

Alpena Power Company Vegetation Management Program

Written August 2022
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FINAL

Alpena Power Company is required by the Michigan Public Service Commission to trim trees that exist in and around power line right of way to improve the safety, efficiency, and reliability of its power transmission and distribution system. Safety and service reliability for Alpena's customers is a primary concern. Untrimmed trees can result in outages, damages, injuries, and even deaths if not appropriately maintained. Utilities such as Alpena Power Company are regulated by the Michigan Public Service Commission and must adhere to strict technical performance and reliability standards. These standards ensure that rate paying customers receive the best possible service and reliability of power to their homes and businesses. Trees are a major source of outages and therefore must be cut and trimmed in a manner that appropriately reduces the risk that they will contact an energized power line.

APC's Vegetation Management Plan consists of two primary activities: cycle-based cutting and trimming on a circuit/feeder basis, and hot spot trimming based on poor circuit performance or customer notification. Customers are encouraged to notify APC if they see a tree that poses a significant threat to the distribution system and those requests are handled on a case-by-case basis. All work is performed by contract tree trimmers who are certified by the State of Michigan. Alpena supervisory employees manage the contract tree trimmers and prioritize and schedule the work.

Cycle trimming on a circuit/feeder basis is the preferred and most cost-effective method to directly affect safety and reliability. APC has determined that a 7-year trimming cycle would provide the level of safety and service reliability expected by APC's customers. APC's service territory has a total of 657 miles of overhead lines and 64 miles of underground lines. Proper right of way cutting means that all trees within the right of way are cut to the ground, with the larger pieces of wood left for the property owner and the smaller pieces chipped. Stumps are left as close to the ground as possible. This is referred to as "ground to sky" clearing and a pictorial example can be seen in "Image A" at the end of this document. With all of the miles of line that need to be maintained, ground to sky clearing is the best way to ensure that each circuit gets trimmed every seven years. APC strives to cut all right of ways ground to sky, but there are certain situations where that type of clearing is not feasible. One example of this would be some areas within the city limits where both trees and power lines run along the street adjacent to the sidewalk. These situations are handled case by case, with the intent to ensure cutting and trimming is done to provide safe clearance for energized lines. A pictorial example of this can be seen below in Image C. APC will also communicate with customers and property owners the importance of planting appropriate species of vegetation with respect to existing power lines and facilities to ensure that vegetation will not encroach upon the safe clearance and access to lines.

There are many advantages to having a clean right of way for energized power lines. Outage durations are shorter because crews can more easily access damaged lines or poles. Better access to the lines also means better maintenance because crews can physically see the structures well and inspect for damaged parts or heat issues. Clear right of way is a safer work environment for everyone that needs to go near energized power lines including communications workers, utility workers, tree trimmers, and the general public.

When APC is cutting and trimming right of way, APC's policy is to leave the area in the same condition in which it was found or better. That means that if the power line went through a

wooded area, crews will typically cut the larger wood and leave it for the property owner, then chip or mow the smaller limbs and trees and spread them on the ground. If the line goes through a yard that is grass covered and maintained, crews will typically cut and leave the larger wood for the owner, then chip the smaller wood and haul it away. Every effort is made to reduce any impact to the property other than clearing the right of way. If there will be a drastic change to the landscape because of the cutting, an APC representative will make every attempt to communicate those changes to the property owner prior to crews showing up to the area. While tasked by the Michigan Public Service Commission to keep right of ways and energized power lines safe from vegetation, APC also looks at the environmental aspects of vegetation management. Alpena Power Company policy is to follow Michigan Department of Natural Resources (MDNR) guidelines to prevent the spread of oak wilt disease. These guidelines include not trimming or cutting oak trees between April 15 and July 15, or if an oak must be trimmed or cut due to storm damage or an emergency situation the cut will be covered with tree-wound paint.

APC is also sensitive to specific tree species and their growth rates when managing the program. In certain cases, vegetation such as apple trees and lilac bushes may not pose a threat to power lines when they exist in right of way and may, in the company's discretion, be allowed to stay. Certain tree species pose greater risks to power lines based on growth and structure characteristics and need to be treated differently than others. When APC finds "danger" trees that fit these characteristics, a supervisor will contact the property owner and communicate the issue and need to remove the tree. Communication is the key as most of these danger trees are outside of the right of way, but pose a clear threat to the power lines.

