STATE OF INDIANA

FILED March 31, 2025 INDIANA UTILITY REGULATORY COMMISSION

BEFORE THE 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

CAUSE NO. 43663

RESPONDENTS: ALL INDIANA JURISDICTIONAL ELECTRIC UTILITIES

INDIANA MICHIGAN POWER COMPANY'S SUBMISSION OF ANNUAL VEGETATION MANAGEMENT REPORT

Indiana Michigan Power Company (I&M), by counsel, hereby submits its Annual Vegetation

Management Report as required by the Commission's November 30, 2010, Order in this Cause.

Dated this 31st day of March, 2025

Respectfully submitted,

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Attorney for Indiana Michigan Power Company

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Submission of Annual Vegetation Management Report was served this 31st day of March 2025, by email transmission, upon the

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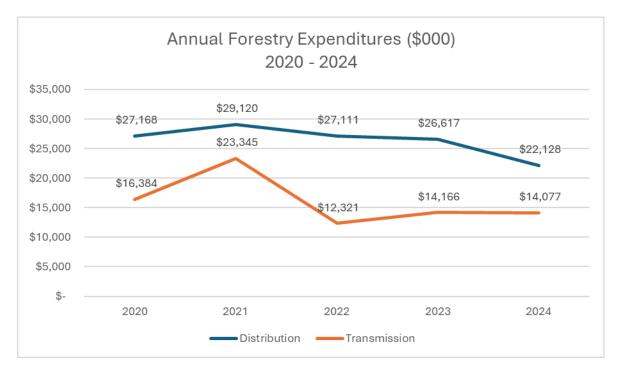
Indiana Michigan Power Annual Vegetation Management Report Cause No. 43663 Calendar Year 2024

			Budget	Actual
Budget Category	Project		\$(000's)	\$(000's)
Capital	Forestry IM/IN Distribution		8,625	6,398
-	Forestry IM/IN Transmission		7,645	6,644
		Indiana Capital Sum:	\$ 16,270	\$ 13,042
O&M	Forestry IM/IN Distribution		15,440	15,731
	Forestry IM/IN Transmission		10,674	7,433
		Indiana O&M Sum:	\$ 26,114	\$ 23,163
	TOTAL - Capital & O&M Co	ombined - Indiana Sum:	\$ 42,384	\$ 36,205

The above numbers exclude major events as defined using the major event day methodology detailed in "IEEE Std 1366-2022, IEEE Guide for Electric Power Distribution Reliability Indices." Major event days are determined by considering the entire Indiana jurisdiction. If one day of an event met the criteria, the total event is excluded from the actual expenditure column.

Forestry Cost Trend

Vegetation Management Expenditures - 2024



Indiana Michigan Power Annual Vegetation Management Report Cause No. 43663 Calendar Year 2024

Customer Complaints Related to Tree Trimming

I&M had two customer complaints related to tree trimming in 2024. I&M is successful with its advance notification procedures and its Customer Solution Center in avoiding the escalation of customer contacts into actual complaints. The majority of tree-related calls into the Customer Solution Center are inquiries seeking information or clarifications on I&M's vegetation management operations. If follow-up by an I&M representative is unsuccessful in addressing or answering customer inquiries, then the inquiry is entered into a customer complaint database to ensure tracking and appropriate treatment.

2024 I&M Tree Related Complaints

Nbr	Complaint Type	Caller Type	Before or After Trimming Performed	Distribution or Transmission	Resolution
1	Commission	Commission	Before	Distribution	Resolved/Closed by Commission as Unsubstantiated - Customer's spouse contacted commission requesting that I&M not remove bushes on her property. After review by customer service and forestry, Commission contacted customer and advised that Indiana Michigan Power evaluated the vegetation and determined that it met their criteria for removal rather than trimming. Commission explained that since the vegetation in question is within the easement granted to Indiana Michigan Power, they can remove the vegetation.
2	Commission	Commission	Before	Distribution	Resolved - Customer contacted commission requesting that I&M remove tree as previously agreed upon. After review by customer service and forestry, tree crews removed the tree at customer's address. The tree was cut down and the wood was piled up in the backyard. Utility forester spoke with the customer, and she was satisfied with their work and will have someone come get the wood.

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Tree-Related Outages

Tree-related outages in 2024 were 12.7% of total outages (excl JMED).

