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July 24, 2025

VIA ELECTRONIC MAIL AND HAND DELIVERY

Ellen Golde, Division Clerk
Rhode Island Division of Public Utilities and Carriers
89 Jefferson Boulevard
Warwick, RI 02888

RE: Division Docket No. D-25-15 - The Narragansett Electric Company d/b/a Rhode Island Energy 2025 Vegetation Management Standards and Practices
Responses to Advocacy Section Set 1

Dear Ms. Golde:

On behalf of The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company"), enclosed please find the Company's responses to the First Set of Data Requests issued by the Advocacy Section of the Division of Public Utilities and Carriers.

Thank you for your attention to this filing. If you have any questions, please do not hesitate to contact me at 401-784-4263.

Sincerely,

Andrew S. Marcaccio

Enclosures

cc: Division Docket No. D-25-15 Service List

Certificate of Service

I hereby certify that a copy of the cover letter and any materials accompanying this certificate were electronically transmitted to the individuals listed below.

The paper copies of this filing are being hand delivered to the Rhode Island Public Utilities Commission and to the Rhode Island Division of Public Utilities and Carriers.

Andrew S. Marcaccio

July 24, 2025
Date

Docket No. D-25-15
The Narragansett Electric Company d/b/a Rhode Island Energy's 2025 Vegetation Management Standards and Practices

Service List
(Updated 7/3/25)

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AS 1-1
General Questions

Request:

Please provide a list of all industry best practices and standards that were considered in developing the Vegetation Management Standards and Procedures ("VM Plan" or the "Plan") and how RIE complied with RI VM statute R.I. Gen Laws § 39-34-3(c).

Response:

The Narragansett Electric Company d/b/a Rhode Island Energy ("RIE" or the "Company") prides itself on its longstanding Vegetation Management program, the basis of which has been in place for many years (previously under control of National Grid). Through the years this program has been adapted and adjusted to ensure the Company can continue to deliver safe, cost effective and reliable electric services to its customers in Rhode Island. RIE has continually employed vegetation management experts, including but not limited to, certified arborists, foresters and horticulturalists for its staff.

To ensure safety, RIE mandates that its employees and vendors comply with all applicable Occupational Safety & Health Administration ("OSHA") Safety Rules and Regulations as well all American National Standards Institute ("ANSI") Z133 Safety Requirements for Arboricultural Operations. They also follow all Rhode Island Department of Transportation ("RIDOT") safety rules and requirements for roadside construction job sites. All staff, vendors and contract arborists are also required to complete Electrical Hazard Awareness Program ("EHAP") training and review it annually.

To attain value and reliability RIE staff ensure that vendors adhere to both the ANSI A300 Standards for Tree Pruning and the International Society of Arboriculture, Best Management Practices ("BMP") – Tree Pruning Publication.

There are many publications that may have also been referred to while establishing and/or updating the Company's Vegetation Management program through the years. Those include, but are not limited to, The Arborday Foundation's recommendations, Tree Care Industry Association's ("TCIA") published safety information/recommendations, International Organization for Standardization ("ISO") 14001 environmental management system guidelines and standards, and Electrical Power Research Institute's ("EPRI") research and development related to delivery of electricity aimed at improving reliability, affordability and environmental responsibility.

AS 1-2
General Questions

Request:

Regarding the Company's April 10, 2025 virtual presentation of the Vegetation Standards; provide a list of participants and associated municipality, the presentation, and any comments received.

Response:

Please see the following list of participants and associated municipalities.

Chris Rooney – Rhode Island Energy
Mike Maneri – Rhode Island Energy
Randy Borders – Rhode Island Energy
Ellie Hiers – Rhode Island Energy
Samantha Farthing – Rhode Island Energy
Jacques Alfonso – Rhode Island Energy
Carlos Pinheiro – Warwick Tree Warden
Brian Wheeler – Warren DPW Director
Ray Pendergast – N. Smithfield DPW Director
Robert Corayer – S. Kingstown Assistant Highway Superintendent
Sue Richardson – Tiverton Public Works Admin Assistant
Joe Shilling – Division
Gene Allan – Smithfield DPW Director
Ralph Farrar – Smithfield Deputy Public Works Director
Eric Earls – Warwick DPW Director
Nancy Stairs – RI DEM Division of Forest Environment
Richard Bourbonnais – S. Kingstown DPW Director
Adam White – N. Kingstown DPW Director
Ben NG – City of Johnston
Molly Ahearn – City of East Providence
Darren McConnell – City of Narragansett
Matt Largess – Warren & Central Falls Tree Warden
Scott Wheeler – Newport Tree Warden
Kevin McGee – Coventry DPW Director
Maureen Cronin – Newport Tree Commission
Stan Zuba – N. Smithfield Tree Warden
Peter - no last name or municipality given
Chris -- no last name or municipality given

AS 1-2, page 2

General Questions

The presentation was the PDF of the Company's Standards and Policies and Procedures. The Company is attaching the presentation as Attachment AS 1-2.

There was only one question: It was from Matt Largess from Central Falls. Mr. Largess was curious if the Company has seen fires on ROW's near Pitch Pine forests. The Company has not seen any fire activity near pitch pine forests in RI. He was informed.

Rhode Island Energy™

a PPL company

Forestry Department

Standards, Policies, Practices & Procedures

03/20/25

Rhode Island Energy™
a PPL company

RI Energy's Vegetation Management

Standards and Procedures

Introduction

Rhode Island Energy's VM Program is an essential component of the company's plan to maintain the safety and reliability of its electric distribution network. Trees have a significant impact on reliability. Keeping the vegetation clear from the conductors provides a level of safety for the workforce/ public, improves operational efficiencies, and reduces wildfire risk.

Working with the RI PUC and RI Division of Public Utilities, the Company historically has had a very strong VM program. The company's VM program includes several different activities, each addressing a different aspect of utility vegetation management. This document will describe the company's Forestry department's various programs. In addition, it will contain all the materials we use for the day-to-day operations as well as contractor documents that are to be followed.

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Cycle Trim:

The cycle trim program is designed to ensure that the vegetation growth along the overhead portion of the company's distribution network does not interfere with the safe and reliable performance of the electric network. Cycle trim includes scheduling of every distribution circuit for pruning on a fixed timeframe or rotation. The pruning work performed is based on a dimension clearance specification and is designed to maintain an acceptable vegetation clearance. A consistent and well thought out cycle trim program helps maintain service reliability and supports the efficient management of the overhead network.

Managing the vegetation clearance helps to avoid interruptions caused by phase-to-phase tree contact and makes the network more accessible to line crews. This pruning enables quick restoration of an outage due to enhancing the visibility of the equipment in the field. Lastly, this activity provides the clearance necessary to accurately inspect overhead wires to identify issues or potential issues.

A traditional 4-year cycle has been the focus of the program since fiscal year 2011, the company is always looking to optimize available data to get our annual feeder list as pinpointed as possible. Many different factors are brought into consideration such as growing degree days, and satellite tree health analysis. These factors help to optimize the scheduling of the cycle, which is critical to being ahead of growth, insects and disease risks. Our annual workplan is roughly 1,000 to 1,400 circuit miles a year. Addendum 1 is this fiscal year's workplan.

The cycle trim specifications for our vendors are included as an addendum to this packet. Overall, our specifications for clearance distances have not changed. Addendum 2. lists the specifications our vendors follow for cycle trimming operations. Vendor qualifications as well as industry safety and quality standards are referenced in this document.

With the passing of law RIGL 3934, et. Seq. RI Energy will be now modifying our notification process to include the following steps.

Notification Procedure –

1. At the beginning of the fiscal year the tree warden and the DPW director will be notified by mail that there is scheduled cycle trimming tree work in their community. At that time RIE will be looking for the community to identify the point person for the coordination of efforts.

2. At least thirty days out from the beginning of cycle trim work being performed the tree warden and or the designated point person will be updated with very specific info regarding what vendor will be working in their community, the exact scope of work (neighborhoods to be trimmed) and RI Energy staff contacts for the project.
This notification will be sent via mail. In addition, organizations such as fire districts or other large private property owners will be notified in the same manner.

3. RI Energy's communications department will examine the best avenue for each community and create notices or ads to inform. This will take place thirty days from the beginning of trimming. It will include company and vendor contact information for customers who have questions or concerns.

4. RI Energy will be mailing a letter to all property owners in the scheduled cycle trim area informing them of the scheduled work as well as providing them with the appropriate contact information for both RI Energy and the vendor doing the tree work. (sample in binder)

5. Included in the vendor specs will be to the requirement to leave door hangers on all impacted property owners as well as properties that abut a community owned tree that will be pruned. This will be done at least 14 business days prior to the tree work. See addendum 3 and 4.

Cycle Trimming Customer Concerns: (light trims or refusals)

During routine trimming operations customers will be concerned about the tree pruning happening to their or the community's trees and asking for adjustments to the trimming specification. The company will be taking appropriate steps to address these concerns. The first information that must be obtained is whether the utility equipment is located on a public way or a private way.

Public Way

For the public way the tree warden or designee, will be engaged. Next it will be determined if the utility equipment is on town property or not. Over the years some utility infrastructure has mistakenly been located on property that is thought to be in the town's ROW. If it is found not to be properly situated the parties will work together to get the situation rectified. If the utility equipment is properly situated the request for adjustment to the specification will be taken into consideration with site factors evaluated.

Some of the site factors include

Electrical infrastructure (present at that location). The wire and voltage onsite dictate if the flexibility to the spec is available. The higher the voltage present on site, the greater need for clearance from vegetation.

Customer Risk (downstream of a location). If the adjustment to the specification increases the risk of power quality issues for customers downstream of that location the consideration is more difficult to approve.

Critical Customer Risk (downstream of a location) There are customers that are considered critical for various reasons on the system. These include customers that are on life supporting electrical equipment at home as well as community assets such as hospitals, pumping

stations, police and fire stations. Adjustment of the spec could pose a higher risk of power interruptions for these customers.

Specific site risks Certain locations and environments throughout the company's service territory present more risks of service interruptions and potential hazards. These sites include fire prone areas as well as windy sites. Adjustments to the spec could present an increased risk of fire and property damage.

Please Note

There is language included in pole permits over the years that gives RI Energy the right to maintain our equipment and therefore the company feels that this enables tree trimming activities to help maintain equipment located on the pole lines. In 1982, R.I. Gen Laws 39-1-30.1 , et. Seq. gave all the poles and equipment on public ways deficient of documentation the right to be in their location.

Private Property ROWs

For private property ROW concerns, the first step will be to ascertain if the company has the right to have our equipment on the specific property. Secondly, does the company have the right to maintain equipment located on the property. If historical rights cannot be discovered, then the company will work with the property owner to rectify the situation. If the company does have the right to maintain our equipment and or the right of way we will consider the spec adjustment with the same criteria as in a public way.

Some of the site factors include

Electrical infrastructure (present at that location). The wire and voltage onsite dictate if there is flexibility to the spec available.

Customer Risk (downstream of a location) If the adjustment to the specification increases the risk of power quality issues for customers downstream of that location, the consideration is not feasible.

Critical Customer Risk (downstream of a location) There are various customers that are considered critical for various reasons on the system. These include customers that are on life supporting electrical equipment at home as well as community assets such as hospitals, pumping stations, police and fire stations. Adjustment of the spec could pose a higher risk of power interruptions for these customers.

Specific site risks Certain locations and environments throughout our service territory present more risks of service interruptions and potential hazards. These sites include fire prone areas as well as known windy sites for example. Adjustments to the spec could present an increased risk of fire and property damage.

Please Note:

If the property owner does not reasonably offer the opportunity to maintain the vegetation around the company's equipment the company may explore options such as deenergizing said

equipment or presenting the property owner with accountability for future property damage and outages.

Tree Growth Regulators

Tree Growth Regulators (TGRs) are an effective tool used in the Utility Arboriculture industry to help regulate regrowth from routine cycle maintenance trimming. TGRs are a compound that when taken up by the tree decreases vegetative growth by inhibiting the formation of gibberellins, the group of hormones responsible for cell elongation. When applied to a tree growing near power lines, these growth regulation treatments reduce the length of regrowth that would occur routinely after cycle trim activities. An effective TGR program is all about using this treatment on the right tree / trees. Fast growing trees located near the wires in a sidewalk planting pit, or a planting strip are perfect candidates. In addition, trees that are in very busy spots are also perfect candidates. The industry has established that treating trees with TGRs can save 35%-60% maintenance costs in cycle trimming versus untreated trees. This saving is attributed to either moving feeders to a longer pruning cycle or just having the benefit of doing less tree work to do upon returning to the treated tree. This treatment option will be presented to applicable tree owners and will only be conducted with their permission.

Traffic Control

Traffic control can consist of either flaggers or police officers. Flaggers are personnel that are trained in traffic control, road safety conditions and job site safety and set-up. They can be employees of an independent traffic control company or trained employees of the RIE contracted tree vendors. Flaggers are typically utilized at the vendor's discretion for the safety of the crew performing work at the job site as well as for the safety of any/all vehicular traffic & pedestrians at the job site. Police officers used for flagging are actual employees or retirees of the towns/communities in which the work is being performed. The towns provide a non-negotiable rate for these employees to perform flagging duties, typically at an overtime rate. Often the towns or their police departments will mandate the vendors to utilize police officers rather than trained flaggers to perform these duties, which minimizes cost savings. For the majority of RIE annual pruning maintenance work, the vendors are asked to submit pricing for the work that will include the cost of using flaggers or police details based on existing town ordinances/mandates for officer usage.

Risk reduction (On-cycle / Off cycle) Tree Work

This work is above and beyond the cycle trimming specification. This work is reliability based and intended to reduce tree caused outages in certain areas. This work will be highly coordinated with the tree owners and community partners. In all circumstances this additional work will be permissioned out with the tree owners. The form presented to tree owners is addendum 5.

Sub Transmission (Sub T)

Sub Transmission (Sub T) is defined as electrical distribution lines typically ranging from 22kV to 46kV in Rhode Island. These lines can run along roadsides (like most lower voltage distribution lines), along railroad tracks (active/non-active) or off road through ROWs or cleared corridors. Sub T lines can run from substation to substation or to a single large industrial customer or industrial park. RIE has created specifications to document the requirements for sideline pruning, hazard tree removal and IVM (Integrated Vegetation Management) along Sub T roadside and Rights-of-way lines. Sub-t Specs see addendum 6.

Sub T work shall be carried out in a multi-step site specific process. First sideline pruning, hazard removals and ROW floor cutting/mowing and then, where deemed necessary, follow-up herbicide treatment, typically for off road sections. All treatment types are prescribed prior to vendors bidding on and commencing the work, based on the vegetation present, line structure and voltage classification and sensitive areas (which may include the presence of endangered species, wetlands and drinking water wells). All herbicide applications MUST follow local state pesticide regulations.

During all operations the contractors shall comply with all applicable Federal, State and local laws and regulations and with the requirements of all permits and approvals obtained by RIE. RIE is committed to minimizing its impact on the environment and requires its contractors to demonstrate the same level of commitment as RIE in the management of the environment.

Hourly (CORE) crew activities:

Aside from cycle pruning work, RIE performs other essential vegetation management activities that aid in efficiently maintaining the safety and reliability of the network as well as addressing customer needs/requests. RIE has limited discretion over the timing of many of these activities, as they vary from month to month and year to year. Each of these activities consumes a small and variable proportion of the overall annual budget and must be managed to ensure efficiency.

These core activities include, but are not limited to:

Customer Requests: These requests include both internal and external customers.
Internal customers include other RIE departments which may require vegetation work to be done to complete their projects.
External customers include residential and business customers, town/municipal officials, DOT/highway departments, etc. Residential customers may inquire about vegetation maintenance, vegetation removal, or perceived hazards. Town or municipal officials may inquire about these same types of vegetation issues or may need vegetation work to be done to complete their projects

Un-qualified Tree Work Assistance Requests: These requests are made to the company when an unqualified (with respect to line clearance) tree worker/company or property owner wants to remove a tree that is within 10' of live electrical wires. If the wires cannot be removed or deenergized, RIE's qualified Tree Contractors will remove the portion(s) of the tree that are within 10' of the energized lines, so that the remaining portion of the tree can be removed by the

unqualified line clearance tree worker/company. The debris and traffic protection will be processed by the requesting party.

Interim Pruning: On occasion, pruning must be performed between scheduled maintenance cycles after an exceptional growth season where regrowth has prematurely begun to encroach on the wires posing a threat. Another occasion would be when circuits have been reconfigured to shift loads. On rare occasions when this occurs, small portions of a circuit may be missed due to a neighborhood now being on a different circuit and schedule. Tree owners will be properly notified if they are in one of these areas.

Trouble Work: This type of work can be related to post storm work or can happen on a clear day/night. These are calls concerning a tree or branch that has fallen on live wires and the situation needs to be immediately resolved by one of our qualified line clearance tree crews. The debris generated by this work will be the responsibility of the tree owner to remove. The company and our tree vendor will make the condition safe electrically.

Vendor Training: RIE staff take time annually to train the line clearance tree workers that are currently working for us. Even though the vendor companies are mandated to conduct training of their own employees, RIE recognizes the need for some additional training. This training may include reviewing the work specifications, customer interactions, safety topics, etc.

Capital Construction Activities:

What is Capital Construction?

Replacing or upgrading our assets such as poles, wire, transformers, etc.

Why are we doing this work?

Equipment deterioration, equipment upgrades for voltage requirements, new customers, line extensions, damaged equipment, either by storms, motor vehicle accidents, etc.

What does the process look like.

A request is made by either a customer or a company employee. Company engineers review the job to see what equipment or upgrades will be required to complete the request. The engineers draw up the plans for the work to be performed. If the tree work is extensive the forestry team is brought in to make suggestions and even propose moving locations to avoid tree conflicts. Company overhead lines field supervisors review the work to see what personnel and equipment that will be needed, and if any additional items are needed such as dig safes, tree trimming, police details, etc. If tree trimming is required, the job is forwarded to the forestry department. A forestry department representative will go out and review the job to see what trimming and or tree removals may be necessary. At this point they contact the party that owns the trees or is responsible for the property in question, to attempt to obtain permission to perform the necessary work. In some cases, voltages need to be increased to satisfy load requirements which typically results in taller poles and changed to the conductors, there for greater vegetation clearances may be required. The tree work gets done, followed by the line work.

Primary Metering

Primary metering is typically present when an industrial customer, campground, or a distribution power generator has a higher voltage line running to a meter on their property. After the meter the customer owns equipment such as transformers, additional spans of wire, etc. RIE is responsible for maintaining wires and equipment up to the primary metering. Beyond the primary metering is customer owned equipment which falls under the customer's responsibility for maintenance. They are responsible for keeping this area free of weeds, trees, other vegetation, and debris, to ensure the equipment remains properly working. RIE will be installing signs at such locations to reinforce the customer maintenance responsibilities and requirements. During routine maintenance, if RIE notices that the customer owned equipment needs attention, RIE will make every effort to notify the customer of this condition

Supervision

RIE's vegetation management staff consists of RIE employees (aka forestry or vegetation management supervisors) and contracted vegetation management techs.
RIE's employee Forestry Supervisors are required, at minimum, to hold a RI Arborist License as well as being an ISA (International Society of Arboriculture) certified Arborist. They are encouraged to be active members of the New England Chapter of ISA along with other local green industry organizations to maintain continuing educational credits required to maintain said certifications. They each have many years of both educational and practical experience.

RIE requires the same high standards and qualities for their contracted Veg Techs to ensure that our Vegetation Management Program safely minimizes tree related power outages while maintaining sound arboricultural practices and affordability for our customers.

Our staff (employees and contractors) assist with local Arbor Day/Earth Day celebrations throughout our service territory, educating the public about tree benefits, tree care and planting the right tree in the right place. They also take part in various volunteer events throughout the year, one example being Saluting Branches. In addition, the RI Forestry department has been recognized as a Tree Line utility for 2025.

Vendor Scorecard

Company staff visually inspect each completed vendor work package prior to final payment being made to the vendor. Upon performing the audit, the staff member completes a robust scorecard which grades the vendors overall work and work practices. **(See addendum 8 for an example of the current scorecard).** The scorecard evaluates not only the quality and thoroughness of the vendors work upon completion, but also their communications with RIE, municipalities, police departments and customers throughout their time spent on the work package. It also evaluates their ownership in the work and of course their overall safety performance. This helps to determine the viability of the vendor to continue to work on the RI Energy system.

Right tree right place program:

The company is working with community partners to develop a right tree right place informational program. Within the coming months a website will be designed and built as well as demonstration arboretum is to be planned.

Attachment A-1

FY26 Rhode Island

Vendor	PACKAGE	SUBSTATION	CIRCUIT	MILES
COASTAL				
ABC	**Hopkinton**	Chase Hill	155F4	21.7
			155F6	39.42
		Wood River	85T1	76.68
			Total	137.8
LUCAS	**Westerly**	Westerly	16F1	26.79
			16F2	24.76
			16F3	11.71
			16F4	20.61
			Total	83.87
ABC	**Boston Neck**	Old Baptist Road	46F2	28.82
			46F3	21.19
		Divison st	61F4	11.71
			Total	61.72
DAVEY	**Warwick West Warwick**	Kilvert St	87F2	2.95
			87F3	12.58
			87F4	2.59
		New London Ave	150F2	7.64
			150F4	11.07
			150F6	17.84
			150F8	14.56
	West Cranston	WEST CRANSTON	21F1	36.43
			Total	105.66
DAVEY	**Kenyon**	KENYON	68F1	84.29
			68F4	51.98
			68F5	11.68
			Total	147.95
ABC	**Tower Hill**	TOWER HILL	88F1	45.57
			88F5	36.28
			88F7	23.93
			Total	105.78
CAPITAL				
DAVEY	**Chopmist**	CHOPMIST	34F1	171.08
			Total	171.08
ASPLUNDH	**Urban**	CLARKSON STREET	13F2	4.52
			13F3	9.76
			13F4	20.25
			13F5	15.17
			13F9	17.57
			13F10	13.51
		CENTREDALE	50F2	10.12
			50J1	2.97
			50J2	0.18
			50J3	3.23
			Total	97.28
ABC	**Smithfield**	FARNUM PIKE	23F1	15.27
			23F3	26.42
			23F6	21.25
			Total	62.94
ASPLUNDH	**Blackstone 1**	VALLEY	102W51	20.22
		STAPLES	112W41	13.55
			112W42	23.06
		WASHINGTON	126W51	27.17
			Total	84
STS	**Blackstone 2**	NASONVILLE	127W40	57.42
		WOONSOCKET	26W3	19.08
			26W5	21.46
			Total	97.96
			Grand Total	1156.04

Attachment A-2

RIVERSIDE	108W51	3.12
	108W53	12.74
	108W55	3.33
	108W65	18
HIGHLAND PARK	200W2	1.03
	200W3	0.44
	200W5	14.73
	200W6	4.97
HARRIS AVENUE	1131	0.7
	1133	0.64
DYER STREET	2J3	0.41
	2J4	0.26
	2J5	0.58
HARRIS AVENUE	12J1	0.67
	12J2	1.65
	12J3	0
	12J4	2.17
	12J5	0.74
	12J6	1.49
SPRAGUE STREET	36J1	2.02
	36J2	1.88
	36J4	2.49
	36J5	2.24
OLNEYVILLE	6J6	1.03
	6J8	1.41
POINT ST	76F5	8.57
HUNTINGTON PARK	67J1	2.76
WAMPONAUG	48F2	4.94
DAVISVILLE	84T1	0.62
	84T2	0.46
	84T3	1.66
QUONSET	83F1	0.65
	83F2	0.43
	83F3	11.87
	83F4	12.51
WASHINGTON	126W42	10.07
	Total	133.28

Attachment B

Rhode Island Energy Rhode Island Distribution Line Clearance Specification Fiscal Year 2027	Revision No. 1 Page 1 of 12 Date: 3-17-25

FOREWORD

This specification documents the objectives, practices and procedures for vegetation management on Rhode Island Energy company distribution circuits in **Rhode Island only**. The specification also defines the responsibilities of Rhode Island Energy vegetation management personnel and contractors, identifies procedures to be followed by contractors performing all work and defines the requirements to maintain vegetation acceptable to the Company.