In many cases, APC holds specified easements on customers' property for construction and maintenance of power lines. In other cases, such as in public streets and highways, a franchise is granted giving APC the right to construct and maintain power lines and structures. In situations where neither a specified easement nor a franchise is held by APC, the right to maintain power line right of way is granted by prescriptive easement. Prescriptive easement means that if the power lines have been in place for years and have been in open and notorious use, as in the property owner has been using the power that the facilities provide and it is reasonably clear that the facilities exist, then they are said to have impliedly given permission to APC to use the right of way to maintain the lines. The following is an excerpt from Page C-2.00 in Alpena Power Company's Rate Book for Electric Service approved by the Michigan Public Service Commission on July 10, 2008 outlining service terms and requirements for all APC customers. The full page is shown at the end of this document in "Image B". It spells out the required access to premises customers must grant APC for maintenance of facilities in order to receive electric service.

a. ACCESS TO PREMISES - The customer shall provide at no expense to the Company suitable space with provisions for installation and maintenance of the Company's facilities on the customer's premises. Authorized agents of the Company shall have access to the premises at all reasonable times to install, read, repair or remove its meters; to install, operate or maintain other Company property; to perform tree trimming and brushing to maintain line clearance standards; to determine the connected electrical load; and to inspect the customer's facilities. Authorized employees and agents shall

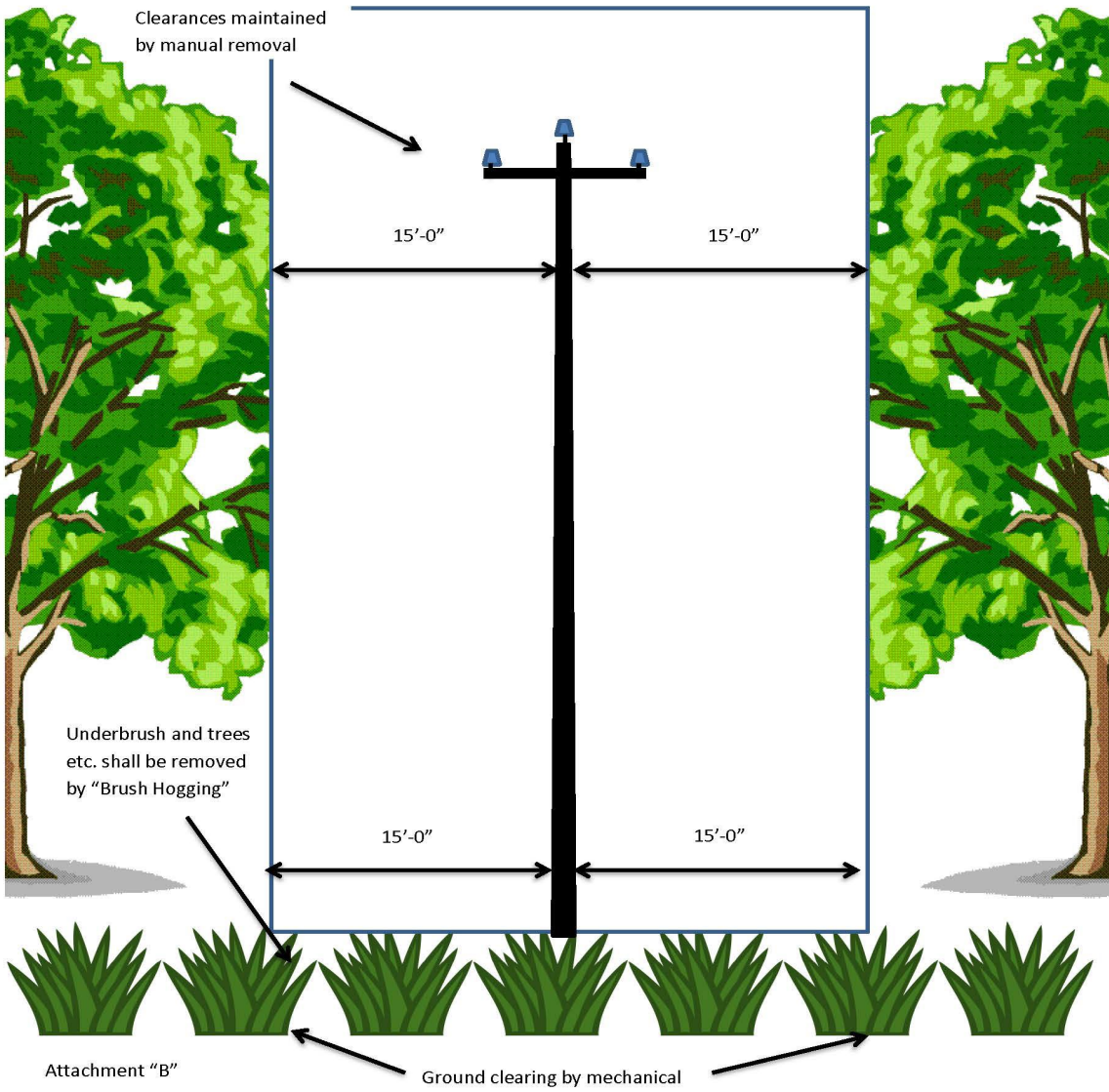
carry identification furnished by the Company and shall display it upon request. Failure to provide access for any of the above reasons may result in termination of service, and assurance of access may be required before service is restored.

