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January 30, 2009

Ms. Cully Dale  
Secretary/Chief Regulatory Law Judge  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102-0360

Re: PSC Rules 4 CSR 240-23

Ms. Dale,

Enclosed are revised copies of our:

- Distribution System Management Procedure and Policy Manual
- Transmission Vegetation Management Program Policy and Procedures

Excluding some formatting changes, the significant changes we made to the Distribution document are:

- 2.1.8.2 – Removal Considerations diameter of trees where ownership cannot be determined and are either 4" – 10.9" changed to 6"-11.9"
- Appendix 1 – Major Tree Species & Growth Rates Table altered to reflect growth rates and trees specifically in EDE service territory
- Appendix 2 – Recommended Line Clearance chart expanded to include primary voltage three phase.
- Added Appendix 6 – Empire Line Clearance Scheduling Strategy
- Added Appendix 8 – Definitions.

In the Transmission document changes include:

- IV. Approved Procedure A. Residential Sites 1. Notification  
The time frame was 7 to 60 days changed to 7 to 90 days, which is consistent with a previous paragraph on customer service notification.
- Appendix II. Residential Tree Trimming Clearances some of the species have been changed to reflect the EDE service territory.
- Definitions: Specifically defining brush to be any vegetation with a diameter at brush height (DBH) smaller than 6".

It is our intention to implement the revised specifications as of March 1, 2009 in conjunction with the award of our new tree trimming contracts. The aforementioned changes are desired to increase the efficiency of our program.

Sincerely,

Scott Mackey  
Manager of Vegetation Control

# AFFIDAVIT

State of Missouri

)ss

County of Jasper

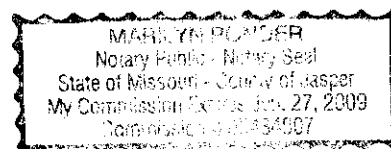
I, Michael E. Palmer, having been duly sworn upon my oath, state that I am the Vice President of Commercial Operation of The Empire District Electric Company (Empire), that I am duly authorized to make this affidavit on behalf of Empire, and that the matters and things stated in the foregoing are true and correct to the best of my information, knowledge and belief.

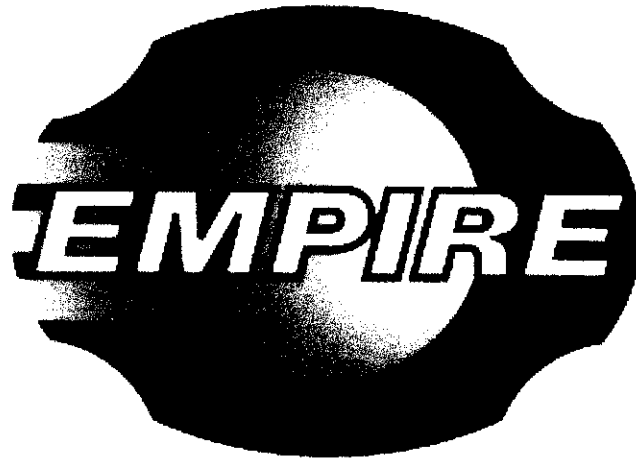
Michael E Palmer

Subscribed and sworn before me this 30 day of January, 2009.

Marilyn Ponder

Notary Public





**SERVICES YOU COUNT ON**

<b>Title: Transmission Vegetation Management Program</b>	<b>Revision: C</b>	<b>Author: Scott Mackey 03/01/2009</b>
<b>Approval Signature(s) and date:</b>		
Director of Engineering and Line Services, <i>Scott Mackey</i> 1/30/09		
VP of Commercial Operations <i>M. E. Palmer</i>		
Applicable NERC Standard(S): FAC003-1 and Missouri PSC Rules effective Aug 9, 2008		
Note: This document may have some changes in the near future depending on NERC standard FAC003-1 (12-1-2008)		

Revision	Date	Changes	Approved By
A		Formalized existing documentation	
B	3/30/08	Annual Review, Added NERC Standards FAC003-1	McGarrah, Palmer

## Definitions

**ANSI A300 Standards** - A set of standards for tree trimmers pertaining to safety and tree care published by the American National Standards Institute.

**Brush** – **a.** Woody stem vegetation declared brush by species designation. **b.** Trees smaller than six inches DBH. **c.** Any vegetation at a height and in a setting manageable by machinery or through herbicide application.

**DBH** – Diameter at Breast Height, 4 ½ feet above ground level on the uphill side of a tree.

**Firewood** – All debris resulting from utility line clearing that cannot be chipped by a utility line clearance contractor's average chipper.

**IEEE Standard 516-2003** – A reference established by the Institute of Electrical and Electronics Engineers pertaining to maintenance of electrical systems.

**ISA** - International Society of Arboriculture – A professional group that researches and addresses current tree care practices including needs pertaining to line-clearance work.

**Job Coordinator** – The individual responsible for notifying property owners and quality control of tree clearing work conducted on rights-of-way.

**Make Safe** – Cutting down or trimming to a level that is safe for the property owner to have a professional tree trimming company trim or remove the rest of the tree and brush. All resulting debris will be left on site. NESC requires 10 feet if voltage is lower than 50kV.

**Qualified Personnel** – The manager of Vegetation Control is the position that defines qualified personnel and qualifications are defined in the job description as having a B.S. in Forestry or a closely related field and at least four years experience in electric utility vegetation management.

**Notification Period** – The amount of time between the date a customer was left notice of tree clearing work on their property to the date work is performed on that site.

**Removal** - A tree that should be cut down rather than trimmed. Stumps and wood will be left on site. Slash will be chipped onto the site or hauled off.

**R/W** – Right-of-way – The corridor through which Empire's facility traverses public and private properties.

**Stump** – The remaining intact portion of a removal.

**Slash** – **a.** Forestry term describing the un-merchantable portion of a tree as a result of removal i.e. limbs, leaves, twigs, etc. **b.** All debris resulting from a removal that can be chipped up by tree crews.

**Transmission Lines** – Empire facility conducting electricity ranging from 34.5kV to 345kV.

**Transmission Vegetation Outages** – Outages on 34.5kV to 345kV lines caused by vegetation coming in contact with conductors or causing damage to transmission facility. (For details on reporting outages refer to Appendix V of this document.)

**Wire-Zone** – The R/W area located directly under the conductors.

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## **Objective:**

This document is to support continuity in management practices for transmission vegetation control. Empire maintains to be a viable source of reliable electric power in conjunction with other providers on the transmission grid while meeting the needs of its customers. This program shall be guided by qualified personnel as defined by the Human Resources Department's job description for Manager of Vegetation Control and is organized in the Department of Engineering and Line Design of The Empire District Electric Co.

## **Practices:**

The Department of Vegetation Control is dedicated to the implementation of standards and methods for vegetation management as described in this document. Processes are based on current standard practices for the industry and comply with ANSI A-300, and International Society of Arboriculture. Dr. Alex Shigo's "Pruning Trees near Power Lines" should serve as a quick reference guide.

### **I. System Vegetation Surveys**

Aerial surveys are conducted annually during the fall to enable appropriate action for immediate threats to the transmission facility. The documentation of vegetation on Right-of-Way is also used as an aid in developing the workplan for the following year. Ground Surveys are to be conducted on lines determined to have potential danger trees threatening reliability due to inclement weather such as major ice storms, flooding, etc.

### **II. Vegetation Management Approach**

#### **A. Rural Areas:**

##### **1. Rural Cross-Country**

Transmission line R/W that traverses open or wooded land not a part of a manicured lawn will be maintained, by clearing or spraying intrusive trees and brush as needed, for reliability and access purposes. Trees located outside but that have encroached into the right-of-way will be trimmed back to a proper pruning point at or near the right-of-way edge. Hazard trees off right-of-way should be addressed at the time normal maintenance is conducted in that area. Crews should make the trees safe as this document defines. Trees and brush that are sprayed will not be removed unless deemed necessary by the Transmission Forester for safety or access. Refer to Appendix I for Right-of-way specifics for widths.

## **2. Rural Road-side**

Trees under transmission lines running along county road, state road, and interstate highway “fence row areas” should be sprayed with a properly applied herbicide mix that best meets species control needs and state and federal regulations. Trees along these corridors in lawns or other manicured areas (i.e. parks, golf courses, businesses, etc.) should be handled as indicated in the Rural Residential Areas section. Property issues as a result of this work should be handled on a case by case basis by the job coordinator and property owner.

## **3. Rural Residential Areas**

Trees located in residential areas should be trimmed to meet ANSI A300 Standards while adhering to International Society of Arboriculture specifications and meeting Empires minimum clearance requirements as designated in Appendix II. If the job coordinator determines these requirements cannot be met he/she shall then negotiate for “removal.” *(For definition of removal refer to Forward.)*

## **B. Urban and Suburban Areas:**

### **1. Urban/Suburban Nonresidential**

Transmission lines running through nonresidential/unimproved Urban and Suburban areas should be maintained clear of trees and brush located under the lines that could cause outages or impede access to the facility. This condition must be considered with current construction of facility and maximum height and spread of vegetation. Although mechanical and or labor clearing will be used routinely, herbicide use should be considered whenever applicable. Designated R/W should be reclaimed and maintained to full width in these areas. However, the minimum needs for R/W clearing of woody stem vegetation is ten feet outside the “wire-zone.”

### **2. Urban/Suburban Residential/Commercial**

Transmission lines running through residential/commercial areas in a town should be maintained by dealing one on one with each property owner to develop an acceptable solution to each issue on site.

- a. Tall or Fast re-growth category trees located or growing directly under the lines should be removed.
- b. Shrubs and flowers should not be targeted for removal as they are desirable in such settings.
- c. Smaller tree species with slow re-growth potential are generally acceptable under the lines, however if determined by the job coordinator unmanageable with trimming the trees should be removed.