The above numbers exclude major events as defined using the major event day methodology detailed in "IEEE Std 1366-2022, IEEE Guide for Electric Power Distribution Reliability Indices." Major event days are determined by considering the entire Indiana jurisdiction. Outages that begin on the identified days are categorized as occurring during major events.

Vegetation Management Program

The most recent version of I&M's Vegetation Management Program (**Procedures & Guidelines** for Distribution and Transmission Line Clearance Operations) is included as Exhibit 1.

BOUNDLESS ENERGY"	FOD 025		
AEP Forestry: Vegetat	ion Management Goals, P Transmission Line Cle		es for Distribution and
Guidelines		Eff	fective Date: 8/1/2022
K. Patton/P. Ross	<u>Vegetatio</u>	Vegetation Management Vegetation Management	
Writer	Docum	Document Owner	
	Supersede	es TVMD-010 Rev. 5	
Caution: Printed copie revision before using.	s of this document are unc	ontrolled and may be	obsolete. Check for the latest

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the AEP system without the express written consent of AEP; and is to be returned upon request.

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AEP Forestry: Vegetation Management Goals, Procedures & Guidelines for Distribution and Transmission Line Clearance Operations				

2 PURPOSE

The purpose of these American Electric Power ("AEP" or "Owner") Forestry Vegetation Management Guidelines is to document and inform AEP employees and contractors of important criteria, practices, and procedures pertaining to initial vegetation clearing for construction projects and the management of vegetation within rights-of-way. AEP incorporates these guidelines into each vegetation management contract; a copy shall be kept in all vegetation management Contractor's vehicles. These guidelines are to be read consistently with other contract documents by and between AEP and the Contractor. Variances and/or clarifications to these guidelines may be necessary and applied to specific operating companies.

These guidelines contain references to national industry standards; government regulations; and AEP standards and practices. Upon approval of this document, any editions referenced are valid. All standards, regulations, and practices are subject to revision. AEP and the Contractor are encouraged to investigate the possibility of applying the most recent editions.

3 DEFINITIONS

<u>Brush:</u>	Woody stem vegetation less than four (4) inches DBH
<u>Clearing:</u>	The physical cutting and/or removal of woody stem vegetation
<u>Control:</u>	100% defoliation with no viable buds one year after application; or, on species that require several years to achieve control, significant signs of herbicidal activity
Danger Tree:	A tree on or off the right-of-way with the potential to contact electric supply lines. ¹

¹ American National Standard for Tree Care Operations – Tree, Shrub and Other Woody Plant Maintenance – Standard Practices (Integrated vegetation Management a. Electric Utility Rights-of-way (Part 7 - 2006), Tree Care Industry Association, Manchester, NH

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		(Diameter at Breast H	eight) The	
DBH:		diameter of a tree me	asured at the	
		height of 4 ½ feet abo	ve the ground on	
		the uphill side.		
		Vegetative or non-veg		
<u>Debris:</u>		such as bottles; cans;		
		branches; or other res	idue from	
		clearing operations.		
		The removal of limbs in a manner that		
Directional Pruning:		provides increased conductor		
		clearance and directs growth away from the conductors ²		
			tin a trop or on	
Hanger:		A cut limb left hanging other facilities.		
<u>ridiger.</u>		other facilities.		
		A structurally unsound	l tree that could	
Hazard Tree:		strike a target when it		
		this clause the target of		
		electric supply lines. ³		
		The merchantable por	tion of a tree as	
<u>Log:</u>		designated by AEP.		
		The cutting of limbe a	ad clach co that thou	
Lopping:		The cutting of limbs an lie in contact with the		
TANALIP.		otherwise designated	•	
		-	in a chunchan a	
Duimon, Conductor		Any conductor, includ	-	
Primary Conductor		copper, or aluminum or reinforced (ACSR), that		
		insulated, with a nomi		
		750 volts. ⁴		

² Best Management Practices – Utility Pruning of Trees. International Society of Arboriculture. Champaign, IL

³ American National Standard for Tree Care Operations – Tree, Shrub and Other Woody Plant Maintenance – Standard Practices (Integrated vegetation Management a. Electric Utility Rights-of-way (Part 7 - 2006), Tree Care Industry Association, Manchester, NH

