
**Louisville Gas and Electric Company
and
Kentucky Utilities Company**

Distribution Vegetation Management Plan

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Louisville Gas and Electric Company and Kentucky Utilities Company Distribution Vegetation Management Plan

Introduction

The Distribution Vegetation Management Program encompasses right of way maintenance for Louisville Gas and Electric Company and Kentucky Utilities Company (referred to as "LKE") to maintain safety, reliability of service, and access to the utility's facilities for maintenance and repair. The program is centralized and managed by a Forestry Manager and team of company Utility Arborists. The LKE vegetation team are all certified arborists through the International Society of Arboriculture. LKE employs professional tree contractor companies, contract herbicide applicators, and supplemental staffing contractors to assist in planning, executing, and auditing vegetation management work performed on the system.

Safety

LKE's primary focus and core values are to ensure the health and safety of our employees, contractors, and the public. The policies, procedures, and goals of LKE support the Companies operating and safety commitments. Contractors shall regard safety as their first priority. Contractors and their employees will recognize and follow all laws, rules, and regulations regarding public and worker safety. Any incident must be reported to the appropriate safety consultant immediately. Contractors are held accountable for safety per OSHA requirements, Company standards, and other applicable regulations. Every new contract employee must complete a safety training program in the first 30 days of working on the LKE system. Safety performance is reviewed as part of quarterly meetings and contract negotiations.

Right of Way Maintenance Strategy

LKE employs a variable vegetation management program that includes using chemical, manual, or mechanical techniques to control undesirable vegetation. This is completed by natural or directional pruning, environmentally safe herbicides, and tree removals. Targeted clearance for multi-phase lines is 25' from center line, or to the full extent of the established tree line. Targeted clearance for single phase lines is 15' from center line, or to the full extent of the established tree line. The program includes flexibility to operate and maintain variable easement widths, differences between rural and urban service areas, applicable codes or ordinances, and the ability to address landowner requests or concerns.

Schedules and priorities for tree trimming will balance vegetation clearance specifications, and reliability impact. Work will be identified thru a combination of visual inspection and use of technology, such as satellite imaging. Circuits will be maintained utilizing variable methods as mentioned above to reduce the risk of outages due to tree contacts.

All tree trimming shall be governed by approved principles of modern arboriculture and shall adhere to International Society of Arboriculture (ISA) standards. Other standards

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utilized in the program include ANSI A300, NESC, and OSHA 1910.269 as well as compliance with tree ordinances and local codes.

Work Plan

Work plans are prepared annually by work area based on vegetation growth, reliability data, satellite imagery, and visual inspections. The Arborists oversee work plans targeting vegetation that needs to be trimmed or removed utilizing the most cost-efficient means to maintain reliability. Cycle length will be determined by clearance thresholds to reduce grow-in outage potential. Herbicide treatment should be considered as an alternative to brush control on circuits. Hazard tree identification will be a combination of spatial detection and visual identification by ISA certified Arborist team.

The Work Plan includes the following sections:

Maintenance Cycle Plan

The routine trimming cycle plan is a proactive plan to trim work areas based on clearance thresholds and risk mitigation.

Herbicide Treatment Plan

The herbicide plan is a proactive plan to control brush and immature trees as part of the maintenance cycle.

Danger Tree Plan

The danger tree plan targets trees that pose a threat to the Companies facilities that cannot be mitigated thru normal maintenance trimming. These trees are identified thru modelling methods as well as visual inspections by the ISA certified Arborist team. Danger trees are prioritized and mitigated based on reliability disruption potential.

Evaluation of Plan Effectiveness

The effectiveness of the plan is evaluated by the system performance as measured by system SAIDI, SAIFI and CAIDI. Reports used to monitor the plan's effectiveness include the Circuit Reliability Report, System SAIDI, SAIFI, and CAIDI Reports.

Customer Communication

Each customer on the circuit receives a mailing notification letter, one to two weeks prior to beginning the circuit work. The crew “knocks on the door” before the work begins. Customer complaints are investigated. Customer satisfaction is included in contractor evaluations. Customer education about tree trimming and planting trees is provided in

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consumer mail inserts, listed on the company website, participation in community events, and media announcements.

Contractor Performance Management

The vegetation management strategy includes unit-based pricing, target pricing and T&E work. Unit/target pricing promotes efficiency in contractor resource management. The target price strategy deploys prescriptive tree management techniques. Maintenance work is prescribed, and marked on a work area map, span by span, with a price established for the work. Every circuit is inspected after the tree work is complete.

A contractor's performance is evaluated based on safety, productivity, quality, and customer satisfaction on a quarterly and annual basis. Contractors are held accountable for safety per OSHA and Company standards.