**Note:** Factors to consider in determining residential trees as candidates for removal are:

- i. public safety
- ii. crew safety
- iii. cycle reliability
- iv. site quality
- v. mature tree height and crown spread
- vi. conductor height and sag
- vii. wind
- viii. topography
- ix. other variables

### **III. Customer Service**

#### **A. Notification**

1. A reasonable effort to notify property owners should be made for work to be performed on property that is evidently residential and/or manicured. The normal notification period is 7 to 90 days.

#### **B. Complaints**

1. Resulting complaints from work conducted on the transmission system should be forwarded to and resolved by the Transmission Forester. Resolution to these complaints should be held to clearance guidelines in this manual.
2. All complaints resulting in contractor negligence will be routed through the Transmission Forester to the responsible contractor's supervisor and should be resolved within 14 days. If the complaint is not resolved within 14 days the Transmission Forester may resolve the complaint and the resulting cost will be credited to Empire from the responsible contract company.

### **IV. Approved Procedures**

#### **A. Residential Sites**

1. Notification – A reasonable effort should be made to notify owners with yard trees in need of trimming or removal to clear for transmission lines. A standard “*notification period*” of 7 to 90 days is required. If, due to safety or reliability, the job coordinator declares the vegetation clearing is an emergency situation notification is not necessary. Communication to the property owner should be relayed by the crew that performed the work or the responsible coordinator.



2. Directional Trim – To remove the portion of a tree crown encroaching on or toward utility line while leaving any portion of the crown that will not become an obstruction to the safe delivery of reliable electricity. This trimming shall follow ISA standards on residential sites in an effort to sustain public safety, cyclic conductor clearance, and the health and structural integrity of the tree. As a quick reference guide all crews shall be required to have in their possession and follow “Pruning Trees Near Electric Utility Lines” by Dr. Alex Shigo.
3. Removal – To cut a tree down as low to the ground as possible, usually below a three inch stump. If the lower portion of the trunk has any obstruction or foreign object in it that the saw operator sees as a safety risk the final cut may be made above that obstruction. In either case Empire will not grind out the stump or pay for such services. All slash as defined in the Forward of this document will be chipped up and hauled off site unless otherwise directed. All Firewood will be cut into 16-24 inch lengths and piled near the stump. The residual stump shall be treated with herbicide in an effort to eliminate sprouting. Empire reserves the right to use work above and beyond these work details as a tool in negotiating tree removals advantageous to the company’s needs for safety or reliability.
4. Brush Control – Brush control will vary greatly due to many variables including property owner desires. Whenever possible herbicides should be used to control small brush to limit growth and proliferation. When the use of herbicides is not possible lowering the number of stems on site by cutting brush will be acceptable. All stumps shall be treated with herbicide to limit sprouting.

## **B. Nonresidential Sites**

1. Herbicide Use – Vegetation control by proper use of herbicides is the most cost efficient, effective means of control and impacts the site less than other current available means of vegetation control. Herbicide should be used anywhere applicable on nonresidential sites including cross-country, roadside, clear pasture, hay meadows, cash crop fields, fencerows, wooded areas, and railroad beds. This method should become the primary means of vegetation control where possible to promote a reliable transmission system while helping to promote varying herbaceous, grass, and shrub species for cover and food sources to wildlife.

2. Mechanical Clearing – This means of clearing is to be use where herbicide is a desirable means of management but cannot be use due to varying issue including access limitations, surrounding properties, USFS property, R/W details stating no herbicide use, etc.
3. Labor Clearing – This is a conventional type clearing usable on nearly all type settings and due to the costly nature of this type work should be avoided when other tools are available and appropriate.

## **Appendix I**

### **EDE Right-of-Way Specifications for Vegetation Control**

## Appendix I

### Right-of-Way Width Specifications for Vegetation Control

Facility Characteristics		Right-of-Way specifics	
Voltage	Construction Type	each side of facility center	Total width
34.5 kV	single pole	25 feet	50 feet
34.5 kV	double pole H-frame	50 feet	100 feet
69 kV	single pole	25 feet	50 feet
69 kV	double pole H-frame	50 feet	100 feet
161 kV	single pole	35 feet	70 feet
161 kV	double pole H-frame	50 feet	100 feet
345 kV	double pole H-frame	75 feet	150 feet

## **Appendix II**

### **Residential Tree Trimming Clearances for Transmission Voltage Conductors**

## **Side Trim Clearance Specifications for 34.5--69kV lines.**

### **Category I (species w/fast re-growth): 20 feet of separation minimum requirement**

Silver Maple	Poplars
Sugar Maple	Sycamore
Hackberry	Willows
Mulberry	Walnut
Locusts	Elms
Ailanthus	Sassafras
Cottonwood	

### **Category II (species w/medium re-growth): 16 feet of separation minimum requirement**

Red Oaks except Black Jack Oak (pointed lobed leaves)  
Pecan  
Catalpa  
Red Maple  
Kentucky Coffee  
Bois D' Arc (Osage Orange, hedge)  
Hickory  
Trees in moderately stressing conditions

### **Category III (species w/slow re-growth): 12 feet of separation minimum requirement**

White Oaks (rounded lobed leaves)  
Black Jack Oak  
Evergreens  
Apples, Pears, and other fruit trees  
Ornamental dwarf tree species  
Trees in stressing conditions

## **Side Trim Clearance Specifications for 161--345kV lines.**

### **Category I (species w/fast re-growth): 30 feet of separation minimum requirement**

Silver Maple	Poplars
Sugar Maple	Sycamore
Hackberry	Willows
Mulberry	Walnut
Locusts	Elms
Ailanthus	Sassafras
Cottonwood	

### **Category II (species w/medium re-growth): 25 feet of separation minimum requirement**

Red Oaks except Black Jack Oak (pointed lobed leaves)  
Pecan  
Catalpa  
Red Maple  
Kentucky Coffee  
Bois D' Arc (Osage Orange, hedge)  
Hickory  
Trees in moderately stressing conditions

### **Category III (species w/slow re-growth): 20 feet of separation minimum requirement**

White Oaks (rounded lobed leaves)  
Black Jack Oak  
Evergreens  
Apples, Pears, and other fruit trees  
Ornamental dwarf tree species  
Trees in stressing conditions

### **Additional Notes for Side-Trimming Specifications:**

1. Consider that these clearances are based upon 4 years of separation for clearing average sites. Higher quality sites will have need for more clearance. Examples of higher quality sites would be river or creek crossings, drainage areas, and other irrigated type sites such as crop fields, livestock ponds, etc.
2. When R/W is defined, full reclamation of that R/W should be cleared. These clearances will be applied primarily to yards or other manicured areas near the R/W.
3. Conductor height in relation to mature canopy height may enable lower clearance needs. Trained job coordinating personnel may make this determination.
4. These are minimum re-growth clearance requirements and ISA standards may require more clearance for physiological or structural vegetation integrity.
5. If these clearances for side-trimming are not attainable due to limiting factors the tree becomes a candidate for removal or other means of control. These issues will have to be addressed individually with regard to property owner wishes.



## **Appendix III**

### **Minimum Vegetation-to-Conductor Separation Distances for Transmission Voltages**

# Minimum Vegetation-to-Conductor Separation Distances for Transmission Voltages

*Reference IEEE Standard 516-2003 page 20, Table-5 MAID w/o tools  
in the gap (phase to ground)*

Voltages in Kilovolts phase to phase	Distances	
	meters	USS conversion in feet
72.5 -- 121	0.75	2.46
138 -- 145	0.9	2.95
161 -- 169	1.05	3.44
230 -- 242	1.57	5.15
345 -- 362	2.88	9.45
500 -- 550	4.48	14.70
765 -- 800	6.24	20.47

## Appendix IV

### Transmission Danger Tree Response Procedures

# Transmission Danger Tree Response Procedures

In the event that field or other Empire District Electric Co personnel or contractors find that in their assessment a tree or other vegetation poses an immediate threat to the reliability of a transmission voltage circuit by causing damage or coming into contact with a conductor the following steps are required for hazard elimination:

1. The individual on site shall report the information to the appropriate Area Manager.
2. The Area Manager should then assess the condition and scope of the work to determine the capability in his area to deal with the situation and act accordingly.
  - a. If in his/her assessment they do not have the appropriate capabilities at his/her disposal for immediate remediation of the situation
    - i. A call to the Manager of Vegetation Control should be made
    - ii. Follow-up documentation by an e-mailed copy of all pertinent information available for quick response to the hazard.
  - b. If the Area Manager is able to respond immediately to the hazard only an e-mail of the situation should be sent to the Manager of Vegetation Control.
3. The Manager of Vegetation Control should follow the procedures above with an assessment on site for other potential threats and appropriate action will be taken.
4. If there is any reason the situation cannot be immediately resolved (such as may be due to accessibility or safety issues) the Manager of Vegetation Control shall contact dispatching to inform them of the situation so as to determine necessary steps to avoid an outage by following appropriate system dispatching protocol to avoid an unintended outage.

The purpose of this process is to ensure that all immediate threats to the reliable integrity of the Empire District Electric Co. transmission system are resolved in an efficient manner and documented. Also this can be used as an indicator of many potential areas that may need further attention.

## Appendix V

### Relay Operations Reporting Procedures

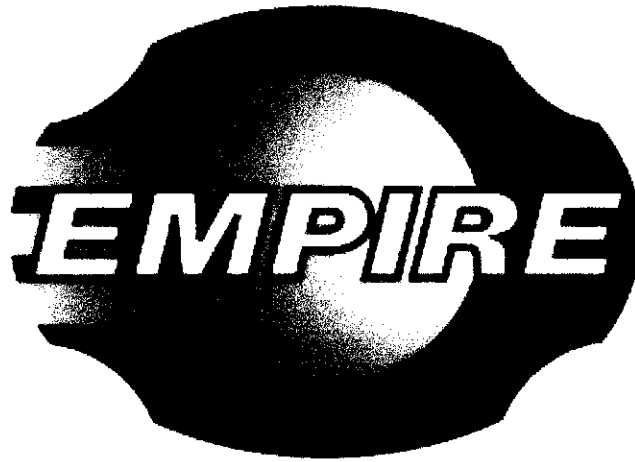
# Relay Operations Reporting Procedures

This document contains NERC requirements for reporting relay mis-operations and EDE procedures for gathering information.