⁴ ANSI Z133-2012 Annex A, Glossary of Terms for ANSI Z133.1

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4 CONTRACTOR GUIDELINES

4.1 SAFETY

Protecting the safety of all people (Contractors, public, and AEP employees) is of utmost importance to AEP. Contractors shall regard safety as a priority core value; Contractor employees will recognize and follow all laws, rules, and regulations of public and worker safety. Any safety related incidents (e.g., personal injuries, vehicle accidents, outages, flashes, near misses, customer issues, etc.) that occur on the job shall be reported to the proper AEP personnel as specified by AEP management.⁵

4.2 **Personnel**

- 1. Contractors shall comply with all federal, state, and local laws for permits, certifications, and licensing requirements necessary to perform vegetation management in specified operating areas.⁶
- No private work may be solicited or performed by the Contractor or Contractor employees while on AEP time. Contractors shall not seek nor receive compensation from anyone except AEP for any work that is part of AEP's Forestry Vegetation Management program. The consequences will be crew and/or Contractor disciplinary actions.

4.3 EQUIPMENT

- 1. Contractors shall provide sufficient equipment in working order to operate their business.
- 2. The minimum number of chainsaws on the job shall equal the number of personnel on the crew, or as per contract agreement. Chainsaws shall not be billed separately.
- 3. Each climber shall be provided with a complete set of equipment including but not limited to rope, saddle, chainsaw, pruner, and handsaw. Each tree crew shall be properly equipped so that, if necessary, a tree rescue can be performed.
- 4. Contractors shall provide GPS tracking for all billable equipment unless excluded per contract agreement. The contractor shall provide a portal for Owner to monitor GPS tracking.

4.4 **Overtime**

Overtime is billable as designated by each operating company.

⁵ Article 12.0 of AEP Safety and Health Supplemental Conditions. American Electric Power

⁶ AEP General Terms and Conditions for Labor and Services. American Electric Power

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4.5 WORK PROCEDURES

- 1. Contractor practices shall be compliant with applicable industry standards (e.g. ANSI, OSHA, and NESC) whenever practical unless the use of such standards increases the risk of injury or property damage.⁷
- 2. Significant changes in the work schedule due to inclement weather, equipment breakdown, or other circumstances must have approval of AEP Forestry personnel.
- 3. The contractor will be responsible for the development of a plan to complete the assigned tasks. The plan must meet AEP approval before work begins.⁸
- 4. It is the Contractor's responsibility to ensure the plan is followed, including time estimates to complete the assigned tasks.
- 5. Contractors shall provide daily work locations to AEP, including changes to these locations throughout the day, in an AEP approved format.
- 6. Prior to work in any location and before any changes in procedures or activities are made, the Contractor shall perform a job briefing in written report form to identify all potential work site risks. At least one copy of all documents and reports, including job briefings, shall be prepared in English.⁹
- 7. An ongoing list of refusal, scheduled outages, or areas that have not been worked, including reasons, shall be provided to AEP Forestry personnel. Undocumented skips shall be worked at the Contractor's expense.
- 8. Contractor's work should be inspected for clearance and quality compliance on an ongoing basis by the Contractor and designated AEP Forestry representative. When an assigned task complete, the Contractor shall notify AEP Forestry for final inspection. Work not completed to contract or guideline specifications shall be worked at the Contractor's expense.
- 9. The contractor shall notify AEP of any hazardous conditions found during the performance of work under this contract.
- 10. The crew should work in a systematic and organized fashion daily (i.e., not skipping around). The crew supervisor should have a plan for the day and be prepared to discuss that plan with the property owner and any AEP employee or designated representative. It is the responsibility of each crew member to inform their supervisor of any equipment needs that may stand in the way of production or safety.

⁷ AEP General Terms and Conditions for Labor and Services. American Electric Power

⁸ AEP General Terms and Conditions for Labor and Services. American Electric Power

⁹ Article 5.0 of AEP Safety and Health Supplemental Conditions. American Electric Power

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4.6 **PUBLIC RELATIONS**

Public relations are important to AEP. Proper notification can eliminate most property owner issues before they arise.

- 1. An attempt will be made to contact property owners through personal notification, door hangers, news releases, letters, etc. AEP will attempt to contact anabsentee landowner only if the landowner provides AEP with a method to contact the landowner.
- 2. During emergency work, the Contractor will attempt to notify the property owner/resident of the crew's arrival. Discretion should be used during late night or early morning work. If no personal contact is made, a door card may be left to explain the emergency work performed.
- 3. Contractor shall document all notification attempts, including address and date. A monitored local or toll-free telephone number to reach the Contractor shall be on the door card.