Questions or inquiries regarding information provided in this document should be referred to the Rhode Island Energy Manager of Vegetation Strategy.

Christopher J Rooney
Manager
Rhode Island Energy T&D

Date of Review/Revision:		
Revision	**Date**	**Description**
0	11-7-2022	Original Specification
1	7-5-2023	Services and secondary update
2	3-17-2025	Services and secondary update

Rhode Island Energy™
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RI DISTRIBUTION LINE CLEARANCE SPECIFICATIONS **Date 3-17-2025**

I. Scope/Intent

1.1 These specifications cover the cutting, clearing, pruning, tree removal and herbicide treatment of vegetation along overhead electric distribution lines and the corresponding substations. The intent is to define the minimum clearances between the overhead conductors and vegetation acceptable to RI Energy. These specifications are strictly for use on overhead line maintenance pruning projects. This is not a specification to be used for enhanced hazard tree removal, new construction clearing or rebuild construction clearing.

II. Program Objectives:

2.1 The RI Energy Distribution Line Clearance program's goals are to provide safe, reliable, electric service through a cost-effective, integrated vegetation management program. RI Energy acknowledges differences in the way various landowners respond to the need for routine line clearance activities,together with occasional differences in easement rights. Therefore, these specifications are designed to address:

- The minimum clearance requirements necessary to sustain safe, reliable electric service while striving to satisfy the concerns of sensitive customers, and the optimum clearance requirements necessary to sustain an appropriatelevel of safety and reliability.

III. Definitions:

Maintained Area: Generally defined as an area where the landowner or occupant is mowing the lawn and/or caring for gardens, ornamental shrubs, or trees in the area under and immediately adjacent to the distribution poles. It includes commercial land uses such as business areas, parking lot edges and the tree lawn areas along urban and suburban streets. Un-maintained areas, of course, hold the opposite of these characteristics. It should be noted that within residential (maintained) areas there may be small sections of un-maintained property between yards or along the roadside of residential front lawns, etc. These small sections shall be treated as maintained areas for the purposes of this specification.

Mature Tree Line: A generally straight and contiguous line of trees nine (9) inches d.b.h. or greater, that mark the boundary between the forested edge and the maintenance

corridor. In the case of an existing mature tree line, there may be individual mature trees that are rooted closer to the pole centerline than the common mature tree line. In these instances, the mature tree line continues behind those individual trees.

Maintenance Corridor: The area physically located under and alongside the overhead distribution feeder bounded by the mature tree line when one exists. In the absence of a mature tree line the maintenance corridor is defined as the area that is at least ten (10) feet either side of the pole centerline or equal to the previously maintained dimensions if greater than ten (10) feet.

Secondary side taps and service drops: Service drops are pole to house triplex or open wire. Secondary taps are tap lines off roadside secondary to a pole.

Roadside Secondary: The conductor, either triplex or open wire, which extends from the transformer to the Service Drop or Secondary (tap). These secondary spans may run along under primary or run separately.

RIE owned Street Light Secondary: The conductor, either triplex or open wire, leaves the primary pole to pole configuration and extends out to service a streetlight or lights.

IV. Scope of Work:

4.1 Pruning Standards: All pruning shall be performed according to ANSI A300 standards and the Best Management Practices – Tree Pruning publication. All cuts shall be made at a parent branch or limb, so that no stub shall remain. In cutting back a branch, the cut shall be made at a crotch or node where the branch being removed is at least one-third the diameter of the parent limb. All pruning cuts shall be made in accordance with proper collar cutting methods, utilizing drop crotch principles to minimize the number of pruning cuts,promote natural growth patterns, and maintain tree health and vigor (ANSI A300). Climbing irons or spurs shall not be used in pruning a shade/ornamental tree to be saved. Tree wound dressings shall not be applied.

4.2 Line Clearance within Maintained Areas: All overhead primary lines shall be pruned to provide a minimum of ten (10) feet of overhead clearance, a minimum of six (6) feet of side clearance from the outermost phase and a minimum of ten (10) feet of clearance below the wires. The contractor shall recognize that the use of ANSI A300 standards and techniques will result in clearances beyond the dimensions noted above.

4.2.1 The main trunk of the tree or major leads which are structurally sound and healthy may be left growing within these distances if none of the smaller diameter end branches are within the clearance dimensions. In that case the lead must be removed.

4.2.2 Where greater clearances have been achieved in previous cycles, the pruning shall be completed to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

4.2.3 The contractor shall ground cut any new volunteer growth capable of growing into the wires from around poles, guys, fences, etc. within the maintained yard areas after notifying the property owner.

4.2.4 It is an objective of Rhode Island Energy's program to continually strive to reduce the number of underwire trees and branch growth that will continually require pruning, by removing as many stems and growth as possible on each cycle. The Contractor is expected to emphasize this type of removal through the landowner contacts made by their customer contact personnel.

4.2.5 Contractors shall exercise extreme care when pruning ornamental plantings. Species, growth rates and growth characteristics should be considered and may require differing clearances.

4.2.6 All slash from pruning in maintained areas shall be disposed of through chipping. Large diameter wood may remain on site provided it is cut into manageable lengths and piled neatly. Smaller debris shall be raked up and removed to leave the property in a condition equal to the start of work.

4.3 Line Clearance Outside of Maintained Areas: All overhead lines shall be pruned to provide at least fifteen (15) feet of overhead clearance and six (6) feet of side clearance from the outermost phase.

4.3.1 Along off-road sections the contractor shall completely remove all side branches that extend into the maintenance corridor from below and beside the lines to "box out" the maintenance corridor. This practice will minimize future pruning efforts and improve storm restoration and line inspection efficiency.

4.3.2 Where greater clearances have been achieved in previous cycles, the pruning shall be completed to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

4.3.3 The contractor shall cut all trees and shrubs which could interfere with the conductor out to the limits of the existing maintenance corridor. Where a maintenance corridor does not already exist, ground cutting shall be performed for a minimum distance of ten (10) feet either side of centerline. Ground cutting shall include stems of eight (8) inches d.b.h. or less, all as part of the fixed price bid. Along individual spans that have been previously maintained using RI Energy's past eight (8) foot targeted ground cutting specification (trimming and removal) the same approach shall be utilized.

4.3.4 Where trees beyond the maintenance corridor's limits extend into the corridor, the contractor shall either prune those limbs back or remove the tree as part of the fixed price bid. For trees, eight

(8) inches d.b.h. or less, where the top of the tree leans out into the corridor so that topping would be the only possible correction, the contractor shall ground cut that tree as part of the fixed price bid.

4.3.5 Stumps shall be cut flat and close to grade as possible.

4.3.6 All slash along the roadway or near residences shall be disposed of by chipping or mowing/mulching. Where practical, chips may be blown back onto the site without creating large chip piles. On off-road, un-maintained sites, slash shall be mowed/mulched or neatly windrowed to the edge of the maintenance corridor and cut to lie close to the ground, away from sensitive locations. No debris shall be left anywhere that will potentially block access, significantly alter any drainage or water resource, or create any unsafe condition for the public. Alternatives to these practices must be approved by Rhode Island Energy's Forestry representative and by the current landowner.

4.44.4 All dead or damaged overhead limbs under 8" D.B.H., branches or leads that can fall onto overhead primary wires from above or alongside the right-of-way and potentially causing a tree outage, shall be removed at the time of pruning, and included in the fixed price bid.

4.54.5 For all pine species growing above the overhead clearance limits with boughs overhanging primary conductor - the contractor shall shorten all overhanging boughs so to reduce the length of the branch by approximately 1/3 without removing all needle growth from the entire branch. This shall be done in a progressive manner beginning at the upper clearance dimension (10 or 15 feet) and working upwards generally two (2) whorls in the tree as necessary to reduce the likelihood of a long pine bough loaded with ice or wet snow, drooping down or breaking onto the conductors.

4.74.7 Multiple Circuits and Under-builds: The contractor shall prune all distribution circuits on a pole unless otherwise called out on the bid documents. Where a distribution circuit is under-built below a sub-transmission the contactor is responsible for the pruning of both the distribution circuit as well as the over-built circuit utilizing the specification of the higher voltage circuit unless otherwise directed in the bid documents. The contractor is also responsible for work on any primary tap running off the sub-transmission line along that specific distribution circuit. Any exceptions to the above will be explained at the time of bidding. Reference the appropriate sections of either RI Energy's Sub-T IVM and/or Sideline specifications depending on the under-built situation.

4.8 Circuits along Transmission Rights-of-Way: The contractor shall employ this specification on all sections of distribution circuits that run along segments of transmission rights-of-way except for areas where the distribution circuit is underbuilt on the same pole. In those cases, the above section will apply. Any exceptions to the above will be explained at the time of bidding.

4.9 Substation Clearances: All vegetation within 10' of the substation fences shall be pruned, from ground to sky, removed and chipped and no overhanging branches shall be allowed to remain. Where shrubs and trees have been plantedfor screening purposes and are rooted within the 10' distance, only the fence side branches shall be removed. Any volunteer growth (natural regeneration) rooted within the 10' distance shall be removed.

4.10 Vine Control: All vines growing on poles, guy wires, stub poles or towers shall be cut to create a "growth gap" of 4 feet and treated (where appropriate) with a herbicide approved by the company. Contactors should not attempt to remove vines from any structure.

4.11 Hazard Tree Inspection and Removal: Other than work required in previous sections, the removal of any tree over 8 inches d.b.h. within the maintenance corridor or outside the maintenance corridor shall be considered a hazard tree removal and is outside the fixed price bid.

4.11.1 While pruning the circuit, the contractor's personnel shall perform a visual inspection of each tree along the circuit to identify potential defects and determine the potential risk for the tree to cause an interruption over the length of the pruning cycle. The crew shall work closely with an Rhode Island Energy Forestry representative to determine potential hazard trees, preparing a list of trees in accordance with Rhode Island Energy's Hazard Tree Reporting Form. The completed lists of potential hazard trees shall be regularly provided to the Forestry representative for review

and approval prior to removing any of those specific trees. Exceptions to this procedure may be approved to enable removals of trees that have been pre-identified as hazard trees by RI Energy representatives, trees that pose an imminent risk, or to authorize hazard tree removals in off-road areas where a skidder bucket is already on site.

4.11.2 Once a crew completes the removals on an approved list, they shall note the completion details on the Hazard Tree Reporting Form. This form shall be submitted to the Forestry representative on a timely basis. Once the list is audited the contractor may submit an invoice for that specific work.

4.11.3 **Vendors will clear vegetation to a minimum of 18" away from any on road secondary conductor. As part of the fixed bid price.**

4.11.4 **Vendors will clear any vegetation within 6 inches of a service drop. Via unit price.**

4.11.5 **Vendors will clear 12" away from any secondary side tap conductor. Via unit price.**

4.11.6 **RIE owned street light secondary is to be trimmed 6" away from the conductor.**

V. Contractor Requirements

5.1 The Contractor shall do all work and furnish all labor including supervision, tools, machinery, and transportation necessary for the pruning, removal and herbicide treatment of trees to provide acceptable vegetation clearance for overhead lines of Rhode Island Energy. Work at the fixed price rates will be designated on the distribution circuit maps and identified in the pre-bid documents. Work at the fixed price is based on overhead primary miles of line, and includes pruning, tree and lead removal and herbicide treatment to all primary, and substation fence areas as clarified in the Work Scope section of this specification. Work at unit prices and/or hourly rates as also defined in the Work Scope section will be designated at the pre-bid meeting or by a Rhode Island Energy Forestry representative as required.

VI. Contractor's Responsibility

6.1 The Contractor shall provide all necessary supervision, labor, material, tools and equipment for the safe execution of all work covered by these specifications.

6.2 The Contractor shall employ a competent field supervisor and customer contact

person(s) acceptable to the Corporation, in addition to the crew Foreman and senior Company management. Notification personnel shall be qualified in tree identification including identification of "proper under powerline trees". The supervisor shall be available to the Corporation at all reasonable times during the project's length and/or contract. In addition, at least one member of each stand-alone crew or unit of crews shall be fluent in the English language andon-site.

6.3 The Contractor shall comply with all building and sanitary laws and all Federal, State, County, Town and Municipal laws, ordinances and regulations pertaining to the work. The contractor shall be responsible for obtaining all permits necessary to perform the work unless otherwise provided by Rhode Island Energy.

6.4 The Contractor shall notify each landowner and inform them of the clearing, removal, pruning and herbicide work to be done, and where appropriate, agree on access point(s), before crossing the property and then abide by the same. The Contractor shall designate a Customer Contact Person(s) for each project they are awarded and communicate that name and phone contact information for that person to the Rhode Island Energy forestry representative for that project

6.5 In addition to the above notifications, where herbicide applications will be made, the Contractor must follow all current notification requirements of any applicable regulations.

6.6 The Contractor shall be held solely liable and indemnify Rhode Island Energy fully for all claims and legal expenses for damage to crops, land, trees or otherwise resulting from such violations, failure or damages arising out of the Contractor's negligence. The Contractor shall not be liable for claims or suits for damage to property if the work causing such damage is done under specific direction from RI Energy.

6.7 The Contractor shall replace or make necessary repairs to all property destroyed or damaged in the course of the work and exercise due care and diligence in adequately protecting all properties, both real and personal, from damage of whatsoever nature whenever crossed over, on, or in the vicinity of the work. If the contractor neglects or fails to promptly make said repairs or make good of said destruction, the Corporation may make all necessary repairs to the satisfaction of the property owner and the Contractor agrees to promptly reimburse the Corporation the amount of its incurred cost and expenses.

6.8 The contractor shall inform Rhode Island Energy's Forestry representative of their intent to start work at least two weeks prior to the start of any action ona feeder.

6.9 The Contractor shall implement and provide the required training and certification programs necessary to provide fully qualified Line Clearance Tree Trimmers or Line Clearance Tree Trimmer Trainees. A single Foreman may supervise multiple bucket trucks on the same project. In that case however, the minimum qualifications for the "lead" person on each of the other trucks shall be a certified qualified Line Clearance Tree Trimmer. At least one other employee on the truck shall be at least a qualifying Line Clearance Tree Trimmer Trainee, in accordance with all applicable OSHA requirements.

6.10 The Contractor shall submit a weekly time report to the Rhode Island Energy's Forestry representative, indicating the labor and equipment assigned to the project, amount of work accomplished, quantities and location of herbicide applications and location of the work.

6.11 The Contractor shall provide a monthly summary report to Distribution Forestry, identifying crew staffing and equipment by area as of the first of each month, to be submitted by the 5th of each month or the following Monday should the 5th fall on the weekend. The report shall also identify work type (e.g., such as hourly, new construction, danger trees, mowing; lump sum or unit price) by project, percentage complete for all fixed price projects, and anticipated completion dates.

6.12 The Contractor shall provide a monthly OSHA injury summary report in a format supplied by Rhode Island Energy for the previous month, no later than the 10th of the month or the following Monday should the 10th fall on the weekend. The data in the report shall be separated by state as well as reported for the overall Contractor Company for all United States operations.

6.13 By April 10th of each year, the contractor shall provide a list of employees and Aerial lifts that could reasonably be expected to work on RI Energy's property to Distribution Forestry. This listing shall include:

Employees:

- identify the current pay classification of each employee, together with their union certification level,
- the date of their progression to their current pay level,
- the dates each employee completed their required OSHA safety and other training, or retraining, including any annual refreshers,
- the date each employee last demonstrated their tree rescue and climbing proficiency
- the date each employee completed first aid and CPR training,
- identify each certified pesticide applicator and their certification number.

Aerial Lifts:

- The truck number and date of dielectric testing
- The next scheduled dielectric test date

6.14 The contractor shall provide a unit cost per tree for the removal of potential hazard trees from the three phase portions of the circuit, as well as "high risk target" hazard trees from the single-phase portions. See the attached Addendum # 1, Hazard Tree Removal, Unit Price Schedule to be bid separately from the fixed price project. Rhode Island Energy reserves the right to award, in whole or in part, the removal of hazard trees for each bid package based on these unit prices, or to do the work at the contractor's current hourly rates.

VII. Acceptance of Work

7.1 At appropriate intervals, the Contractor shall report and review the work completed to date with Rhode Island Energy's Forestry representative. The Contractor may then invoice for the percentage of the work completed and approved by Rhode Island Energy.

7.2 Near completion of the work, the Contractor shall notify the Rhode Island Energy Forestry representative that the entire project has been reviewed by the contractor's supervision and is now ready for inspection. Upon review and acceptance of all required work including the resolution of all required corrective actions as well as any outstanding damage claims, the RI Energy Forestry representative will give the contractor permission to submit a final invoice for payment.

7.2.1 Traffic detail costs associated with re-work or corrective action shall be borne by the Contractor.

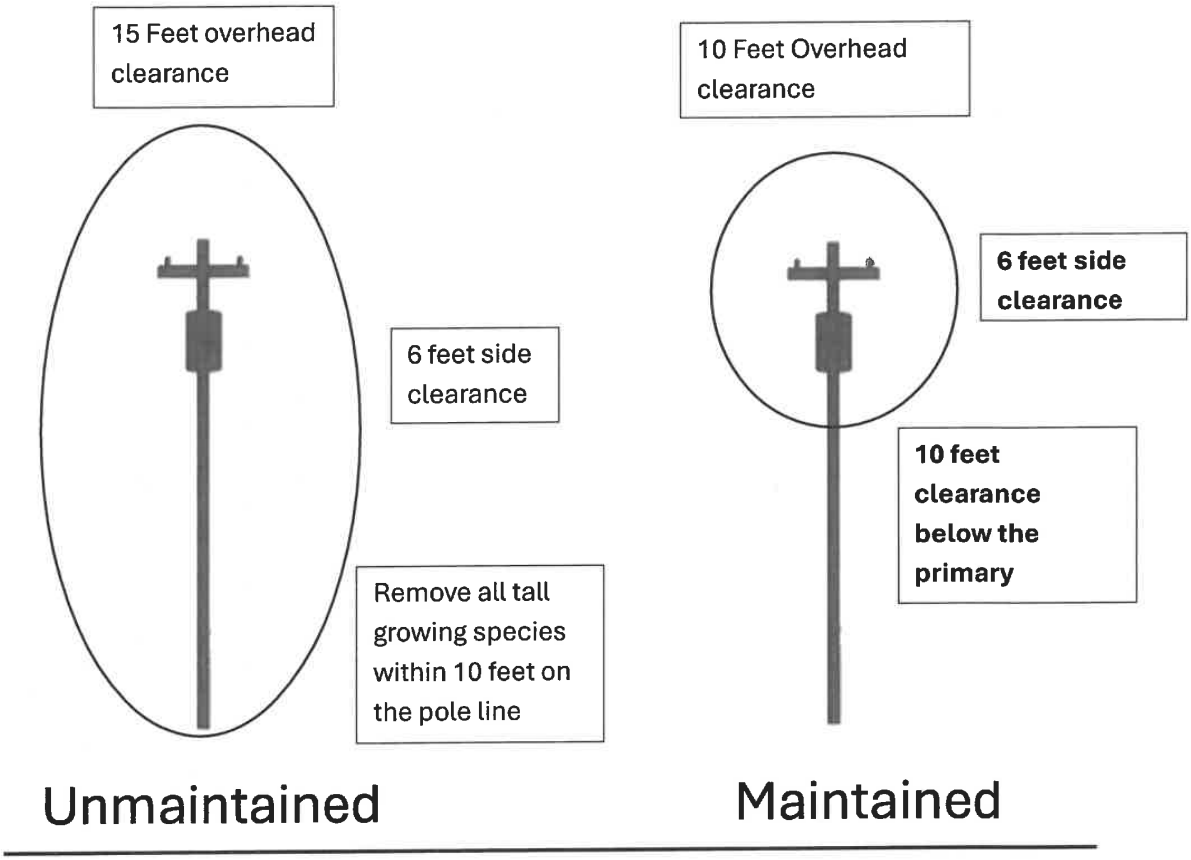
7.2.2 Police detail costs for any work not completed by the end of the fiscal year (March 31st) shall be borne by the Contractor. Rhode Island Energy has the discretion to make allowances for circumstances outside of the Contractor's control. (Storms, requested outages, etc.)

7.3 The contractor shall understand, in their signed Master Purchase order with Rhode Island Energy, that time is of the essence with respect to this work's performance. The contractor shall take all appropriate actions necessary to complete the work on schedule. Those actions shall include among other things, the use of overtime, the use of supplemental labor crew resources from outside areas, and the use of subcontractors, notwithstanding the RI Energy requirement for advanced approval of all subcontractors. All actions employed by the

8 The contractor shall understand, in their signed Master Purchase order with Rhode Island Energy, that time is of the essence with respect to this work's performance. The contractor shall take all appropriate actions necessary to complete the work on schedule. Those actions shall include among other things, the use of overtime, the use of supplemental labor crew resources from outside areas, and the use of subcontractors, notwithstanding the RI Energy requirement for advanced approval of all subcontractors. All actions employed by them to complete their schedule are at their cost and shall not affect the lump sum contract amount. In the event of extenuating circumstances defined by RI Energy, the company can extend project completion dates.

Attachment C-1

Rhode Island Energy Distribution trimming specifications. 15kv to 2kv



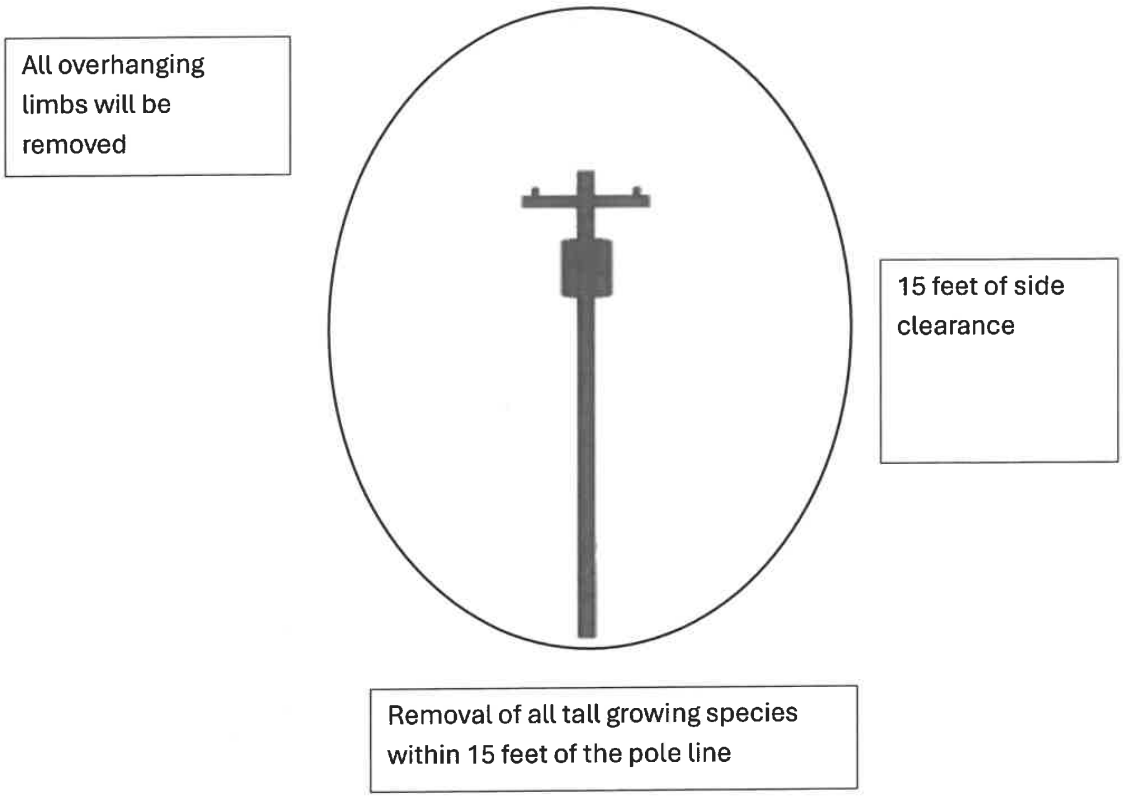
Maintained areas are areas where customers have been clearly maintaining the property. It's a lawn area, flower beds, etc...

