

Cope # 2011-00450



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March 28, 2014

VIA OVERNIGHT DELIVERY

Mr. John A. Rogness III
Director of Engineering
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

RECEIVED
MAR 31 2014
PUBLIC SERVICE
COMMISSION

**RE: 2013 Reliability Report and Vegetation Management Plan Update
2013 Calendar Year**

Dear Mr. Rogness:

Enclosed please find the signed paper and one electronic copy of the Duke Energy Kentucky, Inc. 2013 Reliability Report and Vegetation Management Plan Update.

We have included the unredacted part of Exhibit A in a separate envelope to be filed under seal. Also enclosed is a Petition for Confidential Treatment for your consideration in the above referenced matter.

Please date-stamp the two copies of the letter and the filings and return to me in the enclosed envelope.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

E. Minna Rolfes-Adkins
Paralegal to Rocco D'Ascenzo

ERA
Enclosure

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

DUKE ENERGY KENTUCKY, INC.
RELIABILITY REPORT AND VEGETATION MANAGEMENT PLAN UPDATE
FOR CALENDAR YEAR 2013

March 31, 2014

TABLE OF CONTENTS

<u>No.</u>		<u>Page</u>
I.	Introduction.....	1
II.	Reliability Report Summary	1
III.	Vegetation Management Update and Summary	3
	Electric Distribution Utility Annual Reliability Report.....	Exhibit A
	Vegetation Management Plan.....	Exhibit B

I. Introduction

On May 30, 2013, the Commission issued its Order requiring all jurisdictional utilities to file annual reliability reports and to develop vegetation management plans. Pursuant to the Order, jurisdictional utilities were required to report a 5 year average of reliability data. The reports are required to be based upon a calendar year (January to December) and filed by the first business day in April in the year immediately following the reporting year.

Duke Energy Kentucky, Inc. (Duke Energy Kentucky or the Company) submits its Reliability Report and Vegetation Management Plan update for Calendar year 2013 as required by the Commission's May 30, 2013 Order in Case No. 2011-00450.¹

II. Reliability Report Summary

Consistent with the most recent edition of the standard number 1366 "Guide for Electric Power Distribution Reliability Indices," and the Commission's Order,² the following is included in Exhibit A of Duke Energy Kentucky's Reliability Report Summary:

1. Calculate the System Average Interruption Duration Index (SAIDI) system-wide indices including Major Event Days (MEDs) and calculate the SAIDI system-wide indices excluding MEDs;
2. Calculate the System Average Interruption Frequency Index (SAIFI) system-wide indices including MEDs and calculate the SAIFI system-wide indices excluding MEDs;
3. Develop a system-wide rolling five-year average SAIDI excluding MEDs;

¹ *In the matter of An Investigation of the Reliability Measures of Kentucky's Jurisdictional Electric Distribution Utilities, Case No 2011-00450. (Order)(May 30, 2013).*

² *Id.*

4. Develop a system-wide rolling five-year average SAIFI excluding MEDs;
5. Calculate SAIDI excluding MEDs for every circuit within its system;
6. Develop a rolling five-year average SAIDI for each circuit within its system;
7. Compare each circuit to that circuit's rolling five-year average SAIDI;
8. Calculate SAIFI excluding MEDs for every circuit within its system;
9. Develop a rolling five-year average SAIFI for each circuit within its system;
10. Compare each circuit to that circuit's rolling five-year average SAIFI.
11. File a Reliability Report by April 1 of each year, containing the reliability information as outlined in the attached Appendix for the preceding calendar year from January 1 to December 31 that includes the SAIDI and SAIFI system-wide indices, both including and excluding MEDs.
12. For each circuit with either SAIDI or SAIFI value higher than that circuit's respective SAIDI or SAIFI rolling five-year average, excluding MEDs, include in the annual Reliability Report the following information:
 - a. The circuit's SAIDI index for the year;
 - b. The circuit's SAIFI index for the year;
 - c. The circuit's rolling five-year average SAIDI;
 - d. The circuit's rolling five-year average SAIFI;
 - e. The substation name, number and location (Le., County-Road-Town);

