannot safely or productively continue working, the Company and the Contractor will mutually agree on the number of crews to be held or released. Crews will be allowed to make up time missed (due to inclement weather) between the hours of 7:00 a.m. and 5:30 p.m., Monday through Friday, provided sufficient daylight is available. If four or more hours have been missed due to inclement weather during the week, and the Company and the Contractor mutually agree, crews will be allowed to make up time on Saturday. Both Production and Time and Material crews will follow the outlined inclement weather policy.

INDIANA UTILITY REGULATORY COMMISSION

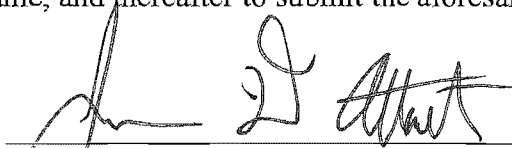
Final Rulemaking


IURC RM #10-04
LSA #12-42(F)

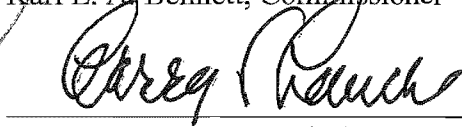
Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

Upon prior publication of notice, a public hearing was held on May 24, 2012, at 6:00 p.m. Eastern Daylight Time, at the PNC Center, 101 West Washington Street, IURC Conference Center, Judicial Courtroom 222, Indianapolis, Indiana, as required by the provisions of I.C. 4-22-2-1, *et seq.* On July 11, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of the Indiana Utility Regulatory Commission was present and adopted the Final Rule. On August 24, 2012, the Commission recalled the rule and made changes to comply with form and legality. On August 29, 2012, at 2:00 p.m. Eastern Daylight Time in Judicial Courtroom 222, PNC Center, Indianapolis, Indiana, a majority of members of said Commission were present and adopted the foregoing Revised Rule.

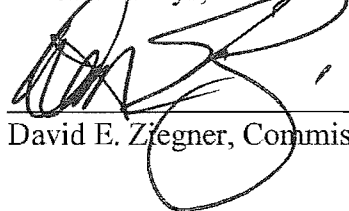
The Secretary is hereby directed to submit the aforesaid rule to the Attorney General and Governor of Indiana, for their approval of same, and thereafter to submit the aforesaid rule to the publisher, Indiana Register.

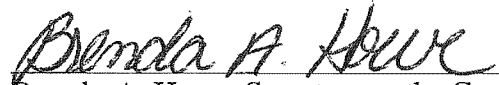

James D. Atterholt, Chairman


Kari E. A. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

ATTEST:

Brenda A. Howe, Secretary to the Commission

Date: AUG 29 2012

Rule Signature Page

Rule#: LSA #12-42(F)
Agency: Indiana Utility Regulatory Commission
Subject: Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011.

ADOPTED:

By the Indiana Utility Regulatory Commission


Date: 'AUG 29 2012


James D. Atterholt, Chairman


Kari A. E. Bennett, Commissioner


Larry S. Landis, Commissioner

Not Participating
Carolene Mays, Commissioner


David E. Ziegner, Commissioner

APPROVED AS TO FORM AND LEGALITY:

By: _____
Gregory F. Zoeller
Attorney General, State of Indiana

Date: _____

APPROVED:

By: _____
Mitchell E. Daniels, Jr.
Governor, State of Indiana

Date: _____

ACCEPTED FOR FILING:

By: _____
Indiana Register
Legislative Services Agency

Date: _____

TITLE 170 INDIANA UTILITY REGULATORY COMMISSION

**Final Rule
LSA Document #12-42(£)**

DIGEST

Adds 170 IAC 4-9 regarding vegetation management standards for electric utilities to implement the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Effective 30 days after filing with the Publisher.

170 IAC 4-9

SECTION 1. 170 IAC 4-9 IS ADDED TO READ AS FOLLOWS:

Rule 9. Vegetation Management Standards

**170 IAC 4-9-1 Applicability; incorporation by reference of commission order
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 1. (a) This rule applies to an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders. This rule does not apply to an electric public utility subject to the jurisdiction of the commission that is organized as a rural electric membership corporation under IC 8-1-13 or a nonprofit corporation organized under IC 23-1-17.

(b) The commission through this rule implements the commission's order in cause number 43663, approved on November 30, 2010, and the commission's order on reconsideration in the cause, approved July 7, 2011. Copies of the orders are available for review and copying at the Indiana Utility Regulatory Commission, 101 West Washington Street, Suite IS00E, Indianapolis, Indiana 46204. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-1*)

**170 IAC 4-9-2 Definitions
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2**

Sec. 2. The following definitions apply throughout this rule:

- (1) "Brush" means vegetation with stems less than six (6) inches diameter at breast height.**
- (2) "Business days" means days other than:
(A) Saturday;**