4.7 **Refusals**

- 1. The Contractor shall immediately notify the proper AEP Forester or designated representative with all pertinent information forall refusals.
- 2. If the Contractor is unable to resolve the refusal, the refusal shall be turned over to AEP Forestry for resolution.
- 3. Undocumented refusals shall be worked at the Contractor's expense.

4.8 **DAMAGE CLAIMS AND COMPLAINTS**

- 1. The contractor shall be responsible for all damage claims and complaints due to Contractor negligence. AEP shall be notified immediately of all claims and complaints.
- 2. An on-site investigation with the property owner/resident shall be made as soon as possible. A documented attempt to contact the complainant shall be made within 24 hours of receipt of the complaint. An AEP representative may accompany the Contractor during the investigation.
- 3. All valid claims resulting from the Contractor's negligence shall be settled within 30 days by the Contractor, or the Contractor shall provide evidence of their attempts to reach a reasonable settlement.
- 4. The Contractor shall keep AEP informed of the status of all complaints. When a settlement is reached, a written release for both AEP and the Contractor shall be obtained from the property owner/resident. The Contractor shall provide a copy of all supporting documentation to AEP.
- 5. If a settlement cannot be reached, the Contractor shall confirm in writing to AEP the final settlement offers and briefly summarize events pertaining to the offer.
- 6. After 30 days, if a Contractor fails to resolve a claim, does not continue attempting to resolve the claim, or keep AEP fully informed, AEP may settle the claim and bill the Contractor.

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7. Costs to restore outages or repair AEP's facilities due to negligence may be billed to the Contractor as determined by AEP.

5 PERFORMANCE GUIDELINES

5.1 **Removals**

- Stumps shall be cut as close to the ground as practical, but not to exceed a three-inch maximum height and treated with an Owner approved herbicide, unless the situation prevents application according to label instructions; there is a documented customer refusal; or an AEP Forester or designated forestry representative directs otherwise. Where possible, the cut shall be parallel to the slope.
- 2. Tree removal shall be completed in one operation. If this is not practical, hazardous conditions shall not be left while the work is not actively in progress. Trees shall be removed in a manner to protect electric lines, yards, fences, houses, and other facilities.
- 3. Targets for removal are:
 - All trees with the potential of growing into the conductor.
 - Trees where minimum clearance cannot be obtained using proper pruning practices.
 - Trees that will take less than three times the amount of time to remove as they would take to prune.
 - Trees within five (5) feet of poles.
 - Mature trees where more than 50% of the crown must be removed to obtain minimum clearance.
 - Young, vigorously growing trees where more than 66% of the crown must be removed to obtain minimum clearance.
 - Palm species.
 - Hazard trees.
- 4. If a property owner requests, through an IO-13 or any other notification method, the removal of a tree(s) on their property solely for their benefit or convenience, AEP should evaluate the requested removal to ensure the tree is situated such that the location of AEP facilities impede, or add significantly to the cost of, the safe removal of the tree(s) and an additional burden is placed upon the property owner due to the location of the Company's facilities. AEP should take the steps necessary to mitigate the impediment or to relieve the additional burden placed upon the property owner. AEP actions may include, but not be limited to moving or protecting AEP facilities; removing portions of the tree(s) to provide the clearances required by ANSI, OSHA, or any other regulatory authority, to allow removal by "non-line clearance" qualified arborists or non-professionals. Except in case of emergency, AEP must evaluate the property owner's request and prioritize any necessary work according to its benefit to the provision of

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electric service to all customers. Debris will be left for disposal by the property owner in these situations.

5. State and local regulations or ordinances shall be obeyed during the disposal of debris.

5.2 HAZARD TREES

Trees may exhibit potential threats to AEP facilities due to disease, damage, physical location, growth characteristics or environmental problems. Where these trees exist, AEP considers them high priority risks that need to be remediated.

5.2.1 Visual Assessment

While performing work on a circuit, contract crews shall conduct a visual assessment to identify trees with imminent¹⁰ and/or probable¹¹ likelihood of failure inside and outside the right-of-way. The trees should be viewed from some distance away, if possible, to consider the crown shape and surroundings.

5.2.2 Ground Evaluation

If a Hazard Tree is identified during the visual assessment, a 360° ground evaluation shall be required. The evaluation should include an inspection of:

- Tree crown
- Trunk
- Trunk flare
- Above-ground roots
- Site conditions around the tree in relation to targets.¹²

The contractor shall report risk and mitigation options to the responsible AEP forester or designate forestry representative.