The North American Electric Reliability Council (NERC) has issued mandatory reporting requirements concerning mis-operation of protective relaying equipment. Transmission owners must file a report quarterly showing any mis-operation, what was the cause for it, and any remedial action taken to fix it. This is in addition to other requirements for documentation of relay testing procedures, schedule for testing, and date tested.

To meet this requirement, EDE will use the following procedure to monitor and document relay operations.

1. System Operations will monitor the transmission system for any switch or breaker operations at 34kV and above. The list of operations will be sent (Faxed) daily to the Manager of Substation Operations for each operating area and also to Protection & Planning Engineering.
2. It is the responsibility of the Manager of Substation Operations for each area to direct field personnel to gather relay target information, as soon as practical, from substations in their area for operations listed as well as any other system devices that may be involved.  
(Note: Where operations may involve equipment in another area, the Manager should coordinate with the Manager for that area to ensure information is obtained.)
3. Relay information will be provided to Protection & Planning Engineering by entering the required data using a PC, into a database form provided by Engineering or by hard copy form if electronic means are unavailable.
4. Outages suspected to have been caused by vegetation will be reported to the Vegetation Management Department by System Protection and Planning Engineering for notification about and confirmation of possible vegetation outages.
5. Protection & Planning Engineering will track all vegetation outages defined as reportable by Southwest Power Pool and will submit this information to SPP on a quarterly basis.
6. Protection & Planning Engineering will analyze the outage data obtained for mis-operations, check coordination settings, etc. and flag any problems.
7. The System Relay Technicians will investigate any mis-operations and report findings to Protection & Planning Engineering for inclusion in the database.
8. Reports will be prepared and sent to Southwest Power Pool and appropriate personnel within EDE.



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<b>Title: Distribution System Vegetation Management Policy and Procedures Manual</b>	<b>Revision: B</b>	<b>Author: Scott Mackey 3/1/2009</b>
<b>Applicable Standards: Missouri PSC Rules effective Aug 9, 2008</b>		

These policies and procedures apply to all overhead Empire District Electric Company distribution power lines, from 120V to 25kV.

This manual supersedes all previous manuals, specifications and guidelines for line clearance and vegetation management work at Empire District Electric Company March 1, 2009.



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# Safety Policy

## Section 1.0

All crews performing vegetation management work on or near Empire District Electric Company facilities or rights-of-way shall follow approved safety guidelines and procedures. All contractors performing work for Empire District Electric Company shall comply with all applicable governmental safety and health regulations and the safety and health provisions of their contract.

*All contractors must also, at all times, be aware of the nature and characteristics of Empire District Electric Company's electric facilities before work begins. Contractors need to understand that electric facilities must remain energized during the performance of work unless special arrangements are made with an authorized Empire District Electric Company representative.*

The following procedures pertain to contractors performing vegetation management work for Empire District Electric Company:

- The contractor shall obtain from Empire District Electric Company full information as to the voltage of its circuits before starting the work.
- The contractor shall at all times conduct work in a manner to safeguard the public from injury and property from damage.
- The contractor must use all necessary protection for its employees and the public and guard against interference with normal operation of the circuits. If, in the judgment of the contractor's general foreman/supervisor, it is hazardous to prune or remove trees with the circuits energized, the contractor must contact an authorized Empire District Electric Company representative(s). If appropriate, Empire District Electric Company will provide the necessary protective materials or de-energize circuits to ensure the safe pruning or removal of the tree(s).
- Should the contractor knock down or come into contact with Empire District Electric Company conductors (power lines), the contractor must notify Empire District Electric Company immediately and take the necessary protective measures. All contractor-caused electric service interruptions are subject to repair at the contractor's expense. This would include any damage to customers' property, including any electrical damage.
- In the event a contractor becomes aware of any dangerous, broken, loose or faulty Empire District Electric Company line facilities in the normal course of its line clearance performance, the contractor shall promptly advise Empire District Electric Company as to the exact pole location(s) and nature of the condition found.

# General Guidelines

## Section 2.0

### 2.1 – EXPLANATIONS OF TERMS AND METHODS

#### 2.1.1 Qualified Line Clearance Tree Trimmer:

Personnel who meet the qualifications of “line clearance tree trimmer and/or trimmer trainee” as defined by OSHA 1910.269, ANSI Z133.1 and any other applicable federal, state or local, laws, codes, or regulations.

#### 2.1.2 Distribution ( $\leq 25\text{kV}$ ) Pruning Cycle:

Empire District Electric Company uses a scheduled pruning cycle to prune trees on lines in rural and urban areas. The company will schedule certain critical feeder lines as often as necessary to ensure its reliability.

#### 2.1.3 Trimming Around Primary and Secondary Wires:

Empire District Electric Company will identify and schedule for maintenance, any trees that are a hazard or potential hazard to the supply or reliability of primary or secondary power lines. Qualified line clearance tree trimmers under direction of Empire District Electric Company or its agents are to perform selective tree-branch removal to prevent or correct hazardous situations that may result in outages or endanger life or property. They are to make field judgment as to what amount of clearance is necessary to obtain reliability. They are to look for obvious situations such as deflected wires, branches rubbing insulated wires and broken or hanging tree branches.

#### 2.1.4 Pole-to-House and Street Light Service Wires:

Pole-to-house and street light service wires should only be pruned if a branch is significantly pushing against or is lying on the wire.

#### 2.1.5 General Guidelines for Tree/Conductor Clearance:

The exact amount of clearance needed to maintain reliability depends on the type of tree, its location and condition, and the type of power line and its voltage, as well as many other factors. Empire District Electric Company and its contractors will consider all factors when deciding how much clearance is necessary.

Empire District Electric Company and its contractors will use their professional judgment in determining what these clearances will be in each situation, based on the proposed maintenance cycle for the area in which they are working. The maintenance cycle is dependent upon electric reliability requirements of the system.

#### 2.1.6 Circuit Prioritization and Scheduling:

During a year, circuits are prioritized based on the following factors:

- Reliability – The circuits due to be trimmed for any given year are ranked based on customer minutes interrupted by tree-related causes. Circuits that have the highest number of customer minutes interrupted by tree growth outages are scheduled first.
- Last Trim Date – Circuits are scheduled based on the last trim date. The oldest are weighted over the earliest.
- Customers Affected – Circuits are ranked by customer count. Circuits with high numbers of customers or circuits with critical customers are ranked higher.
- Current Vegetation Conditions – The current vegetation conditions on a circuit will be used to prioritize it. Customer requests for tree trimming are also taken in to consideration when determining the current vegetation conditions of a circuit.
- Other – Other factors that are considered when scheduling are circuit load, customer complaints and political issues.

Circuits are first scored based on reliability data, last trim date and the current vegetation conditions. Then other factors are considered to refine the rankings. Prioritization of a circuit may change based on any of these factors. For scheduling strategy, see Appendix 6.

#### 2.1.7 Pruning

Tree pruning is the selective removal of branches that are not an adequate distance from the power lines, or that will grow too close to the power lines within the next maintenance cycle.

Trees are pruned to provide adequate clearance from Empire District Electric Company facilities. As a general rule, trees should be pruned to improve or re-establish the clearance provided from all previous tree maintenance performed.

Some factors to consider before pruning include:

- The growth rate of the tree species (how fast the branches grow back);
- The wood strength of the tree species (what is the chance of the branch breaking under the load of strong wind, snow, or ice);
- The voltage conducted by the line (the hazard presented by the branch contacting the line; the higher the voltage, the greater the hazard);
- Tree removal considerations. In some cases, it may be preferable to remove the tree. For example, when repeated severe pruning is necessary or when the tree is declining and unsafe;
- Limbs overhanging Empire District Electric Company facilities. Remove or shorten dangerous limbs – those overhanging limbs with a high potential for breaking or bending into Empire District Electric Company conductors due to ice, snow or wind loading (be aware of included bark at the branch bark ridge);
- ANSI-A300 procedures and techniques will be followed

## 2.1.8 – Manual/Mechanical Removal of Vegetation

### **2.1.8.1 -- Removal Considerations** for trees where ownership can be determined

- Remove all tall-growing trees within the width of the right-of-way.
- Remove all tall-growing brush that has the potential to grow closer than the minimum clearance specified for a specific voltage line.
- Remove all brush and vines around poles and other EMPIRE equipment.
- All trees and brush should be cut as close to the ground as practical.
- Remove all fast-growing and undesirable tree species.
- Remove all second growth from stumps cut on previous pruning cycles.
- Remove all trees that present an obvious or potential hazard to Empire District Electric Company facilities.

### **2.1.8.2 -- Removal Considerations** for trees where ownership cannot be determined and are either 6"-11.9" DBH trees with original crown or Trees that have been topped or otherwise improperly pruned as defined by ANSI A-300 (Part 1)-2001 Pruning

- All considerations on section 2.1.8.1.
- Unmarketable fencerow trees that currently lack ability to be beneficial shade.
- Trees located in such a manner that ANSI A-300 (Part 1)-2001 Pruning cannot be followed while attaining clearances set in this documents Appendix 2
- Edge trees of no market value that yield no additional benefit due to adjacent or otherwise available shade to livestock.
- Trees located in areas not manicured, accessible and inaccessible alleys in town, or not associated with a residence.

Stumps should be treated with herbicide to prevent re-sprouting.