- (B) Sunday; or
 - (C) a legal holiday observed by the state of Indiana.
 - (3) "Commission" means the Indiana utility regulatory commission.
 - (4) "Customer" means the following:
 - (A) For purposes of notice, "customer" has the meaning set forth in 170 IAC 16-1-2(3) or may include the occupant of the property.
 - (B) For purposes of the disputes, "customer" has the meaning set forth in 170 IAC 16-1-2(3) but also includes the property owner.
 - (5) "Emergency or storm event":
 - (A) means:
 - (i) a condition dangerous or hazardous to:
 - (AA) health;
 - (BB) life;
 - (CC) physical safety; or
 - (DD) propertyexists or is imminent;
 - (ii) an interruption of utility service; or
 - (iii) the need to immediately repair or clear utility facilities; and
 - (B) includes:
 - (i) circumstances that exist that make it impractical or impossible for a utility to comply with the provisions of the rule, including, but not limited to:
 - (AA) floods;
 - (BB) ice;
 - (CC) snow;
 - (DD) storms;
 - (EE) tornadoes;
 - (FF) winds; and
 - (GG) other acts of God;
 - (ii) falling trees;
 - (iii) trees causing outages; and
 - (iv) trees showing evidence of:
 - (AA) burning; or
 - (BB) otherwise having been in direct contact with electric conductors.
 - (6) "Implied consent" means the property owner or customer has not contacted the utility to deny consent within two (2) weeks after receiving notice that tree trimming will occur.
 - (7) "In person" means:
 - (A) person to person delivery of verbal or written notice by an authorized utility representative to a customer, or
 - (B) hand delivery of a door hanger or similar document accompanied by an attempt by the authorized utility representative to speak with the resident through actions including knocking on the door or ringing the door bell, with delivery documented in writing or

computerized entry by the authorized utility representative making the hand delivered-

- (8) "Power line compatible vegetation" means a plant that at maturity will not reach a height greater than twelve (12) feet.
- (9) "Public safety situation" means the following:
- (A) The existence of a vegetation condition that could reasonably be expected to cause imminent physical harm to electrical equipment necessary for the provision of electric service, including the following:
 - (i) Trees that are unstable to the point of representing a danger to utility equipment, facilities, or personnel in the course of repairs to said equipment or facilities due to disease, damage, or soil erosion. Personnel may include, but is not limited to safety workers such as fire, police, emergency medical personnel, utility line and repair crews.
 - (ii) Trees that lean to a degree that they can touch power lines.
 - (iii) Trees that have burn marks or other indicators that they have previously touched a power line.
 - (B) A condition in vegetation unrelated to normal growth that would result in contact with power lines or high voltage equipment and cause imminent physical harm to the public if not immediately mitigated.
- (10) "Telephone call" means:
- (A) making an attempt to contact the customer via the telephone number the utility has on file; and
 - (i) making verbal telephone contact; or
 - (ii) leaving a message on
 - (AA) voicemail;
 - (BB) an answering machine; or
 - (CC) an answering service,if available.
 - (C) If an attempt is unsuccessful in either making verbal telephone contact with the customer or leaving a telephonic message as described in clause (A), a second attempt must be made.
- (11) "Utility" means an electrical public utility subject to the jurisdiction of the commission pursuant to the provisions of the Public Service Commission Act, IC 8-1-2, that is financed by the sale of securities and whose business operations are overseen by a board representing their shareholders.
- (12) "Vegetation management" means the cutting or removal of vegetation or the prevention of vegetative growth to accomplish one (1) of the following:
- (A) The maintenance of safe conditions around utility facilities.
 - (B) Ensuring reliable electric service.
 - (C) Preventing hazards caused by the encroachment of vegetation on utility facilities and to provide utility access to facilities.
- (13) "Written notice" means notice sent from the utility to the customer in one (1) of the following manners:
- (A) By electronic mail.

(B) By U.S. mail or another mail delivery system, including inside utility bills.

(C) By in person delivery of written notice to the customer's premises, including, but not limited to, a door hanger. (Indiana Utility Regulatory Commission; 170 IAC 4-9-2)

170 IAC 4-9-3 Easements and right of way

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 3. (a) This rule does not modify properly rights. Utilities must have or obtain the following legal authority and must provide documentation in accordance with subsection (b):

- (1) easements;**
- (2) rights of way;**
- (3) statutory authority;**
- (4) other legal authority; or**
- (5) the express or implied consent of the property owner or customer;**

prior to trimming vegetation. The utility's ability to secure a prescriptive easement may be presented to the customer to obtain consent, but is not independent legal authority.

(b) Upon request by the customer within five (5) business days of the customer's receipt of the notice required under section 4 of this rule, the utility will provide one (1) of the following prior to vegetation management:

- (1) A copy of the easement or public right of way document that gives the utility the legal right to enter the customer's property to perform vegetation management.**
- (2) If an easement or public right of way document is not reasonably available, a copy of the authority that gives the utility the legal right to enter the customer's property to perform vegetation management. (Indiana Utility Regulatory Commission; 170 IAC 4-9-3)**

170 IAC 4-9-4 Notice requirements for routine vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 4.(a) At least two (2) calendar weeks prior to engaging in routine vegetation management, the utility must provide notice to customers and property owners whose vegetation will be subject to the vegetation management except under the following circumstances:

- (1) The utility has:**
 - (A) a written easement;**
 - (B) government permit;**
 - (C) contractual agreement; or**
 - (D) court order;**

that expressly gives the utility the right to conduct vegetation management activities.

(2) An emergency or storm event occurs.

(b) A utility must provide notice to a customer in the following manner:

(1) At least one (1) attempt to contact must be:

- (i) in person; or
- (ii) via telephone call.

(2) At least one (1) attempt to contact must include written notice.

(c) Written and in person notice shall include, at minimum, the following information:

(1) The fact that vegetation management is scheduled to occur.

(2) An explanation of

- (A) what vegetation management is; and
- (B) why it is necessary for safe and reliable electric service.

(3) The fact that nonproperty owners living or working on the property who receive the notice are strongly encouraged to notify the property owner as soon as possible that vegetation management is scheduled to occur.

(4) The fact that receipt of this notice by the occupant initiates the two (2) week window for calculating implied consent by the customer.

(5) The estimated date that vegetation management is scheduled to occur.

