FILED March 31, 2023 INDIANA UTILITY REGULATORY COMMISSION

#### STATE OF INDIANA

#### INDIANA UTILITY REGULATORY COMMISSION

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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:** 

**ELECTRIC UTILITIES** 

ALL INDIANA JURISDICTIONAL

CAUSE NO. 43663

#### 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,

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#### **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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DMS 25709809v1

AES Indiana Annual Vegetation Management Report Cause No. 43663<sup>1</sup> Calendar Year 2022

#### I. <u>Vegetation Management Expenditures</u>

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.<sup>2</sup> 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 guestions 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

<sup>&</sup>lt;sup>1</sup> 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.

<sup>&</sup>lt;sup>2</sup> 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 <u>Exhibit A</u>. 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 <u>Exhibit A</u> as supplemental background information.

## I. <u>Tree Related Outages as a Percentage of Total Outages (SAIFI)</u>

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 <u>Exhibit B</u>. AES Indiana has attached the text of 170 IAC 4-9 for reference as <u>Exhibit</u> <u>C</u>.

# 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 notice documentation to IURC
Other	3	3	2 Customer complaints concerned with non-emerency 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		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.
	31	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 2	Contractor was onsite at time and fixed the issue 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

<u> </u>		
Total Inquiries Received by AES Indiana	63	63

## EXHIBIT A

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

	Number of	Number ner	
Distribution -Reason for Refusal	Inquiries	Category	Resolution Category
Customer wanted self trim		17	AES Indiana did not trim (could not resolve, customer not responding, etc.)
	20	3	Tree(s) did not need trimmed
	20		
	-	-	
Customer wanted trees removed-not trimmed			AES Indiana trimmed tree (did not remove) after meeting with customer
Queters as weaters to be sweet used as in a to be trivers and		r	IAEC Indiana triannal after marting with evolution
Customer wanted to know what was going to be trimmed			AES Indiana trimmed after meeting with customer
Customer concerned because of previous experience	ſ	3	AFS Indiana trimmed after meeting with customer
	- 7	4	Tree (s) did not need trimmed
			Hoc(o) dia not noon ammon
Customer concerned about aesthetics	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/nowers/ non-tree vegetation) or	4	4	
property damage(rence/driveway/swings, etc.)	-		AES Indiana did not trim after meeting with customer
Other(non tree issue, no reason diven)	1	7	AES Indiana trimmed after meeting with customer
Other(non tree issue, no reason given)	8	/	ALS indiana unimed anter meeting with customer
	0	1	AFS Indiana did not trim (could not resolve, customer not responding, etc.)
			The binardina dia not thim (codia not rocorre, additioner not roopending, etc.)
Customer refused to allow AES Indiana on "private property"	3	3	AES Indiana did not trim after meeting with customer
Customer stopped trimming (not a refusal during notification process)		18	AES Indiana finished trimming after meeting with customer
	49	8	AES Indiana determined nothing left to trim
		4	customer is going to self trim
	1	19	AES Indiana did not finish triming (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

## Contents

1.0 Introduction
2.0 Definitions
3.0 Federal, State, Local Laws
4.0 Service Territory (Distribution)
5.0 Routine Maintenance (Cycle)
6.0 Notification
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7.3 Three phase primary lines
7.4 Two-phase Primary
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7.6 Secondary conductors
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11.3 Customer requests – Time & Material
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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 31of 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.