### 2.1.9. Hazard Trees

Trees that are located beyond the edge of the right-of-way, have a high probability of failure and are of sufficient height to contact the conductors and/or structures and guy wires, if they were to fall in that direction, are classified as danger trees, and should be considered for removal.

Conditions could include but are not limited to the following:

Dead or dying

Leaning trees

Weak branches

Shallow root system

Root failure

Internal decay

Canker or canker root

### 2.1.10 – Right-of-way Screens

Right-of-way screens are strips or areas of trees and brush purposely left on the right-of-way in certain areas where it is required by federal, state and/or local laws or regulations

and/or it is desirable to reduce the visual impact of the cleared right-of-way to the general public. Along certain roads and other areas frequented by the public, screens of trees may be left on the right-of-way so the natural tree line is not interrupted by the cleared right-of-way, and to reduce the “corridor” appearance of a cleared right-of-way. Screens should be composed of low-growing trees and shrubs that will not normally grow to conductor height..

## **2.2 - EMPIRE DISTRICT ELECTRIC COMPANY SCHEDULED TREE PRUNING**

### 2.2.1 Procedure

Empire District Electric Company or its agents will inspect trees near power lines scheduled for pruning and determine which trees should be pruned or removed. Attempts will be made to notify homeowners or residents before pruning is done.

### 2.2.2 Limb and Branch Disposal

Empire District Electric Company/Empire District Electric Company contract crews will dispose of all debris resulting from their tree and pruning operations that are small enough to be fed through a chipper unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site unless the homeowner requests the wood be removed.

### 2.2.3 Brush Removal

Brush is defined as a tall-growing tree stem that is less than 6 inches in diameter at breast height. Brush should normally be removed rather than pruned.

## **2.3 - EMPIRE DISTRICT ELECTRIC COMPANY SCHEDULED TREE REMOVAL**

### 2.3.1 Removal Procedure

Empire District Electric Company and its agents will inspect the trees near power lines scheduled for maintenance and determine which trees should be removed. If a tree is a candidate for removal, the homeowner or resident will be contacted and asked to authorize Empire District Electric Company and its contractors to remove the tree as low to the ground line as possible (See Section 2.10, Customer Contact).

### 2.3.2 Tree Disposal

Empire District Electric Company/Empire District Electric Company contract crews will dispose of all debris small enough to feed through a chipper resulting from their tree removal and pruning operations unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site unless the homeowner requests the wood be removed.

### 2.3.3 Stumps

Empire District Electric Company and its contract crews will NOT grind out stumps, unless special arrangements have been agreed upon. All stumps shall be treated with an

approved herbicide unless a property owner has requested that the stump not be treated or if the herbicide label warns against treatment of stumps in particular situations.

## **2.4 – CUSTOMER REQUESTED TREE PRUNING POLICY**

Empire District Electric Company will promptly respond to legitimate request related to tree/right-of-way maintenance, assign a priority level for scheduling and inform the property owner of the results of the investigation. All requests are legitimate to the customer. Empire District Electric Company will decide if the work requested will benefit the overall safety and reliability of the electric system and its customers and the general public.

Empire District Electric Company Utilities should follow the following guidelines:

- Document all request using a standard Customer Request Form.
- Screen all request by phone by asking questions such as:
  - Do you have power?
  - Do your lights blink?
- Field inspect the request that cannot be resolved by phone and ask the same questions as above. If no one is home when the field inspection occurs, provide door-hanger that notifies customer of the decision that was made and if the work will be completed, deferred or denied. This practice can increase efficiency for field investigations that are completed when property owners are not at home.

### **2.4.1 Procedure**

When a customer requests Empire District Electric Company to prune a tree away from pole-to-pole lines, the company will send out a representative to make a determination of any potential hazards that exist.

If it is determined that a potential hazard does exist, Empire District Electric Company will schedule a crew to perform all necessary pruning and/or removal.

If the tree is not a potential hazard, Empire District Electric Company will inform the customer that the tree will be re-evaluated when that particular area is scheduled for maintenance.

### **2.4.2 Limb and Branch Disposal**

If it is determined that a potential hazard does exist, Empire District Electric Company/Empire District Electric Company contract crews will dispose of all debris small enough to feed through a chipper resulting from their tree removal and pruning operations unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site unless the homeowner requests the wood be removed. If the tree is not a potential hazard and pruning and/or removal is still agreed to, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.



## **2.5 – CUSTOMER TREE REMOVAL**

### **2.5.1 Procedure**

When a customer wants to remove a tree and Empire District Electric Company's facilities make it hazardous for the customer or customer's agent to accomplish the work, Empire District Electric Company will do one of the following:

- Temporarily drop the conductors while the customer or customer's agent performs the work. To make arrangements, call the Empire District Electric Company Customer Service Center at (800) 206-2300
- Prune or remove the portion of the tree that is contributing to the hazard.
- A Empire District representative will inspect the request within five working days

Note: Empire District Electric Company will not remove trees to clear house (pole-to-house), or street light service wires.

### **2.5.2 Tree Disposal**

When Empire District Electric Company prunes or removes trees at the customers' request, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.

## **2.6 –CUSTOMER PRUNING WITH EMPIRE DISTRICT ELECTRIC COMPANY ASSISTANCE**

### **2.6.1 Procedure**

When a customer desires to prune a tree close to Empire District Electric Company lines for reasons other than line clearance, and it is hazardous to complete the work, Empire District Electric Company will do one of the following after customer notification: Temporarily drop the conductors while the customer or customer's agent performs the work. To make arrangements, call the Empire District Electric Company Customer Service Center.

Prune or remove the portion of the tree that is creating the hazard.

Note: In all cases, the decision on which course of action to take will be determined by a Empire District Electric Company representative after consultation with the customer.

### **2.6.2 Limb and Branch Disposal**

When Empire District Electric Company assists the customer to prunes or removes trees at a customer's request, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.

## **2.7 – CUSTOMER PRUNING NEAR EMPIRE DISTRICT ELECTRIC COMPANY FACILITIES**

### 2.7.1 Procedure

When a customer desires to prune trees near Empire District Electric Company lines, the following conditions must be met:

Only qualified line-clearance tree trimmers and/or trimmer trainees are allowed within 10 feet of any energized conductors (OSHA 1910.269 and ANSI Z133.1 and any other applicable federal, state or local laws, codes or regulations). Qualified line-clearance tree trimmers will do all pruning around Empire District Electric Company facilities.

Empire District Electric Company must be notified in advance of the customer's agent performing the work.

### 2.7.2 Limb and Branch Disposal

Clean up and disposal of all limbs, branches and debris resulting from this clearing operation are the responsibility of the property owner.

## **2.8 – TREE PRUNING AND REMOVAL DURING STORMS**

### 2.8.1 Procedure

When trees fail or branches break during storms, and they make contact with or cause failure of Empire District Electric Company facilities, Empire District Electric Company will do the necessary pruning or removal to clear its facilities and restore power.

Note: Due to the emergency conditions that exist during storms, Empire District Electric Company and its contract crews may not be able to contact all customers before pruning or cutting trees. Crews may make a courtesy knock on the customer's door to let them know that work will be performed at that location.

### 2.8.2 Disposal

If Empire District Electric Company and its contract crews prune or remove trees following storm emergencies, all limbs and logs will be left on the customer's premises. The disposal of limbs and/or logs is the responsibility of the property owner.

## **2.9 – PRUNING AND REMOVAL OF DISEASED TREES**

### 2.9.1 Pruning

Where trees are encountered that are suspected of being diseased (Dutch elm disease, oak wilt, etc.) the customer should be notified and a determination made as to whether the tree should be pruned. If the customer is not willing to agree the tree is diseased, Empire District Electric Company will refrain temporarily from pruning the tree, if possible, until symptoms are more visible or the hazard is too great. Contract crews should report the matter to their supervisor.

### 2.9.2 Removal

When diseased trees are near Empire District Electric Company lines, Empire District Electric Company and its contract crews will do one of the following:

Prune the trees to clear Empire District Electric Company facilities;

Temporarily drop the conductors while the customer or customer's agent removes the tree. For a temporary line drop, customers should contact Empire District Electric Company Customer Service Center.

### 2.9.3 Disposal

Should a tree be condemned by a municipal jurisdiction as having Dutch elm disease, oak wilt or another tree disorder, Empire District Electric Company has no responsibility for the removal or disposal of the tree except when the tree is located on property owned by Empire District Electric Company. Removal and disposal of diseased trees is the responsibility of the property owner.

## **2.10 – CUSTOMER CONTACT POLICY**

### 2.10.1 – Scheduled Pruning/Removal

An Empire District Electric Company agent or Empire District Electric Company representative will attempt to contact each customer/homeowner whenever possible before pruning any trees or in accordance with any pending special conditions mandated by an appropriate regulatory body.

#### **For normal pruning:**

An Empire District Electric Company representative or agent will knock on the door to talk with the homeowner and explain the necessary pruning. If no one is home, a notice will be left on the door.

If the homeowner does not contact Empire District Electric Company, the contract trimming crew will do the necessary pruning. Before starting the line clearance work, the contract trimming crew will attempt a courtesy contact with the property owner by knocking on the door.

If the pruning is necessary and the homeowner refuses permission, the crew will turn the matter over to the work planner. If the planner is unable to develop concurrence with the customer regarding the necessary pruning, the planner will notify appropriate Empire District Electric Company representative.

#### **Pruning on public property:**

When pruning involves trees on public property or rights-of-way, it is recommended that the Empire District Electric Company representative or agent contact the appropriate public agency to discuss any special concerns. (Example: Contact a city forester or parks department before pruning boulevard trees). It is the line clearance trimming contractor's responsibility to acquire any licensing required by municipalities for the pruning of trees.