(6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to vegetation management.

(d) Written notice will also include the following:

(1) The heading, "TREE TRIMMING NOTICE".

(2) The date the written notice was hand delivered or mailed.

(3) The website address of the commission's vegetation management administrative rule, this rule.

(4) The commission's website at <http://www.in.gov/iurc>.

(5) The utility's vegetation management website address.

(6) A reference to an educational resource for planting around electrical facilities, like the Arbor Day Foundation's right tree, right place program and the website address, if available.

(7) A website address and telephone number for customers to obtain the name of the contractor, if used by the utility, that will deliver the in person notice or conduct vegetation management.

(8) A statement that the utility's representative shall carry identification when delivering the in person notice or conducting vegetation management.

(e) The customer may, within three (3) calendar days of receiving the notice in subsection (a), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the customer requests a more specific time, the supervisor shall endeavor to work with the customer to give a precise time.

(f) A utility must provide notice to a property owner by publishing notice in at least one (1) newspaper of general circulation in the county in which the property is located.

The notice must include the following:

- (1) The fact that vegetation management is scheduled to occur.**
- (2) The area where vegetation management is scheduled to occur by listing at least one (1) of the following:
 - (i) The street name and block.**
 - (ii) The name of the subdivision.**
 - (iii) The intersecting roads bounding the area.**
 - (iv) The specific address of each property.****
- (4) The fact that publication of this notice initiates the two (2) week window for calculating implied consent by the property owner.**
- (5) The estimated date that vegetation management is scheduled to occur.**
- (6) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer property owner inquiries related to vegetation management.**

(g) The property owner who receives notice by publication may, within three (3) calendar days of the notice being published as outlined in subsection (f), request the utility provide the estimated day that vegetation management is expected to occur. The utility will then provide the estimated day at least three (3) business days prior to engaging in vegetation management. If the property owner requests a more specific time, the supervisor shall endeavor to work with the property owner to give a precise time. (*Indiana Utility Regulatory Commission.: 170 IAC 4-9-4*)

170 IAC 4-9-5 Notice requirements for line upgrades

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 5.(a) At least sixty (60) calendar days prior to a utility changing a distribution or transmission line to a higher voltage level, the utility must give notice to the affected customer if the change in the line will change the area in which vegetation management will be necessary as a result of safe clearance requirements.

(b) Notice shall be provided in the same manner as in section 4(b) of this rule.

(c) Notice shall include, at minimum, the following information:

- (1) The fact that line upgrades are scheduled to occur.**
- (2) An explanation of what line upgrades are.**
- (3) An explanation as to why line upgrades are necessary for safe and reliable electric service.**
- (4) The fact that nonproperty owners living or working on the property and receiving the notice are strongly encouraged to notify the property owner as soon as possible that line upgrades are scheduled to occur.**
- (5) The estimated date that line upgrades are scheduled to occur.**
- (6) The estimated length of time construction will continue.**
- (7) New vegetation restrictions on the property as a result of the line upgrades.**

(8) Changes to the property owner's easement or right of way as a result of the line upgrades.

(9) Contact information, including, at a minimum, a telephone number for an authorized utility representative who is able to answer customer inquiries related to line upgrades. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-5*)

170 IAC 4-9-6 Emergency or public safety trimming
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 6. In cases of emergency or public safety, utilities may, without customer consent, remove more than twenty-five percent (25%) of a tree or trim beyond existing easement or right-of-way boundaries in order to remedy the emergency or public safety situation. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-6*)

170 IAC 4-9-7 Vegetation management standards
Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8
Affected: IC 8-1-2

Sec. 7. (a) Utilities, their agents, and contractors shall apply and adhere to the guidelines of:

- (1) American National Standards Institute ANSI A300;**
- (2) the National Electric Safety Code;**
- (3) the Shigo Guide; and**
- (4) the International Society of Arboriculture Best Management Practices.**

(b) There is not a uniform clearance requirement, but line clearances should take into consideration the:

- (1) characteristics of the locality;**
- (2) electrical facility; and**
- (3) health of the tree.**

(c) Except in situations of emergency or public safety, if a tree would have more than twenty-five percent (25%) of its canopy removed, the utility or its agent or contractor shall do one (1) of the following actions:

- (1) Obtain consent from the property owner.**
- (2) If the property owner and utility or its agent or contractor cannot mutually agree on how the tree can be trimmed to provide sufficient clearance in order to maintain reliable electric service, the utility or its agent or contractor shall take one (1) of the following actions:**
 - (A) Remove the tree, at the utility's expense, as long as the utility has secured the requisite easements to allow its personnel onto the owner's property.**
 - (B) Inform the customer that it will need to make non-ANSI standards cuts in order to provide clearance.**

(d) Brush that is under or near a utility's electrical facilities may be removed by the utility without the consent of the customer only when its removal is necessary for safe and reliable service.

(e) Debris associated with routine maintenance, in a maintained area, absent intervening inclement weather that may pull crews from maintenance activities, shall be removed within three (3) calendar days or left on the property as agreed to in writing by the owner.

(f) Utilities and their agents and contractors are not required to clear debris caused by storms and other natural occurrences like tree failures.