Although the width of right of way is different, this access requirement applies to both overhead and underground facilities, as APC is required to maintain and repair our equipment safely whenever needed. Table 1-1 explains the easement widths and trimming clearances for all of the different types of power carrying wires on Alpena Power's electrical system.

TABLE 1 - 1

| <u>Line Type</u> | <u>Minimum Trimming Clearance Limits</u> | <u>Easement Width</u> |
|----------------------------------|--|-----------------------|
| Overhead Secondary/Service Drops | 2.5 Feet | Right to Access |
| Underground (All) | N/A | 10 Feet |
| Overhead Primary Distribution | 15 Feet | 30 feet |
| Sub Transmission (34.5kV) | 25 Feet | 50 Feet |
| Transmission (138kV) | 50 Feet | 100 Feet |

Image A: Ground to Sky Right of Way Clearance



Minimum Clearances for Distribution Lines "Attachment B"

Image B: Rate Book Page on Access to Premises

M.P.S.C. No. 9
Alpena Power Company
(Reformatted Rate Book)

Original Sheet No. C-2.00

TERMS AND CONDITIONS OF SERVICE

- A. **ELECTRIC SERVICE** - Each applicant for electric service will be required to sign the Company's "Application For Electric Service". Acceptance of service, with or without a signed application, shall be subject to compliance with the terms of the Standard Rules and Regulations and Rate Schedules as filed with the Michigan Public Service Commission.
- B. **OWNERSHIP AND RESPONSIBILITY**
1. **COMPANY OWNED FACILITIES** - The Company will normally install, own, operate and maintain all distribution facilities on the supply side of the point of attachment as shown on the Company's Standard Drawings, including metering equipment. All service entrance conductor wiring from a point of connection to the Company's service line at a location satisfactory to the Company shall be the responsibility of the customer. If building modifications hinder access to metering facilities, create a hazardous condition, or cause a violation of code, the customer will be responsible for all costs incurred by the Company to correct these conditions.
 - a. **ACCESS TO PREMISES** - The customer shall provide at no expense to the Company suitable space with provisions for installation and maintenance of the Company's facilities on the customer's premises. Authorized agents of the Company shall have access to the premises at all reasonable times to install, read, repair or remove its meters; to install, operate or maintain other Company property; to perform tree-trimming and brushing to maintain line clearance standards; to determine the connected electrical load; and to inspect the customer's facilities. Authorized employees and agents shall carry identification furnished by the Company and shall display it upon request. Failure to provide access for any of the above reasons may result in termination of service, and assurance of access may be required before service is restored.
 - b. **USE OF FACILITIES** - The Company will not allow use of its poles or other facilities by others for installations or attachments of any kind without written authorization from the Company. This includes, but is not limited to, electrical or communication equipment, lights, signs, and fences. The Company assumes no liability for property owned by others attached to its facilities. Unauthorized attachments to Company facilities may be removed by the Company.
 - c. **PROTECTION** - The customer shall use reasonable diligence to protect the Company's facilities located on the customer's premises, and to prevent tampering or interference