- f. The circuit name, number and location (Town-Road-General Area);
- g. The circuit's overall length in miles to the nearest tenth of a mile;
- h. The number of customers served on the circuit for the year;
- i. The date of the last circuit trim performed by the utility as part of its vegetation management plan;
- j. A list of outage causes for the circuit, along with the percentage of total outage numbers represented by each cause;
- k. Circuit five-year average SAIDI;
- l. Reporting year SAIDI;
- m. Circuit five-year average SAIFI;
- n. Reporting year SAIFI;
- o. A Corrective Action Plan which describes any measures the utility has completed or plans to complete to improve the circuit's performance; and
- p. Any other information the utility believes will assist the Commission in understanding the circumstances surrounding the circuit's performance.³

III. Vegetation Management Plan Update and Summary

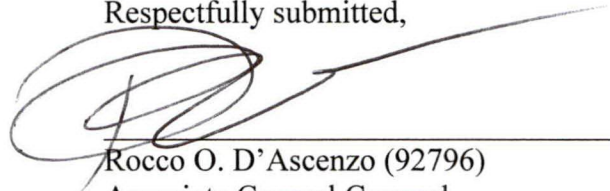
Duke Energy Kentucky filed its initial Vegetation Management Plan with this Commission on December 18, 2007 in Case No. 2006-00494.⁴ Duke Energy's Midwest Vegetation Management Group is responsible for controlling vegetation growth for 37,000 miles of transmission and distribution overhead electric lines and gas supply lines in Ohio, Indiana and Kentucky.

³ *Id.*

Exhibit B is a copy of Duke Energy Kentucky's Vegetation Management Plan. There have been no amendments or changes to the plan since it was initially filed with the Commission on December 18, 2007. There are no amendments or changes planned for 2014.

As part of its 2014 plan, Duke Energy Kentucky plans to trim trees and maintain vegetation along 385 miles of its distribution system. In the first quarter of 2014, although the weather conditions were harsh at times, Duke Energy Kentucky was able to get a good start on our Vegetation Management Plan for 2014. As of March 14, 2014, Duke Energy Kentucky has completed 20.3% of its scheduled trimming, or approximately 78 miles of its distribution system. This leaves approximately 307 miles to be trimmed in 2014. The Company does not anticipate any difficulty in completing all planned trimming for 2014. The Company will have sufficient crew coverage throughout the year.

Respectfully submitted,



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KENTUCKY PUBLIC SERVICE COMMISSION

Electric Distribution Utility Annual Reliability Report

SECTION 1: CONTACT INFORMATION

UTILITY NAME	DUKE ENERGY KENTUCKY
REPORT PREPARED BY	ILONA KORB
E-MAIL ADDRESS OF PREPARER	ILONA.KORB@DUKE-ENERGY.COM
PHONE NUMBER OF PREPARER	513-287-3121

SECTION 2: REPORTING YEAR

CALENDAR YEAR OF REPORT	2013
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SECTION 3: MAJOR EVENT DAYS (MED)

	T _{MED}	6.42
FIRST DATE USED TO DETERMINE T _{MED}		Jan 1, 2008
LAST DATE USED TO DETERMINE T _{MED}		December 31, 2012
NUMBER OF MED IN REPORT YEAR		2

NOTE: Per IEEE 1366 T_{MED} should be calculated using the daily SAIDI values for the five prior years. If five years of data are not available, then utilities should use what is available until five years are accumulated

SECTION 4: SYSTEM RELIABILITY INFORMATION AND RESULTS

System-wide Information

TOTAL CUSTOMERS	136,906	TOTAL CIRCUITS	129
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Excluding MED

5 YEAR AVERAGE		REPORTING YEAR	
SAIDI	113.0 (minutes)	SAIDI	103.2 (minutes)
SAIFI	1.3	SAIFI	0.9

Including MED

5 YEAR AVERAGE		REPORTING YEAR	
SAIDI	576.9 (minutes)	SAIDI	133.7 (minutes)
SAIFI	1.9	SAIFI	1.1

Notes

- 1) All duration indices (SAIDI) are to be reported in units of minutes.
- 2) Reports are due on the first business day of April of each year
- 3) Reports cover the calendar year ending in the December before the reports are due.
- 4) IEEE 1366 (latest version) is used to define SAIDI, SAIFI, and T_{MED}