(g) A utility shall file a separate report regarding tree-related outages by March 31 annually and whenever the utility makes a change to its vegetation management plan. The report shall include the following information:

- (1) The utility's vegetation management budget.**
- (2) Actual expenditures for the prior calendar year.**
- (3) The number of customer complaints related to tree trimming.**
- (4) The manner in which complaints were addressed or resolved.**
- (5) Tree-related outages as a percentage of total outages. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-7*)**

170 IAC 4-9-8 Dispute resolution process prior to vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 8. (a) To temporarily stay the proposed vegetation management on the customer's property or rental property, a customer must notify the utility of the customer's objection to the proposed vegetation management within five (5) business days of the customer's receipt of the notice required under section 4 of this rule. Questions or requests for information are not customer objections.

(b) A utility must respond to a customer's objection:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing;**

within three (3) business days.

(c) If the initial utility representative cannot resolve the customer's objection regarding proposed vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the customer shall be provided with the following:

- (1) The website location of the commission's vegetation management administrative rule, this rule.**
- (2) Contact information, including, at minimum, a telephone number, for the commission's consumer affairs division.**

(d) No temporary stay of vegetation management shall be available when one (1) of the following occurs:

- (1) An emergency, storm event, or public safety situation exists.**
- (2) The customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call.**

(3) More than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a).

(4) A final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission, 170 IAC 4-9-8*)

170 IAC 4-9-9 Dispute resolution process during vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 9. (a) Upon request of the customer, the utility shall temporarily stay vegetation management on the customer's premises during the vegetation management only if one (1) of the following occurs or is disputed:

(1) The utility failed to provide the notice required under section 4 of this rule.

(2) The utility is engaging in vegetation management outside the scope of a written or recorded agreement between the customer and the utility.

(3) The utility did not have authority to enter the customer's property.

(4) The utility did not exercise due diligence to secure an easement or right of way document in accordance with section 3(b)(2).

(b) At least one (1) member of the work crew must have the authority from the utility to discuss and attempt to resolve customer objections and must respond to the customer's inquiry or complaint. If the work crew cannot resolve the customer's objection regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the objection. If the utility is unsuccessful in resolving the objection, the utility shall provide to the customer the information required in 170 IAC 16-1-4(c)(5).

(c) A utility may proceed with the vegetation management where:

(1) an emergency exists;

(2) the customer has withdrawn the objection or approved conditions under which cutting may resume, either in writing or during a recorded call;

(3) more than seven (7) calendar days have passed since the utility provided the proposed resolution referenced in the complaint process under 170 IAC 16-1-4(c)(5) and the customer failed to file an informal complaint to the commission as required by 170 IAC 16-1-5(a);

(4) the customer failed to take timely action to seek further review of a decision of the commission's consumer affairs division or its director under 170 IAC 16-1-5(d) or 170 IAC 16-1-6(a); or

(5) a final disposition on an informal complaint has been rendered by the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-9*)

170 IAC 4-9-10 Dispute resolution process after vegetation management

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 10. (a) A customer may contact the utility regarding vegetation management on the customer's premises after the vegetation management occurred if one (1) of the following occurs:

- (1) The utility failed to provide the notice required under section 4 of this rule.**
- (2) The utility engaged in vegetation management outside the scope of an agreement between the customer and the utility.**
- (3) The utility did not have authority to enter the customer's property.**
- (4) The utility failed to follow the vegetation management pruning standards required by the commission or by the utility's own vegetation management policy.**
- (5) Another reason permitted by law.**

(b) A utility must respond within three (3) business days of receiving a customer's inquiry or dispute:

- (1) in person;**
- (2) via telephone call; or**
- (3) in writing.**

(c) If the initial utility representative cannot resolve the customer's dispute regarding vegetation management, at least one (1) additional authorized utility representative must attempt to resolve the dispute. If the utility is unsuccessful in resolving the dispute, the customer shall be provided the information required in 170 IAC 16-1-5 and will be informed that disputes over monetary damages can only be resolved by a civil court, not the commission. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-10*)

170 IAC 4-9-11 Customer education process

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 11. A utility shall develop and implement an education plan to inform and educate customers on the following:

- (1) Tree and vegetation selection and placement around electric facilities.**
- (2) The public importance of vegetation management to avoid:**
 - (A) electric interruptions;**
 - (B) injuries; and**
 - (C) fatalities.**
- (3) The need for, and benefit of, preventing tree contact with power lines.**
- (4) The importance of cooperation between customers and their utility in accomplishing the essential public task of power line maintenance.**
- (5) The critical importance of the public service of vegetation management to:**
 - (A) protect electric service reliability; and**
 - (B) avoid injuries and fatalities from electrocution.**

(6) Trimming cycles a utility chooses to implement, including how the chosen trim cycle impacts clearance distance and the extent to which a tree's appearance will be impacted based upon that chosen cycle. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-11*)

170 IAC 4-9-12 Tree replacement program

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 12. Where a tree will be removed, a utility may offer to provide the customer with:

(1) a power line compatible vegetation;

(2) other replacement plant; or

(3) monetary compensation or credit at an amount agreed to by the parties;

provided that the customer agrees not to plant a tree that will encroach into the utility's facilities at a future date and consents to the removal by the utility if that kind of a tree is planted. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-12*)

170 IAC 4-9-13 Utility representative identification

Authority: IC 8-1-1-3; IC 8-1-2-4; IC 8-1.5-3-8

Affected: IC 8-1-2

Sec. 13. Employees or contractors performing:

(1) vegetation management; or

(2) in person notification for vegetation management;

on behalf of the utility shall carry identification and provide it for inspection by the customer upon request. (*Indiana Utility Regulatory Commission; 170 IAC 4-9-13*)