¹⁰ Imminent – Failure has started or is most likely to occur in the near future, even if there is no significant wind or increased load. (Tree Risk Assessment Manual, pg. 100)

¹¹ Probable – Failure may be expected under normal weather conditions within the specified time frame. (Tree Risk Assessment Manual, pg. 100)

¹² American National Standard for Tree Care Operations – Tree, Shrub and Other Woody Plant Maintenance – Standard Practices (Tree Risk Assessment a. Tree Structure Assessment) (Part 9 - 2011), Tree Care Industry Association, Manchester, NH

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5.3 TREE FELLING

Before beginning any tree felling operation, the Contractor shall consider relevant factors¹³ pertaining to the tree site and shall take the appropriate actions to ensure a safe removal operation.¹⁴

- 1. When there is a danger that the tree pieces or tree being removed may fall in the wrong direction and contact utility facilities or damage other property, appropriate methods shall be used to control the direction of fall.¹⁵
- 2. All limbs shall be removed to a height and width sufficient to allow the tree parts or tree to fall clear of hazards.¹⁶
- 3. Notches shall be used on all trees and trunks greater than five inches DBH.¹⁷
- 4. Contractor shall provide evidence of training to employees related to tree felling upon request.

5.4 **Pruning**

- Contractor practices should be compliant with all applicable industry standards (i.e., ANSI, OSHA, and NESC) whenever practical unless the use of such standards increases the risk of injury or property damage.
- Pruning shall provide at least the minimum specified clearance from electrical conductors as set forth in Section V. Distribution Clearances; or Section VI. C. Transmission Clearances; or as designated by the operating company.
- 3. Reasonable care should be exercised to help prevent the spread of insects and pathogens.
- 4. Portions of wild cherry, black walnut, and other vegetation toxic to livestock (i.e., wilted leaf material) that has been pruned, cut, treated with herbicide, or damaged by the Contractor's activities, will be removed from active pasture areas accessible to livestock, unless agreed to by the property owner in writing.
- 5. Any limbs/slash landing in crops, ditches, streams, roads, or across fences shall be promptly removed.

¹⁶ American National Standard for Arboricultural Operations – Safety Requirements. International Society of Arboriculture. Champaign, IL

¹⁷ American National Standard for Arboricultural Operations – Safety Requirements. International Society of Arboriculture. Champaign, IL

¹³ ANSI Z133-2012 Annex C.3, Manual Tree Felling Procedures contains a list of relevant factors to be considered during tree felling.

¹⁴ ANSI Z133-2012 Annex C.3, Manual Tree Felling Procedures contains a list of relevant factors to be considered during tree felling.

¹⁵ American National Standard for Arboricultural Operations – Safety Requirements. International Society of Arboriculture. Champaign, IL

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6. State and local regulations or ordinances shall be obeyed during the disposal of debris.

5.5 HANGERS AND CLEANUP

- 1. All hangers shall be removed from the pruned tree before leaving the job site.
- 2. Work sites shall be left in a neat and orderly condition.
- 3. A minimum amount of cleanup should be performed. Unless otherwise designated by AEP Forestry or forestry designated representative, chipping the brush, cutting wood into lengths, and raking the site is the maximum cleanup that should be performed.
- 4. All streams and/or drainage ditches shall be kept free of any logs, limbs, slash, or woody debris cut by the Contractor.

5.6 CLEARING AND RE-CLEARING

- 1. AEP Forestry or forestry representative will provide the width of the right-of-way.
- 2. All woody plants having the potential to grow into and interfere with service reliability; restoration; patrolling; or other maintenance operations of AEP facilities should be controlled in accordance with the operating company or business unit guidelines.
- 3. During scheduled maintenance operations, the presence of any vegetation adjacent to station facilities that may affect the safe operation of those facilities should be brought to the attention of the proper AEP personnel.
- 4. Stumps shall be cut as close to the ground as practical, but not to exceed a three-inch maximum height and be treated with AEP approved herbicide(s), unless the situation prevents application in accordance with label instructions; there is a documented customer refusal; or an AEP Forestry representative directs otherwise. Where possible, the cut shall be parallel to the slope.
- 5. Trees/brush shall be felled to avoid damage to crops, fences, and other facilities. Any tree/brush felled into crops, ditches, streams, roads, or across fences shall be promptly removed. Slash and debris from vegetation clearing shall not be left in managed agricultural areas or other maintained landscapes. No trees/brush shall be felled in a manner as to endanger AEP facilities or the property of third parties, or hinder access along the right-of-way.