Unmaintained areas are overgrown areas where no homes or businesses exist and are typically rural in nature. They can and will be in between maintained areas.

Attachment C-2

Sub transmission trimming specifications

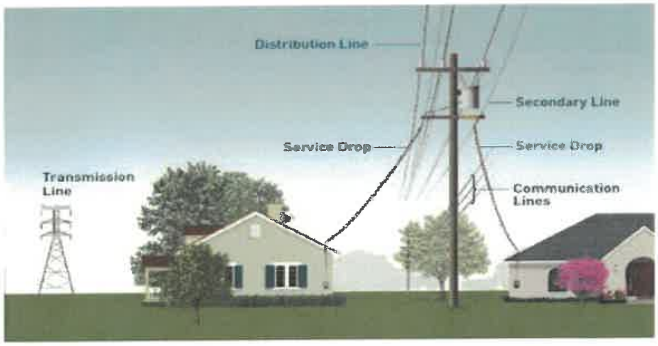
22kv to 34kv



Sub transmission lines carry higher voltage electricity from substation to substation, or to a large customer. They require more clearance because of the voltage, and risk associated with an outage on these lines

Attachment C-3

Low voltage trimming specifications



Electric and communication lines

Secondary lines run pole to pole (upper left) require 18" of clearance around the wire.

Service drops run pole to house (upper right) require 6 inches on clearance around the conductor.

Attachment C-4

Additional notes:

- RIE has not changed our trimming specifications, or clearance distances in our 15 years, and they are remaining the same.
- Where greater clearances have been obtained in the past, we will try to maintain these clearances.
- Ornamental and slow growing species will get special consideration are allowed to remain inside of the clearance zone.
- Established tree trunks and limbs are allowed to be within the clearance area if found to be structurally sound and healthy.

Attachment D

Rhode Island Energy
a PPL company

Dear Rhode Island Energy Customer,

[FORESTRY VENDOR] Service has been contracted by Rhode Island Energy to perform routine maintenance trimming along the power lines in [TOWN NAME] Rhode Island. This trimming is done every four years and there is *no cost to you* for this work. We are writing to you to inform you that trimming will soon begin. Please read below.

The routine maintenance trimming specifications are as follows:

1. Line Clearance within Maintained Road-Side Areas: All overhead primary lines will be pruned to provide a minimum of ten (10) feet of overhead clearance, a minimum of six (6) feet of side clearance from the outermost wire and a minimum of ten (10) feet of clearance below the wires. New voluntarily growing brush (not intentionally planted) eight (8) inches in diameter or less, capable of growing into the wires within the maintained yard areas will be cut. All slash from pruning in maintained areas will be chipped and taken away unless otherwise requested by the property owner. Vines growing on poles, guy wires and trees will be cut at their base but not removed from trees or electrical equipment.

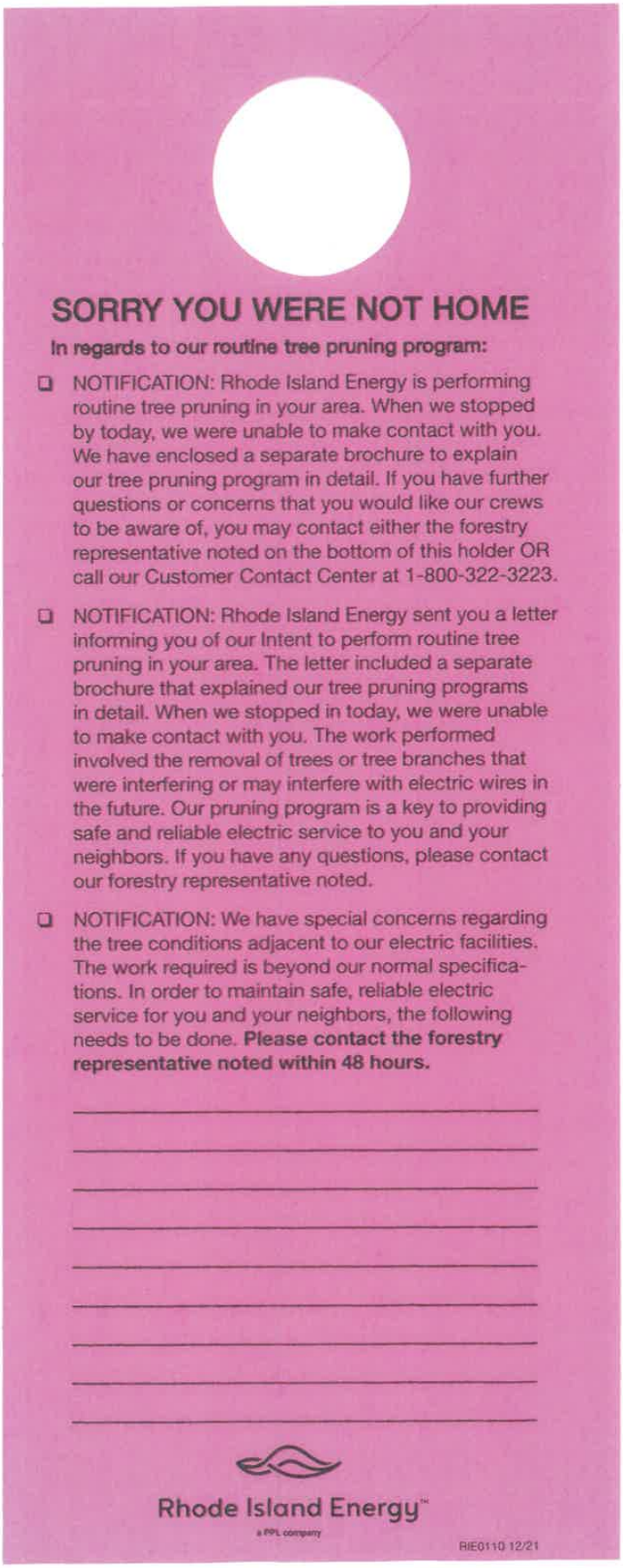
2. Line Clearance Outside of Maintained Road-Side Areas: All overhead primary lines will be pruned to provide a minimum of fifteen (15) feet of overhead clearance and six (6) feet of side clearance from the outermost phase. The brush and vine specifications above apply to this portion as well, with the major difference here being overhead clearance.

3. Line Clearance in Off-Road Rights of Way: Along off-road sections we will completely remove all side branches that extend into the maintenance corridor from below and beside the primary lines in order to "box out" the maintenance corridor. All brush eight (8) inches in diameter or less, capable of interfering with the conductors will be removed to a width of ten (10) feet from the pole-line or to the existing edge of the right of way, whichever distance is greater. On off-road, non-maintained sites, slash will be neatly placed at the edge of the maintenance corridor and cut to lie close to the ground, away from sensitive locations.

If you have any questions or concerns, please call or email:

[supervisor]
[FORESTRY VENDOR]
[phone number]
[email address]

Attachment E



SORRY YOU WERE NOT HOME

In regards to our routine tree pruning program:

- ❑ NOTIFICATION: Rhode Island Energy is performing routine tree pruning in your area. When we stopped by today, we were unable to make contact with you. We have enclosed a separate brochure to explain our tree pruning program in detail. If you have further questions or concerns that you would like our crews to be aware of, you may contact either the forestry representative noted on the bottom of this holder OR call our Customer Contact Center at 1-800-322-3223.
- ❑ NOTIFICATION: Rhode Island Energy sent you a letter informing you of our Intent to perform routine tree pruning in your area. The letter included a separate brochure that explained our tree pruning programs in detail. When we stopped in today, we were unable to make contact with you. The work performed involved the removal of trees or tree branches that were interfering or may interfere with electric wires in the future. Our pruning program is a key to providing safe and reliable electric service to you and your neighbors. If you have any questions, please contact our forestry representative noted.
- ❑ NOTIFICATION: We have special concerns regarding the tree conditions adjacent to our electric facilities. The work required is beyond our normal specifications. In order to maintain safe, reliable electric service for you and your neighbors, the following needs to be done. **Please contact the forestry representative noted within 48 hours.**

_____

_____

_____

_____

_____

_____

_____

_____

_____

Rhode Island Energy™
a PPL company

RIE0110 12/21

Storm Damaged Trees

A storm can damage a few trees in a small neighborhood, or it can affect thousands across a wide area. Regardless of the size of the area impacted, Rhode Island Energy is responsible for ONLY clearing storm damaged trees and/or limbs from our electric lines and facilities in order to:

- **Restore service**
- **Allow reasonable access for emergency service restoration**
- **Ensure future service reliability**

The disposal, processing and cleanup of storm generated tree debris removed from, or over Rhode Island Energy facilities, or to provide emergency access, remains the responsibility of the owner of the tree(s) whether publicly owned or privately owned.

REMEMBER: During or after any storm event, all downed wires should be considered energized and dangerous including telephone, fiber optic and cable TV wires as they may be in contact with energized electric wires due to facility damages beyond your property and out of your view.

This is an important notice.
Please have it translated.

Este é um aviso importante. Queira mandá-lo traduzir.
Este es un aviso importante. Sírvase mandarlo traducir.
Avis important. Veuillez traduire immediatement.
Questa è un' informazione importante, si prega di tradurla.

ĐÂY LÀ MỘT BẢN THÔNG CÁO QUAN TRỌNG
XIN VUI LÒNG CHO DỊCH LẠI THÔNG CÁO ẤY

Это очень важное сообщение.
Пожалуйста, попросите чтобы
вам его перевели.

Safety around trees and electric wires

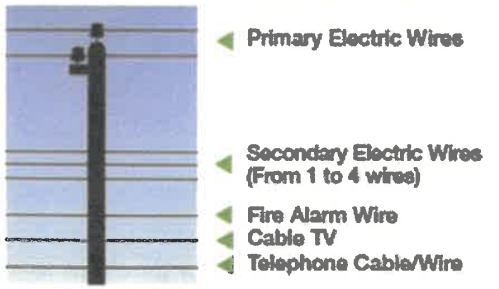
Children and adults should not climb or play in trees that are near electric wires. Property owners should not prune trees that are near or touching our electric wires; instead, call Customer Service and report any trees that may need immediate attention. Your call will prompt a visit by a utility representative for review at the earliest opportunity.

Types of Wires

Wires are normally attached to utility poles by voltage categories – the higher the voltage, the higher they are on the pole. In most situations, primary electric wires (the highest voltage class of wires) are attached at the top of the Pole, followed by secondary electric wires (see illustration below). Generally, the lower-voltage wires and cables used for cable TV, telephone, and fire alarms are lowest on the utility pole.

For safety reasons, always treat all wires as high voltage wires, energized and dangerous to touch, whether such wires are covered or bare – on the pole or fallen on to the ground.

Normal Wire Layout of Utility Pole



RIE6695 12/21

Rhode Island Energy

Rhode Island Energy's Vegetation Management Program

Rhode Island Energy has scheduled Vegetation Maintenance to occur on or near your property in the near future.

This includes tree pruning and tree removal.

This notice is intended for the property owner. If you are not the property owner, please forward this document to the owner if possible or respond to us that you are not the owner.

Please review the information in this pamphlet. It will help you better understand our approach to keeping vegetation clear of overhead utility wires.

There is no charge for this service. This work will occur adjacent to the overhead distribution power lines and is done in order to maintain minimum clearances between the lines and surrounding trees.

We maintain trees and other vegetation growing close to our electric utility wires. We do so because the vegetation can cause power outages during storms or high winds and as well as for safety reasons. Our goal is to ensure everyone's safety and deliver reliable energy.

Rhode Island Energy performs this routine maintenance work on a 4 or a 5 year cycle depending on your geographic area. The work is performed by contractors who are overseen by in-house employees. The contractor listed on the additional insert can answer your questions regarding our tree pruning program.

Each tree's size, shape and growth rate are taken into consideration during line clearance tree work. Rhode Island Energy utilizes an arboricultural technique called "directional pruning" in order to naturally train and direct growth away from the wires. This practice minimizes the number of pruning cuts by removing fewer, larger limbs to produce the desired clearance. This method is a true benefit to the health of the tree as it reduces the number of cuts that must heal, which in turn reduces disease and decay entry points.

This science-based pruning practice was developed in conjunction with the U.S Forest Service and is endorsed by the International Society of Arboriculture, the National Arbor Day Foundation and other tree care professionals around the world.

If you have concerns about trees that are near or touching electric wires, property owners should call Customer Service for any pruning or removal work they would like to request. A representative will review your request at the earliest opportunity.

Distribution Power Line Clearance Zone

Above electric lines: 15 ft. Prune all limbs up to 15 ft. above wires. It is possible that some main limbs on mature trees may remain inside of the clearance zone. This depends on the health of the tree and rate and direction of growth.

Beside electric lines: 6 ft. Limbs extending inside the minimum 6 foot clearance will be cut back at a main branching point or at the trunk, even if that point is more than 6 feet from the wires. It is possible that some main limbs or trunks on mature trees may remain inside of the clearance zone. This depends on the health of the tree and the rate and direction of growth.

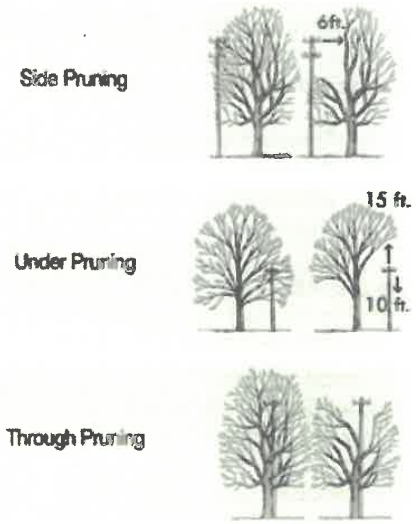
Under electric lines: 10 ft. Shrubs or low-growing tree species that will not interfere with electric lines may be left. Brush or tall-growing tree species up to 8 inches in trunk diameter at chest height will be removed at ground level. These removals usually extend up to 10 ft. off structures. Some trees leaning into the zone from greater than 10 ft. away may be removed if there is no appropriate limb to prune to.

Clean Up and Wood Disposal

Crews will chip the branches they remove from trees in your yard as part of our cycle pruning program. They will rake the work area to pick up smaller twigs/debris and disperse sawdust. Pieces of wood that cannot be chipped will be cut into manageable lengths. In off-road and "unmaintained" areas, wood and brush will be left 'windrowed' along the edge of the right-of-way. Paths, drainage ditches and stream channels within the work area will be kept clear.

Stumps will be left cut as close to grade as possible.

The following illustrations provide examples of the proper directional pruning for shade and ornamental trees.



Rhode Island Energy has been selected and recognized by the National Arbor Day Foundation each year since 2000 as a 'Tree Line USA" utility through our demonstration of quality tree care, annual worker training and community tree planting programs.

We offer more information on the benefits of trees as well as the most appropriate tree selection for your landscaping needs-whether near our electrical lines or elsewhere on your property. To obtain more information please call Customer Service at 1-855-RIE-1101 or visit our website at www.rienergy.com

Attachment G

Tree Removal Authorization

Rhode Island Energy
a PPL company

Customer Information

Name: _____

Address: _____

_____

Phone: _____ Work or Cell Phone: _____

National Grid Site Information

Pole # _____ Feeder # _____ Evaluator Name: _____

Description of Tree: _____

- ❑ Tree flagged
- ❑ Brush will be chipped
- ❑ Brush will be left on site
- ❑ Wood will be removed by Rhode Island Energy
- ❑ Wood will be left in large pieces
- ❑ Wood will be removed by town
- ❑ Wood will be left cut up and piled
- ❑ Stump will be left below 1 0" height
- ❑ Stump will be left 15' height
- ❑ Possible lawn damage

Additional Notes

_____

_____

_____

_____

_____ _____

Property Owner Signature
(Authorizing Work as Specified)

Date

Attachment H

Rhode Island Energy Sub-Transmission Line Clearance Specification Fiscal Year 2025	Revision No. 1 Date:	Page 1 of 18 2-22-24

FOREWORD

This specification documents the objectives, practices, and procedures for vegetation management on Rhode Island Energy's sub-transmission electric roadsides and rights-of-way in **Rhode Island only and** specifically addresses sideline and hazard tree pruning and removal. The specification also defines the responsibilities of RIE vegetation management personnel and contractors, identifies procedures to be followed by contractors performing all workand defines the requirements to maintain vegetation acceptable to the Company.

Questions or inquiries regarding information provided in this document should be referred to the Rhode Island Energy's Manager of Vegetation Strategy.

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1.0 Introduction

1.1 Purpose

The purpose of this specification is to document the requirements for sideline pruning, hazard tree removal and IVM on sub-transmission electric roadsides and rights-of-way for Rhode Island Energy in Rhode Island. This specification defines:

- Objectives, strategies and approved practices and procedures for sideline pruning and hazard tree removal on sub-transmission electric roadsides and rights-of-way.
- Clearance requirements between conductors and vegetation are acceptable to Rhode Island Energy for maintaining reliable electric sub-transmission service.
- Responsibilities of RIE Forestry personnel and contractors.
- Procedures to be followed by contractors performing all work within the scope of this specification.

The Vegetation Strategy group is responsible for preparing this specification. Company Foresters will manage the work performed by the contractor.

1.2 Scope

The requirements of the specification apply to all RIE companies' sub-transmission electric roadsides and rights-of-way in Rhode Island.

2.0 Definitions

Buffer-Areas of vegetation preserved on the right-of-way, on both sides of selected improved road crossings, yards, for the purpose of minimizing the visual impacts and linear views of the right-of-way for motorists.

Capable -Tree, shrub, and vine species that have the ability to grow into within 1 foot of conductor.

Danger Tree - A tree on or off the right-of-way that if were cut or failed could contact electric lines.

Hand Cutting - Vegetation management method in which woody vegetation is felled using hand tools, including chainsaws and brush saws.

Hazard Tree - Danger trees which are due to species and/or structural defect are likely to fail and fall into the electric facility.

IVM - IVM is an adaptation of Integrated Pest Management (1PM) where the pest is tall growing, capable vegetation. IPM/IVM is a system of controlling pests in which pests are identified, action thresholds considered, all possible control options evaluated, and selective physical, biological controls are considered. When chemical controls become necessary to control and prevent the growth of capable, tall-growing woody species, The Company is committed to employing selective, targeted applications. These treatments shall use approved herbicide products and mixtures that target specific plants or plant communities in a manner calculated to control and eliminate the tall-growing, capable

woody species, while preserving as much of the small, compatible woody shrub and herbaceous vegetation as is practical.

Pruning - the cutting and removal of tree branches to provide specified clearance distance between vegetation and the conductors. See ANSI A300 for additional details.

Roadside - The area physically located under and alongside the sub-transmission line bounded by the mature tree line on the field phase side when one exists. In the absence of a mature tree line the maintenance corridor is defined as the area that Is at least fifteen (16) feet either side of the pole centerline or equal to the previously maintained dimensions if greater than fifteen (16) feet.
Roadside may include areas: 1. where the landowner or occupant is mowing the lawn and/or caring for gardens, ornamental shrubs or trees in the area under and immediately adjacent to the sub-transmission line/poles; 2. commercial land uses such as business areas, parking lot edges and the tree lawn areas along urban and suburban streets.

Right-of-Way (ROW} (Off-Road definition)- For this VM Spec (Sub-Transmission) a ROW is a cleared corridor of land over which electric lines are located. The companies may own the land in fee, own an easement, or have certain franchise or license rights to construct and maintain electric facilities. This definition does not address the specific width of any ROW. Specific widths will be supplied by the Company where necessary.

Sensitive Area -Areas on rights-of-ways where legal, visual, or environmental impacts/concerns require compromises to the general Vegetation Management Program.

Slash - All branches, tops, small diameter main stems and debris resulting from any cutting operation.

Sub-transmission - Can include electric lines 13kV - 46kV in New England Identified in the sub-transmission work plan. •

Tree Removal - The cutting and felling of trees, including wood and brush disposal.
Water - Standing or running water, existing at the time of maintenance operations, which has impact outside the right-of-way.

Wire Zone/Border Zone - the wire zone is defined as that portion of the right-of-way floor that is situated directly beneath the conductor for a distance extending approximately ten (10) feet to either side of the conductor. The border zone is that portion of the right-of-way floor situated to the outside of the wire zone extending to the right-of-way edge. It is sometimes referred to as a transition zone between the wire zone and the adjacent forest edge. The wire zone mid-span is the portion of the span where the conductor is at or near its lowest ground clearance distance, generally 60-70% of the span length.

3.0 General Policy/Requirements

- All work will be completed in accordance with the Request for Proposal document, this specification and the maps provided for each sub-transmission line.
- The contractor shall furnish all materials, vehicles, equipment, supervision and labor necessary for the completion of the work described within the timeframe and within the conditions herein set forth.
- Both sides of a right-of-way shall be worked unless instructed otherwise by RIE Forestry staff, or noted on the maps for the project. If there is a lower voltage circuit on one side of the right-of-way it must meet the minimum side clearance for the lower voltage unless otherwise noted on the maps for the project.
- If the sub transmission circuit is located on the same structure or within the same right of way as a transmission circuit, clearances must be obtained to at least the sub transmission specification. (These areas are not to be skipped, unless specified by RIE Forestry Staff).
- All vegetation management operations shall be conducted in a safe, effective manner in conformity with Federal and State laws, regulations and permit conditions.
- All vegetation management operations shall be conducted in conformance with national and regional standards including but not limited to IS014001.
- All state permits necessary for any vegetation management operations shall be obtained.
- All applicable state notification procedures shall be followed.
- RIE Forestry staff, in consultation with vegetation management contractors, shall establish procedures for notifying nearby residents of all vegetation management activities conducted within a right-of-way.
- RIE Forestry staff and/or contractors shall respond quickly to any questions or complaints relating to vegetation management from the public and/or government agencies.
- Appropriately licensed, certified and qualified contractors shall be retained to implement RIE's vegetation management programs. Contractors shall conduct all vegetation management operations consistent with RIE safety requirements and the ANSI Z-133 safety standard.
- RIE Forestry shall provide local supervision, coordination and enforcement of this specification for contractors.

The document control process for this specification is as follows: The document is generally updated annually and distributed as hard copy. The applicable hard copy cover date shall be for the current fiscal year.

4.0 Safety

As a contractual term, Rhode Island Energy requires all contractors to comply with all appropriate state and federal safety laws and regulations. This includes applicable sections of the Occupational Safety and Health Act (OSHA) and all worker safety-related statements.

It shall be understood and agreed to by the Contractor that vegetation management activities conducted near existing sub-transmission lines shall be undertaken while lines are presumed to be energized and operating at voltages up to and including 46kV. The Contractor shall provide competent, trained personnel to perform the work.

In order to ensure the safety of their employees, the general public and continuity of service in the energized lines, the Contractor shall exercise extraordinary precautions when conducting vegetation management activities in close proximity to structures, poles, guy wires, and anchors on roadsides and rights-of-way.

5.0 Rhode Island Energy Roles and Responsibilities

5.1 Sub-Transmission Owner

Rhode Island Energy companies own and are responsible for ensuring proper clearance of their sub-transmission electric facilities on roadsides and rights-of-way.

5.2 Forestry Department

The Forestry Department is responsible for system-wide design, planning, coordination and supervision of all vegetation management operations conducted near electric lines on roadsides and rights-of-way.

5.3 Location of Work

The location of work sites will be provided by the Company Forester.

6.0 Contractor Duties and Responsibilities

Vegetation management operations must be conducted according to this specification and according to the written directives of the Company's on-site representative or other contract documents.

6.1 Environmental and Safety Compliance

The Contractor shall comply with all applicable Federal, State and local laws and regulations and with the requirements of all permits and approvals obtained by RIE.

RIE is committed to minimizing its impact on the environment and requires contractors to demonstrate the same level of commitment as RIE in the management of the environment. RIE's commitment to the environment is communicated in the RIE - Environmental Policy (Appendix 2).

The contractor shall immediately notify the Company of any release of any quantity of oil or hazardous material. The contractor is responsible for making all required notifications of releases to appropriate regulatory agencies and to ensure that the response to the release is prompt and done in a proper manner.