STATE OF INDIANA

INDIANA UTILITY REGULATORY COMMISSION

**INVESTIGATION BY THE INDIANA UTILITY)
REGULATORY COMMISSION, UNDER IC §§)
8-1-2-58 AND 59, TO INVESTIGATE)
ELECTRIC UTILITY TREE-TRIMMING)
PRACTICES AND TARIFFS RELATING TO)
SERVICE QUALITY IN THE STATE OF) CAUSE NO. 43663
INDIANA)
)
)
RESPONDENTS:)
ALL INDIANA JURISDICTIONAL)
ELECTRIC UTILITIES)**

**PETITIONER’S SUBMISSION OF ANNUAL
VEGETATION MANAGEMENT REPORT**

Indianapolis Power & Light Company d/b/a AES Indiana (“AES Indiana” or “IPL”), by counsel, hereby submits its Annual Vegetation Management Report as required by the Commission’s November 30, 2010, Order in this Cause. This report also includes outage investigation information showing the number of outages caused by vegetation and the text of 170 IAC 4-9, as agreed to in the Stipulation and Settlement Agreement in IPL’s most recent rate case, Cause No. 45029.

Respectfully submitted,



Jeffrey M. Peabody, Atty No. 28000-53,
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COMPANY

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing *Submission of Annual Vegetation Management Report* was served by email transmission, upon the following:

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Dated this 31st day of March, 2023.



Jeffrey M. Peabody

**AES Indiana
Annual Vegetation
Management Report
Cause No. 43663¹
Calendar Year 2022**

I. Vegetation Management Expenditures

2022	Budget	Actual	Storm Expenditures	Non-storm Expenditures
Line Clearing Services	\$14,014,828	\$18,714,857	\$2,347,280	\$16,367,577

II. Customer Complaints Related to Tree Trimming

AES Indiana uses a multi-step notification process to provide advance notice to Customers of routine vegetation management on their premises. This process is outlined in AES Indiana's Vegetation Management Program. The initial steps of this process occur two to three months prior to the scheduled pruning.² The final steps occur during the three-week period leading up to the planned vegetation management. This process permits customer inquiries to be addressed in advance of the planned vegetation management and includes an opportunity for customers to meet with an AES Indiana representative on-site to discuss the vegetation management. AES Indiana also has a process in place to address customer questions that arise on the day of pruning or thereafter. AES Indiana has successfully used its advance notification and customer inquiry procedures to avoid the escalation of customer contacts into actual complaints. The majority of tree related inquiries made to AES Indiana's Line Clearing Office are inquiries seeking information or clarifications on AES Indiana's vegetation management operations. If follow up by an AES Indiana representative (either from AES Indiana's Line Clearing Department or AES Indiana's Customer Advocate) is unsuccessful in addressing or answering customer inquiries, then the matter is forwarded to AES Indiana's Legal Department for handling via an internal complaint resolution process to ensure tracking and appropriate treatment. In 2022, no tree related matters were forwarded to this internal complaint resolution process. During this period, 17 customers made complaints to the Commission's Consumer Affairs Division, all of which were determined by

¹ The IURC Order dated November 30, 2010 (at 106) found that "utilities shall file a separate report by March 31, under this Cause, which outlines the utility's vegetation management budget and actual expenditures for the prior calendar year; the number of customer complaints related to tree trimming and the manner in which those complaints were addressed or resolved; and the tree-related outages as a percentage of total outages. Utilities shall also file their Vegetation Management Program (VMP) with the Commission, and any changes to that plan going forward." The Order did not establish a uniform standard for this report.

² As a result of the multi-step process, the initial steps of the advance notification process may have been made in 2022 for pruning scheduled to occur in 2023. When customer inquiries are received well in advance of the actual pruning, AES Indiana responds to the customer but discussions regarding the proposed pruning at the customer's premises may occur closer to the proposed pruning date so that discussions may better reflect actual work plans for the specified location.

the Commission to be unsubstantiated. Further information regarding these matters is included in the attached Exhibit A. Customer satisfaction is important to AES Indiana, as is the continued provision of safe, reliable, and economic electric service. To this end, AES Indiana tracks data on customer inquiries to AES Indiana's Line Clearing Department. Information regarding 2022 inquiries is included on Exhibit A as supplemental background information.

I. Tree Related Outages as a Percentage of Total Outages (SAIFI)

Tree (vegetation) related outages as a percent of total SAIFI in 2022 were 19.87% Total (including MED) for a total vegetation incident count of 2,552. Tree (vegetation) related outages as a percent of total SAIFI in 2022 were 15.65% without Major Events (excluding MED) for a vegetation incident count of 2,114. There were 17 declared storms and eight Major Event Days (MED) in 2022.

II. Vegetation Management Program

The most recent version of AES Indiana's Vegetation Management Program is attached as Exhibit B. AES Indiana has attached the text of 170 IAC 4-9 for reference as Exhibit C.