5.7 HERBICIDE APPLICATION

- 1. All woody plants that have the potential of growing into or impairing access to AEP facilities should be controlled, as designated by AEP Forestry.
- 2. Contractor is required to maintain accurate records for all herbicide applications as required by all Federal, State, and local laws.

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- Contractor shall be required to control at least 90% of targeted vegetation by span. Any areas not meeting the control requirements shall be retreated at the Contractor's expense.¹⁸
- 4. AEP Forestry may make the vegetation management prescriptions in consultation with Contractors.
- 5. Property owner notification may vary by locale. Contractor shall contact local AEP Forestry representative for requirements.¹⁹
- 6. Managers of public rights-of-way involved in the treatment area shall be notified, where appropriate.
- 7. Contractor shall be responsible for training of herbicide applicators including certifications as required by state and local regulations or ordinances.
- 8. Unless specifically prohibited by property owners or AEP Forestry, stumps shall be treated with an Owner approved herbicide.

5.8 **TREE GROWTH REGULATOR APPLICATION**

- 1. Trees designated for tree growth regulators shall be treated in accordance with the label instructions.
- 2. All trees shall be inspected by the Contractor for health and vigor prior to treatment. Trees found in excessive state of decline shall not be treated unless directed by AEP Forestry.
- 3. Property owner notification requirements vary by locale. Contractor shall contact local AEP Forestry representative for requirements.¹⁶

5.9 VINES

- 1. Vines shall be cut; BUT NOT REMOVED from AEP or other facilities. Pulling/removing vines from the facilities may damage equipment and endanger the employee.
- 2. Vines shall be treated with an Owner approved herbicide as designated by AEP Forestry representative.

6 DISTRIBUTION CLEARANCES

Variances to these guidelines may be necessary and be applied due to specific operating company guidelines or specific restrictions in permits and/or easements.

The site, tree species, tree form, line configuration, conductor sag and sway during various weather conditions; and the effect of electrical load should all be considered when determining the clearance requirement.

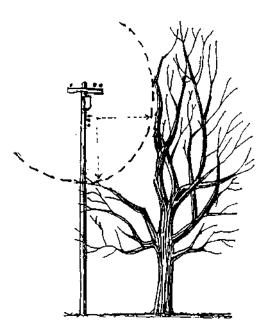
¹⁸ AEP Vegetation Management Ground Spray Requirements. American Electric Power

¹⁹ AEP Vegetation Management Ground Spray Requirements. American Electric Power

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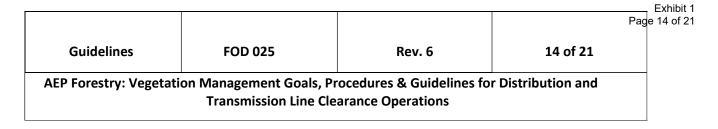
6.1 **PRIMARY CONDUCTORS**

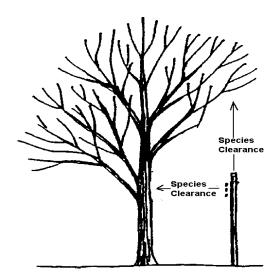
Limbs should be pruned for a minimum of three years clearance. Overhanging limbs should be removed, and tops of trees should be directionally pruned unless prior arrangements have been made with the proper AEP Forestry representative. See Distribution Line Clearance Guidelines on page 15.



6.2 SECONDARY CONDUCTORS

Limbs should be pruned for two to five feet of clearance without removing overhanging branches unless otherwise specified by an AEP Forestry representative.





6.3 Service Drops and Street Light Conductors

Trees near service drops and street light conductors will not be pruned unless specified by an AEP Forestry representative. Do not prune for street light illumination except at the specific direction of the proper AEP Forestry representative.

6.4 **POLES AND GUYS**

- 1. Heavy limbs applying pressure on the span guy should be pruned or removed at the specific direction of the proper AEP Forestry representative.
- Trees, brush, and slash should be cleared to obtain a minimum of a five-foot radius of clearance around the pole and/or guy and treated with an Owner approved herbicide unless otherwise specified by an AEP Forestry representative.