**For tree removal:**

Before removing a tree, homeowners will be contacted and informed of the necessary work. Empire District Electric Company representative or agent will secure a signed permit before starting the work unless otherwise approved by Empire District Electric Company. When property ownership cannot be determined the approved agents assigned by EDE will be allowed to authorize by signature removal of trees defined in section 2.1.8.2 for that site to the utility line clearance contractor.

**2.10.2 – Customer-Requested Pruning/Removal**

Emergency and hazardous conditions will be addressed immediately.

If the pruning has been agreed to over the phone, (for normal pruning) the crew will make a courtesy knock on the door before starting the work.

If the work requires written permission (tree removal), the crew will follow the same procedure as outlined for scheduled work.

**2.10.3 – Storm Work**

Due to emergency conditions that occur during a storm, Empire District Electric Company and its contractors will prune and remove trees necessary to restore power without contacting every homeowner.

A courtesy knock will be made at each customer site to inform them of the work being done, however, *the work will proceed even if the customer is not home.*

# Herbicide Use Policy (Distribution)

## Section 3.0

### 3.1 – SAFETY AND REGULATIONS

All herbicides shall be applied in strict compliance with all federal, state and local laws and regulations. This includes, but is not limited to: transporting, handling and chemical container disposal.

All herbicide and treatment methods used by the contractor shall have prior approval by Empire District Electric Company.

Any crewmember applying herbicides must be supplied with the appropriate protective gear, current label and Material Safety Data Sheet (MSDS) for the product being applied. It is the contractor's responsibility to provide all necessary materials, including chemicals and safety gear, unless specifically indicated as being provided by Empire District Electric Company.

The contractor is responsible for the proper disposal or recycling of all herbicide containers.

A reasonable attempt to notify homeowners adjacent to the application area of necessary work should be made by the contractor performing the applications. An Empire District Electric Company representative or agent may attempt to contact homeowners before starting the work when ownership can be determined during planning. If ownership cannot be determined without property research work will be performed as planned.

### 3.2 – APPLICATION OF HERBICIDE

#### 3.2.1 Requirements and Precautions

- Do not apply herbicides outside the easement right-of-way boundaries except in cases where no right-of-way width has been established in the easement.
- All herbicide treatment shall be performed in a responsible manner that will reflect the best interests of the property owner and Empire District Electric Company. If a property owner should object to any of the herbicide treatments, the operation shall immediately be discontinued on that property until any differences are resolved.
- Cut off all vines ascending all poles and guy wires at the height of reach.
- Herbicide may be applied to foliage of brush under 10 feet tall.
- Herbicide may be applied to foliage of trees over 10 feet tall as approved and directed by the assigned Empire District Electric Co. employee or representing agent.
- The Contractor shall furnish all mixing materials and application equipment and shall be responsible for transporting, handling, mixing, and application of chemicals used in the immediate operation unless other wise directed by the Manager of Vegetation Control.
- The Contractor shall comply with all State and Federal Laws and Regulations pertaining to Herbicide Applications and any other licensing or regulatory requirements.

- The Contractor shall only use herbicide solutions that contain dye according to label recommendations for basal and stump applications.
- The Contractor shall guarantee a minimum ninety percent (90%) stump control per span, as determined during the growing season following the treatment. Spans not meeting these specifications shall be re-treated by the Contractor at the Contractor's expense to achieve the proper mortality. The Contractor shall guarantee a minimum of ninety-five percent (95%) mortality of brush stems per span for all foliage or basal applications. Mortality must be achieved within two hundred seventy (270) days following treatment. Spans not meeting these specifications shall be retreated at the Contractor's expense to achieve the proper mortality.

In chemical application work, the Contractor shall have the right to skip any portion of a line when, in the opinion of the Contractor, damage to crops, orchards, or ornamental plantings may result from drift. Any skips shall be reported to the appropriate inspector or supervisor.

### **3.3 – REPORTING PESTICIDE INCIDENTS**

When a spill is reported the contractor general foreman should determine the type of chemical and amount of spillage along with the containment efforts that were made. Then the general foreman should notify the proper state or federal agencies if necessary. Any spill, leak, fire or other accident involving pesticides *must be reported immediately* to the proper line clearance supervisor. All damage from such leaks or spills are the responsibility of the contractor.

# **Tree Replacement**

## **Section 4.0**

### **4.1 – GENERAL GUIDELINES**

Repeated pruning of unmanageable trees can lead to increased utility rates for Empire customers. It may be preferable to remove and replace certain trees that pose a particular hazard to the power lines. Fast-growing, tall trees directly under primary wires are an example. They grow back quickly into the wires and can cause repeated outages. Poplars, elms, willows and silver maples are some fast-growing trees that need frequent pruning near power lines.

#### **Communities**

Empire District Electric Company is willing to cooperate with communities in applying for tree-planting grants from the state and federal government. Empire District Electric Company may provide funds to purchase trees, or labor to remove existing trees, or both depending on the circumstances.

#### **Property Owners**

Empire District Electric Company works with homeowners to identify trees that are good candidates for replacement. The tree must be near Empire District Electric Company power lines and must require repeated pruning to keep the lines clear. The power line must be at least a primary circuit. Empire District Electric Company will remove the existing tree and provide assistance in replacing the tree. The planting and care of the new tree are the responsibility of the property owner, unless other arrangements are made.

Empire District Electric Company reserves the right to decide under what circumstances trees will be replaced (at the expense of Empire District Electric Company). The replacement tree must be a low-growing variety, or it must be planted a sufficient distance away from power lines as to not require future line clearance pruning, if it is a tall-growing variety.

# Appendices

1. Major Tree Species and Growth Rates
2. Guideline for Line Clearances
3. Annual Growth Rates
4. Natural Pruning
5. What is a Tree
6. Scheduling Strategies
7. Plant the right tree in the right place
8. Definitions



# Appendix 1

**Table 1:**  
**MAJOR TREE SPECIES AND GROWTH RATES**

<b>Common Name</b>	<b>Scientific Name</b>	<b>Growth Rate</b>
Eastern Redcedar	<i>Juniperus virginiana</i>	S
Elm	<i>Ulmus spp.</i>	F
Green Ash	<i>Fraxinus pennsylvanica</i>	F
Hackberry	<i>Celtis occidentalis</i>	F
Honeylocust	<i>Gleditsia triacanthos</i>	F
Mulberry	<i>Morus spp.</i>	F
Pin Oak	<i>Quercus palustris</i>	F
Pine	<i>Pinus spp.</i>	S
Post Oak	<i>Quercus stellata</i>	S
Red Oak	<i>Quercus rubra</i>	F
Silver Maple	<i>Acer saccharinum</i>	F
Sycamore	<i>Platanus occidentalis</i>	F
Black Walnut	<i>Juglans Nigra</i>	F

## Appendix 2

The following guidelines (TABLE 1) for tree clearances may apply at the time of line clearance tree maintenance to protect the wires under normal operating conditions. Special clearances may be needed at times because of field conditions. Additional allowance should be made for wires that will sag due to hot weather or swing sideways in strong winds.

**Table 1.**

**Recommended Line Clearances (in feet)**

<b>Clearance From Trees</b>	<b>Rate of Growth</b>	<b>Secondary Cable (120-480 V)</b>	<b>Open Wire Secondary (120-480 V)</b>	<b>Primary Voltage Single-Phase</b>	<b>Primary Voltage Three-Phase</b>
SIDE	Slow	2 (c)	2 (c)	8 (c)	10(c)
	Fast	4 (c)	6 (c)	12 (c)	15(c)
OVER	Slow	2	2	15 (a)	Remove all overhang
	Fast	4	6	15 (a)	
UNDER	Slow	3	8	8	10
	Fast	4	10	12	14

**Site Considerations:**

(a) Remove all hazardous overhang, and all overhang within 15 feet of the conductors that could contact them if weakened or broken. Remove all overhang over 3-phase lines.

(b) Remove all trees that could grow into, or fall into the lines.

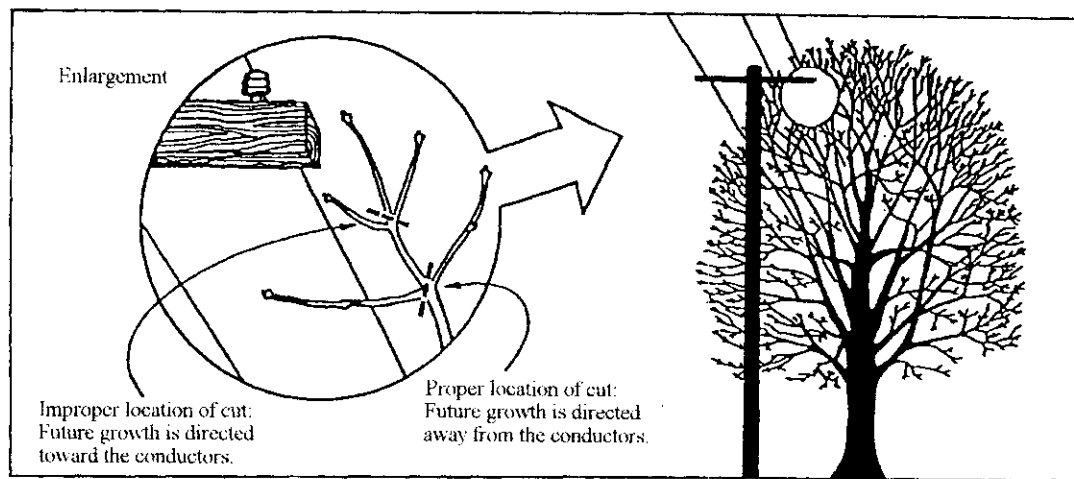
(c) Large tree trunks or major limbs of established trees may be allowed to remain as close as 4 feet from the conductors if all of the following are true:

- Movement of either the conductor or the tree will not result in contact between the tree and the conductor.
- The tree is not easily or readily climbed without the use of ladders or specialized climbing equipment.
- There is no evidence of re-growth or sprouting from the tree trunk toward the line.