Rhode Island Energy contractor Safety Requirements establish safety requirements for contractors. This document has been provided during the contractor qualification and bidding process.

All safety incidents shall be reported to the Company. The first call should be to the Company Forester. All inquiries will be entered into the RIE Incident Management System.

6.2 Qualifications

Contractor shall utilize only experienced and/or trained workers who are appropriately licensed or certified. Workers must always conduct themselves professionally.

Contractors shall utilize appropriately licensed or certified supervisors who are knowledgeable regarding all aspects of vegetation mowing, and who are responsive to the guidance of the Company Foresters. Each supervisor must be able to effectively communicate with the public. They must also effectively supervise contractor crews to ensure the satisfactory completion of the treatment operation.

6.3 Training

Contractors shall provide their employees with training that includes, but is not limited to, recognition of electrical hazards, working in proximity to energized facilities, identification of operating voltages, minimum approach distances, and other applicable rules and regulations associated with worker safety.

6.4 Commencement of Operations

Contractor may not initiate activities without a Purchase Order. The contractor shall contact Company Forestry staff if a Purchase Order has not been received by the time vegetation management activities are scheduled to commence. The contractor must return the signed acknowledgement copy of the Purchase Order to the Procurement Department before any work is done.

6.6 Notifications to Rhode Island Energy

At least one (1) week prior to the initiation of vegetation management activities, the contractor must specify to Company Forestry staff the date work will begin. The contractor will notify Company Forestry staff of the approximate work schedule the contractor's crew will follow during the project. The contractor must keep Company Forestry staff informed about crew location, conditions encountered and problems that arise as work progresses. Work shall be completed on each sub- transmission line with as few work interruptions as possible.

At least one (1) week prior to the completion of vegetation management activities, the contractor must specify to RIE Forestry staff the date work on that sub-transmission line will end.

When working on a sub-transmission right-of-way, the contractor must supply crew work locations daily by notifying the local forestry supervisor. The location information will include the sub-transmission line name, the contractor company and foreman name, the number of crew members, and the nearest sub-transmission line structure number. Each crew shall call the appropriate RIE Forester at the completion of the workday and when relocating to another right-of-way.

Should a contractor cause an event on a sub-transmission line, the contractor must immediately notify the appropriate Control Center. Refer to Appendix 1 for a listing of RIE Forestry staff and Control Center contact information.

The contractor must supply completed weekly time sheet(s) with information for all time and materials worked as per direction of RIE Forestry staff.

The contractor shall notify and provide copies of any records/reports of any regulatory Inspection by federal, state or municipal officials.

6.6 Notifications to Customers/Landowners

The Contractor shall make every reasonable effort to notify nearby residents of all vegetation management activities. They shall also notify any property owner where a yard tree requires pruning or removal. The property owner shall also be notified prior to extensive widening or danger tree removal, unless RIE has provided prior notification or otherwise specified by the Company Forester. Refer to Appendix 3 for examples of notification materials. Documentation of notification shall be maintained by the contractor and provided to RIE Forestry staff upon request and at the completion of the project.

6.7 Documentation

The Contractor shall provide supplemental or new information regarding site conditions that affect current or future treatment operations, such as new construction, encroachments, At Time of Vegetation Management (ATVM) clearance deficiencies, hazardous conditions, significantly eroded access or right-of-way, sensitive areas and landowner concerns/requirements to the Company Forester on a timely basis.

6.8 Interaction with the Public

The Company strives in every way possible to maintain good relations with the property owner and public. The actions of the Contractor reflect on the Company; therefore, the Contractor shall consider the interests of property owners, tenants, and the public, whenever involved, and shall carry out the work in such a manner as to cause a minimum inconvenience.

The contractor, or his representative, will only respond to inquiries regarding what work they are performing, where they are working, and when they will be working.

Copies of appropriate plans or permits may be shown as well. Refer to all other inquiries to RIE Forestry Staff.

Landowner complaints must be forwarded immediately by telephone to Company Forestry staff. The contractor must provide the name, address and telephone number of the major people involved, as well as the complaint or question.

6.9 Demands to Cease Operations

Handle demands to cease operations as follows:

- Immediately make the work area safe for the public, then move all personnel, equipment and materials to another property and continue work.
- Notify RIE Forestry staff as soon as practical, if not immediately, of a demand that operations cease. Upon contacting RIE Forestry staff, relate the chain of events and status of the situation.
- Do not return to that site until RIE Forestry staff has notified the contractor of when and under what circumstances the crew may return.

6.10 Access to a Right-of-Way

Enter a site through the right-of-way on established roadways whenever possible. Permission to enter by any other means must be obtained from the landowner by the contractor.

Access to the right-of-way shall be limited to public road crossings. Where this is not possible, the Contractor shall obtain permission for the use of private roads, driveways, and other access to the right-of-way from the property owners involved and shall be responsible for any damage thereto. When permission for off right-of-way access cannot be obtained from the property owners involved, and other ingress/egress is unavailable, the Contractor shall notify the Company Forester or their designee.

In general, vehicular traffic shall be restricted to a twenty (20) foot wide roadway into and along the right-of-way. When present, existing roads into and along the right-of-way shall be used as the primary access and maintained in as good or better condition for the duration of the Contractor's use. Access to the overall right-of-way is allowed only for vehicles performing selective vegetation maintenance activities. Other vehicles must remain on the designated access roads. Appropriate efforts to minimize unnecessary or excessive environmental or vegetation damage are required. Repair or replacement of excessive or unnecessary damage shall be the responsibility of the Contractor.

6.11 Site Conditions

Unreasonable site damage or destruction during any phase of the vegetation management operation by the contractor, his agents or employees, must be repaired immediately to the satisfaction of Company Forestry staff at no cost to RIE companies. Company Forestry staff will determine what constitutes unreasonable site damage. Contractors shall make reasonable efforts to complete work during favorable site conditions to prevent unnecessary damage.

The Contractor shall leave all culverts, stream fords, fences, gates, walls and roads in the same or better condition as when they commenced their work. Any trees to be removed that have fence wire attached, or that are part of a permanent functional fence, shall be cut off above the top strand of wire. Care shall be taken that all fences and gates are closed or left in such condition that livestock cannot escape. If fences or gates of an active pasture along the right-of-way are in a state of disrepair prior to the start of clearing and could allow livestock to escape, the contractor shall attempt to notify both the property owner and the Company Forester of this condition. Where movement of the Contractor's equipment is required through existing fences, the Contractor shall make appropriate openings and adequate facilities for closing these openings during and after their use.

6.12 Railroads

Where the Company's right-of-way parallels or crosses railroad property, and the Contractor elects to gain access to the right-of-way from railroad property, they shall be responsible for all applicable rules, regulations and fees pertaining thereto. All associated costs will be a pass-through to RIE.

The contractor must:

- Coordinate with Rhode Island Energy to obtain a permit, If required, from the railroad near whose tracks he or she will be executing vegetation maintenance.
- Check with each railroad near whose tracks he will be treating to ensure that the contractor carries all Insurance which the railroad may require. Contact RIE Forestry staff if any problems arise.
- Provide qualified railroad trained personnel.
- Refrain from beginning vegetation work whenever a railroad has failed to provide a flagman or remove the railroad from service. Contact RIE Forestry staff immediately so that he or she can contact the railroad.

6.13 Native American Lands

Where required to complete work upon reservations, the contractor shall employ the designated Native American personnel for the successful completion of the project.

6.14 Chainsaw Bar Lubricants

When working within a sensitive area, chainsaw bar lubricants must be biodegradable products.

6.16 Equipment

The contractor crew supervisor or foreman must be equipped with a cellular telephone.

Clearing crews should always carry with them a shovel, a broom, heavy-duty plastic bags or other leak-proof containers, absorptive clay and activated charcoal (Chemical Spill Kit or Universal Kit).

Contractor's equipment must be sufficient to maintain the highest practical level of efficiency and effectiveness. Equipment must be maintained in good visual and working condition.

6.16 Site Restoration

Work shall also include grading, mulching, and reseeding of rutted or scarified soils caused by the Contractor's operations when directed by the Company Forester. This shall include repair of all environmental damage, maintenance of stream crossings, wetlands, crop fields, fence lines, etc. which are adversely impacted by the Contractor so as to leave the right-of-way in as good or better condition than found.

Inclusion of the repair of any previously existing environmental damage, including grading, seeding, mulching, stream, culvert and ditch repair, etc. shall be specified at the time of bidding or completed on a Time and Material basis if required.

7.0 Sub-Transmission Scope of Work

7.1 Pruning Standards

All pruning shall be performed in accordance with ANSI A300 standards as well as the Best Management Practices-Tree Pruning publication. All cuts shall be made at a parent branch or limb, so that no stub shall remain. In cutting back a branch, the cut shall be made at a crotch or node where the branch being removed is at least one-third the diameter of the parent limb. All pruning cuts shall be made in accordance with proper collar cutting methods, utilizing drop crotch principles to minimize the number of pruning cuts, promote natural growth patterns, and maintain tree health and vigor (ANSI A300). Climbing irons or spurs shall not be used in pruning a shade/ornamental tree in a maintained area. Tree wound dressings shall not be applied.

7.2 Hazard Tree Inspection and Removal

Other than work required in previous sections, the removal of any tree 9 inches dbh and above, within a maintained, roadside or unmaintained area, shall be considered a hazard tree removal.

7.2.1 While pruning the circuit, the contractor shall perform a visual inspection of each tree along the circuit to identify potential defects and determine the potential risk for the tree to cause an interruption over the length of the pruning cycle. The RIE Forester will work closely with the contractor to determine potential hazard trees, preparing a list of trees in accordance with RIE's Hazard Tree Removal Form (Appendix 4). The contractor shall also submit, with approval by Rhode Island Energy, an additional list of potential hazard trees found while performing the work.

7.2.2 Once a crew completes the removals on an approved list they shall note the completion details on the Hazard Tree Removal Form. This form shall be submitted to the Forestry representative on a timely basis.

7.3 Management of Wood and Brush (Slash)

Wood and brush slash may be generated during vegetation management activities. In general, where tree removal or pruning is required, the brush that has been cut may be left where it falls after being cut (diced) to lie close to the ground. The length of diced stems or branches should not exceed 10 feet, the height of diced slash should not exceed two (2) feet. Stumps shall be cut flat and close to grade as much as possible. (The contractor may choose to mow the floor; this is an option and should be discussed with the Company Forester before proceeding.)

Near public or private roads, residential or commercial areas, parks, streams, access roads, in any sensitive area or otherwise managed properties, the brush shall be disposed of by either chipping or removal to a suitable location within the right-of-way and neatly piled, windrowed or dispersed.

When chipping is required, the chips may be disposed of by dispersing on site in non-sensitive areas. Chips shall be removed from areas of more Intense landscape management such as lawns.

Where trees and limbs larger than four (4) inches in diameter at the small end are removed and the designated slash disposal is a windrow, the wood shall be neatly piled on the site, taking care not to block any access roads used by either the property owner or the Company. When the authorized slash disposal method is chipping, it may be necessary to remove the larger wood from the site to another approved area of the right-of-way and piled neatly or moved to an approved off right-of-way disposal site.

No burning of wood or brush will be permitted unless specifically authorized by the Rhode Island Energy Forester.

All species of wild cherry (Prunus serotina, P. virginiana, P. pennsylvanica) that are cut or treated during the growing season can become toxic to livestock during the wilting stage of the leaves. In addition, several species of Maple (Acer) have been identified as toxic to horses in the wilting stage. Therefore, Maple and Cherry stems, which are cut or treated in active pastures, shall be immediately removed from the pasture following clearing, or arrangements made with the farmer to utilize alternate pastures until the wilting stage and hazard has passed.

Contractors shall comply with all applicable laws and guidelines pertinent to invasive species and their management, as set forth by the Government and Rhode Island Energy.

7.4 Overhead Dead or Damaged Vegetation

All dead or damaged overhead limbs, branches or leads that are capable of falling onto overhead sub-transmission lines from above or alongside the right-of-way and potentially causing a tree interruption, shall be removed at the time of pruning.

7.5 Pine Species

For all road-side pine species growing above the overhead clearance limits with boughs overhanging primary conductor, the contractor shall shorten all overhanging boughs so to reduce the length of the branch by approximately 1/3 without removing all needle growth from the entire branch. This shall be done in a progressive manner beginning at the upper clearance dimension (20 feet) and working upwards generally two whorls in the tree as necessary to reduce the likelihood of a long pine bough loaded with ice or wet snow, drooping down or breaking onto the conductors.

7.6 Vine Control

All vines growing on poles, guy wires, stub poles or towers shall be cut to create a "growth gap" of four feet and treated (where appropriate) with an herbicide approved by the company. Contactors should not attempt to remove vines from any structure.

Sub-transmission work shall be carried out in a two-step process:

Step 1: Sideline pruning and floor cutting/mowing
Step 2: Follow-up herbicide treatments on off-road sections

7.7 Step 1: Sideline Pruning and Floor Cutting/Mowing

7.7.1 Vegetation Clearance• Roadside

All overhead sub-transmission lines shall be pruned to provide a minimum of 20 feet of overhead clearance, a minimum of 15 feet of side clearance from the outermost phase, or to the mature tree line and removal of capable species below the wires and within the clearance dimensions. The contractor shall recognize that the use of ANSI A300 standards and techniques will result in clearances beyond the dimensions noted above.

Where greater clearances have been achieved in previous cycles, the pruning shall be completed to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

It is an objective of Rhode Island Energy's vegetation program to continually strive to reduce the number of under-wire tree and branch growth that will continually require pruning, by removing as many stems and growth as possible on each cycle. The Contractor is expected to emphasize this type of removal through the
landowner contacts made by their customer contact personnel unless they have signed documentation of refusal. Rhode Island Energy must be notified upon refusal within 24 hours.

All slash from pruning in maintained areas shall be disposed of through chipping. The brush shall be disposed of by either chipping or removal to a suitable location within the right-of-way and neatly piled, windrowed or dispersed. Large diameter wood may remain on site provided it is cut into manageable lengths and piled neatly. Smaller debris shall be raked up and removed to leave the property in a condition equal to the start of work.

Herbicide treatments may be applied to road-side vegetation. This will be defined during the bidding process. All herbicide applications MUST follow local state pesticide regulations.

7.7.2 Vegetation Clearance - Off-Road

Prior to commencing vegetation maintenance activities in a right-of-way, the contractor MUST contact a Rhode Island Energy Forester to discuss any sensitive areas within the right-of-way, which can include endangered species, wetlands, and drinking water wells. The presence of sensitive areas might alter the type and timing of vegetation maintenance activities that will be conducted. A site- specific work plan may be provided to the contractor by the Rhode Island Energy Forester.

There should be no overhang above a sub-transmission line, unless there Is an easement restriction or otherwise noted on the map, in which case follow Section 7.4 Overhead Dead or Damaged Vegetation. All sub-transmission lines shall be pruned to provide the maximum clearance allowed by easement. Where no easement has been obtained, prune to the established tree line **unless an alternative clearance is approved by Rhode Island Energy.**

Where greater clearances have been achieved in previous cycles, the pruning shall be completed to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

Slash shall be mowed/mulched or neatly windrowed to the edge of the maintenance corridor and cut to lie close to the ground, away from sensitive locations. All slash near residences shall be disposed of by chipping or mowing/mulching. Where practical, chips may be blown back onto the site without creating large chip piles. No debris shall be left anywhere that will potentially block access, significantly alter any drainage or water resource, or create any unsafe conditions for the public. Stumps shall be cut flat and close to grade as much as possible. (Contractor may choose to mow the floor, this Is an option and should be discussed with the Company Forester before proceeding.) All mowing will be done in accordance with Rhode Island Energy's Mowing Specification.

Alternatives to these practices must be approved by a RIE Forester and by the current landowner.

As stated above, the contractor shall practice ANSI A300 pruning in choosing the pruning points within the tree which will often mean clearances greater than vertical/horizontal clearance distances will be obtained. Trees shall be directionally pruned to encourage growth away from the sub-transmission line.
Pruning shall not leave any overhang over the right-of-way.

Prune or remove high risk hazard trees. Hazard trees found beyond the right-of-way and/or vertical/horizontal clearance distances that are judged to be an imminent threat to the conductors shall be brought to the attention of a Rhode Island Energy Forester for approval prior to removing (see Section 6.7). Desirable species shall be retained along the edge of the right-of-way.

Any tree in the border zone that is within vertical/horizontal clearance distances shall be removed, not pruned.

Contractors shall comply with all applicable laws and guidelines pertinent to invasive species and their management, as set forth by the Government and RIE.

7.8 Step 2: Herbicide Treatments

Herbicide treatments will mainly be conducted in the off-road sections on **the sub-transmission corridors. If a sub-transmission line shares a ROW with a Transmission line, then that corridor will be treated when the Transmission line is treated. This will be defined during the bidding process. All herbicide applications MUST follow local state pesticide regulations.**

All treatment operations must be applied to the full specified width of the ROW. Vegetation Operations staff will determine whether the full specified width of the ROW has been treated. The contractor must, at his own expense, re-treat the site upon notification by Vegetation Operations staff that a treatment was not applied to the full specified width of the ROW. Re-treatment must be accomplished by using the application method and materials prescribed by Vegetation Operations staff. Refer to the Rhode Island Energy ROW floor specification for additional details.

8.0 Management of Sensitive Areas & Wetlands

8.1 Sensitive Areas

Sensitive Areas are defined as areas on rights-of-way where legal, visual or environmental impacts/concerns require compromises to the general vegetation management program. Sensitive Areas include public surface, public well and private well drinking water supplies; lakes, ponds, rivers, streams, and any other surface waters; wetlands; endangered species sites; agricultural areas including croplands, orchards, tree plantations and animal pastures; buffers at road crossings; buffers at residential and/or commercial yards; and easement restrictions and/or landowner agreements.

These sensitive areas have varying legal definitions in each of the states in which RIE companies have sub-transmission facilities. Permits for vegetation management activities in these states vary as well. For purposes of this document, sensitive areas and vegetation management within them are discussed in a general way.

8.2 Wetlands

In wetlands, tall growing trees generally only occur in wooded swamps or areas that are dry for long enough periods each year to support tree growth. Generally, equipment may not enter a wetland area. All tree felling in wetlands must be done by hand. Exceptions must be reviewed with the RIE Forester prior to entering a wetland with equipment.

In remote areas, including remote wetlands, and with the RIE Forester's approval, trees to be removed may be topped below conductor level to provide wildlife habitat and to reduce ground disturbance and clutter.

9.0 Mitigation of Impacts

If, during their operations, the Contractor causes any damage to the land such as deep ruts or scarified areas, which in the opinion of the RIE Forester could cause future erosion or interfere with access for line maintenance, the Contractor shall re-grade the site to original contours, and seed and mulch as required. Areas that do become rutted or where erosion occurs during sideline program operations will be restored per RIE companies' policies.

The Contractor shall take reasonable precautions not to remove or damage existing low-growing vegetation, either natural or planted, which are to be preserved on the right-of-way. Where road crossing buffer vegetation, either natural or planted, has been damaged beyond reasonable repair because of the Contractor's negligence, this vegetation will be replaced at the Contractor's expense.

The Contractor shall take care not to rut or scarify the right-of-way for the duration of their operation. All environmental damage resulting from the Contractor's operation shall be permanently repaired at the Contractor's sole expense.

Mobile equipment shall not Intrude into road crossing buffers, stream buffer zones or pruning and topping areas, except on designated access routes. When a tree that has been cut must be removed from such an area, it must first be limbed, and the brush hand carried to the chipping location or pile site. The trunk wood may be removed by means of a winch line taking adequate care to avoid damaging residual vegetation.

In certain areas, where feasible and advantageous, the Forester may authorize the use of aerial lifts and other specialized equipment, in road crossing buffers for the purpose of pruning trees, and disposal. In no case, however, will any vegetation be cleared or any new road be authorized, other than the approved access road through the screen to facilitate the use of this equipment.

The Contractor shall take adequate precautions to protect the watercourses and wetlands from pollution and shall avoid disturbing streambeds and banks and the low-growing vegetation protecting them. Felling vegetation in or across a watercourse (such as a river, stream, or brook), should be avoided. Vegetation that is felled into a watercourse shall be removed as soon as possible and placed on high ground. Brush chipping shall be performed in such a manner that the chipped material shall not enter any watercourse or wetland area, nor accumulate more than four (4) inches in depth at any location.

Attachment I

RHODE ISLAND ENERGY CONTRACTOR EVALUATION FORM

Contractor:

Package or Circuit:

Evaluator:

Date:

Rhode Island Energy
a PPL company

Overall
#DIV/0!

Quality of Work

	Question	Score
1	How frequently does the contractor have go-backs / not-dones?	
2	It is assumed all work will be completed to RIE Spec. Does the contractor's work meet the ANSI A300 standard of quality (proper cuts, no dog ears, etc.)?	
4	Are the contractor crews taking ownership of the work?	

Customer Service

	Question	Score
1	How often is the contractor receiving at-fault customer complaints?	
2	How well does the contractor deal with customer complaints? This includes promptness and ability to resolve issues?	
3	Does RIE receive damage or cleanup complaints from contractor's work activities?	

Leadership

	Question	Score
1	How often is the General Foreman on site with the crews?	
2	How engaged is the General Foreman in getting the work done?	
3	Does the General Foreman consistently review the work prior to submitting it for audit?	
4	Does the contractor alter operating procedures to maintain margins on jobs?	

Communication

	Question	Score
1	How well is the contractor communicating with municipalities, tree wardens, police departments, etc.?	
2	How well is the contractor communicating with RIE supervisors?	
3	How effectively are the contractors communicating with customers? (Use of door hangers, etc.)	

Responsibilities & Logistics

	Question	Score
1	Does the contractor provide a useful and quality list of danger trees when pruning?	
2	What is the condition of the contractor's equipment?	
3	Does the contractor provide RIE with enough lead time when requesting planned outages?	
4	Does the contractor notify RIE of changes in manpower or qualifications?	
5	Does the contractor submit accurate time and data sheets?	

Safety

	Question	Score
1	PPE used and condition?	
2	Work area and vehicle safety	
3	Risk assessment and mitigation- Job Briefing	
4	Work practices	

Additional Comments

Attachment J

Feedback

As our municipality partners your thoughts and opinions are important to us. If there is anything we didn't cover or any other comments or concerns, please title your comments with the topic you are concerned with in an email to:

SFarthing@rienergy.com

Please have any comments back to us by April 25th, 2025

AS 1-3
General Questions

Request:

If there is a conflict or contradiction between RIE's VM Standards and Procedures and the Distribution or Sub-T Clearance Specifications, which document controls?

Response:

The Company's VM Standards and Procedures is a broader document that contains all aspects of the Company's activities. It is the overall arching document that is the framework of the Company's VM Program. The attachments submitted by the Company as part of the filing, including the Distribution Specifications and Sub-T Clearance Specifications, pertain to very specific aspects of the program.

The specific documents should ultimately be consistent with the approved VM Standards and Procedures. To that end, prior to procuring its vegetation vendors for the year (takes place in the Fall), the Company plans to update and revise the Distribution Specifications and Sub-T Clearance Specifications to conform with the approved VM Standards and Procedures. When performing the work, the Company's vendors would follow the more specific Distribution Specifications and Sub-T Clearance Specifications.

AS 1-4
General Questions

Request:

When will the Company send letters to each city and town council that the proposed VM Standards and practices have been filed with the Division, as required by R.I. Gen Laws § 39-34-3(e)? Please provide a copy of the letter(s).

Response:

A letter that Company's proposed VM Standards and Practices have been filed with the Division was sent to each city and town council as well as each city and town's DPW Director on June 26, 2025.

Please see Attachment AS 1-4 for a copy of the letter.

June 26, 2025

VIA U.S. MAIL TO MUNICIPAL COUNCILS
VIA ELECTRONIC MAIL TO MUNICIPAL COUNCILS,
TREE WARDENS AND TREE COMMISSIONS

RE: The Narragansett Electric Company d/b/a Rhode Island Energy
2025 Vegetation Management Standards and Practices
Division Docket No. D-25-15
Notification to Municipalities

Dear:

We write to inform you that The Narragansett Electric Company d/b/a Rhode Island Energy (the "Company") filed its proposed 2025 Vegetation Management Standards and Practices ("Vegetation Standards") with the Rhode Island Division of Public Utilities and Carriers ("Division") on June 23, 2025.