7 VI. TRANSMISSION FORESTRY

7.1 CLEARANCES

Transmission clearances can be referenced in TVMD-001 Transmission Vegetation Management Program to ensure consistency with FAC-003 requirements.

7.2 TRANSMISSION FORESTRY CONSTRUCTION GUIDELINES

Transmission Forestry Construction Guidelines are in TFS.002 Construction Clearing Guidelines 05122020.

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8 APPENDICES

8.1 **DISTRIBUTION LINE CLEARANCE GUIDELINES**

These growth rates and clearance distances are guidelines for the minimum clearances required. These distances are not static and should serve as minimum clearance requirements unless designated otherwise by the operating company forester or forestry representative. Good soils and high moisture may cause many species to grow faster. These clearance guidelines are not meant as a requirement for all trees on AEP's rights-of-way. It is understood that within maintenance intervals, trees may encroach into these minimum clearance zones. These guidelines are meant to be used as an aid for pruning clearances from AEP facilities.

Table 3: Minimum Clearance from Distribution Conductors

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Re-growth	Minimum Clearance from	Species
Rates	Conductors	
Fast	Minimum clearance of 20 feet	Cottonwood
		Poplar
		species Silver
		Maple
		Sycamore
		Willow
		Ailanthus
		Boxelder
		Elm species
Medium	Minimum clearance of 15 feet	Locust
		Red maple species
		Ornamental pear species
		Fruit trees (apple, pear,
		etc.)
		Pine, Spruce and Hemlock species
		Sweetgum
		Catalpa
		Hackberry
		Hickory
		Crabapple
		Red oak
		Ash species
		Mulberry
		Bois d'arc (Osage orange, hedge tree)

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Re-growth Rates	Minimum Clearance from Conductors	Species
Rales	conductors	
Slow	Minimum clearance of 10 feet	Cedar
		Chinaberry
		Magnolia
		Any small variety species
		Persimmon
		White oak (round lobes)
		(Redbud, dogwood, etc.)

1) Exceptions

- 1. When the entire trunk of a tree falls within the minimum clearance specifications
- 2. When less pruning would still provide adequate clearance and an overall healthier tree.
- 3. As approved by AEP Forestry Representative.

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9 REFERENCED DOCUMENTS AND SPECIFICATIONS

Title	Year	Version	Pages
AEP General Terms and Conditions for Labor and	2014	Revision 3	1-27
Services. American Electric Power			
AEP Vegetation Management Ground Spray	2014		1-3
Requirements			
American National Standard for Arboricultural	2017	ANSI [®] Z133-	1-71
Operations – Safety Requirements. International		2017	
Society of Arboriculture. Champaign, IL			
American National Standard for Tree Care Operations –	2008	ANSI [®] A300	1-13
Tree, Shrub, and Other Woody Plant Management –		(Part 1)-2008	
Standard Practices (Pruning). Tree Care Industry			
Association. Londonberry, NH			
American National Standard for Tree Care Operations –	2011	ANSI [®] A300	1-14
Tree, Shrub and Other Woody Plant Maintenance –		(Part 9)-2011	
Standard Practices (Tree Risk Assessment a. Tree			
Structure Assessment) (Part 9 - 2011), Tree Care			
Industry Association, Manchester, NH			
American National Standards for Tree Care Operations	2006	ANSI [®] A300	57-66
– Tree, Shrub, and Other Woody Plant Management –		(Part 7)-2006	
Standard Practices (Integrated Vegetation			
Management a. Utility Rights-of-way). Champaign, IL ²⁰			
American National Standards for Tree Care Operations	2012	ANSI [®] A300	1-15
– Tree, Shrub, and Other Woody Plant Management –		(Part 7)-2012	
Standard Practices (Integrated Vegetation			
Management a. Utility Rights-of-way). Champaign, IL			
Best Management Practices – Integrated Vegetation	2014	Second	1-44
Management. International Society of		Edition	
Arboriculture. Champaign, IL			
Best Management Practices – Tree Pruning.	2008	Revised, 2008	1-38
International Society of Arboriculture. Champaign, IL			

²⁰ Definition of Danger Tree and Hazard Tree were removed in the 2012 revision.