# Appendix 3

## Annual Growth Rates

This table intentionally left blank. Current Empire study is in progress.



## Appendix 4

### Natural Pruning (to direct growth away from wires)

Natural pruning is a method by which branches are cut at a suitable parent limb back toward the center of the tree. The cut should be made as close as possible to the branch collar at the branch base, however the branch collar should not be injured or removed. Every branch has a branch bark ridge that separates the branch from the main stem. The cut should be made on the outer side of the ridge. If the cut is made on the inner side of the branch bark ridge, a "larger" wound will result that may inhibit the tree's ability to naturally compartmentalize the wound, increasing wound closure time and the risk of entry for microorganisms. This method of pruning is sometimes called "drop-crotching", "direction trimming" or "lateral trimming." Large branches should be removed to laterals at least one-third the diameter of the branch being removed. Natural pruning is especially adapted to the topping of large trees where a great deal of wood must be removed.

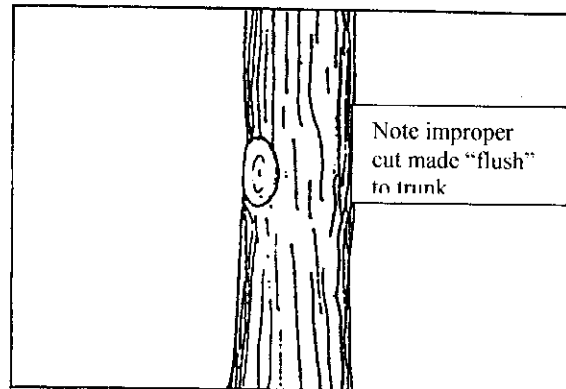
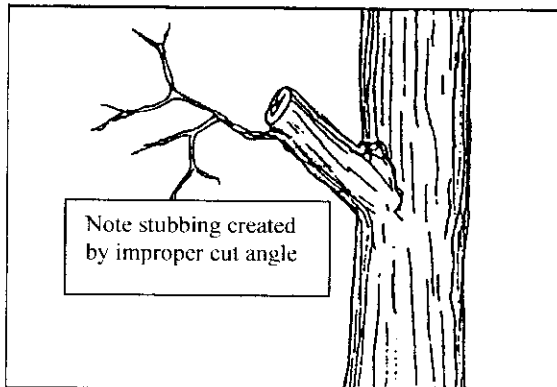
In natural pruning, almost all cuts are made with a saw, and very little pole pruning work is required. This results in a natural looking tree when finished, even if a large amount of wood has been removed. However, a hydraulic or manual pole pruner is required to trim those smaller laterals that cannot be properly trimmed using the pole saw and each crew shall be equipped with the necessary hydraulic pruners for lift crews and manual pruners for climbing crews.

Natural pruning is also directional pruning, since it tends to guide the growth of the tree away from the wires. Stubbing or pole-clip clearance, on the other hand, tends to promote rapid sucker growth right back into the conductors. It is important to remember that natural pruning does work, and that two or three trimming cycles done in this manner will bring about an ideal situation for both the utility and the tree owner. Most shade trees lend themselves easily to this type of pruning.

Natural pruning techniques should be used for top pruning, side pruning, under pruning, and combinations as described on the following pages.

## Natural Pruning Details

### Improper Trimming Techniques

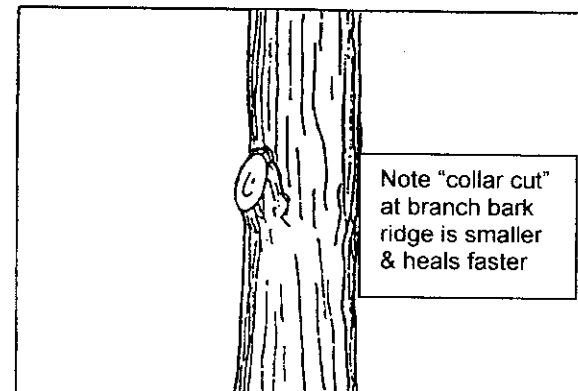
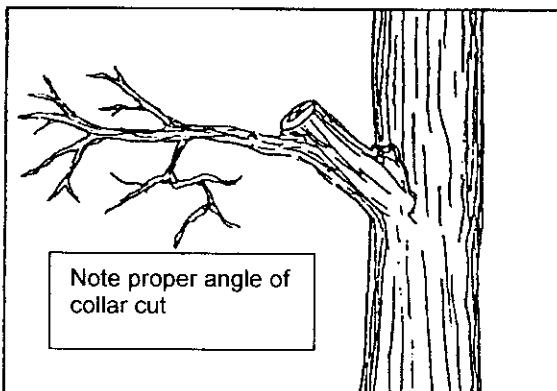


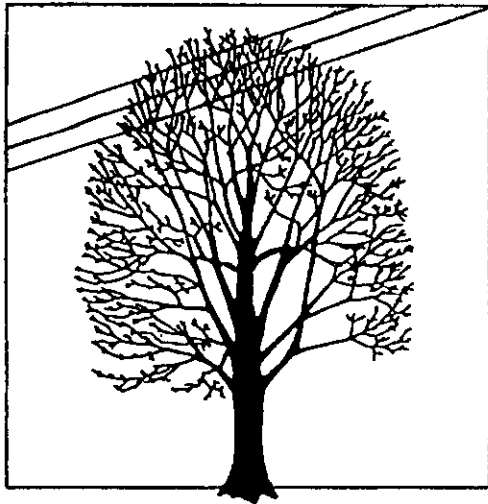
Details of improper trimming and proper natural pruning techniques are shown here. The branch at left above was cut back to a lateral that is too small. Branches should be cut back to a lateral that is at least one-third the size of the branch being removed as shown at left below. If a proper lateral is not available, the branch should be cut back to the trunk. Note that the remaining limb should be trimmed in a manner that meets the minimum clearance requirements while "training" it to grow away from the conductors. When limbs growing toward the conductors cannot be trimmed to meet these requirements, they should be removed back to the truck of the tree.

The cut shown at right above is an improper flush cut where the branch collar was removed. The cut at right below shows the proper method to remove the branch at the trunk, leaving the branch collar but not a stub.

The CONTRACTOR shall remove all past stubbing, correctly trimming these limbs back to a lateral one third the size of the parent limb, or removing them back to the trunk of the tree, to promote proper healing. Removal back the truck will be the preferred method when it would create a "cleaner" appearance and minimize future re-growth and trimming.

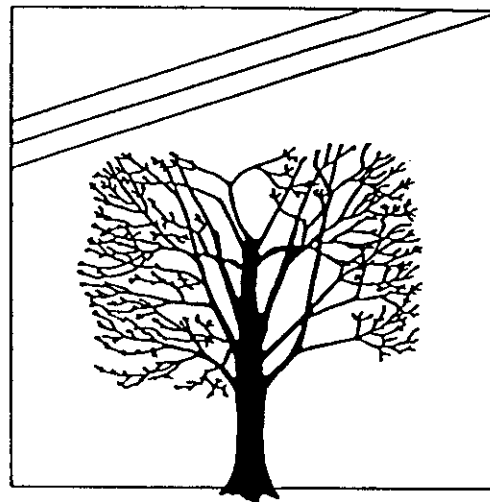
### Proper Pruning Techniques





**Before Top Pruning**

**After Top Pruning**



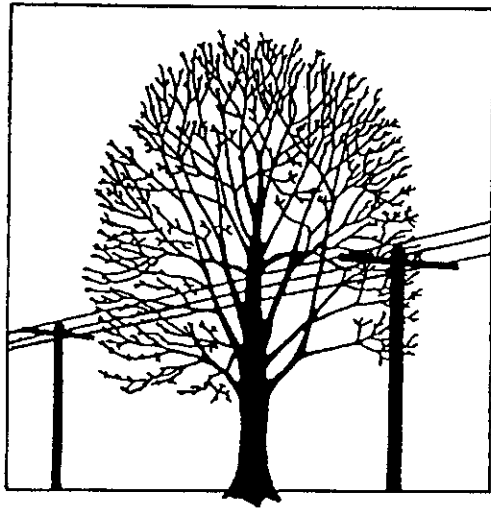
## 1. TOP PRUNING

Top pruning involves cutting back large portions of the upper crown of the tree. Top pruning is often required where a tree is located directly beneath a line. The main leader or leaders are cut back to a suitable lateral. (The lateral should be at least one-third the diameter of the limb being removed.) While most cuts should be made with a saw; a hydraulic or manual pole pruner is still required to properly prune the small lateral limbs that cannot be properly pruned using a pole saw.

For the sake of appearance and to limit the amount of regrowth, it is best not to remove more than one-fourth of the crown when top pruning. In certain species, removal of too much of the crown may result in death of the tree.

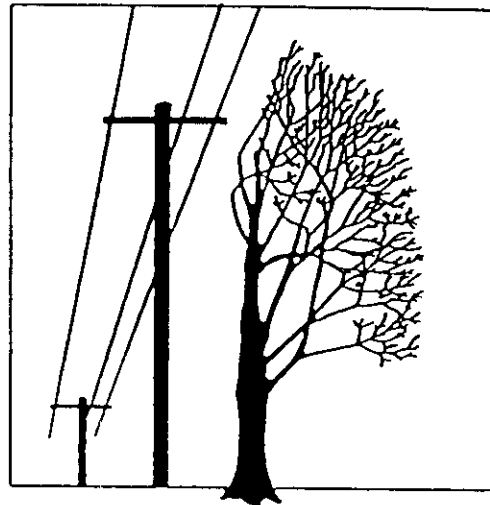
Top trimming is generally required to address the situation where a tall growing tree has been planted or grown underneath the lines. Top trimming should NOT be used on those trees that are located partially under the line, where part of the tree could be

trained to grow away from and/or beside the line, specifically required by the property owner. Side trimming is discussed in the next section.