The filing may be accessed on the Division's website, through Docket No. D-25-15, at: D-25-15-RIE 2025 Vegetation Standards (DPUC 6-23-25).pdfor on the Company's website at: https://www.rienergy.com/site/outages-and-safety/safety/gas-and-electric-safety/trees-and-your-electric-service

Company Contact for Filing

If you have any questions about the filing or would like a hard copy of the filing, please contact:

Christopher J. Rooney
Rhode Island Energy
Manager – Forestry
Email: cjrooney@rienergy.com
Phone: 401-255-4439

Background

In 2024, the General Assembly enacted the Vegetation Management for Electric System Reliability Act (the "Act"), codified as R.I. Gen. Laws § 39-34-1 et seq. The Act sets forth a process for developing, reviewing, and approving the Vegetation Standards.

On March 20, 2025, the Company met with and presented its proposed Vegetation

Standards to municipal tree wardens.[1] At the meeting, the Company and tree wardens discussed the type of vegetation work that would be performed by the Company. Overall, the presentation was well received. Following the presentation, the Company solicited written comments on the Vegetation Standards. No written comments were submitted.

On April 10, 2025, the Company hosted a virtual presentation of the Vegetation Standards.[2] The Company went through all aspects of its program including the more in-depth notification procedures set forth in the Vegetation Standards. Again, the presentation was well received.

On June 23, 2025, the Company filed its proposed Vegetation Standards with the Division. The Division has 90 days to render a decision. This period includes at least a 30-day public comment period. In accordance with R.I. Gen. Laws § 39-34-3(e), the Company is sending this letter to each city and town council informing them that the Vegetation Standards have been filed with the Division.

Summary of Vegetation Standards

The Vegetation Standards contain the major components of the Company's Vegetation Department's activities. This ranges from cycle trimming to risk reduction work. Each activity is outlined in the Vegetation Standards. In addition, the filing contains the Company's vegetation specifications as well as customer notification materials. Overall, the proposed Vegetation Standards are not much different than current practice. The Standards simply create a more robust notification process for customers so they can be informed of future vegetation management activities.

Thank you for your attention to this filing.

Sincerely,

/s Christopher J. Rooney
Rhode Island Energy
Manager – Forestry

[1] The following municipalities were represented at the meeting: North Kingstown, Newport, Exeter, West Greenwich, Glocester, East Providence. Also in attendance were individuals representing Rhode Island Department of Environmental Management ("RIDEM") forestry division, Rhode Island Department of Transportation ("RIDOT"), and the Green Infrastructure Center.

[2] The following municipalities joined the virtual meeting: Central Falls, Warren, North Smithfield, Warwick, East Providence, Coventry, Smithfield, Newport, North Kingstown, South Kingstown, Johnston, Narragansett. In addition, individuals from RIDEM forestry division, Division staff, and the Newport Tree Commission attended.

AS 1-5
General Questions

Request:

The Company only included the circuits to be cleared in 2026 in the VM plan. Which circuits will be cleared in the remaining three years and does this include all distribution and sub-transmission circuits? If the plan does not include all the circuits, please list the omitted circuits and the reasons why those circuits were omitted since the Company stated this is a traditional 4-year cycle.

Response:

The Company intentionally only included the circuits to be trimmed in 2026 in the VM Plan as an addendum to show the actual current year plan. Each "proposed" year's plan will include approximately ¼ of the total line miles that are owned and operated by RIE, creating the "4 year cycle". A master list of all RIE circuits is kept internally and includes the "proposed" year to be trimmed based on the last time trimmed. The subsequent years workplans are not printed and distributed prior to being put out to bid by vendors, this prevents incorrect duplicate lists being circulated, both internally and externally.

Once the upcoming years circuit list has been reviewed, confirmed, put out to bid, approved and awarded, then the list is made public, in time for all proper customer and community notifications to be made and after all budget concerns are met and approved.
Reasons why an actual printed list of when circuits will be trimmed is considered only a "DRAFT" include the fact that it would only be a "snapshot" in time, and it could/will morph and change as circuits are reconfigured and/or converted for loading purposes, sometimes temporarily and sometimes permanently.

AS 1-6
VM Standards and Procedures

Request:

Why is there no discussion that Vegetation is the number one cause of outages?

Response:

The Company's approach to the VM Standards and Procedures was more procedural in context. The VM Standards and Procedures document was developed to provide vegetation management standards and practices for application across the service territory. The Company believes that an assessment of outage drivers is not required in the VM Standards and Procedures and is better suited for discussion in the ISR process.

Prepared by or under the supervision of: Christopher Rooney

AS 1-7
VM Standards and Procedures

Response:

After the PPL acquisition RIE implemented enhanced cycle trimming, which includes increased clearances; however, RIE's VM filing does not appear to address enhanced cycle trimming, including what constitutes enhanced trimming. Please explain why enhanced cycle trimming was not addressed in the filed plan.

Response:

Enhanced trimming is a very specific treatment to vegetation in certain areas of circuits on the Company's system. This tree work constitutes clearing twenty-five feet from the centerline of the pole line. It targets compatible species of trees that can grow into as well as fall into the wires on these spans. The areas in which this work is conducted are of very high value to the circuit. The value could be high customer counts, critical, or important customers, as well as areas of circuits that are remote or difficult to maintain. Enhanced trimming is only done with coordination of the property owners. The coordination involved involves getting exact permission for the work with agreed upon conditions using the scope of work or tree removal authorization forms.

Since the Company has implemented enhanced tree trimming, we have worked closely with stakeholders and tree owners to obtain greater clearances on the system with great success. The protocol behind the scenes is detailed and thought out by the staff. While enhanced trimming is only progressed with approval of stakeholders and tree owners the Company will formalize the strategies and protocols for this work going forward and will include it in the Standards, Policies, Practices and Procedures as well as including exact work practices in the Company's distribution specification.

AS 1-8
VM Standards and Procedures

Request

Please explain the current VM program and procedures that have changed since the PPL acquisition of Narragansett Electric.

Response:

The largest change in the Vegetation Management program since PPL has acquired Narragansett Electric has been introducing targeted risk reduction work to the program. While the old program targeted hazard tree work on circuits off cycle to reduce outages, the updated program now targets specific areas on just about every circuit worked in a year to improve overall reliability. These areas are identified using the Company's proprietary software that takes inputs from a multitude of sources to help the team identify areas to prescribe appropriate additional arboricultural treatments. These treatments include enhanced trimming as well as specific tree work in the form of hazard tree removal or targeted overhang removal. This targeted work with its over aching effects will lead to the removal of the pocket of poor performance program funding recovered through the ISR process.

The Company's off cycle risk reduction work is now specifically concentrating efforts on areas of circuits where trees have been affected by insect or disease infestation causing tree mortality. This part of the program is mostly determined by windshield surveys of identified impacted areas. This proactive program is designed to reduce the risks these pests can present to the system.

Another change made was to include the cost of traffic control in the bid scope of the cycle trimming. This change enables the Company to help the vendors focus on this part of their work with more attention and accountability.

The Company also introduced the use of Tree Growth Regulators. The treatments that have been used for many decades in Utility Arboricutlure are a well-known effective way to control regrowth after pruning. The Company is exploring their use in targeted areas on its system to help slow regrowth between cycles. These target areas include mostly urban areas where incompatible trees are well established in high traffic areas. This management tool could potentially reduce vendor and traffic control costs in future cycles.

Preceding the purchase, the RI distribution and transmission programs of vegetation management were managed separately. With the purchase, they were combined enabling some synergies in both procurement instances as well as work coordination, and strategies.

AS 1-8, page 2
VM Standards and Procedures

This merged department enables both functions to closer align to Rhode Island specific needs and operating conditions.

AS 1-9
VM Standards and Procedures

Request:

RI VM statute R.I. Gen Laws § 39-34-3(b)(2) requires at least 30-day notification when municipalities, state agencies, and/or private property owners may be impacted by "vegetation management activities", not just cycle trim work. Except for storms and emergencies, would RIE consider reflecting this requirement in its plan for all VM activities including on-cycle and off-cycle risk reduction work (hazard tree removals, etc.)?

Response:

For regular maintenance work (trimming around the wires), the Company sees the 30-day notification process as a way to notify customers that this work is required and, absent unusual circumstances, will take place as part of the maintenance rights granted to the Company upon setting the poles and infrastructure.

At this time, for work not considered regular maintenance (hazard tree removals), the Company believes a better approach is a back and forth process with customers as opposed to a standard 30-day notification. This would entail having a conversation with the property owner or municipality regarding the type of work that the Company is looking to perform and said party granting permission to do that work. This could potentially require some negotiation as to what/how much work will be done, if anything at all.

However, the Company is open to considering any alternatives the Advocacy Section may offer.

AS 1-10
VM Standards and Procedures

Request:

According to Notification Procedure 4., on page 2, of the Plan, RIE will mail letters to property owners informing them of scheduled work:

a. Should the standards state that the notification letter will be provided at least 30 days in advance as required by RI VM statute [Section (b)(2)]? Also, should notification be required for all vegetation management activity, not just trimming?

b. The sample letter (Attachment E) indicates that "trimming is done every four years and there is no cost to you for this work" ... Since customers pay for VM through rates, should the word **direct** be added before the phrase: "cost to you"?

c. What procedure will be followed if screening has been planted by the landowner in Off-Road Rights of Way which can occur since the Company indicates any brush 8" in diameter or less will be removed?

d. Can the landowner where Off-Road Rights of Way practices are utilized request the debris be chipped rather than neatly placed at the edge of the maintenance corridor?

Response:

a. Yes, the standards should state that the notifications letter will be provided at least 30 days in advance as required by RI VM statute [Section (b)(2)] and that will be amended as such. As for the notification letter being required for all other vegetation management activities, please see the Company's response to AS 1-9.

b. Yes, the Company will make that update so that is phrased to "no direct cost to you."

c. The first item that must be ascertained is what voltage is present in the right-of-way in question. This will determine what specification is referenced and adhered to. Secondly, the Company will determine if there are proper easements for its equipment to be located on the said property. The next step is determining where the screen is in relation to the Company's wires. Lastly determining the type of screening planted will be examined. If it is a low growing non-capable species there may be an opportunity for it to remain. These factors will all play a part in deciding.

AS 1-10, page 2
VM Standards and Procedures

d. The landowner can request that debris be chipped rather than neatly placed at the edge of the maintenance corridor. The determination of the request will be examined case-by-case, with factors such as location and extent of work considered.

AS 1-11
VM Standards and Procedures

Request:

According to Notification Procedure 5., on page 2, of the Plan, RIE indicates that vendor specs require contractors to leave door hangers at least 14 days prior to tree work. Please address the following issues:

The door hanger is referenced as Attachment C, which contains trimming specifications but no communication documents. Attachment D is a notification letter that is not referenced in the standards. It appears that Customer outreach documents, including the door hanger, may need attention, including providing current examples, removing language suggesting trimming is a service at no charge, including right tree right place references, providing a clear contact for both information and concerns with trimming, ensuring clearance specs are accurate (given enhanced trimming), discussing hazard tree removal, etc.

Response:

The customer facing documents located in this standard are the Company's current materials being used in FY 2026. These require significant updating to conform with the law. Items such as specific phone numbers (in English and Spanish), websites, and email address going forward will be there for customers who have concerns. All these materials are currently being developed. The Company at this point is still reviewing these so that the materials are meaningful in the descriptions of the program and useful to the customers who want to raise a concern. Once these door hanger materials are developed, they will be used by the vendors to notify prior to commencing work. The Company acknowledges how important these are to the process and will ensure proper development and accuracy.

AS 1-12
VM Standards and Procedures

Request:

Cycle Trim Concerns - Are specification adjustments and/or refusals formally documented? Signed off by customer to have a record? Reported to the Division/PUC? If not, should a process be considered?

Response:

For fiscal year 2026, which is currently underway, light trims and refusals are captured for each circuit in the workplan when they occur. They are currently stored with each circuit's information (maps, work-quality documents. etc.) A customer is not given a copy of this form. This information is not currently reported to the PUC or Division.

Going forward, the refusal documents / customer requested specification modifications will continue to be tracked with each feeder trimmed. Going forward, the customers will be provided with a copy of the refusal documents / customer requested specification modifications for their records. The Company is open to providing this information to the Division and/or PUC if desired. The information on these adjustments will be recorded and kept for many years and available for reference at any time.

AS 1-13
VM Standards and Procedures

Request:

Property owner trim refusals – the company "may explore options" such as deenergizing equipment or holding owner accountable for future damage and outages. Is this a long-standing policy? How often has RIE taken these actions?

Response:

This has not been a long-standing policy, and the Company is still exploring the optimal way to move forward with this. To date, the Company has not adopted these actions.

Taking prompts from western state utility companies that have had challenges with wildfires, it is of growing industry importance to explore options when a property owner refuses trimming.

AS 1-14
VM Standards and Procedures

Request:

RIE applied Tree Growth Regulators ("TGR") along feeders in the last two years, but results will not be known until next 4-year trim cycle. (see FY26 ISR, DIV 7-2). TGR was previously proposed as a treatment on specific feeders but here it is shown as an option for tree owners.

a. Please elaborate.

b. Is this now a program?

Response:

a. Using TGRs is currently targeted as an on-cycle treatment to help control / reduce regrowth on feeders on each year's workplan. The treatment has been addressing only municipal and/ or state-owned trees planted directly under wires. Going forward, it could be an option for individual tree owners if they would be comfortable with this treatment and would be included in the current on-cycle treatment. Knowing that this Standards and Practices document would be applicable for the next four years, the Company wanted to include this option.

b. Using TGRs has been accepted by municipal officials from Newport, Providence, and from RIDOT. With the Company seeing promising results, we are planning on continuing with it for the near future as a trial. Specifically, the Company intends to use TGRs through FY2027. In the late summer of 2026, the Company will be extensively looking at regrowth from the first year of treatment, specifically on trees in Newport and Providence. For the FY2028 vegetation management program submittal, the Company will be indicating its results and indicating if we will be continuing with the TRG program.

AS 1-15
VM Standards and Procedures

Request:

Please address whether the topic of TGR may be better suited in another section. This ties into right tree and right place. Similarly, National Grid had a section on invasive species assessment and control. How/where does RIE address the issue?

Response:

From a utility and arboricultural perspective using TGRs must coincide with cycle trimming. Time of the application must be in tune precisely when the tree is trimmed. Procedurally it needs to be discussed with the cycle trim program and in the Company's, opinion should be included right after the cycle tree discussion.

The issue of invasive species assessment and control is not specifically addressed in this document. Besides day-to-day practices that can control vines or invasive types of trees that pose risks for the system, the Company does not specifically address the issue on the distribution side of the business.

The Company's transmission vegetation management does address some issues. As transmission corridors are elaborate ecological areas the Company does call out specific species that are averse to the Company's integrated vegetation management and are not in line with the Company's strategies of right of way stewardship.

AS 1-16
VM Standards and Procedures

Request:

Traffic Control is not a program and seems it should be incorporated in the Contractor guidelines, particularly the requirement to include police detail and flaggers in bid pricing. When does RIE not require vendors to submit pricing for flaggers and police details?

Response:

Vendors are required to submit pricing for flaggers &/or police details only on roads/locations where it is required for crew/public safety or required by local/state authorities or regulations. When the vendors bid on the work, they review the locations of the circuits, estimate the time/cost to perform the work, and determine then if flaggers/police details are needed. If they are required, the vendor then includes an estimate for that cost as well. If work is not bid on by the vendors (for example it is assigned on an hourly basis), the vendor would only be required to "pass-thru" the exact cost of the hired flagger/police detail required to do said hourly work, or charge RIE the exact cost of utilizing one of their own flagger personnel.

AS 1-17
VM Standards and Procedures

Request:

Please address the following risk reduction work issues:

a. The work, which includes hazard tree removals, is not explained or outlined in any specifications or guidelines.

b. Risk reduction is a vegetation management activity. All notification requirements in the RI VM statute apply to this work as well. Stating that "this work will be highly coordinated with tree owners and community partners" does not appear adequate.

c. RIE's standards or specifications should specifically incorporate RI VM statute Section R.I. Gen Laws § 39-34-3(b)(6) that requires a process to seek approval from property owners for tree removal.

d. Hazard tree removal refusals.

Response:

a. The hazard tree identification and implantation procedures are being developed. The Company would appreciate an opportunity to update the proposed VM Standards and Procedures prior to the Division's position being due on August 19, 2025.

b. Hazard tree inspection language will be included in the Company's cycle trim notification materials. This will let customers know that, while tree crews are trimming an area, the Company or Company designee will be looking for hazard trees. This notification will also note that all removals will be discussed with and approvals requested from tree owners prior to work being done. In addition, the hazard tree identification and implantation procedure will have the proper steps to take to obtain permission for risk reduction activities.

c. The task of getting permission from tree owners for the tree removal will be highlighted in the hazard tree identification and implantation procedure.

d. The Company is open to collecting hazard tree refusals. More specifically, if a property owner refuses to allow the Company to remove the hazard identified, RIE would document the refusal and retain these documents. The Company would also be open to reporting to the Division.

Prepared by or under the supervision of: Christopher Rooney

AS 1-18
VM Standards and Procedures

Request:

Parties affected by VM required for capital construction activities should receive at least 30-day notice in advance of scheduled activity per RI VM statute R.I. Gen Laws § 39-34-b(2). Please address whether this section should be amended accordingly.

Response:

Please see the Company's response to AS 1-9. The Company considers capital construction activities to be outside of regular maintenance (similar to hazard tree removals).

AS 1-19
VM Standards and Procedures

Request:

Under what circumstances does the forestry department require permission to perform vegetation management for capital work, particularly if work is within a new or existing right of way?

Response:

RIE requires the property owners or the municipality official's permission for all vegetation work deemed necessary for all capital work. This capital work includes upgrading existing infrastructure or building completely new lines regardless of whether it is within a new or existing right of way. Because this work is not included in the Company's "right to maintain" granted in the original setting of poles, the Company feels notification is not sufficient therefore it seeks permission to complete this work. The Company has deemed this a best practice since capital work could be as little as a few limbs or in some instances having to remove large parts of trees. Involving the tree owner also is important due to, that in some instances, this involvement could facilitate a design change to save or protect trees.

AS 1-20
VM Standards and Procedures

Request:

Interim Pruning also requires 30-day notice per the RI VM statute R.I. Gen Laws § 39-34-b(2). Does RIE agree that this should be mentioned in the policy?

Response:

Yes, the Company agrees that Interim Pruning does require a 30-day notice. The Company will update this section regarding Interim Pruning to reflect the change.

AS 1-21
VM Standards and Procedures

Request:

Are primary metering VM requirements better suited in RIE's retail service requirements?

Response:

The Company believes that stating what the vegetation management program is responsible for as well as what it is not responsible for is critical for setting the foundation of the program. In addition, specifically calling out that the Company does not conduct its activities past metering may give municipal officials information that they may not be aware of. Tree Wardens and or DPW directors would not necessarily know this policy since they would not commonly know specific retail service requirements.

AS 1-22
VM Standards and Procedures

Request:

Would RIE agree to add Supervision into a section on RIE's organization chart, with key personnel, titles and licenses? If not, please explain why RIE does not believe it should be added.

Response:

The Company is agreeable to add a RIE Forestry organization chart with key personnel, titles, and licenses.

AS 1-23
VM Standards and Procedures

Request:

Please provide the following information regarding the Right Tree Right Place Program mentioned on page 9 of 9:

a. When did this effort begin?

b. Who is involved on behalf of RIE?

c. What other stakeholders are included?

d. What has transpired and what is the current status of the program?

e. What best practices or existing models has the Company utilized and why?

f. What other education outreach is planned in addition to a website?

g. How will contractors be educated since they have the most contact with customers?

h. When will the right tree right place program be completed and published?

Response:

a. The effort began shortly after the law was passed in the summer of 2024. The Company started with an in-depth peer review of how other utilities spread information about right tree right place.

b. The Forestry staff is leading the effort for the right tree right place program.

c. Locally, The Rhode Island Tree Council, the RI Nursery and Landscape Association, RI DEM Division of Forest Environment are included in this development. Nationally, the National Arbor Day Foundation has done a lot of work in this area. Their vast amounts of information will be utilized.

d. Many meetings have taken place. The RI Tree Council will be hosting the website and helping the Company develop materials for distribution. The design of the website is currently being outlined, and formal agreements are being worked on. The other organizations are on board, their exact roles yet to be determined.

e. The best practice from the peer reviews is to let the industry and landscape professionals help other professionals determine the best practices in this arena. Trade groups as well

as community forestry advocacy groups continuously monitor and stay on top of species, industry trends, and new technology that can help this program develop and be successful. By the Company leading customers to the industry and local professionals it adds to the credibility and overall adaptation of the concepts.

f. In addition to the website, brochures, industry talks, as well as demonstration plantings are planned.

g. Getting the word out to the contractors as well as the Public Works community is vital for success. Targeting industry meetings as well as developing talks for community groups and interested forestry partners are planned.

h. The Company is looking for the program to be mostly complete and officially kicked off by Arbor Day 2026 (April 24th).

AS 1-24
VM Standards and Procedures

Request:

Please explain the plans for the demonstration arboretum mentioned on page 9 of 9. Please include the following information in the response: where will it be located, when will it be constructed, the estimated cost, source of funding, and why the demonstration arboretum is considered necessary?

Response:

The Company is working with the different partners on possible locations for arboretums or demonstration planting areas. Possible sites include the URI east farm location where the master gardeners have their facility. A transmission ROW in E Providence where the Company is working with the Tree Council to design a planting. Lastly, some communities have reached out interested in creating some wire friendly areas in their community forests.

The sources of funding for each would vary. Each site would have the roles and responsibilities worked out and agreed ahead of time. The true arboretums would be outside of ISR approved vegetation spend. April of 2026 around Arbor Day is the target to get some installed by.

Having a demonstration area / arboretum or multiple areas can be a game changer for professionals in Rhode Island. Neighboring states have these types of areas, and they have been a great resource to visit and get the visuals of the specific species of trees. However, with each state (CT, MA, NH) there is only one per state and can create travel issues, with our state being much smaller and RIE covering every community in the state the opportunity to create a few of these spots can help be a local resource to decision makers. Planting incapable species of trees in the wrong spots continue to be a problem in Rhode Island. These poor decisions create years and years of spending and work for the Company; arboretums / plantings can help inform quality tree choices and save tree wire conflicts thus saving money for ratepayers.

AS 1-25
Attachment A

Request:

Please explain the chart on the second page. Also provide headers for each of the columns.

Response:

The second page of Attachment A are additional feeders that were added to the FY26 workplan. These circuits were not put out to bid in the annual procurement event conducted in September 2024. Most of these circuits are small enough to be done with one or two specific crews at a specific time and therefore did not warrant bidding out. The Riverside and Highland Park circuits were put out in a supplemental bid event early in April of this year thus added to the extra list.

In its amended submittal of the document, the Company will update the list to provide headers for each of the columns. In the submittal, the Company will also include other edits and updates as referenced in this Set 1 of responses.

AS 1-26
Attachment A

Request:

Please provide the same information contained in Attached A, Page 1 of 2 for FY27, FY28, and FY 29.

Response:

As described in the Company's response to AS 1-5, yearly workplans can change. Circuits are routinely reconfigured and/or converted for loading purposes, sometimes temporarily and sometimes permanently. In addition, new circuits can be added, due to voltage conversions, or even brand-new circuits.

Creating a workplan is a yearly exercise and therefore FY27, FY28, and FY29 workplans are currently unavailable. If the Division would like additional information, the Company will work on and provide an estimated plan for FY27, FY28, and FY 29.

AS 1-27
Attachment B

Request:

Would RIE consider including a Table of Contents (see Sub-T document as example) for Attachment B?

Response:

Yes, RIE will add a Table of Contents for Attachment B.