SUBSTATION NAME	SUBSTATION NUMBER	SUBSTATION COUNTY	SUBSTATION ROAD	SUBSTATION TOWN	CIRCUIT NAME	CIRCUIT ID	CIRCUIT NUMBER	CIRCUIT TOWN	CIRCUIT ROAD	CIRCUIT GENERAL AREA	TOTAL CIRCUIT LENGTH (miles)	CUSTOMER COUNT FOR THIS CIRCUIT
ALEXANDRIA SOUTH	205	CAMPBELL		ALEXANDRIA	ALEXANDRIA SOUTH - 41	H9322050041	41	ALEXANDRIA		Alexandria, Ross ar	60.45	2072
BELLEVUE	131	CAMPBELL		NEWPORT	BELLEVUE - 42	H9321310042	42	NEWPORT		Fort Thomas, Dayto	22.92	2261
CLARYVILLE	147	CAMPBELL		CLARYVILLE	CLARYVILLE - 43	H9321470043	43	CLARYVILLE		Claryville	1.48	8
CONSTANCE	42	BOONE		ERLANGER	CONSTANCE - 44	H9320420044	44	ERLANGER		Erlanger	10.79	317
										Crescent Springs, Fort Mitchell and Lakeside Park	17.73	1986
CRESCENT	70	KENTON		FT. MITCHELL	CRESCENT - 41	H9320700041	41	FT. MITCHELL				
DIXIE	89	BOONE		FLORENCE	DIXIE - 43	H9320890043	43	FLORENCE		Florence	1.73	33
DONALDSON	55	KENTON		ERLANGER	DONALDSON - 41	H9320550041	41	ERLANGER		Erlanger and Floren	16.66	2114
EMPIRE	289	BOONE		FLORENCE	EMPIRE - 42	H9322890042	42	FLORENCE		Florence	1.2	1
HANDS	128	CAMPBELL		COVINGTON	HANDS - 41	H9321280041	41	COVINGTON		Covington & Indepe	25.53	1614
HEBRON	152	BOONE		HEBRON	HEBRON - 41	H9321520041	41	HEBRON		Hebron	22.26	1336
HEBRON	152	BOONE		HEBRON	HEBRON - 44	H9321520044	44	HEBRON		Park West Internatic	4.35	37
HEBRON	152	BOONE		HEBRON	HEBRON - 45	H9321520045	45	HEBRON		Hebron	13.18	442
HEBRON	9	KENTON		LAKEVIEW	KENTON - 42	H9320090042	42	LAKEVIEW		Taylor Mill, Covingt	14.54	956
HEBRON	9	KENTON		LAKEVIEW	KENTON - 46	H9320090046	46	LAKEVIEW		Edgewood and Fort	14.96	669
LONGBRANCH	98	BOONE		FLORENCE	LONGBRANCH - 42	H9320980042	42	FLORENCE		Union, Beaverlick a	41.45	1015
MT ZION	305	BOONE		FLORENCE	MT ZION - 41	H9323050041	41	FLORENCE		Florence	2.67	84
OAKBROOK STA	210	BOONE		FLORENCE	OAKBROOK STA - 42	H9322100042	42	FLORENCE		Limaburg, Oakbrook	23.45	2232
THOMAS MORE	134	KENTON		FT MITCHELL	THOMAS MORE - 41	H9321340041	41	FT MITCHELL		Crestview Hills	1.68	9
VERONA	125	KENTON		CRITTENDEN	VERONA - 41	H9321250041	41	CRITTENDEN		Verona, Piner, Fisk	47.7	824
VERONA	125	KENTON		CRITTENDEN	VERONA - 42	H9321250042	42	CRITTENDEN		Walton	20.9	704
WILDER	59	KENTON		WILDER	WILDER - 44	H9320590044	44	WILDER		Wilder & Covington	19.4	1193