Exhibit A

EXHIBIT A

IURC Cause No. 43663
 Complaints to the IURC Consumer Affairs Division - 2022

	Number of Inquiries or Complaints	Number per Resolution Category	Resolution Category
Debris left after recent outage restoration	4	4	AES Indiana informed customer of vegetation management standards and debris from storms/outages are the customer's responsibility.
Customer did not want trees removed	3	3	Customer did not want trees removed for improvement projects
Customer dissatisfied with trimming process	4	4	2 wanted trees removed, two believes that tree limbs in general causes outages and wants trimming completed.
Customer advised proper notice not received	3	3	Provided no ice documentation to IURC
Other	3	3	2 Customer complaints concerned with non-emergency debris removal. One was not AES work. One was delayed due to weather. One customer complaint of ruts made in yard from tree crew vehicle.
Total complaints or inquiries received by IURC	17	17	

Customer Inquiries Received by AES Indiana Line Clearing Department - 2022

	Number of Inquiries	Number per Category	Resolution Category
Brush Left	31	21	Brush left from production trimming -picked up by contractor within 48 hrs of trimming, advised customer of policy that brush may be left up to 48 hrs.
		3	Debris left by others: 1 = Debris left by AES Indiana line crew, not tree trimming contractor - service dispatch sent crew to clean up
		7	Storm Debris - storm debris policy explained - not cleaned up
Crews left ruts in yard	1	1	Ruts not from contractor - fixed by AES Indiana line department
Customer claimed property damage by crew	12	10	Contractor was onsite at time and fixed the issue
		2	Damage not caused by AES Indiana contractor
Customer claimed the tree had poor shape or died after trimming	10	10	Resolved by Forester (explain that some trees die from being diseased or maturity of tree)
Customer requested no more trimming	4	4	Trimming stopped, AES Indiana resolved
Customer requested removal of debris following storm restoration and/or emergency work	5	5	AES Indiana advised customer that storm and emergency debris is not removed by utility
Total Inquiries Received by AES Indiana	63	63	

EXHIBIT A

Customer Inquiries Indicating Customer Does Not Want Trimming ("Refusals") - 2022

Distribution -Reason for Refusal	Number of Inquiries	Number per Category	Resolution Category
Customer wanted self trim	20	17	AES Indiana did not trim (could not resolve, customer not responding, etc)
		3	Tree(s) did not need trimmed
Customer wanted trees removed-not trimmed			AES Indiana trimmed tree (did not remove) after meeting with customer
Customer wanted to know what was going to be trimmed			AES Indiana trimmed after meeting with customer
Customer concerned because of previous experience	7	3	AES Indiana trimmed after meeting with customer
		4	Tree(s) did not need trimmed
Customer concerned about aesthe ics	9	4	AES Indiana did not trim (could not resolve, customer not responding, etc)
		5	AES Indiana trimmed after meeting with customer
Customer claimed nothing to trim on property	20	18	AES Indiana confirmed nothing for AES Indiana to trim on property (neighbors trees - do not enter property)
		2	Customer already had tree trimmed by private contractor
Customer concerned about landscaping (garden/flowers/ non-tree vegeta ion) or property damage(fence/driveway/swings, etc.)	4	4	AES Indiana did not trim after meeting wi h customer
Other(non tree issue, no reason given)	8	7	AES Indiana trimmed after meeting with customer
		1	AES Indiana did not trim (could not resolve, customer not responding, etc)
Customer refused to allow AES Indiana on "priva e property"	3	3	AES Indiana did not trim af er meeting wi h customer
Customer stopped trimming (not a refusal during no ification process)	49	18	AES Indiana finished trimming after mee ing with customer
		8	AES Indiana determined nothing left to trim
		4	customer is going to self trim
		19	AES Indiana did not finish trimming (could not resolve)
Total Inquiries Received by AES Indiana concerning REFUSALS	120	120	

Exhibit B

AES Indiana Distribution Vegetation Management
Program (DVMP)
ISSUED: March 31, 2022
Version 3.4

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1.0 Introduction

AES Indiana's vegetation management program ("VMP"), commonly called line clearance, strives to balance safety, reliability, shareholder value, environmental stewardship, and customer satisfaction. The Line Clearing Department has the objective of meeting this mission by controlling the growth of vegetation near electrical lines using best management practices ("BMP's") while remaining compliant with federal, state, and local laws, regulations, and ordinances.

In general, AES Indiana's VMP is separated into distribution voltage vegetation management and transmission voltage vegetation management. This document's primary focus is the management of vegetation near distribution voltage electrical lines; however, transmission line voltages between 34.5kV and 138kV will be briefly mentioned in this document. Vegetation management for transmission lines of 345kV is detailed in a separate document called the "Transmission Vegetation Management Program ("TVMP")".

AES Indiana's objective is to perform routine vegetation management near distribution lines on a four (4) year rotation or cycle. To manage incompatible vegetation near electrical lines, AES Indiana uses qualified contractors to monitor and control vegetation. Control practices will vary depending on multiple factors such as accessibility, property owner concerns, local ordinances, etc. The standards in this document will define the most common situations and methods used to control vegetation.

All contractors shall adhere to these standards to the extent included in written contracts.

2.0 Definitions

Action Threshold – the maximum acceptable levels of plant density and height that initiates implementation of a control method

ANSI A300 Standard – The performance parameters established by industry consensus as a rule for the measure of extent, quality, quantity, value or weight used to write specifications (TCIA, 2008).

ANSI Z133- Safety requirements for Arboricultural Operations

Brush – woody vegetation with stems less than six (6) inches diameter at approximately 4.5 ft. from ground-line.

Integrated Vegetation Management (IVM) – A system of managing plant communities in which compatible and incompatible vegetation is identified, action thresholds are considered, control methods are evaluated, and selected control(s) are implemented to achieve a specific objective (TCIA, 2006).

Minimum allowable clearance – distance from limb to conductor at the end of trimming work

Risk – likelihood of a conflict or tree failure occurring and affecting a target and the severity of the associated consequences, e.g. personal injury, disruption of electrical service

3.0 Federal, State, Local Laws

Contractors shall follow all of AES Indiana's safety rules, AES Indiana's vegetation management standards, OSHA regulations, ANSI A300 and ANSI Z133 standards, as well as remain compliant with all federal, state, county, and municipal laws, ordinances, and regulations while performing line clearing activities for AES Indiana.