(continued on Sheet No. C-3.00)

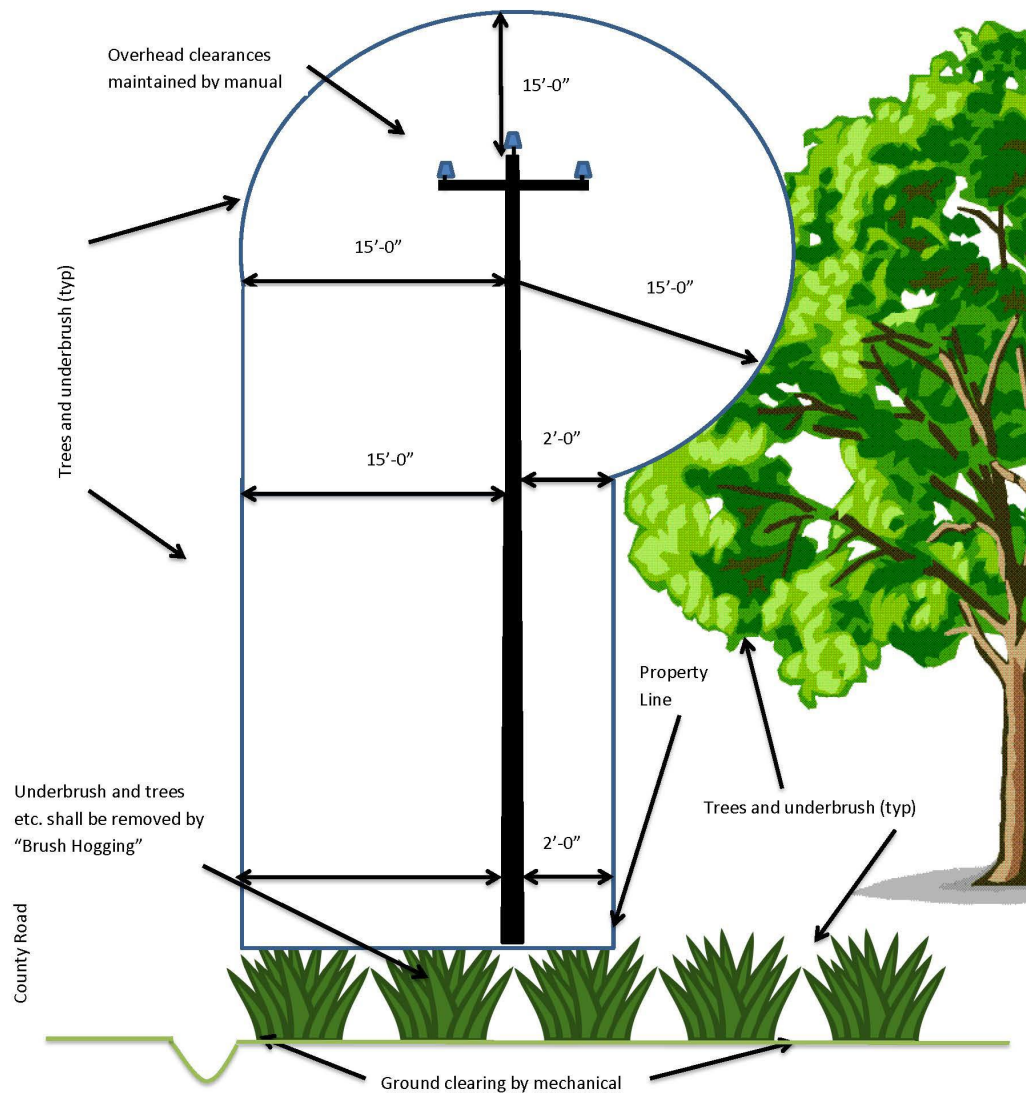
Issued July 7, 2008, by
Ann K. Burton, President
Alpena, MI 49707

Effective for service rendered on
and after October 10, 2007



Issued under authority of the
Michigan Public Service Commission
dated October 9, 2007,
in Case No. U-15152

Image C: Trimming for Clearance in Areas Where Ground to Sky is Not Feasible



Frequently Asked Questions

I'm not having any power reliability issues. Why do you have to trim my trees?