AS 1-28
Attachment B

Request:

Please provide a redline copy of the distribution line clearance specifications comparing the most recent edition in effect under National Grid to RIE's current revision.

Response:

Please see Attachment AS 1-28.

National Grid Rhode Island Distribution Line Clearance Specification Fiscal Year 2021	Revision No. 2 Page 1 of 11 Date: 7/2/2019

FOREWORD

This specification documents the objectives, practices and procedures for vegetation management on National Grid companies' distribution circuits in **Rhode Island only**. The specification also defines the responsibilities of National Grid vegetation management personnel and contractors, identifies procedures to be followed by contractors performing all work and defines the requirements to maintain vegetation acceptable to the Company.

Questions or inquiries regarding information provided in this document should be referred to the National Grid's Manager of Vegetation Strategy.

Bert Stewart III
Bert H Stewart III
Manager
Vegetation Strategy

Anne Marie Moran
Anne Marie Moran
Manager
T&D Forestry, New England

Date: 7/2/2019

Date of Review/Revision:		
Revision	**Date**	**Description**
0	April 20, 2015	Original Specification
1	June 22, 2017	Edited language regarding police details
2	July 2, 2019	Edited section regarding service drops

nationalgrid

RI DISTRIBUTION LINE CLEARANCE SPECIFICATIONS **Updated 7/2/2019**

I. Scope/Intent

1.1 These specifications cover the cutting, clearing, pruning, tree removal and herbicide treatment of vegetation along overhead electric distribution lines and the corresponding substations. The intent is to define the minimum clearances to be obtained between the overhead conductors and vegetation that will be acceptable to National Grid. These specifications are strictly for use on overhead line maintenance pruning projects. This is not a specification to be used for enhanced hazard tree removal, new construction clearing or rebuild construction clearing.

II. Program Objectives:

2.1 The goals and objectives of the NGRID Distribution Line Clearance program are to provide safe, reliable, electric service through a cost effective, integrated vegetation management program. NGRID acknowledges differences in the manner in which various landowners respond to the need for routine line clearance activities, together with occasional differences in easement rights. Therefore, these specifications are designed to address:

- the minimum clearance requirements necessary to sustain safe, reliable electric service while striving to satisfy the concerns of sensitive customers,
- and the optimum clearance requirements necessary to sustain an appropriate level of safety and reliability.

III. Definitions:

Maintained Area: Generally defined as an area where the landowner or occupant is mowing the lawn and/or caring for gardens, ornamental shrubs or trees in the area under and immediately adjacent to the distribution poles. It includes commercial land uses such as business areas, parking lot edges and the tree lawn areas along urban and suburban streets. Un-maintained areas, of course, hold the opposite of these characteristics. It should be noted that within residential (maintained) areas there may be small sections of un-maintained property between yards or along the roadside of residential front lawns, etc. These small sections shall be treated as maintained areas for the purposes of this specification.

Mature Tree Line: A generally straight and contiguous line of trees nine (9) inches d.b.h. or greater, that mark the boundary between the forested edge and the maintenance

corridor. In the case of an existing mature tree line, there may be individual mature trees that are rooted closer to the pole centerline than the common mature tree line. In these instances the mature tree line continues behind those individual trees.

Maintenance Corridor: The area physically located under and alongside the overhead distribution feeder bounded by the mature tree line when one exists. In the absence of a mature tree line the maintenance corridor is defined as the area that is at least ten (10) feet either side of the pole centerline or equal to the previously maintained dimensions if greater than ten (10) feet.

Service Drop or Service Line: The last span of triplex or open three wire extending to the building or meter pole or a multi-span run of either triplex or open three wire that serves a single customer. This does not include street light services.

Secondary: The conductor, either triplex or open wire, which extends from the transformer to the Service Drop. Secondary spans may run along under primary spans or separately.

Street Light Secondary: The conductor, either triplex or open wire, which leaves the primary pole to pole configuration and extends out to service a street light or lights.

IV. Scope of Work:

4.1 Pruning Standards: All pruning shall be performed in accordance with ANSI A300 standards as well as the Best Management Practices – Tree Pruning publication. All cuts shall be made at a parent branch or limb, so that no stub shall remain. In cutting back a branch, the cut shall be made at a crotch or node where the branch being removed is at least one-third the diameter of the parent limb. All pruning cuts shall be made in accordance with proper collar cutting methods, utilizing drop crotch principles to minimize the number of pruning cuts, promote natural growth patterns, and maintain tree health and vigor (ANSI A300). Climbing irons or spurs shall not be used in pruning a shade/ornamental tree to be saved. Tree wound dressings shall not be applied.

4.2 Line Clearance within Maintained Areas: All overhead primary lines shall be pruned to provide a minimum of ten (10) feet of overhead clearance, a minimum of six (6) feet of side clearance from the outermost phase and a minimum of ten (10) feet of clearance below the wires. The contractor shall recognize that the use of ANSI A300 standards and techniques will result in clearances beyond the dimensions noted above.

4.2.1 The main trunk of the tree or major leads which are structurally sound and healthy may be left growing within these distances as long as none of the smaller diameter end branches are within the clearance dimensions. In that case the lead must be removed.

4.2.2 Where greater clearances have been achieved in previous cycles, the pruning shall be completed so as to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

4.2.3 The contractor shall ground cut any new volunteer growth capable of growing into the wires from around poles, guys, fences, etc. within the maintained yard areas after notifying the property owner.

4.2.4 It is an objective of National Grid's program to continually strive to reduce the number of under-wire tree and branch growth that will continually require pruning, by removing as many stems and growth as possible on each cycle. The Contractor is expected to emphasize this type of removal through the landowner contacts made by their customer contact personnel.

4.2.5 Contractor shall exercise extreme care when pruning ornamental plantings. Species, growth rates and growth characteristics should be taken into account and may require differing clearances.

4.2.6 All slash from pruning in maintained areas shall be disposed of through chipping. Large diameter wood may remain on site provided it is cut into manageable lengths and piled neatly. Smaller debris shall be raked up and removed so as to leave the property in a condition equal to the start of work.

4.3 Line Clearance Outside of Maintained Areas: All overhead lines shall be pruned to provide a minimum of fifteen (15) feet of overhead clearance and six (6) feet of side clearance from the outermost phase.

4.3.1 Along off-road sections the contractor shall completely remove all side branches that extend into the maintenance corridor from below and beside the lines in order to "box out" the maintenance corridor. This practice will minimize future pruning efforts as well as improve storm restoration and line inspection efficiencies.

4.3.2 Where greater clearances have been achieved in previous cycles, the pruning shall be completed so as to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

4.3.3 The contractor shall ground cut all trees and shrubs which have the ability to interfere with the conductor out to the limits of the existing maintenance corridor. Where a maintenance corridor does not already exist, ground cutting shall be performed for a minimum distance of ten (10) feet either side of centerline. Ground cutting shall include stems of eight (8) inches d.b.h. or less, all as part of the fixed price bid. Along individual spans that have been previously maintained using National Grid's past eight (8) foot targeted ground cutting specification (trimming and removal) the same approach shall be utilized.

4.3.4 Where trees beyond the limits of the maintenance corridor are extending into the corridor, the contractor shall either prune those limbs back or have the option to remove the tree as part of the fixed price bid. For trees, eight

(8) inches d.b.h. or less, where the top of the tree is leaning out into the corridor so that topping would be the only possible correction, the contractor shall ground cut that tree as part of the fixed price bid.

4.3.5 Stumps shall be cut flat and as close to grade as possible.

4.3.6 All slash along the roadway or near residences shall be disposed of by chipping or mowing/mulching. Where practical, chips may be blown back onto the site without creating large chip piles. On off-road, un-maintained sites, slash shall be mowed/mulched or neatly windrowed to the edge of the maintenance corridor and cut to lie close to the ground, away from sensitive locations. No debris shall be left anywhere that will potentially block access, significantly alter any drainage or water resource, or create any unsafe condition for the public. Alternatives to these practices must be approved by National Grid's Forestry representative and by the current landowner.

SEE RIE 4.44.4

4.4 ~~All dead or damaged overhead limbs, branches or leads that are capable of falling onto overhead primary wires from above or along side the right-of-way and potentially causing a tree outage, shall be removed at the time of pruning, and included in the fixed price bid.~~

4.5 For all pine species growing above the overhead clearance limits with boughs overhanging primary conductor - the contractor shall shorten all overhanging boughs so to reduce the length of the branch by approximately 1/3 without removing all needle growth from the entire branch. This shall be done in a progressive manner beginning at the upper clearance dimension (10 or 15 feet) and working upwards generally two (2) whorls in the tree as necessary to reduce the likelihood of a long pine bough loaded with ice or wet snow, drooping down or breaking onto the conductors.

4.6 Pruning Clearance for Secondary and Service Lines:

4.6.1 All secondary wire (triplex and open wire), other than that serving street lights only, shall be pruned to provide a minimum of eighteen inches of clearance from wire to vegetation.

SEE RIE 4.11.3 through 4.11.6

4.6.2 All service wires (triplex or open wire) and street light secondary on the circuit shall be inspected at the time of scheduled vegetation maintenance. For branches that are either making hard contact with the service wire, pushing on or creating tension enough to force the wire out of a natural arc, or redirecting the wire out of a straight-line run, the vendor shall do whatever pruning is necessary to correct that situation. The entire service drop need not be pruned, only the point of conflict.

4.6.3 For open wire services, pruning is required for all the situations noted in 4.6.2 as well as anytime vegetative growth is forcing the three wires out of their normal configuration. The vendor must take extra care when pruning

around open wire services so not to cause a service interruption to our customers.

4.7 Multiple Circuits and Under-builds: The contractor shall prune all distribution circuits on a pole unless otherwise called out on the bid documents. Where a distribution circuit is under-built below a sub-transmission the contactor is responsible for the pruning of both the distribution circuit as well as the over-built circuit utilizing the specification of the higher voltage circuit unless otherwise directed in the bid documents. The contractor is also responsible for work on any primary, secondary or service tap running off the sub-transmission line along that specific distribution circuit. Any exceptions to the above will be explained at the time of bidding. Reference the appropriate sections of either National Grid's Sub-T IVM and/or Sideline specifications depending on the under-built situation.

4.8 Circuits along Transmission Rights-of-Way: The contractor shall employ this specification on all sections of distribution circuits that run along segments of transmission rights-of-way except for areas where the distribution circuit is actually under-built on the same pole. In those cases the above section will apply. Any exceptions to the above will be explained at the time of bidding.

4.9 Substation Clearances: All vegetation within 10' of the substation fence shall be pruned, from ground to sky, removed and chipped and no overhanging branches shall be allowed to remain. Where shrubs and trees have been planted for screening purposes and are rooted within the 10' distance, only the fence side branches shall be removed. Any volunteer growth (natural regeneration) rooted within the 10' distance shall be removed.

4.10 Vine Control: All vines growing on poles, guy wires, stub poles or towers shall be cut so as to create a "growth gap" of 4 feet and treated (where appropriate) with a herbicide approved by the company.. Contactors should not attempt to remove vines from any structure.

4.11 Hazard Tree Inspection and Removal: Other than work required in previous sections, the removal of any tree over 8 inches d.b.h. within the maintenance corridor or outside the maintenance corridor shall be considered a hazard tree removal and is outside the fixed price bid.

4.11.1 While pruning the circuit, the contractor's personnel shall perform a visual inspection of each tree along the circuit in order to identify potential defects and determine the potential risk for the tree to cause an interruption over the length of the pruning cycle. The crew shall work closely with National Grid Forestry representatives to determine potential hazard trees, preparing a list of trees in accordance with National Grid's Hazard Tree Reporting Form. The completed lists of potential hazard trees shall be regularly provided to the Forestry representative for review

and approval prior to removing any of those specific trees. Exceptions to this procedure may be approved to enable removals of trees that have been pre-identified as hazard trees by National Grid representatives, trees that pose an imminent risk, or to authorize hazard tree removals in off-road areas where a skidder bucket is already on site.

4.11.2 Once a crew completes the removals on an approved list they shall note the completion details on the Hazard Tree Reporting Form. This form shall be submitted to the Forestry representative on a timely basis. Once the list is audited the contractor may submit an invoice for that specific work.

V. Contractor Requirements

5.1 The Contractor shall do all work and furnish all labor including supervision, tools, machinery and transportation necessary for the pruning, removal and herbicide treatment of trees to provide acceptable vegetation clearance for overhead lines of National Grid. Work at the fixed price rates will be designated on the distribution circuit maps, and identified in the pre-bid documents. Work at the fixed price is based on overhead primary miles of line, and includes pruning, tree and lead removal and herbicide treatment to all primary, secondary, service drops, and substation fence areas as clarified in the Work Scope section of this specification. Work at unit prices and/or hourly rates as also defined in the Work Scope section will be designated at the pre-bid meeting or by a National Grid Forestry representative as required.

VI. Contractor's Responsibility

6.1 The Contractor shall provide all necessary supervision, labor, material, tools and equipment for the safe execution of all work covered by these specifications.

6.2 The Contractor shall employ a competent field supervisor and customer contact person(s) acceptable to the Corporation, in addition to the crew Foreman and senior Company management. Notification personnel shall be qualified in tree identification including identification of "proper under powerline trees". The supervisor shall be available to the Corporation at all reasonable times during the entire extent of the project and/or contract. In addition, at least one member of each stand-alone crew or unit of crews shall be fluent in the English language and on-site.

6.3 The Contractor shall comply with all building and sanitary laws and all Federal, State, County, Town and Municipal laws, ordinances and regulations pertaining to the work. The contractor shall be responsible for obtaining all permits necessary to perform the work unless otherwise provided by National Grid.

6.4 The Contractor shall notify each landowner and inform them of the clearing, removal, pruning and herbicide work to be done, and where appropriate, agree on access point(s), before crossing the property and then abide by the same. The Contractor shall designate a Customer Contact Person(s) for each project they are awarded and communicate that name and phone contact information for that person to the National Grid forestry representative for that project.

6.5 In the event that the Contractor cannot locate the landowner after using all reasonable measures, or upon locating them is aware of an objection to the work to be performed, the Contractor shall document the landowners concern and then notify the National Grid's forestry representative within 24 hours in order to obtain specific instructions and/or their permission prior to commencing work on that property.

6.6 In addition to the above notifications, where herbicide applications will be made, the Contractor must follow any and all current notification requirements of any applicable regulations.

6.7 The Contractor shall be held solely liable and indemnify National Grid fully for any and all claims and legal expenses for damage to crops, land, trees or otherwise resulting from such violations, failure or damages arising out of the Contractor's negligence. The Contractor shall not be liable for claims or suits for damage to property if the work causing such damage is done under specific direction from NGRID.

6.8 The Contractor shall replace or make necessary repairs to all property destroyed or damaged in the course of the work and exercise due care and diligence in adequately protecting all properties, both real and personal, from damage of whatsoever nature whenever crossed over, on, or in the vicinity of the work. If the contractor neglects or fails to promptly make said repairs or make good of said destruction, the Corporation may make any and all necessary repairs to the satisfaction of the property owner and the Contractor agrees to promptly reimburse the Corporation the amount of its incurred cost and expenses.

6.9 The contractor shall inform the National Grid Forestry representative of their intent to start work at least two weeks prior to the start of any action on a feeder.

6.10 The Contractor shall implement and provide the required training and certification programs necessary to provide fully qualified Line Clearance Tree Trimmers or Line Clearance Tree Trimmer Trainees. A single Foreman may supervise multiple bucket trucks on the same project. In that case however, the minimum qualifications for the "lead" person on each of the other trucks shall be a certified qualified Line Clearance Tree Trimmer. At least one other employee on the truck shall be at least a qualifying Line Clearance Tree Trimmer Trainee, in accordance with all applicable OSHA requirements.

6.11 The Contractor shall submit a weekly time report to the National Grid Forestry representative, indicating the labor and equipment assigned to the project, amount of work accomplished, quantities and location of herbicide applications and location of the work.

6.12 The Contractor shall provide a monthly summary report to Distribution Forestry, identifying crew staffing and equipment by area as of the first of each month, to be submitted by the 5th of each month or the following Monday should the 5th fall on the weekend. The report shall also identify work type (e.g., such as hourly, new construction, danger trees, mowing; lump sum or unit price) by project, percentage complete for all fixed price projects, and anticipated completion dates.

6.13 The Contractor shall provide a monthly OSHA injury summary report in a format supplied by National Grid for the previous month, no later that the 10th of the month or the following Monday should the 10th fall on the weekend. The data in the report shall be separated by state as well as reported for the overall Contractor Company for any and all United States operations.

6.14 By April 10th of each year, the contractor shall provide a list of employees and Aerial lifts that could reasonably be expected to work on National Grid's property to Distribution Forestry. This listing shall include:

Employees:

- identify the current pay classification of each employee, together with their union certification level,
- the date of their progression to their current pay level,
- the dates each employee completed their required OSHA safety and other training, or retraining, including any annual refreshers,
- the date each employee last demonstrated their tree rescue and climbing proficiency
- the date each employee completed first aid and CPR training,
- identify each certified pesticide applicator and their certification number.

Aerial Lifts:

- The truck number and date of dielectric testing
- The next scheduled dielectric test date

6.15 The contractor shall provide a unit cost per tree for the removal of potential hazard trees from the three phase portions of the circuit, as well as "high risk target" hazard trees from the single-phase portions. ~~See the attached Addendum # 1,~~ Hazard Tree Tree Removal, Unit Price Schedule to be bid separately from the fixed price project. National Grid reserves the right to award**,** in whole or in part, the removal of hazard trees for each bid package on the basis of these unit price costs, or to do the work at the contractor's current hourly rates.

VII. Acceptance of Work

7.1 At appropriate intervals, the Contractor shall report and review the work completed to date with National Grid's Forestry representative. The Contractor may then invoice for the percentage of the work completed and approved by National Grid.

7.2 Near completion of the work, the Contractor shall notify the National Grid Forestry representative that the entire project has been reviewed by the contractor's supervision and is now ready for inspection. Upon review and acceptance of all required work including the resolution of any and all required corrective actions as well as any outstanding damage claims, the NGRID Forestry representative will give the Contractor permission to submit a final invoice for payment.

7.2.1 Traffic detail costs associated with re-work or corrective action shall be borne by the Contractor.

7.2.2 Police detail costs for any work not completed by the end of the fiscal year (March 31st) shall be borne by the Contractor. National Grid has the discretion to make allowances for circumstances outside of the Contractor's control. (Storms, requested outages, etc.)

7.3 The contractor shall understand, per their signed Master Purchase order with NGRID that time is of the essence with respect to the performance of this work. The contractor shall take all appropriate actions necessary to complete the work on schedule. Those actions shall include among other things, the use of overtime, the use of supplemental labor crew resources from outside areas, and the use of subcontractors, not withstanding the NGRID requirement for advanced approval of all subcontractors. All actions employed by the contractor to meet schedules

are at their cost and shall not affect the lump sum contract amount. In the event of extenuating circumstances defined by NGRID, the company reserves the right to extend project completion dates.

AS 1-29
Attachment B

Request:

Section 4.11 indicates that hazard tree removal is outside the fixed bid price. Is this referencing fixed bid price for cycle trimming? RIE indicated to the Division that hazard tree removals are now performed under on-cycle and off-cycle risk reduction. Does this specification document reflect those program changes? Are the removals pre-determined when seeking bids? Are police and flagging costs included? (also see 6.14)

Response:

Yes, this reference pertains to fixed price cycle trimming. The specification document was not updated with these changes. The specification documents are being updated with the proper terms and descriptions. Tree Removals are not predetermined when seeking bids. Police and Flagging costs are only included in the fixed bid price for cycle trimming.

AS 1-30
Attachment B

Request:

The Company includes a sample tree removal authorization form as part of the specifications but does not outline the "process by which" the company "will seek approval from property owners for tree removal", which does not appear consistent with RI VM statute Section (b)(6). Would RIE be agreeable to including explicit language in the standards or specifications to address the process the Company will follow to seek approval from property owners for tree removal?

Response:

The sample tree removal authorization form will be the same one used going forward. The Company is agreeable to add explicit language in the form of a hazard tree inspection and implantation procedure. This additional procedure will in detail describe how the Company will seek approval for tree removals and other risk reduction activities from property owners.

AS 1-31
Attachment B

Request:

Does RIE believe Hazard tree removal refusal should be addressed in the proposed standards? If so, please add. If not, please explain.

Response:

Yes, the Company agrees that Hazard tree removal refusals should be addressed in the proposed standard and will update accordingly. The Company is proposing, that if a property owner refuses to allow the Company to remove the hazard identified, RIE will document the refusal, retain these documents, and report them to the Division if they so desire.

AS 1-32
Attachment B

Request:

Does contractor work at the fixed price include police detail and flagging, which is now required by the Company? If so, would RIE agree to add clarification.

Response:

When the cycle trimming work is bid out the responsibility of the vendor is to pay for the police and flagging for that project. The specifications have been updated to include this language.

AS 1-33
Attachment B

Request:

Within section 6.2 of the RI DISTRIBUTION LINE CLEARANCE SPECIFICATIONS, should the term **Right Tree, Right Place** be added after "proper under powerline trees"?

Response:

The Company is going to update this to read capable trees. This term is commonly used in utility vegetation management industry specifications to denote if a species of tree is of concern to the wires. Meanwhile the term Right Tree, Right Place are a set of concepts for planting considerations between a species of tree and the corresponding site.

AS 1-34
Attachment B

Request:

Section 6.4 Indicates that the contractor shall notify each landowner and inform them of VM activities and in Section 6.8, contractor shall inform RIE of intent to start work at least 2 weeks prior to the start of action on a feeder. Please clarify these roles, responsibilities and time frames, including the required 30-day statutory notification period.

Response:

Overall, the Company is changing the notification requirements of its program, the overarching notification procedures include:

1. At the beginning of the fiscal year the tree warden and the DPW director will be notified by mail that there is scheduled cycle trimming tree work in their community. At that time RIE will be looking for the community to identify the point person for the coordination of efforts.

2. At least thirty days out from the beginning of cycle trim work being performed the tree warden and or the designated point person will be updated with very specific info regarding what vendor will be working in their community, the exact scope of work (neighborhoods to be trimmed) and RI Energy staff contacts for the project. This notification will be sent via mail. In addition, organizations such as fire districts or other large private property owners will be notified in the same manner.

3. RI Energy's communications department will examine the best avenue for each community and create notices or ads to inform. This will take place thirty days from the beginning of trimming. It will include Company and vendor contact information for customers who have questions or concerns.

4. RI Energy will be mailing a letter to all property owners in the scheduled cycle trim area informing them of the scheduled work as well as providing them with the appropriate contact information for both RI Energy and the vendor doing the tree work. There will be applicable specification modifications for this step.

5. Included in the vendor specs will be the requirement to leave door hangers on all impacted property owners as well as properties that abut a community owned tree that will be pruned. This will be done at least 14 business days prior to the tree work.

AS 1-34, page 2
Attachment B

Specifically for the Company distribution specifications in section 6.4 the contractors will now be responsible for informing RIE of their intent to start a cycle trim project 45 days from the start of work. In addition, the contractor will be identifying a customer contact person so their information can be included in the mailers to property owners. These two requirements are important so RIE can mail notification letters to property owners impacted by the project and meet the 30-day statutory notification period.

In addition, section 6.4 will be updated so that it will be the contractor's responsibility to drop doorhangers 14 days ahead of time to properly notify property owners of the impending work and give them an opportunity to reach out to the chosen customer contract person with concerns one last time.

AS 1-35
Attachment B

Request:

RIE's procedures also mention that vendors will place door hangers 14 days in advance, but that requirement is not in these specifications. Can the Company align and improve these standards throughout the documentation to make the timing requirements clearer?

Response:

The Company is currently working on aligning both the distributions and sub-transmission specifications to the overall Standard, Policies, Practices, and procedures document. This will make the standards much clearer going forward.

AS 1-36
Attachment B

Request:

Section 7.1: What is an "appropriate interval" and how is it determined? Does RIE physically inspect the Contractor's completed work before paying invoices at "appropriate intervals"?