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Title	Year	Version	Pages
Best Management Practices – Utility Pruning of Trees.	2004	First Edition	1-22
International Society of Arboriculture. Champaign, IL			
Managing Clearance Restrictions. American Electric	2013	TVMD-005	
Power			
Managing Hazard Trees on FAC-003 Applicable Circuits. American Electric Power	2013	TVMD-006	
Supplementary Terms and Conditions for Forestry Contracts. American Electric Power	2017		1-19
<i>Tree Risk Assessment Manual.</i> International Society of Arboriculture. Champaign, IL	2013	First Edition	1-198
<i>Vegetation Management Guideline for Maximum</i> <i>Conductor Sag and Blowout.</i> American Electric Power	2017	TVMD-011	

10 REVISION HISTORY

This document will be reviewed every major version upgrade and in January of every year if no upgrade has occurred.

Rev.	Description of Change(s)	Ву	Date	Approved
0	Original Issue			
1	Update		5/14/2009	
2	Update; formatting changes; addition of company specific guidelines; addition of referenced documents table; addition of end not to link to other documents; review of document performed by Legal	Kevin Patton	9/10/2014	Walter Sherry 12/14/2016
3	Addition of Transmission Forestry construction clearing guidelines	Kevin Patton	5/1/2016	Walter Sherry 5/4/2016
4	Addition of reporting site location to the guidelines from language that previously existed in the rate clarification section of the contract	Kevin Patton	9/21/2016	Walter Sherry 9/23/2016
5	Update for RFP; formatting changes;	Kevin Patton	7/11/2017	Charles Talley 6/18/2018

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Transmission Line Clearance Operations				

Rev.	Description of Change(s)	Ву	Date	Approved
6	Document moved to Forestry Operations document (FOD); Removal of transmission clearance with reference to TVMD-001; Removal of Transmission construction guidelines with reference to TFS.002;	Phil Ross Kevin Patton	7/26/2022	

11DOCUMENT TEAM

	Member	Title	Title Area of Responsibility		
BMB	Bradburn, Benjamin	Region Forestry Supv	Transmission Forestry	8/4/2022 8:16 A	M EDT
BC	Corbin, Beth	Region Forestry Supv	Southwestern Electric Power Distribution Forestry	8/4/2022 8:28 A	M EDT
SF.	Feggeler, Steven F	Region Forestry Supv	Appalachian Power Distribution Forestry	8/4/2022 1:36 P	M EDT
Des constant	Fields, Donald C	Region Forestry Supv	AEP Texas Distribution Forestry	8/7/2022 5:08 P	M EDT
DH	Hopkins, Dale V	Region Forestry Mgr	AEP Ohio Distribution Forestry	8/4/2022 8:29 A	M EDT
	Karber, Richard L	Region Forestry Supv	Transmission Forestry	8/4/2022 9:02 A	M EDT
\mathbb{M}	Neal, Matthew	Region Forestry Supv	Public Service Company of Oklahoma Dist. Forestry	8/9/2022 3:23 P	M EDT
	Powell, Sarah E	Region Forestry Supv	AEP Ohio Distribution Forestry	8/4/2022 8:24 A	M EDT
BOR	Roll, Billy D	Region Forestry Supv	Kentucky Power Distribution Forestry	8/10/2022 12:54	PM EDT
PR	Ross, Philip T	Region Forestry Mgr	Appalachian Power Distribution Forestry	8/8/2022 8:02 A	M EDT
RS	Simpson, Richard A	Region Forestry Supv	AEP Ohio Distribution Forestry	8/4/2022 8:26 A	M EDT
LT DS	Tinkel, Chad E	Region Forestry Supv	Indiana Michigan Power Distribution Forestry	8/15/2022 12:22	2 PM EDT
	Wageman, Stanley C	Region Forestry Supv	Appalachian Power Distribution Forestry	8/5/2022 9:40 A	M EDT

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12 APPROVAL

Approver	Title	Area of Responsibility	Approval Date]
DocuSigned by: AE16FCA8ED91471 Steven O Mathews	میں Mgr Vegetation Mgmt	Vegetation Management Group	8/17/2022 4:46]	PM PDT
DocuSigned by: 2558195B5BA84DF Kevin B Patton	Dir Vegetation Mgmt	Vegetation Management Group	8/17/2022 7:49	PM EDT
DocuSigned by: Emila Chafer E481AB9899F54F1 Emeka Okafor	Mng Dir Vegetation Mgmt	Vegetation Management Group	8/17/2022 9:59	PM EDT