Governing bodies include but are not limited to:

Indiana Utility Regulatory Commission (IURC)

Office of Indiana State Chemist (OISC)

Marion County DPW/Code Enforcement

American National Standards Institute (ANSI)

Occupational Health and Safety Administration (OSHA)

Indiana Department of Environmental Management (IDEM)

4.0 Service Territory (Distribution)

Overall, the distribution system consists of approximately 3,646 circuit miles covering AES Indiana's service territory of Marion County and parts of Boone, Hamilton, Hancock, Hendricks, Johnson, Morgan, Owen, Putnam, and Shelby counties. There are 424 circuits within the service territory.

5.0 Routine Maintenance (Cycle)

AES Indiana's contractors attempt to control vegetation on each circuit on a four-year cycle. Approximately a fourth of the system, or 912 circuit miles, will be trimmed per year. The production plan is determined by AES Indiana and will be determined by:

- Prioritizing circuits with reliability concerns and time since last trim.
- Rural circuits – scheduled to reduce exposure to driving in inclement weather.
- Grouping circuits together by substation.
- Annual plan is from April 1 to March 31 of following year.

Line Clearing staff and contractors shall follow this plan annually.

*In 2021 AES Indiana switched from section trimming to circuit trimming

6.0 Notification

All cycle work is subject to the rules outlined in IURC rule 170 IAC 4-9. AES Indiana and contractors conform to this by providing the following notifications:

1. Homeowner Association packet – *three months* prior to work being performed, a packet of information regarding the upcoming vegetation management work will be provided.
2. Bill attachment – *two months* prior to vegetation management work, a notice will be attached to the affected customer's monthly bill statement.
3. Individual letter – *one month* prior to vegetation management work a separate letter will be sent to all homes on a circuit, notifying the resident of upcoming tree trimming.
4. Public notice – *one month* prior to work a public notice is posted in the Indianapolis Star describing the boundaries where tree work will be performed during the month.
5. In-person visit #1 – *a minimum of two weeks* prior to vegetation management a contractor forester will visit homes that will be affected by vegetation management activities. If no one is present at time of the visit, a light green door hanger will be left with contact information and a brief description of work to be performed in the area. A record will be kept in the current vegetation management system of the time and date notification was given.

6. In-person visit #2 – *Day of work*, a tree trimming contractor will knock on door to notify the resident of their presence and work to be performed.

At times, special requests are made to notify the owner/resident 24 hours prior to being on the property for such reasons to unlock a gate or because of dogs. It is the responsibility of the contractor foreman to contact the person making these requests.

7.0 Trimming Clearances

Trimming will be performed per ANSI A300 standards. If a tree cannot be trimmed to ANSI standards, the homeowner is made aware during the in-person notification process to obtain consent. If the homeowner does not agree to the trimming, removal at AES Indiana's cost is offered; otherwise, this is considered a refusal and the dispute resolution process will begin as outlined in IURC rule 170 IAC 4-9.

AES Indiana's standards for routine maintenance, by line rating, are as follows:

7.1 138kV Transmission

- Minimum allowable clearance of 20 feet on side and under line.
- No overhang.
- With distribution under-build- these will be planned and trimmed during distribution cycle work

7.2 34.5kV Sub-transmission

- Minimum allowable clearance of 15 feet on side and under line.
- No overhang.
- With distribution under-build- these will be planned and trimmed during distribution cycle work
- If determined idle, no work will be done

7.3 Three phase primary lines

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.

- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.4 Two-phase Primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15 feet) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.5 Single phase primary

- Side clearance will be a minimum of 15 feet clearance *plus* proper lateral as defined by ANSI A300 standards. Minimum allowable clearance should be 3 feet. Established trunks within 15 feet of the conductor will not be removed unless a safety or reliability concern exists and written permission is obtained.
- Overhang clearance a minimum of 15 feet. More than 15 feet of clearance may be taken based on species and branch structure. Additionally, dead or dying branches overhanging the conductor should be removed when possible. Homeowners shall be notified of additional (>15) overhang removal and work will be completed unless an objection is registered by the homeowner.
- Ash trees shall be trimmed, if possible, so failing parts of tree will miss conductors.
- Equipment poles – a minimum of three feet will be cleared around pole with hardware (transformer, switch, fuse, etc.).

7.6 Secondary conductors

- Secondary conductors with primary conductor over-build will have a minimum of three feet clearance.
- Stand-alone secondary (no primary over-build) will not be trimmed during routine maintenance.
- Uprooted trees or broken branches on secondary conductors should be removed.

- Open wire secondary conductors that are sagging or in poor condition which could lead to reliability issues shall be reported to AES Indiana Line Clearing staff. AES Indiana staff will then forward issue to Engineering.

7.7 Hazard Tree Mitigation

- Potential hazards are identified during the planning phase, by AES Indiana employees working throughout the territory, or by customer calls.
- Once the Line Clearing Department is notified of a potential hazard, a qualified AES Indiana employee or contractor will inspect the tree within 24 hours.
- A confirmed hazard tree will be mitigated in within 5 business days unless considered an Imminent Threat.
- Imminent Threat situations will be mitigated the same day
- A minimum of an in-person notification will be given. Permission is not necessary but if the homeowner refuses then no work will be done until resolved by AES Indiana.

7.8 Brush & Vines

- If brush needs to be trimmed, removal shall be pursued.
- 3-phase manual lines shall have a three (3) to four (4) foot path cut under conductors.
- Property owner notification and permission is necessary for removal unless deemed a reliability or safety issue.
- Vines on poles and guy wires shall be cut and treated to prevent regrowth.
- Landscape trees that are brush size shall not be cut unless signed permission is obtained.