SUBSTATION NAME	DATE OF LAST CIRCUIT TRIM (VEGETATION MANAGEMENT)	CIRCUIT 5-YEAR AVERAGE (SAIDI)	REPORTING YEAR (2013) SAIDI	DID SAIDI INCREASE IN 2013?	CIRCUIT 5-YEAR AVERAGE (SAIFI)	REPORTING YEAR (2013) SAIFI	DID SAIFI INCREASE IN 2013?
ALEXANDRIA SOUTH	6/5/2010	160.7	164.2	YES	1.61	1.04	NO
BELLEVUE	10/29/2011	88.3	171.4	YES	0.64	1.61	YES
CLARYVILLE	8/5/2011	93.2	16.9	NO	1.05	1.13	YES
CONSTANCE	12/17/2011	47.3	20.8	NO	1.09	1.10	YES
CRESCENT	11/18/2013	101.1	48.9	NO	1.28	1.44	YES
DIXIE	6/25/2011	55.0	275.4	YES	0.72	0.48	NO
DONALDSON	10/28/2010	88.8	320.6	YES	1.67	1.87	YES
EMPIRE	10/19/2013	148.8	1200.0	YES	1.00	10.00	YES
HANDS	4/19/2013	141.4	217.9	YES	1.23	2.99	YES
HEBRON	9/11/2010	114.8	282.9	YES	1.66	0.98	NO
HEBRON	NEW CIRCUIT	30.7	5.5	NO	0.85	0.92	YES
HEBRON	NEW CIRCUIT	31.8	12.0	NO	0.93	1.04	YES
KENTON	5/18/2012	44.4	50.4	YES	0.75	0.18	NO
KENTON	8/10/2013	61.6	232.6	YES	0.76	1.00	YES
LONGBRANCH	10/19/2013	91.7	77.4	NO	0.76	0.95	YES
MT ZION	7/2/2011	11.4	80.5	YES	0.27	0.19	NO
OAKBROOK STA	10/19/2013	166.2	271.8	YES	1.52	2.22	YES
THOMAS MORE	11/23/2010	12.3	15.9	YES	0.18	0.11	NO
VERONA	5/11/2012	158.2	286.0	YES	1.26	2.69	YES
VERONA	10/26/2013	67.1	91.8	YES	0.62	0.28	NO
WILDER	10/16/2012	45.2	180.2	YES	0.58	0.97	YES

SUBSTATION - CIRCUIT	CIRCUIT NAME	CIRCUIT ID	OUTAGE CAUSE	PERCENT OF TOTAL OUTAGE MINUTES	CORRECTIVE ACTION PLAN
ALEXANDRIA SOUTH-H9322050041	ALEXANDRIA SOUTH - 41	H9322050041	Weather Equipment failure Wildlife Vegetation Planned (IEEE) Other Cause Unknown Cause Public Accident	91.8% 4.5% 1.3% 1.3% 0.7% 0.2% 0.2% 0.1%	Circuit damaged by weather and repaired at time of outage. No additional work or remediation required.
ALEXANDRIA SOUTH-H9322050041 Total					100.0%
BELLEVUE-H9321310042	BELLEVUE - 42	H9321310042	Vegetation Planned (IEEE) Equipment failure Wildlife Unknown Cause Weather Other Cause Public Accident	83.1% 5.8% 4.9% 3.8% 1.2% 1.0% 0.2% 0.0%	Outage caused by dead tree from outside of right-of-way. Vegetation Management to review issue. No additional work or remediation required.
BELLEVUE-H9321310042 Total					100.0%
CLARYVILLE-H9321470043 CLARYVILLE-H9321470043 Total	CLARYVILLE - 43	H9321470043	Weather	100.0%	Outage caused by outage on transmission line. No additional work or remediation required.
CONSTANCE-H9320420044	CONSTANCE - 44	H9320420044	Planned (IEEE) Equipment failure Other Cause Unknown Cause	87.2% 28.2% 2.8% 1.9%	Outage was planned for upgrade work. No additional work or remediation required.
CONSTANCE-H9320420044 Total					100.0%
CRESCENT-H9320700041	CRESCENT - 41	H9320700041	Weather Equipment failure Public Accident Wildlife Other Cause Vegetation Planned (IEEE) Unknown Cause Lightning strike	47.7% 36.3% 9.7% 3.0% 1.3% 1.2% 0.8% 0.1% 0.0%	Changing circuit in 2014. No additional work or remediation required.
CRESCENT-H9320700041 Total					100.0%
DIXIE-H9320890043	DIXIE - 43	H9320890043	Public Accident Planned (IEEE) Equipment failure	94.2% 5.8% 0.0%	Outage caused by car accident. No additional work or remediation required.
DIXIE-H9320890043 Total					100.0%
DONALDSON-H9320550041	DONALDSON - 41	H9320550041	Other Cause Vegetation Wildlife Lightning strike Unknown Cause Planned (IEEE) Equipment failure Weather	88.8% 4.3% 4.0% 1.6% 0.8% 0.3% 0.2% 0.0%	Equipment issue that caused this outage was corrected. No additional work or remediation required.
DONALDSON-H9320550041 Total					100.0%
EMPIRE-H9322890042	EMPIRE - 42	H9322890042	Weather Unknown Cause Vegetation Planned (IEEE)	77.1% 13.1% 7.3% 2.5%	Transmission lockout. Circuit has one customer. No distribution work or remediation required.
EMPIRE-H9322890042 Total					100.0%
HANDS-H9321280041	HANDS - 41	H9321280041	Equipment failure Other Cause Planned (IEEE) Wildlife Unknown Cause Vegetation Weather Public Accident	74.9% 13.9% 4.0% 3.3% 2.3% 1.0% 0.6% 0.0%	Outage caused by broken cross-arm on pole. Damage was repaired at time of outage. No additional work or remediation required.
HANDS-H9321280041 Total					100.0%
HEBRON-H9321520041	HEBRON - 41	H9321520041	Equipment failure Unknown Cause Wildlife Vegetation Public Accident Weather Other Cause Planned (IEEE)	89.5% 0.2% 0.1% 0.1% 0.0% 0.0% 0.0% 0.0%	Outage caused by car accident. Looking into relocating line fuses to prevent further outages due to car accidents
HEBRON-H9321520041 Total					100.0%
HEBRON-H9321520044	HEBRON - 44	H9321520044	Equipment failure Other Cause	100.0% 0.0%	Outage caused by a transmission switch which opened for safety. The switch was repaired. This event caused the outage on HEBRON-H9321520045 as well. No additional work or remediation required.
HEBRON-H9321520044 Total					100.0%
HEBRON-H9321520045	HEBRON - 45	H9321520045	Equipment failure Other Cause Planned (IEEE) Weather Vegetation	36.7% 32.4% 26.2% 2.5% 2.2%	Outage caused by a transmission switch which opened for safety. The switch was repaired. This event caused the outage on HEBRON-H9321520045 as well. No additional work or remediation required.
HEBRON-H9321520045 Total					100.0%
KENTON-H9320090042	KENTON - 42	H9320090042	Equipment failure Wildlife Planned (IEEE) Other Cause Unknown Cause	88.8% 5.4% 3.6% 1.2% 1.1%	Blown Transformer in apartment complex replaced. No additional work or remediation required.
KENTON-H9320090042 Total					100.0%
KENTON-H9320090046	KENTON - 46	H9320090046	Public Accident Vegetation Other Cause Unknown Cause Planned (IEEE) Weather	84.3% 13.1% 2.5% 0.0% 0.0% 0.0%	Outage caused by car accident. Equipment has been repaired. No additional work or remediation required.
KENTON-H9320090046 Total					100.0%
LONGBRANCH-H9320980042	LONGBRANCH - 42	H9320980042	Equipment failure Wildlife Unknown Cause Other Cause Vegetation Planned (IEEE) Lightning strike Weather	96.7% 1.8% 0.9% 0.4% 0.1% 0.1% 0.0% 0.0%	Outage caused by equipment failure caused by lightning striking underground cable terminator on pole. No additional work needed
LONGBRANCH-H9320980042 Total					100.0%
MT ZION-H9323050041	MT ZION - 41	H9323050041	Public Accident Equipment failure Wildlife	78.6% 19.9% 1.5%	Outage caused by car accident. No additional work or remediation required.
MT ZION-H9323050041 Total					100.0%