Response:

Appropriate intervale changes depending upon times of year. For instance, in the winter when the trees are dormant, that interval can be much longer than if the tree is actively growing and the interval therefore must be a shorter timeframe. The work is physically inspected for specification adherence throughout the project and payments are made accordingly.

AS 1-37
Attachment B

Request:

Is there a difference between traffic detail costs and police detail costs? Why is the Contractor responsible for only traffic detail costs for re-work and only police detail costs for incomplete work?

Response:

There is no difference between traffic detail costs and police detail costs. They are both traffic control costs. This wording in the specification is being addressed to make it clearer.

AS 1-38
Attachment B

Request:

Are all costs for re-work, corrective actions and work not completed by the end of a fiscal year the responsibility of the Contractor? If not, please explain the circumstances when it is not the contractor's responsibility.

Response:

Yes, if the tree work is identified as rework, it is the contractor's responsibility to complete.

AS 1-39
Attachment B

Request:

Section 7.3 and Section 8 appear to be partially redundant, and it also appears that Section 7.3 may have been replaced by 8.0 but not deleted. If so, please suggest corrected language. If not, please explain why the language is accurate.

Response:

These two sections in the specification have been edited, which includes deleting section 8.

AS 1-40
Attachment B

Request:

Please include an attachment which lists all reference materials such as ANSI A300, EPRI Best Practices for vegetation management, and all other references relied upon by RIE in developing the distribution line clearance specifications.

Response:

The following is a list of all the references relied upon by RIE in developing the distribution line clearing specifications:

ANSI (American National Standards Institute) A300 Standards for Tree Pruning
ISAs (International Society of Arboriculture), BMP – Tree Pruning Publication.

There are many publications that may have also been referred to while establishing and/or updating the Company's VM Plan through the years. Those include, but are not limited to, The Arborday Foundation's recommendations, TCIAs (Tree Care Industry Association) published safety information/recommendations, ISO (International Organization for Standardization) 14001 Environmental Management System guidelines and standards, and EPRIs (Electrical Power Research Institute) R&D related to delivery of electricity aimed at improving reliability and affordability.

To ensure safety while following the distribution line clearance specifications, RIE mandates that its employees and vendors comply with all applicable OSHA (Occupational Safety & Health Administration) Safety Rules and Regulations as well all ANSI (American National Standards Institute) Z133 Safety Requirements for Arboricultural Operations. They also follow all RI DOT (Department of Transportation) safety rules and requirements for roadside construction job sites. All staff, vendors and contract arborists are also required to complete EHAP (Electrical Hazard Awareness Program) training and review it annually.

AS 1-41
Attachment C

Request:

What resources, guidelines or best practices has the Company relied upon to determine the optimal distribution clearance specifications for Rhode Island?

Response:

Rhode Island has been using similar specifications yearly for nearly 20 years. Yearly, the specification is reviewed and examined for effectiveness by the staff. Incorporating industry trends, safety requirements, and best practices is a continual process. Changes have taken place over the years to produce better system outcomes.

The trees in the Rhode Island community forest have been accustomed to these consistent pruning clearances and the current specifications the Company feels match the four-year cycle correctly for both results, and cost effectiveness. There are areas where greater clearances are deemed necessary due to systems risks, and that is why enhanced trimming was created as a selective specification enhancement for RIE. Enhanced trimming is an industry best practice and many peers incorporate this type of work on their systems.

In addition, recently PPL as a company has conducted a best practice review of vegetation management among peer utilities. This review looked at cycle length as well as clearance distances and funding considerations. PPL's different operating companies were then examined against best practices to ascertain if changes were needed. It was determined that RIE has an optimal cycle length and that overall, the maintenance specification is appropriate for its geographic area and forests characteristics.

AS 1-42
Attachment C

Request:

When were the specifications last reviewed?

Response:

The distributions specifications that were included in the Standards, Policies, Practices, and Procedures were last revised March 17, 2025. Currently these specifications are being modified for the 2027 fiscal year. The Sub-transmission specifications were last revised February 22, 2024. These specifications are being modified for the 2027 fiscal year as well.

AS 1-43
Attachment C

Request:

Are there instances where 15kV to 2kV lines are cleared "ground to sky"? If so, please describe/explain those instances.

Response:

There are instances where 15kv to 2kv is trimmed ground to sky. Specifically, these are spans where the Company's enhanced tree trimming takes place. Using risk software, the Company identifies locations on circuits where this treatment would be most effective. The Company targets areas where vegetation-related risk factors are high coinciding with high customer counts and other site factors.

AS 1-44
Attachment C

Request:

Where does enhanced trimming apply and what are the specifications?

Response:

For distribution circuits using the Company's risk software, the Company identifies locations on circuits where this treatment would be most effective. This tree work constitutes clearing twenty-five feet from the centerline of the pole. It targets capable species of trees that can grow into as well as fall into the wires on these spans. The areas in which this work is conducted are of very high value to the circuit. The value could be high customer counts, critical, or important customers, as well as areas of circuits that are remote or difficult to maintain.

The specification for enhanced trimming is removal of all capable species of trees 25 feet off the center of the pole line. All brush and woody debris generated will be removed accordingly unless other requests are made by the property owner.

AS 1-45
Attachment C

Request:

The diagrams do not indicate the reference point for clearances. Please provide enhanced diagrams to illustrate the actual clearance zone.

Response:

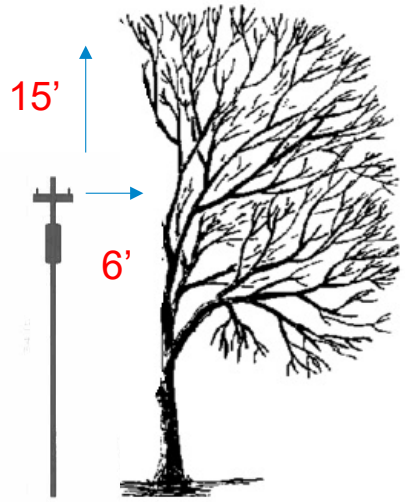
Please see Attachment AS 1-45.

Distribution trimming specifications 2kv to 15kv

Rhode Island Energy™
a PPL company

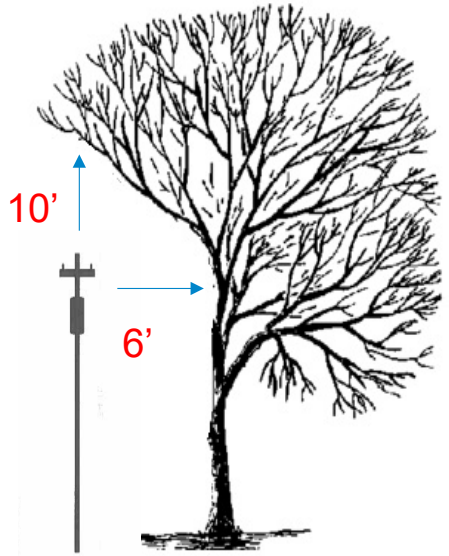
Unmaintained area

- 15 feet of overhead clearance
- 6 feet of side clearance
- No capable species left under conductors, shall be cut at ground level



Maintained area

- 10 feet of over head clearance
- 6 feet of side clearance
- No capable species left under the conductors, shall be cut at ground level

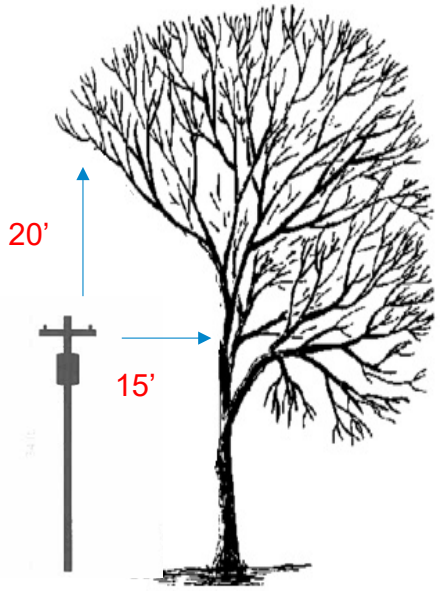


Sub Transmission trimming specifications 15kv to 34kv

Rhode Island Energy™
a PPL company

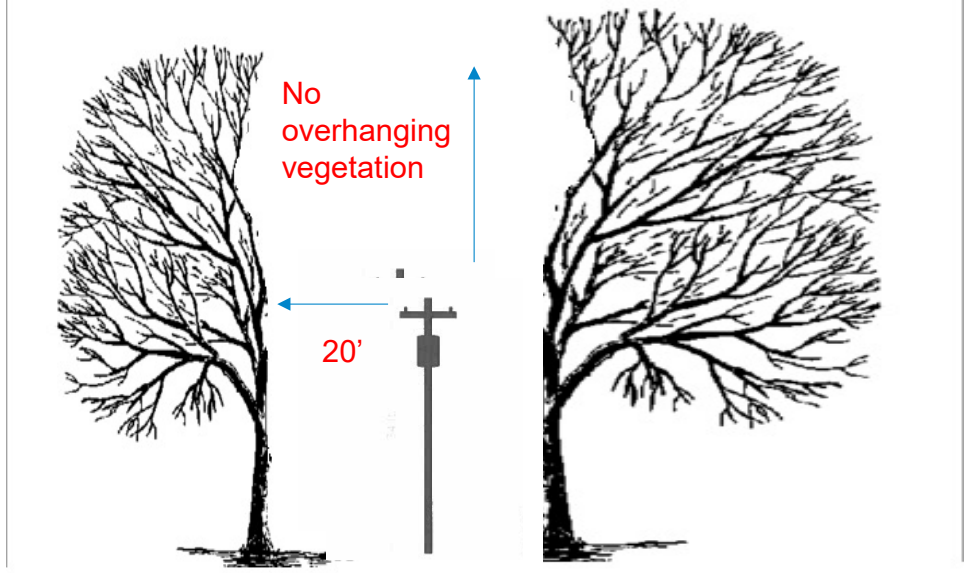
Roadside Specifications

- 20 feet of overhead clearance
- 15 feet of side clearance
- No capable species left under the conductors



Right of way specifications

- No overhanging vegetation
- 20 feet of side clearance
- No capable species left under the conductors, shall be cut at ground level.
- If line is in a ROW no vegetation extending into the ROW from the tree line



AS 1-46
Attachment F

Response:

Please provide a redline copy of the Sub-Transmission Line Clearance Specification comparing the most recent edition in effect under National Grid to RIE's current revision.

Response:

Please see Attachment AS 1-46.

National Grid	Revision No. 4
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Sub-Transmission Line Clearance Specification Fiscal Year 2021	Date: 5/9/2017

FOREWORD

This specification documents the objectives, practices and procedures for vegetation management on National Grid companies' sub-transmission electric roadsides and rights-of-way in **New England only**, and specifically addresses sideline and hazard tree pruning and removal. The specification also defines the responsibilities of National Grid vegetation management personnel and contractors, identifies procedures to be followed by contractors performing all work and defines the requirements to maintain vegetation acceptable to the Company.

Questions or inquiries regarding information provided in this document should be referred to the National Grid's Manager of Vegetation Strategy.

Bert Stewart III
Bert H Stewart III
Manager
Vegetation Strategy

Anne Marie Moran
Anne Marie Moran
Manager
T&D Forestry, New England

Date: 5/9/2017

Date of Review/Revision:		
Revision	**Date**	**Description**
0	August 9, 2013	Original Specification
1	July 16, 2014	Updates for 2015 Procurement Event
2	April 21, 2015	Updates for 2016 Procurement Event
3	June 16, 2016	Date Updates for FY18 Procurement Event
4	May 9, 2017	Updates for FY19 Procurement Event

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1.0 Introduction

1.1 Purpose

The purpose of this specification is to document the requirements for sideline pruning, hazard tree removal and IVM on sub-transmission electric roadsides and rights-of-way for National Grid in New England. This specification defines:

- Objectives, strategies and approved practices and procedures for sideline pruning and hazard tree removal on sub-transmission electric roadsides and rights-of-way;
- Clearance requirements between conductors and vegetation acceptable to National Grid for maintaining reliable electric sub-transmission service;
- Responsibilities of National Grid Forestry personnel and contractors;
- Procedures to be followed by contractors performing all work within the scope of this specification.

The Vegetation Strategy group is responsible for preparation of this specification. Company Foresters will manage the work performed by the contractor.

1.2 Scope

The requirements of the specification apply to all National Grid companies sub-transmission electric roadsides and rights-of-way in New England.

2.0 Definitions

Buffer – Areas of vegetation preserved on the right-of-way, on both sides of selected improved road crossings, yards, for the purpose of minimizing the visual impacts and linear views of the right-of-way for motorists.

Capable – Tree, shrub, and vine species that have the ability to grow into within 1 foot of conductor.

Danger Tree – A tree on or off the right-of-way that if were cut or failed could contact electric lines.

Hand Cutting – Vegetation management method in which woody vegetation is felled through the use of hand tools, including chainsaws and brush saws.

Hazard Tree – Danger trees which due to species and/or structural defect are likely to fail and fall into the electric facility.

IVM – IVM is an adaptation of Integrated Pest Management (IPM) where the pest is tall growing, capable vegetation. IPM/IVM is a system of controlling pests in which pests are identified, action thresholds considered, all possible control options evaluated, and selective physical, biological controls are considered. When chemical controls become necessary to control and prevent the growth of capable, tall-growing woody species, The Company is committed to employing selective, targeted applications. These treatments shall use approved herbicide products and mixtures that target specific plants or plant communities in a manner calculated to control and eliminate the tall-growing, capable

woody species, while preserving as much of the small, compatible woody shrub and herbaceous vegetation as is practical.

Pruning – the cutting and removal of tree branches to provide specified clearance distance between vegetation and the conductors. See ANSI A300 for additional detail.

Roadside – The area physically located under and alongside the sub-transmission line bounded by the mature tree line on the field phase side when one exists. In the absence of a mature tree line the maintenance corridor is defined as the area that is at least fifteen (16) feet either side of the pole centerline or equal to the previously maintained dimensions if greater than fifteen (16) feet.
Roadside may include areas: 1. where the landowner or occupant is mowing the lawn and/or caring for gardens, ornamental shrubs or trees in the area under and immediately adjacent to the sub-transmission line/poles; 2. commercial land uses such as business areas, parking lot edges and the tree lawn areas along urban and suburban streets.

Right-of-Way (ROW) (Off-Road definition) - For this VM Spec (Sub-Transmission) a ROW is a cleared corridor of land over which electric lines are located. The companies may own the land in fee, own an easement, or have certain franchise or license rights to construct and maintain electric facilities. This definition does not address the specific width of any ROW. Specific widths will be supplied by the Company where necessary.

Sensitive Area – Areas on rights-of-ways where legal, visual, or environmental impacts/concerns require compromises to the general Vegetation Management Program.

Slash – All branches, tops, small diameter main stems and debris resulting from any cutting operation.

Sub-transmission – Can include electric lines 13kV – 46kV in New EnglandIdentified in the sub-transmssion work plan..

Tree Removal – The cutting and felling of trees, including wood and brush disposal.
Water – Standing or running water, existing at the time of maintenance operations, which has impact outside the right-of-way.

Wire Zone/Border Zone – the wire zone is defined as that portion of the right-of-way floor that is situated directly beneath the conductor for a distance extending approximately ten (10) feet to either side of the conductor. The border zone is that portion of the right-of-way floor situated to the outside of the wire zone extending to the right-of-way edge. It is sometimes referred to as a transition zone between the wire zone and the adjacent forest edge. The wire zone mid-span is the portion of the span where the conductor is at or near its lowest ground clearance distance, generally 60-70% of the span length.

3.0 General Policy/Requirements

- All work will be completed in accordance with the Request for Proposal document, this specification and the maps provided for each sub-transmission line.

- The contractor shall furnish all materials, vehicles, equipment, supervision and labor necessary for the completion of the work described within the timeframe and within the conditions herein set forth.

- Both sides of a right-of-way shall be worked unless instructed otherwise by National Grid Forestry staff, or noted on the maps for the project. If there is a lower voltage circuit on one side of the right-of-way it must meet the minimum side clearance for the lower voltage unless otherwise noted on the maps for the project.

- If the sub transmission circuit is located on the same structure or within the same right of way as a transmission circuit , clearances must be obtained to at least the sub transmission specification. (These areas are not to be skipped, unless specified by National Grid Forestry Staff).

- All vegetation management operations shall be conducted in a safe, effective manner in conformity with Federal and State laws, regulations and permit conditions.

- All vegetation management operations shall be conducted in conformance with national and regional standards including but not limited to ISO 14001.

- All state permits necessary for any vegetation management operations shall be obtained.

- All applicable state notification procedures shall be followed.

- National Grid Forestry staff, in consultation with vegetation management contractors, shall establish procedures for notifying nearby residents of all vegetation management activities conducted within a right-of-way.

- National Grid Forestry staff and/or contractors shall respond quickly to any questions or complaints relating to vegetation management from the public and/or government agencies.

- Appropriately licensed, certified and qualified contractors shall be retained to implement National Grid's vegetation management programs. Contractors shall conduct all vegetation management operations consistent with National Grid safety requirements and the ANSI Z-133 safety standard.

- National Grid Forestry shall provide local supervision, coordination and enforcement of this specification for contractors.

The document control process for this specification is as follows: The document is generally updated annually and distributed as hard copy. The applicable hard copy cover date shall be for the current fiscal year.

4.0 Safety

As a contractual term, National Grid requires all contractors to comply with all appropriate state and federal safety laws and regulations. This includes applicable sections of the Occupational Safety and Health Act (OSHA) and all worker safety-related statements.

It shall be understood and agreed to by the Contractor that vegetation management activities conducted near existing sub-transmission lines shall be undertaken while lines are presumed to be energized and operating at voltages up to and including 46kV. The Contractor shall provide competent, trained personnel to perform the work.

In order to ensure the safety of their employees, the general public and continuity of service in the energized lines, the Contractor shall exercise extraordinary precautions when conducting vegetation management activities in close proximity to structures, poles, guy wires, and anchors on roadsides and rights-of-way.

5.0 National Grid Roles and Responsibilities

5.1 Sub-Transmission Owner

National Grid companies own and are responsible for ensuring proper clearance of their sub-transmission electric facilities on roadsides and rights-of-way.

5.2 Forestry Department

The Forestry Department is responsible for system-wide design, planning, coordination and supervision of all vegetation management operations conducted near electric lines on roadsides and rights-of-way.

5.3 Location of Work

The location of work sites will be provided by the Company Forester**.**

6.0 Contractor Duties and Responsibilities

Vegetation management operations must be conducted according to this specification and according to the written directives of the Company's on-site representative or other contract documents.

6.1 Environmental and Safety Compliance

The Contractor shall comply with all applicable Federal, State and local laws and regulations and with the requirements of all permits and approvals obtained by National Grid.

National Grid is committed to minimizing its impacts to the environment and requires contractors to demonstrate the same level of commitment as National Grid in the management of the environment. National Grid's commitment to the environment is communicated in the National Grid – Environmental Policy (Appendix 2).

The contractor shall immediately notify the Company of any release of any quantity of oil or hazardous material. The contractor is responsible to make all required notifications of releases to appropriate regulatory agencies and to ensure that the response to the release is prompt and done in a proper manner.

National Grid Contractor Safety Requirements establish safety requirements for contractors. This document has been provided during the contractor qualification and bidding process.

All safety incidents shall be reported to the Company. The first call should be to the Company Forester. All inquires will be entered into the National Grid Incident Management System.

6.2 Qualifications

Contractor shall utilize only experienced and/or trained workers who are appropriately licensed or certified. Workers must conduct themselves professionally at all times.

Contractor shall utilize appropriately licensed or certified supervisors who are knowledgeable with regard to all aspects of vegetation mowing, and who are responsive to the guidance of the Company Foresters. Each supervisor must be able to effectively communicate with the public. They must also effectively supervise contractor crews in order to insure the satisfactory completion of the treatment operation.

6.3 Training

Contractor shall provide their employees with training that includes, but is not limited to, recognition of electrical hazards, working in proximity to energized facilities, identification of operating voltages, minimum approach distances, and other applicable rules and regulations associated with worker safety.

6.4 Commencement of Operations

Contractor may not initiate activities without a Purchase Order. Contractor shall contact Company Forestry staff if a Purchase Order has not been received by the time vegetation management activities are scheduled to commence. The contractor must return the signed acknowledgement copy of the Purchase Order to the Procurement Department before any work is done.

6.6 Notifications to National Grid

At least one (1) week prior to the initiation of vegetation management activities, the contractor must specify to Company Forestry staff the date work will begin. The contractor will notify Company Forestry staff of the approximate work schedule the contractor's crew will follow during the project. The contractor must keep Company Forestry staff informed about; crew location, conditions encountered and problems that arise as work progresses. Work shall be completed on each sub-transmission line with as few work interruptions as possible.

At least one (1) week prior to the completion of vegetation management activities, the contractor must specify to National Grid Forestry staff the date work on that sub-transmission line will end.

When working on a sub-transmission right-of-way, the contractor must supply crew work locations on a daily basis by notifying the local forestry supervisor. The location information will include the sub-transmission line name, the contractor company and foreman name, the number of crew members, and the nearest sub-transmission line structure number. Each crew shall call the appropriate National Grid Forester at the completion of the workday and when relocating to another right-of-way.

Should a contractor cause an event on a sub-transmission line, the contractor must immediately notify the appropriate Control Center. Refer to Appendix 1 for a listing of National Grid Forestry staff and Control Center contact information.

The contractor must supply completed weekly time sheet(s) with information for all time and materials worked as per direction of National Grid Forestry staff.

The contractor shall notify and provide copies of any records/reports of any regulatory inspection by federal, state or municipal officials.

6.6 Notifications to Customers/Landowners

The Contractor shall make every reasonable effort to notify nearby residents of all vegetation management activities. They shall also notify any property owner where a yard tree requires pruning or removal. The property owner shall also be notified prior to extensive widening or danger tree removal, unless National Grid has provided prior notification or otherwise specified by the Company Forester. Refer to Appendix 3 for examples of notification materials. Documentation of notification shall be maintained by the contractor and provided to National Grid Forestry staff upon request and at the completion of the project.

6.7 Documentation

The Contractor shall provide supplemental or new information regarding site conditions that affect current or future treatment operations, such as new construction, encroachments, At Time of Vegetation Management (ATVM) clearance deficiencies, hazardous conditions, significantly eroded access or right-of-way, sensitive areas and landowner concerns/requirements to the Company Forester on a timely basis.

6.8 Interaction with Public

The Company strives in every way possible to maintain good relations with the property owner and general public. The actions of the Contractor reflect on the Company; therefore, the Contractor shall give diligent consideration to the interests of property owners, tenants, and the general public, whenever involved, and shall carry out the work in such a manner as to cause a minimum inconvenience.

The contractor, or his representative, will only respond to inquiries regarding what work they are performing, where they are working, and when they will be working.

Copies of appropriate plans or permits may be shown as well. Refer all other inquiries to National Grid Forestry Staff.

Landowner complaints must be forwarded immediately by telephone to Company Forestry staff. The contractor must provide the name, address and telephone number of the major people involved, as well as the complaint or question.

6.9 Demands to Cease Operations

Handle demands to cease operations as follows:

- Immediately make the work area safe to the public, then move all personnel, equipment and materials to another property and continue work.
- Notify National Grid Forestry staff as soon as practical, if not immediately, of a demand that operations cease. Upon contacting National Grid Forestry staff, relate the chain of events and current status of the situation.
- Do not return to that site until National Grid Forestry staff has notified the contractor when and under what circumstances the crew may return.

6.10 Access to a Right-of-Way

Enter a site through the right-of-way on established roadways whenever possible. Permission to enter by any other means must be obtained from the landowner by the contractor.

Access to the right-of-way shall be limited to public road crossings. Where this is not possible, the Contractor shall obtain permission for the use of private roads, driveways, and other access to the right-of-way from the property owners involved and shall be responsible for any damage thereto. When permission for off right-of-way access cannot be obtained from the property owners involved, and other ingress/egress is unavailable, the Contractor shall notify the Company Forester or their designee.