7.9 Service Drops

- Trimming is not done on pole-to-pole or pole-to-house service drops.
- Homeowner should be informed AES Indiana will disconnect service so they or their contractor can maintain trees near these lines.

7.10 Street Light/APL Wires

- Street light wires and automatic protective lighting (APL) will not be trimmed unless authorized by AES Indiana Line Clearing staff.
- Street light wire vegetation concerns should be forwarded to the Mayor's Action Center (317-327-4622).
- APL's will be disconnected for the customer's convenience so their private contractor can perform the work. Owners of APL can call 317-261-8111 to request disconnection.

7.11 Debris

- Debris from routine maintenance will be removed within 48 hours. This debris shall not be left over the weekend or on holidays.
- Debris from storm damage or emergency situations will not be removed.
- Logs that cannot be chipped will be placed near the tree. Homeowner requests to pick up logs will be honored after two weeks.

8.0 Vegetation Control Methods

- Trimming - trimming shall be performed in accordance to ANSI A300 pruning standards. Trimming will be done from insulated aerial buckets when possible. When inaccessible from an aerial bucket truck, manual climbing of the tree(s) must be performed.
- Removals – under certain circumstances, whole tree removals may be preferred or necessary. AES Indiana Line Clearing staff will be notified and homeowner consent will be pursued in these cases. Stump removal is not offered by AES Indiana
- Mechanical removal of brush – certain areas may have dense areas of brush that may need removed to provide access. Mowing equipment may be used in these areas with IPL and property owner approval.
- Herbicides – the use of EPA registered and approved herbicides may be used to control regrowth of removed trees and brush. In some cases, the use of herbicide may replace hand cutting of brush and must be approved by AES Indiana Line Clearing staff.

9.0 Contractor Safety

Contractors must conform to the AES Global Safety Standard number AES-STD-OHS23: *Tree Trimming and Vegetation Safety Management*. Contractor will also review annually the AES Indiana Contractor Safety video. New contractor employees will be required to view this video prior to working on the system.

10.0 Staffing

The DVMP is overseen by AES' Director of Maintenance, Inspections, and Contract Management. Locally, AES Indiana's Line Clearing Department manages all aspects of the DVMP. Full-time Line Clearing employees include – One Manager and three Contractor Coordinators, where all employees have various certifications and levels of education qualifying them to hold their positions. The Manager manages the entire UVM process, budgets, personnel and contractor/contract management. Each Contractor Coordinator manages various aspects of the daily UVM processes, including overseeing the contract vegetation managers.

AES Indiana utilizes contract vegetation management service providers for inspection, notification, maintenance, and vegetation mitigation efforts. Contract terms vary from three years to five years, depending on contractor. Current contractors and responsibilities are:

- Asplundh Tree Experts* (5-year contract) – Annual transmission maintenance and notification, distribution work orders (non-routine maintenance).
- Wright Tree Service (5-year contract)* – Distribution Inspections, notification, routine maintenance, and mitigation efforts.
- CN Utility Consultants (3-year contract) – Distribution Inspections and notification.

*2021 is a contract year and these are subject to change

11.0 Customer Satisfaction

11.1 Notification

See section 6.0 for routine maintenance notification.

Notification will be given to customers when any vegetation work will be performed on a property. For line upgrades, new construction, or any other line maintenance where tree trimming is needed, one notification will be given by a contractor forester at least two weeks prior to tree work beginning. For imminent risk trees, a minimum of a door hanger will be given the day of the work to inform the customer of the risk and why AES Indiana had to trim.

11.2 Complaint & Dispute Resolution

Complaints and trimming disputes will be resolved by established procedures in IURC rule 170 IAC 4-9.

11.3 Customer requests – Time & Material

Customer requests shall be reviewed and the customer contacted within two business days after receipt by AES Indiana Line Clearing. If Line Clearing determines tree work cannot hold until the time of routine maintenance, the work will be done within five business days.

11.4 Work Order – Time & Material

Work order trimming shall begin two business days after the two-week notification waiting period outlined in IURC rule 170 IAC 4-9.

11.5 Hours of Operation

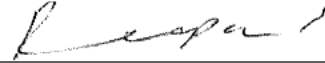
Five eight-hour days or four ten-hour days, Monday through Friday between the hours of 7:00 a.m. and 5:30 p.m.

11.6 Inclement Weather

Crew personnel will be paid up to two hours per day for inclement weather. After two hours of inclement weather, and if it is determined crews cannot safely or productively continue working, the Company and the Contractor will mutually agree on the number of crews to be held or released. Crews will be allowed to make up time missed (due to inclement weather) between the hours of 7:00 a.m. and 5:30 p.m., Monday through Friday, provided sufficient daylight is available. If four or more hours have been missed due to inclement weather during the week, and the Company and the Contractor mutually agree, crews will be allowed to make up time on Saturday. Both Production and Time and Material crews will follow the outlined inclement weather policy.

AFFIRMATION

I affirm, under the penalties for perjury, that the foregoing representations are true.



Roopali Sanka
Utility Analyst
Indiana Office of Utility Consumer Counselor
Cause No. 45911
AES Indiana

October 12, 2023

Date

Certificate of Service

This is to certify that a copy of the *Indiana Office of Utility Consumer Counselor's Redacted Testimony of Roopali Sanka* has been served upon the following parties of record in the captioned proceeding by electronic service on October 12, 2023.

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