- Alpena Power Company is required by the Michigan Public Service Commission to trim trees that exist in and around power line right of way to improve the safety, efficiency, and reliability of its power transmission and distribution system. Safety and service reliability for Alpena's customers is a primary concern. Untrimmed trees can result in outages, damages, injuries, and even deaths if not appropriately maintained.

Who is responsible for the trees on my property?

- The property owner owns all of the trees on their property. Utilities such as APC have authority and responsibility to determine if the proper species of vegetation exists along the distribution power line easement. If it is determined that trees and vegetation need to be removed from the easement for safe clearance to the energized lines and maintainability of the easement, APC is responsible for doing so. Vegetation that is removed from the easement will be taken care of by APC. Larger wood is left for the property owner, smaller wood is chipped or mowed.

What happens to the wood and branches after the trees are cut and trimmed?

- Larger wood is cut up and left for the property owner. Smaller trees and brush are chipped or mowed. In areas where the ground is not maintained, the chips are spread and left on the ground. In maintained areas, such as through yards, chips are blown into a truck and hauled away.

Will you have to drive on my lawn?

- Crews make every effort to avoid impacting lawns and landscaping when performing cutting and trimming work. In cases where lawn damage cannot be avoided, APC will make every effort to return the lawn, as close as practical, to the condition in which crews found it. A possible exception to this policy is if crews need to perform emergency work in a customer's yard during a storm situation. Significant ruts caused by service trucks will typically be repaired, but normal wear and tear impacts may not. APC does not clean up trees damaged by weather, we cut in order to restore power and leave the debris.

Why can't you cut other trees that I want out of my yard while you're in the area doing cutting and trimming?

- Regulated utilities are responsible for providing the best possible service at the lowest possible cost for all of their customers. APC must only cut and trim the trees necessary to ensure reliable service to the entire system because the cost of operations is borne by all ratepayers, so the utility cannot spend extra time and money cutting specific trees for one customer or the other that do not affect the reliability of the system as a whole. The MPSC requires that one customer cannot be responsible for subsidizing the work done for another.

How do I know the people cutting in my yard are hired by APC?

- APC contractors and/or supervisors will make contact with customers before moving into an area to cut, either by phone call, a door hanging, or a personal visit. They all carry identification and their trucks have magnetized Alpena Power Company logos on the side. If the change to the right of way is going to be significant, an APC supervisor will make every attempt to contact you directly to explain what will be happening before any work begins.

What right do you have to cut the trees on my property?

- The first part of this answer is that APC is required by the Michigan Public Service Commission to maintain its energized power lines and keep vegetation a safe distance away from them. The second part is that APC has a right to access our lines in order to maintain them, and there are a few different conditions under which we have permission to do so. In many cases, APC holds specified easements on customers' property for construction and maintenance of power lines. In other cases, such as in public streets and highways, a franchise is granted giving APC the right to construct and maintain power lines and structures. In situations where neither a specified easement nor a franchise is held by APC, the right to maintain power line right of way is granted by prescriptive easement. Prescriptive easement means that if the power lines have been in place for years and have been in open and notorious use, as in the property owner has been using the power that the facilities provide and it is reasonably clear that the facilities exist, then they are said to have impliedly given permission to APC to use the right of way to maintain the lines.

What should I expect when trees are cut in my yard in order to restore power during a weather event?

- APC will do any necessary cutting to restore power to the residence. Crews will leave the debris. If the yard is significantly damaged APC will return at a later date to fix the damage caused by our trucks.

Can I cut trees in my yard that are near power lines?

- Any time a customer is planning to cut trees in their yard and has questions as to the safety of the tree cutting operations around APC power lines, we encourage them to call us. With reasonable notice, APC will send a representative to the area in question and assess the scope of work with regards to the safety around APC Equipment. Please call (989) 358-4941