In general, vehicular traffic shall be restricted to a twenty (20) foot wide roadway into and along the right-of-way. When present, existing roads into and along the right-of-way shall be used as the primary access, and maintained in as good or better condition for the duration of the Contractor's use. Access to the overall right-of-way is allowed only for vehicles performing selective vegetation maintenance activities. Other vehicles must remain on the designated access roads. Appropriate efforts to minimize unnecessary or excessive environmental or vegetation damage are required. Repair or replacement of excessive or unnecessary damage shall be the responsibility of the Contractor.

6.11 Site Conditions

Unreasonable site damage or destruction during any phase of the vegetation management operation by the contractor, his agents or employees, must be repaired immediately to the satisfaction of Company Forestry staff at no cost to National Grid companies. Company Forestry staff will determine what constitutes unreasonable site damage. Contractor shall make reasonable efforts to complete work during favorable site conditions so as to prevent unnecessary damage.

The Contractor shall leave all culverts, stream fords, fences, gates, walls and roads in the same or better condition as when they commenced their work. Any trees to be removed that have fence wire attached, or that are part of a permanent functional fence, shall be cut off above the top strand of wire. Care shall be taken that all fences and gates are closed or left in such condition that livestock cannot escape. If fences or gates of an active pasture along the right-of-way are in a state of disrepair prior to the start of clearing and could allow livestock to escape, the contractor shall attempt to notify both the property owner and the Company Forester of this condition. Where movement of the Contractor's equipment is required through existing fences, the Contractor shall make appropriate openings and adequate facilities for closing these openings during and after their use.

6.12 Railroads

Where the Company's right-of-way parallels or crosses railroad property, and the Contractor elects to gain access to the right-of-way from railroad property, they shall be responsible for all applicable rules, regulations and fees pertaining thereto. All associated costs will be a pass-through to National Grid.

The contractor must:

- Coordinate with National Grid to obtain a permit, if required, from the railroad near whose tracks he or she will be executing vegetation maintenance.
- Check with each railroad near whose tracks he will be treating to ensure that the contractor carries all insurance which the railroad may require. Contact National Grid Forestry staff if any problems arise.
- Provide qualified railroad trained personnel.
- Refrain from beginning vegetation work whenever a railroad has failed to provide a flagman or remove the railroad from service. Contact National Grid Forestry staff immediately so that he or she can contact the railroad.

6.13 Native American Lands

Where required to complete work upon reservations, the contractor shall employ the designated Native American personnel for the successful completion of the project.

6.14 Chainsaw Bar Lubricants

When working within a sensitive area, chainsaw bar lubricants must be biodegradable products.

6.16 Equipment

The contractor crew supervisor or foreman must be equipped with a cellular telephone.

Clearing crews should carry with them at all times a shovel, a broom, heavy-duty plastic bags or other leak-proof container, absorptive clay and activated charcoal (Chemical Spill Kit or Universal Kit).

Contractor's equipment must be sufficient to maintain the highest practical level of efficiency and effectiveness. Equipment must be maintained in good visual and working condition.

6.16 Site Restoration

Work shall also include grading, mulching, and reseeding of rutted or scarified soils caused by the Contractor's operations when directed by the Company Forester. This shall include repair of all environmental damage, maintenance of stream crossings, wetlands, crop fields, fence lines, etc. which are adversely impacted by the Contractor so as to leave the right-of-way in as good or better condition than found.

Inclusion of the repair of any previously existing environmental damage, including grading, seeding, mulching, stream, culvert and ditch repair, etc. shall be specified at the time of bidding or completed on a Time and Material basis if required.

7.0 Sub-Transmission Scope of Work

7.1 Pruning Standards

All pruning shall be performed in accordance with ANSI A300 standards as well as the Best Management Practices – Tree Pruning publication. All cuts shall be made at a parent branch or limb, so that no stub shall remain. In cutting back a branch, the cut shall be made at a crotch or node where the branch being removed is at least one-third the diameter of the parent limb. All pruning cuts shall be made in accordance with proper collar cutting methods, utilizing drop crotch principles to minimize the number of pruning cuts, promote natural growth patterns, and maintain tree health and vigor (ANSI A300). Climbing irons or spurs shall not be used in pruning a shade/ornamental tree in a maintained area. Tree wound dressings shall not be applied.

7.2 Hazard Tree Inspection and Removal

Other than work required in previous sections, the removal of any tree 9 inches dbh and above, within a maintained, roadside or unmaintained area, shall be considered a hazard tree removal.

7.2.1 While pruning the circuit, the contractor shall perform a visual inspection of each tree along the circuit in order to identify potential defects and determine the potential risk for the tree to cause an interruption over the length of the pruning cycle. The National Grid Forester will work closely with the contractor to determine potential hazard trees, preparing a list of trees in accordance with National Grid's Hazard Tree Removal Form (Appendix 4). The contractor shall also submit, for approval by National Grid, an additional list of potential hazard trees found while performing the work.

7.2.2 Once a crew completes the removals on an approved list they shall note the completion details on the Hazard Tree Removal Form. This form shall be submitted to the Forestry representative on a timely basis.

7.3 Management of Wood and Brush (Slash)

Wood and brush slash may be generated during vegetation management activities. In general, where tree removal or pruning is required, the brush that has been cut may be left where it falls after being cut (diced) so as to lie close to the ground. Length of diced stems or branches should not exceed 10 feet; height of diced slash should not exceed two (2) feet. Stumps shall be cut flat and as close to grade as possible. (Contractor may choose to mow the floor, this is an option and should be discussed with the Company Forester before proceeding.)

Near public or private roads, residential or commercial areas, parks, streams, on access roads, in any sensitive area or otherwise managed properties, the brush shall be disposed of by either chipping or removal to a suitable location within the right-of-way and neatly piled, windrowed or dispersed.

When chipping is required, the chips may be disposed of by dispersing on site in non-sensitive areas. Chips shall be removed from areas of more intense landscape management such as lawns.

Where trees and limbs larger than four (4) inches in diameter at the small end are removed and the designated slash disposal is a windrow, the wood shall be neatly piled on the site, taking care not to block any access roads used by either the property owner or the Company. When the authorized slash disposal method is chipping, it may be necessary to remove the larger wood from the site to another approved area of the right-of-way and piled neatly, or moved to an approved off right-of-way disposal site.

No burning of wood or brush will be permitted unless specifically authorized by the National Grid Forester.

All species of wild cherry (Prunus serotina, P. virginiana, P. pennsylvanica) that are cut or treated during the growing season can become toxic to livestock during the wilting stage of the leaves. In addition, several species of Maple (Acer) have been identified as toxic to horses in the wilting stage. Therefore, Maple and Cherry stems, which are cut or treated in active pastures, shall be immediately removed from the pasture following clearing, or arrangements made with the farmer to utilize alternate pastures until the wilting stage and hazard has passed.

Contractors shall comply with all applicable laws and guidelines pertinent to invasive species and their management, as set forth by Government and National Grid.

7.4 Overhead Dead or Damaged Vegetation

All dead or damaged overhead limbs, branches or leads that are capable of falling onto overhead sub-transmission lines from above or along side the right-of-way and potentially causing a tree interruption, shall be removed at the time of pruning.

7.5 Pine Species

For all road-side pine species growing above the overhead clearance limits with boughs overhanging primary conductor, the contractor shall shorten all overhanging boughs so to reduce the length of the branch by approximately 1/3 without removing all needle growth from the entire branch. This shall be done in a progressive manner beginning at the upper clearance dimension (20 feet) and working upwards generally two whorls in the tree as necessary to reduce the likelihood of a long pine bough loaded with ice or wet snow, drooping down or breaking onto the conductors.

7.6 Vine Control

All vines growing on poles, guy wires, stub poles or towers shall be cut so as to create a “growth gap” of four feet and treated (where appropriate) with a herbicide approved by the company. Contactors should not attempt to remove vines from any structure.

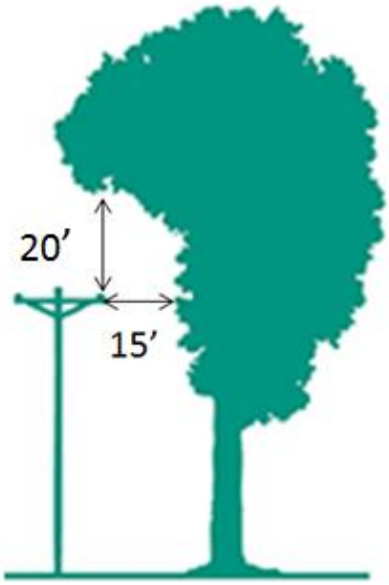
Sub-transmission work shall be carried out in a two-step process:

Step 1: Sideline pruning and floor cutting/mowing
Step 2: Follow-up herbicide treatments on off-road sections

7.7 Step 1: Sideline Pruning and Floor Cutting/Mowing

7.7.1 Vegetation Clearance - Road-side

All overhead sub-transmission lines shall be pruned to provide a minimum of 20 feet of overhead clearance, a minimum of 15 feet of side clearance from the outermost phase, or to the mature tree line and removal of capable species below the wires and within the clearance dimensions. The contractor shall recognize that the use of ANSI A300 standards and techniques will result in clearances beyond the dimensions noted above.



Where greater clearances have been achieved in previous cycles, the pruning shall be completed so as to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

It is an objective of National Grid's vegetation program to continually strive to reduce the number of under-wire tree and branch growth that will continually require pruning, by removing as many stems and growth as possible on each cycle. The Contractor is expected to emphasize this type of removal through the landowner contacts made by their customer contact personnel unless they have signed documentation of refusal. National Grid must be notified upon refusal within 24 hours.

All slash from pruning in maintained areas shall be disposed of through chipping. The brush shall be disposed of by either chipping or removal to a suitable location within the right-of-way and neatly piled, windrowed or dispersed. Large diameter wood may remain on site provided it is cut into manageable lengths and piled neatly. Smaller debris shall be raked up and removed so as to leave the property in a condition equal to the start of work.

Herbicide treatments may be applied to road-side vegetation. This will be defined during the bidding process. **All herbicide applications MUST follow local state pesticide regulations.**

7.7.2 Vegetation Clearance - Off-Road

Prior to commencing vegetation maintenance activities in a right-of-way, the contractor MUST contact a National Grid Forester to discuss any sensitive areas within the right-of-way, which can include endangered species, wetlands, and drinking water wells. The presence of sensitive areas might

alter the type and timing of vegetation maintenance activities that will be conducted. A site specific work plan may be provided to the contractor by the National Grid Forester.

There should be no overhang above a sub-transmission line, unless there is an easement restriction or otherwise noted on the map, in which case follow Section 7.4 Overhead Dead or Damaged Vegetation. All sub-transmission lines shall be pruned to provide the maximum clearance allowed by easement. Where no easement has been obtained, prune to the established tree-line **unless an alternative clearance is approved by National Grid**.

Where greater clearances have been achieved in previous cycles, the pruning shall be completed so as to re-establish the clearances in a manner that equals or exceeds the previous clearance conditions.

Slash shall be mowed/mulched or neatly windrowed to the edge of the maintenance corridor and cut to lie close to the ground, away from sensitive locations. All slash near residences shall be disposed of by chipping or mowing/mulching. Where practical, chips may be blown back onto the site without creating large chip piles. No debris shall be left anywhere that will potentially block access, significantly alter any drainage or water resource, or create any unsafe conditions for the public. Stumps shall be cut flat and as close to grade as possible. (Contractor may choose to mow the floor, this is an option and should be discussed with the Company Forester before proceeding.) All mowing will be done in accordance with National Grid's Mowing Specification.

Alternatives to these practices must be approved by a National Grid Forester and by the current landowner.

As stated above, the contractor shall practice ANSI A300 pruning in choosing the pruning points within the tree which will often mean clearances greater than vertical/horizontal clearance distances will actually be obtained. Trees shall be directionally pruned to encourage growth away from the sub-transmission line. Pruning shall not leave any overhang over the right-of-way.

Prune or remove high risk hazard trees. Hazard trees found beyond the right-of-way and/or vertical/horizontal clearance distances that are judged to be an imminent threat to the conductors shall be brought to the attention of a National Grid Forester for approval prior to removing (see Section 6.7). Desirable species shall be retained along the edge of the right-of-way.

Any tree in the border zone that is within vertical/horizontal clearance distances shall be removed, not pruned.

Contractors shall comply with all applicable laws and guidelines pertinent to invasive species and their management, as set forth by Government and National Grid.

7.8 Step 2: Herbicide Treatments

Herbicide treatments will mainly be conducted in the off-road sections on the sub-transmission corridors. If a sub-transmission line shares a ROW with a Transmission line, then that corridor will be treated when the Transmission line is treated. This will be defined during the bidding process. All herbicide applications MUST follow local state pesticide regulations.

All treatment operations must be applied to the full specified width of the ROW. Vegetation Operations staff will determine whether the full specified width of the ROW has been treated. The contractor must, at his own expense, re-treat the site upon notification by Vegetation Operations staff that a treatment was not applied to the full specified width of the ROW. Re-treatment must be accomplished by using the application method and materials prescribed by Vegetation Operations staff. Refer to the National Grid ROW floor specification for additional details.

8.0 Management of Sensitive Areas & Wetlands

8.1 Sensitive Areas

Sensitive Areas are defined as areas on rights-of-way where legal, visual or environmental impacts/concerns require compromises to the general vegetation management program. Sensitive Areas include: public surface, public well and private well drinking water supplies; lakes, ponds, rivers, streams, and any other surface waters; wetlands; endangered species sites; agricultural areas including croplands, orchards, tree plantations and animal pastures; buffers at road crossings; buffers at residential and/or commercial yards; and easement restrictions and/or landowner agreements.

These sensitive areas have varying legal definitions in each of the states in which National Grid companies have sub-transmission facilities. Permits for vegetation management activities in these states vary as well. For purposes of this document, sensitive areas and vegetation management within them are discussed in a general way.

8.2 Wetlands

In wetlands, tall growing trees generally only occur in wooded swamps or areas that are dry for long enough periods each year to support tree growth. Generally equipment may not enter a wetland area. All tree felling in wetlands must be done by hand. Exceptions must be reviewed with the National Grid Forester prior to entering a wetland with equipment.

In remote areas, including remote wetlands, and with the National Grid Forester's approval, trees to be removed may be topped below conductor level to provide wildlife habitat and to reduce ground disturbance and clutter.

9.0 Mitigation of Impacts

If, during their operations, the Contractor causes any damage to occur to the land such as deep ruts or scarified areas, which in the opinion of the National Grid Forester could cause future erosion or interfere with access for line maintenance, the Contractor shall re-grade the site to original contours, and seed and mulch as required. Areas that do become rutted or where erosion occurs during sideline program operations will be restored per National Grid companies' policies.

The Contractor shall take reasonable precautions not to remove or damage existing low-growing vegetation, either natural or planted, which are to be preserved on the right-of-way. Where road crossing buffer vegetation, either natural or planted, has been damaged beyond reasonable repair because of the Contractor's negligence, this vegetation will be replaced at the Contractor's expense.

The Contractor shall take care not to rut or scarify the right-of-way for the duration of their operation. All environmental damage resulting from the Contractor's operation shall be permanently repaired at the Contractor's sole expense.

Mobile equipment shall not intrude into road crossing buffers, stream buffer zones or pruning and topping areas, except on designated access routes. When a tree that has been cut must be removed from such an area, it must first be limbed and the brush hand carried to the chipping location or pile site. The trunk wood may be removed by means of a winch line taking adequate care to avoid damaging residual vegetation.

In certain areas, where feasible and advantageous, the Forester may authorize the use of aerial lifts and other specialized equipment, in road crossing buffers for the purpose of pruning trees, and disposal. In no case, however, will any vegetation be cleared or any new road be authorized, other than the approved access road through the screen to facilitate the use of this equipment.

The Contractor shall take adequate precautions to protect the watercourses and wetlands from pollution and shall avoid disturbing streambeds and banks and the low-growing vegetation protecting them. Felling vegetation in or across a watercourse (such as a river, stream, or brook), should be avoided. Vegetation that is felled into a watercourse shall be removed as soon as possible and placed on high ground. Brush chipping shall be performed in such a manner that the chipped material shall not enter any watercourse or wetland area, nor accumulate in excess of four (4) inches in depth at any location.

Appendix 1
Contact Information

Vegetation Operations Staff, Control Center and Security Contact Information

SYSTEM WIDE		
Contact	**Location**	**Telephone Number**
Injury Hotline	System	866-322-5594

NEW ENGLAND		
Contact	**Location**	**Telephone Number**
NE Distribution Control Center	New England North New England South	(508)421-7879 (508)421-7885
Security	Northboro, MA	(508) 421-7970
Anne Marie Moran (Manager)	Worcester, MA	(508) 860-6925
Jason Magoon	Worcester, MA	(508) 860-6212
Eric Gemborys	Leominster, MA	(508) 614-0404
Jonathan Duval	Somerset, RI	(508) 730-4007
Seth Bernatchez	Leominster, MA	(978) 604-5308
Chris Rooney	Lincoln, RI	(401) 255-4439

Appendix 2
National Grid Environmental Policy

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Environment Policy

Our strategy is to be a recognised leader in the development and operation of safe, reliable and sustainable energy systems to meet the needs of our customers and communities and to generate value for our investors.

One of the ways we will achieve this is to protect and enhance the environment, always seeking new and innovative ways to lighten the environmental impact of our past, present and future activities.

J. Pettigrew.

John Pettigrew
Chief Executive

We commit to:

- Ensuring environmental sustainability is considered in our decision making and creating a sustainable thinking culture.
- Using resources more efficiently through good design, using sustainable materials, responsibly refurbishing existing assets, recovery and recycling.
- Ensuring our operations that have an impact on natural habitats are conducted in a manner to protect biodiversity and seeking ways to enhance the natural value of the area for the benefit of local communities and/or environment.
- Reducing greenhouse gas emissions: 45% by 2020 and 80% by 2050.
- Looking at ways to reduce the impact of climate change by implementing mitigation and adaptation measures.
- Openly reporting on our environmental and sustainability performance with employees, members of the public and other stakeholders.
- Actively working to prevent pollution which may result from our activities.
- Continually improving our environmental management system to protect the environment, reduce the risk of environmental incidents.
- Satisfying our compliance obligations.
- Actively managing the risks associated with sites where we have responsibility for dealing with contamination associated with past operations.
- Ensuring our employees have the training, skills, knowledge and resources necessary to meet our environmental commitments.
- Working with governments and regulators to help them develop and deliver more effective environmental policies and targets.
- Helping consumers reduce their dependency on fossil fuels by providing them with access to more sustainable energy and through innovative energy efficiency programmes.
- Ensuring those working on our behalf demonstrate the same commitment to the environment as we do.




For more details on this policy, visit the SSR Infonet homepage or nationalgrid.com

Appendix 3
Notification Materials

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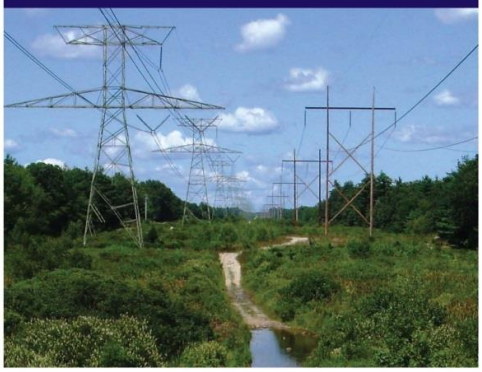
Notification of Vegetation Work



On behalf of National Grid's Vegetation Management department, _____ will soon conduct scheduled maintenance on the electric transmission right-of-way on or adjacent to your property.

The type of work to be done is indicated below:

❒ **Integrated Vegetation Management**
(floor work—see back for details)

❒ **Sideline Maintenance** (see back for details)

Description of work:

_____

_____

_____

_____

If you have questions regarding this work, or a private water supply well on or within 100 feet of the right-of-way, please contact:

Name

_____

Company

_____

Phone

_____

❒ **If this box is checked, a call back is needed**

Date: _____ ROW #: _____

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Program Descriptions

Integrated Vegetation Management (IVM)
IVM focuses on the removal of tall-growing trees and shrubs to encourage the establishment of a low-growing shrub population on the right-of-way.

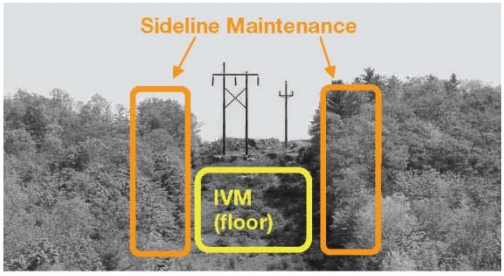
Methods used include:

- Hand cutting with chain saws
- Mowing
- Selective herbicide application (applied to foliage or cut stump surface)

Herbicide use is regulated by federal and state statutes and regulations, which protect sensitive areas, such as:

- Surface Water Supplies
- Wetlands
- Public & Private Wells

Sideline Maintenance
This work consists of removing or pruning danger trees along the sides or edges of transmission line corridors.



Methods used include:

- Skidder bucket or street bucket
- Climbers (for areas inaccessible by equipment)

For more information about our programs and work scheduled for the current year, click on "Operations Documentation" in the following link:

www.nationalgridus.com/transmission/index.asp

National Grid	Revision No. 4
	Page 24 of 24
Sub-Transmission Line Clearance Specification Fiscal Year 2021	Date: 5/9/2017

AS 1-47
Attachment F

Request:

Please explain whether Section 6.6: Notifications to property owners should be revised to include at least 30-day notice, and whether it should be reflected in all applicable areas of Sub-T specs for both trimming and hazard tree removal?

Response:

This Sub-t specification was last changed in February of 2024. These specifications will be revised to include all the proper notification language in all applicable areas.

AS 1-48
Attachment F

Request:

Specifications (7.7.1) indicates roadside overhead Sub-T clearances are a minimum of 20 feet. Sub-T trimming specifications and the graphic in Attachment C, pg. 2 of 4 indicates that all overhanging limbs will be removed. Are these both accurate? Please explain.

Response:

Yes, they are both accurate. 7.7.1 is the correct specification for a roadside sub-t pole line and 7.7.2 is the correct specification for pole lines located in a Right of Way. The picture included in Attachment C was only a picture of the Right of Way specification. The Company has updated the pictures and will correctly label them for attachment C for both Roadside and ROW specifications in the revised document.

AS 1-49
Attachment F

Request:

What resources, guidelines or best practices has the Company relied upon to determine the optimal Sub-T clearance specifications for Rhode Island? When were the specifications last reviewed?

Response:

Rhode Island has a significant Sub-t asset profile. These lines run both on road and in traditional rights of way. The Sub-T specification was created by the Rhode Island team needing to adapt to different clearances for this voltage and risk class. Rhode Island staff led this specification implementation effort back quite a few years ago as part of the previous owner of the Company. Both industry and the Company's distribution and transmission specifications across the industry were examined for best practices to create this specification over the years.

The sub-t specification was last reviewed in February of 2024.

AS 1-50
Attachment F

Request:

Where does enhanced trimming apply and what are the specifications?

Response:

Enhanced tree trimming is not a Sub-transmission treatment and therefore would not be in this specification.

AS 1-51
Attachment F

Request:

The distribution clearance standards include provisions such as contractor bidding, acceptance of work, reporting requirements, interval payment, cost assignment for incomplete work etc. that do not appear in the Sub-T document. Are these applicable?

Response:

Yes, these items will be applicable. The provisions in the distribution specifications will be included in the Sub-transmission specifications going forward. In the past few years, the Company has not awarded many projects via fixed price on sub transmission and therefore has not utilized these provisions regularly.

AS 1-52
Attachment F

Request:

Please include an attachment which lists all reference materials such as ANSI A300, EPRI Best Practices for vegetation management, and all other references relied upon by RIE in developing the sub-transmission line clearance specifications.

Response:

The Company is using the same Sub-t specification that was developed by the previous owner of Narragansett Electric. The Company cannot confirm which reference materials the previous owner relied upon. Based on the Company's review of the Sub-t specifications, it is consistent with ANSI A300 and EPRI Best Practices for vegetation management.