OAKBROOK STA-H9322100042	OAKBROOK STA - 42	H9322100042	Vegetation	51.2%	Loss of Transmission. Feeder to be self-healing in 2014. No additional work needed.
			Weather	25.6%	
			Equipment failure	19.3%	
			Public Accident	3.4%	
			Planned (IEEE)	0.4%	
			Other Cause	0.1%	
			Unknown Cause	0.0%	
			Wildlife	0.0%	
OAKBROOK STA-H9322100042 Total					100.0%
THOMAS MORE-H9321340041	THOMAS MORE - 41	H9321340041	Equipment failure	68.8%	Outage caused by bad switch which has been replaced. Following up with district for permanent repair.
			Other Cause	31.3%	
THOMAS MORE-H9321340041 Total					100.0%
VERONA-H9321250041	VERONA - 41	H9321250041	Weather	33.7%	Outage caused defective hydraulic recloser to lockout instead of reclosing. Has been replaced with another recloser.
			Equipment failure	30.0%	
			Vegetation	27.3%	
			Public Accident	6.8%	
			Wildlife	0.9%	
			Planned (IEEE)	0.6%	
			Other Cause	0.3%	
			Unknown Cause	0.2%	
VERONA-H9321250041 Total					100.0%
VERONA-H9321250042	VERONA - 42	H9321250042	Weather	58.7%	Outage caused by severe weather. No additional work needed.
			Wildlife	23.6%	
			Unknown Cause	6.8%	
			Other Cause	5.0%	
			Planned (IEEE)	2.0%	
			Equipment failure	2.0%	
			Vegetation	1.5%	
			Lightning strike	0.4%	
VERONA-H9321250042 Total					100.0%
WILDER-H9320590044	WILDER - 44	H9320590044	Unknown Cause	65.2%	Electronic Sectionalization added to circuit to reduce outages and assist with restoration. No additional work needed.
			Lightning strike	23.1%	
			Equipment failure	7.0%	
			Planned (IEEE)	4.2%	
			Public Accident	0.4%	
			Wildlife	0.1%	
			Other Cause	0.1%	
			Unknown Cause	0.0%	
WILDER-H9320590044 Total					100.0%