**Before Side Pruning**

**After Side Pruning  
Rural – R/W areas**



## **2. SIDE PRUNING IN NON-RESIDENTIAL R/W AREAS**

In non-residential or rural right-of-way situations side pruning consists of cutting back or removing the side branches that are threatening the conductors from ground to sky. Side pruning is required where trees are growing adjacent to utility lines. Limbs should be removed at a lateral branch or the main trunk wherever possible to minimize future re-growth. All branches beneath the conductors should be removed to prevent them from growing up into the lines. Avoid unsightly notches in the tree, if possible.

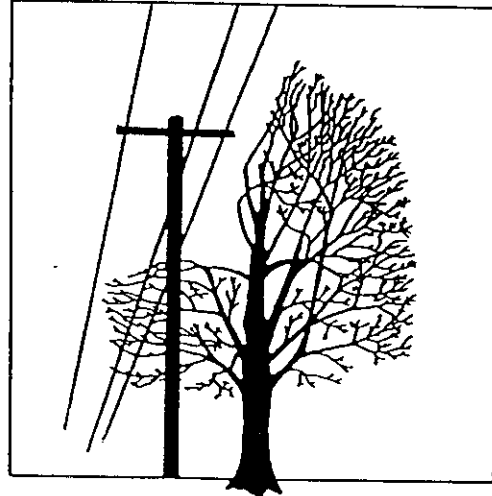
## **3. SIDE PRUNING IN RESIDENTIAL AREAS**

In residential situations, where the tree to be trimmed is part of a lawn or landscape setting it is often necessary to leave a “shelf” of branches below the phone cable level, or at least 10 – 12 feet below the primary level. While this is NOT a preferred trimming

methods, it is commonly required in residential areas in order to maintain as much of the natural appearance, screening and shade value of the tree as possible. Trees that would require excessive trimming or create serious visual impacts for the property owner should be candidates for removal.

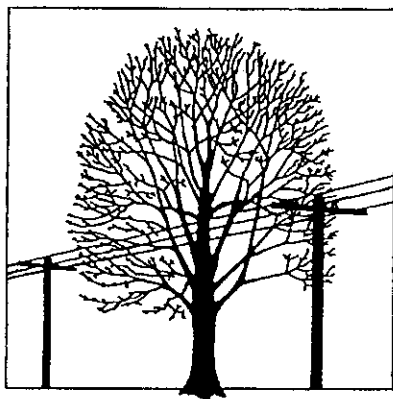
When shelf trimming is performed the remaining branches shall be trimmed so as to train them to grow out flat, or down and away from the conductors. Branches growing up, toward the overhead conductors should be removed or trimmed to laterals growing away from the wires.

**After Side Pruning  
Residential Areas**



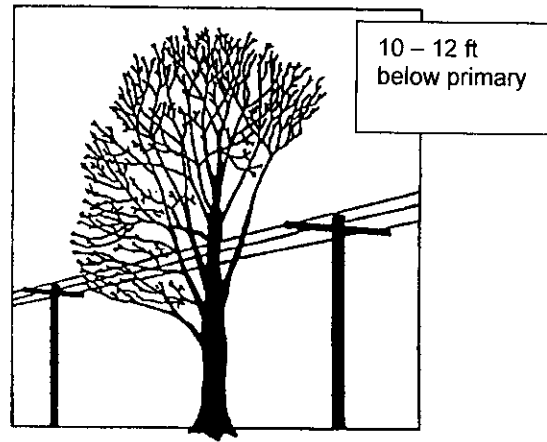
#### **4. UNDER PRUNING**

Under pruning involves removing the lower limbs of the tree to allow wires to pass below the tree crown. All cuts should be made as close as possible to the branch bark ridge at the branch collar, to avoid leaving unsightly stubs. The natural shape of the tree is retained in this type of pruning, and the tree can continue its normal growth. Overhangs shall be trimmed as required by this specification in Exhibit C Table 1, the species of tree, location. All dead branches above the wires shall be removed, regardless of height, since this dead wood could easily break off and cause an interruption.



**Before Under Pruning**





**After Under Pruning**

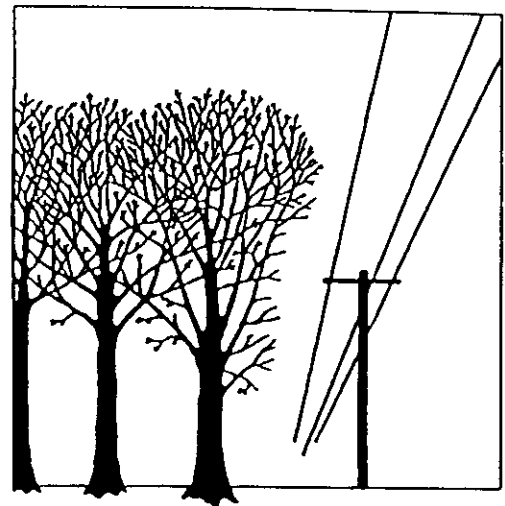
## 5. COMBINATIONS

It may be necessary to combine several pruning types in order to achieve a good-looking job and to obtain adequate clearances.

### Improper Trimming Methods

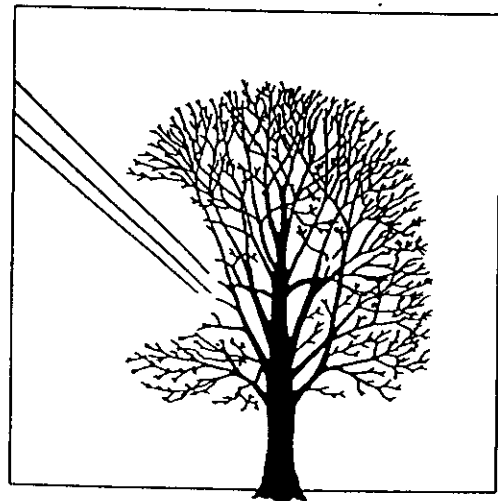
## 6. SIDE TRIM STUBBING

This is done by stubbing off portions of limbs along the side of the tree to obtain clearance. Cutting off portions of limbs (leaving stubs) to obtain clearance creates many fast-growing suckers that become a serious line clearance problem. Corrective pruning will be required to eliminate and repair past stubbing practices when they are encountered.



## 7. "SHAPING" AROUND LINES

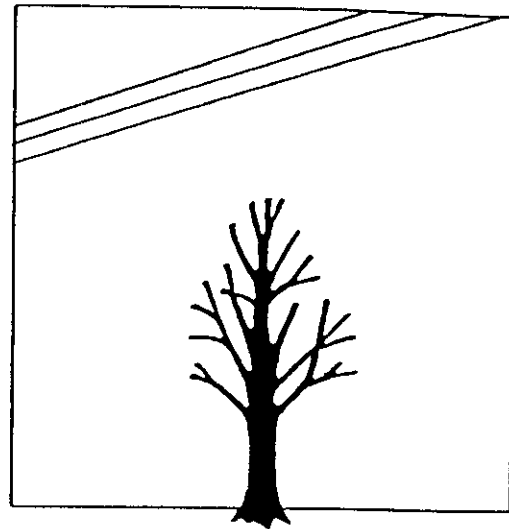
This is done by trimming limbs in an arc to obtain clearance. This unsightly method of trimming leaves branches above the conductors that could bend or break.



## 8. POLLARDING

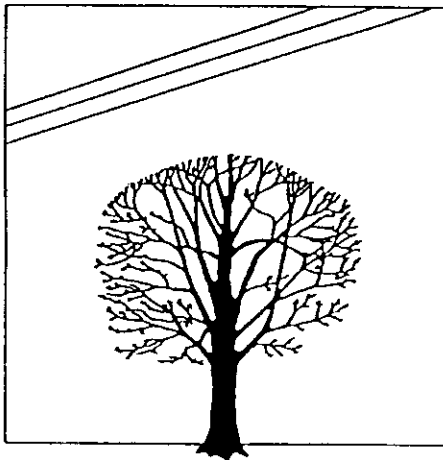
This is done by stubbing off major limbs to greatly reduce the size of the tree crown. The result is not only unsightly, but promotes a multitude of fast-growing suckers that sprout from the stubs. The combination of stubbing and re-sprouting leads to weak limb attachments, disease and decay, which then lead to a serious reliability and line clearance problem.

Pollarding is unacceptable.



## 9. ROUNDING OVER

Rounding over (or shearing) is done by making many small cuts so that the tree top is sheared in a uniform line. This creates an unhealthy tree condition and results in rapid regrowth of suckers directly toward the electric conductors.



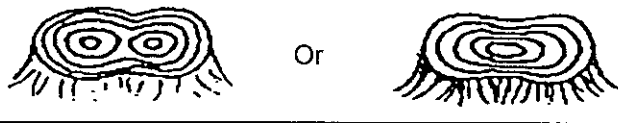
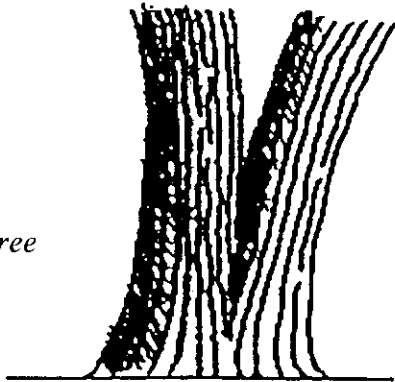
When a round over is done using a pole saw the trimmer usually leaves numerous stubs, rather than following drop crotch and directional trimming principles. This stubbing commonly leads to decay, disease and rapid re-growth. This condition is unacceptable, except when mandated by customer requirements, and even then should be a last resort.