Duke Energy Kentucky's Vegetation Management Plan

Goals

Duke Energy's goals for its Vegetation Management Operations are to balance the need for reliable utility service with safe and cost-effective vegetation management practices that preserve our local communities' natural surroundings, aesthetics and the environment. Targeted herbicides provide one of the most cost-effective and environmentally friendly means of controlling undesirable vegetation.

Safety

Our goals are to work safely at all times to achieve a zero injury culture and to minimize the safety risk of vegetation and conductor contacts. Serious or fatal shocks can occur when working in trees near power lines. Duke Energy strives to minimize that risk by trimming properly in accordance with industry tree trimming safety standards.

Reliability

Duke Energy's electric service reliability, as measured by SAIFI and SAIDI, has improved in recent years due in part to our more rigorous tree trimming practices. Duke Energy strives to trim its Kentucky distribution circuits every four-and-one-half years and transmission every six years.

Tree Care Standards

Duke Energy requires its employees and contractors to prune trees in accordance with American National Standards Institute (ANSI) and National Arborist Association (NAA) standards. The relevant standards are ANSI Z133, Safety in Tree Trimming Operations, and ANSI A300, Safety in Tree Care Operations. These ANSI standards were developed in cooperation with the NAA. Additionally, Duke Energy follows the practices in Field Guide for Qualified Line Clearance Tree Workers by Dr. Alex L. Shigo, former head of the U.S. Forest Service. In rural areas, Duke Energy may authorize its contractors to use mechanized pruning equipment.

Tree Trimming Specifications

69KV and above Transmission Lines

- 15 feet clearance to the side from all conductors.
- 15 feet clearance below the lowest conductor.
- No overhanging/encroaching branches permitted.
- Trim to the previously established widths of our right-of-way and practice established beyond the 15 feet widths.

3 Phase Primary Lines

- 10 feet clearance to the side from all conductors.
- 10 feet clearance below the conductors.
- No overhanging/encroaching branches.

Single Phase and Two Phase Primary lines

- 10 feet clearance to the side from all conductors.
- 10 feet clearance below the conductors.
- Overhang: all live branches above the conductors shall be removed to a minimum height of 15 feet, and at a 45-degree angle. All dead and structurally weak branches overhanging any primary voltage wires shall be removed.
- Underneath the primary: 10 feet clearance from the conductors to the closest limbs beneath the phases.

Secondary Lines

- 5 feet clearance to the side from the secondary line.
- 5 feet clearance above and below the secondary line.

Services Lines

- 1 foot swing clearance from all service lines.

Brush/Wood Removal

- Circuit maintenance - brush is removed, wood cut into movable pieces.
- Customer may request off-cycle maintenance in accordance with the clearance standards above - brush and wood is customer's responsibility.
- Storm Work - no brush or wood removal.

Customer Notification

- Duke Energy customers are notified of tree trimming being done on their property by door hanger cards.
- Duke Energy requires its contractors to contact local government officials prior to beginning work in the community.

Right Tree In The Right Place

- Duke Energy will cooperate in tree removal with local government officials as needed.

Determination of Need to Perform Maintenance/Evaluation of Plan Effectiveness

Duke Energy regularly monitors its SAIFI and SAIDI measures. If SAIFI or SAIDI were to significantly decline, Duke Energy would evaluate whether to modify its vegetation management practices, including its right-of-way clearing cycle, in order to improve SAIFI and SAIDI performance. Duke Energy also monitors the performance of individual circuits. In an individual circuit has a significant number of outages, Duke Energy will perform off-cycle tree trimming as needed. Duke Energy also monitors industry tree trimming standards and modifies its tree trimming practices as necessary to meet or exceed industry standards.