When a round over must be done, it shall be completed using the proper hydraulic or manual pruning tools, following the proper collar cut procedures. Stubbing is unacceptable. The Owner's Representative shall be notified before a round over is performed

# Appendix 5

## What is a Tree

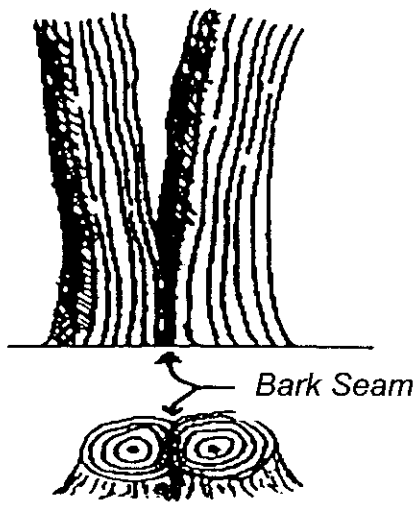
*Single Tree*



### 1. SINGLE-STEM TREE IDENTIFICATION

A tree that splits above ground line and has a visible included bark seam down to the ground line is considered a single tree.

*Separate Trees*



### 2. MULTI-STEM TREE IDENTIFICATION

A tree that splits at ground line is considered multiple trees. A tree that splits above ground line, but has a visible included bark seam down to the ground line is considered separate trees.

# Appendix 6

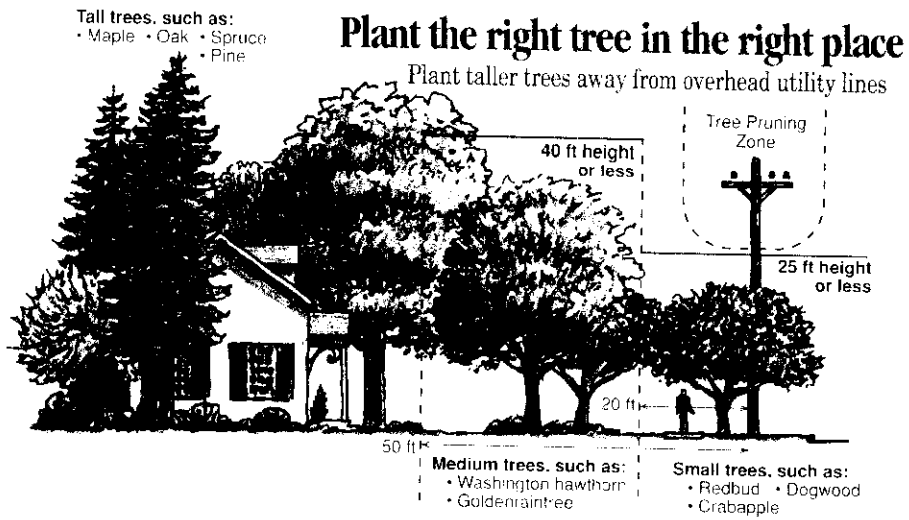
## Empire Line Clearance Scheduling Strategy

The following table summarizes the Empire line clearance scheduling strategy. Individual circuits may be accelerated or deferred based on assessment of field conditions and operating performance.

<b>Feeder Description</b>	<b>Primary Cycle Length (Years)</b>	<b>Mid-cycle Inspection/selective Tree Maintenance (Years)</b>
Residential Feeder Multi-phase	4	2
Rural Feeders	6	3

\* The above schedule will be utilized unless otherwise directed by the appropriate regulatory body

# Appendix 7



# Appendix 8

## DEFINITIONS

*The following words and phrases shall have the definitions set forth below when used in these specifications:*

**basal treatment** - Herbicide application covering the entire stem to approximately 18 inches above the soil

**brush** - a woody plant that is manageable by herbicide application due to setting or tree species less than 6 inches DBH, that is not part of an existing tree, and that may reach the conductor at maturity.

**brush unit** - one square foot of brush-covered ground. A 1,000 square foot pricing unit of brush may consist of partial units scattered throughout the electrical corridor. Brush area shall be measured at the drip line.

**brush work** – trimming, clearing brush and applying a herbicide to the cut stems, or only applying herbicide to brush.

**clearance** - the distance between the nearest portion of a tree or other vegetation and the conductors.

**coniferous** - any of the cone-bearing trees or shrubs, mostly evergreens.

**DBH** - "diameter at breast height" – the diameter of individual tree trunks or individual stems of brush measured at a point 4.5 feet above the ground.

**deciduous** - any perennial plant that sheds its leaves annually at the end of a growing season.

**demand tree trimming** - trimming or removing trees on a customer requested or emergency basis. Also may include tree work associated with line construction projects. This is typically required when trees have grown into the conductors, or are close to the conductors, and have created a potentially dangerous situation. This may also include special trimming or chipping work when requested by EMPIRE. Only EMPIRE authorized representatives may assign customer requested, demand tree work.

**directional pruning** - a form of natural pruning used to encourage tree regrowth away from the conductor. It is accomplished by removing limbs growing toward the conductors entirely at the branch collar near the trunk of the tree, or by pruning to lateral branches that are at least one-third the diameter of the limb being cut and are growing away from the conductor. (References: Dr. Alex Shigo and/or ANSI A300)

**drop-crotching** - is a crown reduction technique in which a tree trimmer makes proper pruning cuts at crotches, removing the larger limb and favoring the smaller. For electric line clearance, the trimmer would remove limbs growing toward the conductors and favor those growing away from the conductors. This usually results in a "V" shaped appearance of the tree crown and is frequently referred to as "V-trimming". See definition of "natural pruning" for further description.

**evergreen** - any plant that retains its leaves/needles year-round.

**foliar herbicide application** - the application of a herbicide to the leaves or needles of a target plant.

**hazard trees** - trees that are located off the right of way, have a high probability for failure and are of sufficient height to contact the conductors and/or structures and guy wires if they were to fall in that direction, and should be cleared. Conditions could include but are not limited to the following: Dead, dying or diseased, leaning trees, weak branches, shallow root system, root failure, internal decay, canker or canker root.

**herbicide** - a chemical pesticide used to control, suppress, or kill plants.

**Make-safes** – the practice of cutting only the portion of a tree that encroaches beyond air insulation distance as required by NESC for work to be performed by companies not line clearance certified. This work does not include the chipping or removal of the resulting debris and will be performed at the direction of EMPIRE personnel.

**mechanical per lineal foot, one side** – A pricing unit used to describe pruning solid side wall of trees, on one side of the lines, where it is not practical to designate individual trees and is practical and appropriate to use mechanical tree trimming equipment.

**natural pruning** - a method by which branches are cut to the branch collar at a suitable parent limb, the trunk of the tree, or an appropriately sized lateral branch. This method of pruning is sometimes called "drop-crotching", "proper pruning", the "Shigo method" or "lateral trimming."

**non-mechanical per lineal foot, one side** – A pricing unit used to describe pruning solid side wall of trees, on one side of the lines, where it is not practical to designate individual trees and is not practical or appropriate to use mechanical tree trimming equipment.

**preventative maintenance** - trimming or removing vegetation on a systematic basis typically by, but not limited to, circuit or grid, and in a manner intended to achieve system reliability.

**pruning** - the removal of dead, dying, diseased, interfering, objectionable, and/or weak branches of trees or shrubs using proper arboricultural techniques.

**removal** - completely cutting to the ground or as close to the ground as obstructions do not inhibit an entire tree and applying herbicide to the cut stump.

**right-of-way** - a distribution right-of-way, an easement, a EMPIRE easement, or any other corridor of land paralleling, on both sides, an overhead distribution line, and in respect of which EMPIRE has certain rights.

**rounding over** - the making of many small cuts so that a tree underneath the conductors is rounded over in a uniform curve. This creates an unhealthy tree condition and results in rapid regrowth directly back toward the electrical conductors. This is not an acceptable practice.

**safety zone work** – removing all overhang and cutting back limbs to a minimum clearance of 10 feet from the energized conductor.

**selective herbicide** - a herbicide that, when applied to a mixed population of plants, will control specific species without injury to others.

**shearing** - the making of many small cuts so that a tree adjacent to the conductors is sheared in a uniform line. This is not a generally acceptable practice.

**show-up site** – site where CONTRACTOR crews receive work assignments.

**side pruning** - using natural pruning methods to cut back or removing side branches that are threatening the conductors; required where trees are growing adjacent to conductors.

**stump treatment** - applying an approved herbicide to the outer ring (cambium) portion of the stump to reduce or eliminate re-growth.

**sucker growth** - the re-growth within the tree that originates near the cuts made during the previous trimming.

**the property** - any work site associated with this contract.

**topping** - cutting back the upper crown of a tree to a uniform horizontal line, leaving multiple stubs. This is an improper and unacceptable trimming technique except where specified to reduce a hazard. Usually applies to make-safes and top and spray applications.

**tree** - a perennial plant with a woody trunk measuring at least six (6) inches DBH, and having one set of annual rings at ground level or more than one set of annual rings not separated by included bark. Trees that grow adjacent to one another and share an apparent common base completely separated by "included bark" are considered to be distinct trees. "Included bark" is bark that is included within the wood of a tree, or between the woody stems of separate trees, creating a physical separation between the trees.

**tree size classifications** - tree diameter as measured at breast height (DBH): 6" to 11.9", 12" to 17.9", 18" to 23.9", and 24" and greater

**tree crown** - the upper portion of the tree; the branches or leaf area.

**trimming** - cutting back tree branches or shrubs to shape or reduce the size of the tree or shrub.

**V-trim** - using natural pruning methods to cut back large portions of the upper crown of a tree. This is required when trees are located directly beneath a conductor. Also known as crown reduction pruning or drop crotching.

**vegetation** - all the plant (flora) life in a particular region; a plant community, assemblage, or aggregation with distinguishable characteristics.