

Local Vegetation Management Planning

Supplemental materials

Local Vegetation Supplemental Materials Index

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Will traffic be blocked on my street?

Perhaps. There may be times when trucks are traveling to and from the job site and heavy equipment will be brought on site. We will do whatever we can to minimize the length of time traffic will be blocked, and crews will be on site to move any construction vehicles that may be blocking the road for residents who live in the area.

Will the street or my yard be torn up?

As with large-scale projects like this, heavy equipment and vehicles will be traveling in and out of the area for extended periods of time. At times, they will need to access the right-of-way which, in most cases, is located behind the homes and yards in an area. While we certainly do not anticipate any damage will occur to the roads or yards in your neighborhood, rest assured we will restore the area to its original - or better - condition if any damage does occur.

What if I do not own this property?

Please forward this information to your landlord or property management company. They need to be aware of the project, but we want to make sure you are aware of the work that is being done because you live in the area. equipment will be brought on site. We will do whatever we can to minimize the length of time traffic will be blocked, and crews will be on site to move any construction vehicles that may be blocking the road for residents who live in the area.

This work was reviewed and approved by the Kentucky Public Service Commission as part of KU's Transmission System Improvement Plan outlined in the company's 2016 rate review filing.

transmission projects

vegetation management and tree clearance

Please reach out to us for additional information or if you have a question that was not addressed in this brochure.

Questions?

Call 859-367-5423 (Press 1)

Email

vegetation.management@lge-ku.com

Please be sure to leave your name, a phone number where you can be reached, the address about which you are contacting us, and a brief message. Someone with KU will respond to you as quickly as possible.



Frequently Asked Questions

As part of ongoing transmission system improvement work to strengthen the safety and reliability of its transmission system and modernize its transmission infrastructure, KU is clearing overgrown vegetation from overhead transmission lines.

Overhead line clearance work is necessary to maintain the reliability of the electric transmission grid for the entire region. By performing this work, KU and surrounding utilities can continue to provide safe, reliable electric service.

What is a transmission line?

Transmission lines are the high-voltage power lines that run between large transmission towers and poles.

What is the difference between transmission and distribution systems?

The company's transmission system consists of 69,000 through 500,000 volt lines and moves power from power generation plants to substations. Distribution lines consist of 4,160 through 34,500 volt lines and move power from the substations to individual customers' businesses and homes. Transmission line outages can impact a much larger area than distribution system outages which tend to be more localized.

Why is this work necessary?

Overhead line clearance work is necessary to maintain the reliability of the electric transmission grid for the entire region. By performing this work, KU and surrounding utilities can continue to provide safe, reliable electric service.

Why is KU clearing the trees away from the overhead electric transmission lines in my area?

In 2003, a blackout in the Northeastern portion of the United States occurred when a tree branch came into contact with a high-voltage electric transmission line. While there were multiple contributing issues, the vegetation issue was the most significant cause. Since that time, there have been reliability standards developed to mitigate the issues. Line clearing of vegetation is a primary focus of those reliability standards. This project will allow KU to further strengthen electric reliability for our customers and the entire region.

Why is KU clearing more area in the easement on my property than has previously been cleared?

Trees within the existing right of way, but uncleared in the recent past, have continued to grow to the point that action needs to be taken. Repeatedly topping and trimming trees does not provide high voltage transmission lines with the recommended adequate and safe distances to maintain the reliability of the transmission grid in compliance with reliability standards.

What is a right-of-way?

A right-of-way is the actual land area acquired from a property owner for a specific purpose, such as a transmission line or roadway.

How wide are the company's transmission line rights-of-way?

It varies. The company's transmission lines are generally between 100 and 200 feet in width; however, in some cases, the right-of-way may be as much as 350 feet with the overhead transmission line usually being constructed in the center of the right-of-way.

What is an easement?

Easements are agreements between the company and private property owners about their rights and responsibilities within a right-of-way. The easement on your property gives KU the right to build, operate and maintain the transmission lines, which includes managing vegetation and removing trees. While many easements were negotiated by previous property owners, the terms of the agreement remain in place even if the property is transferred or sold.

Can I plant and grow trees on the transmission line right-of-way?

The easements granted to KU prohibit planting of trees or any other structures within the right-of-way. Typically, easements were purchased when the transmission line was constructed by KU to provide perpetual rights to keep the right-of-way clear of trees and vegetation.

Does the company clean up trees and other debris after transmission line clearance work along the right-of-way?

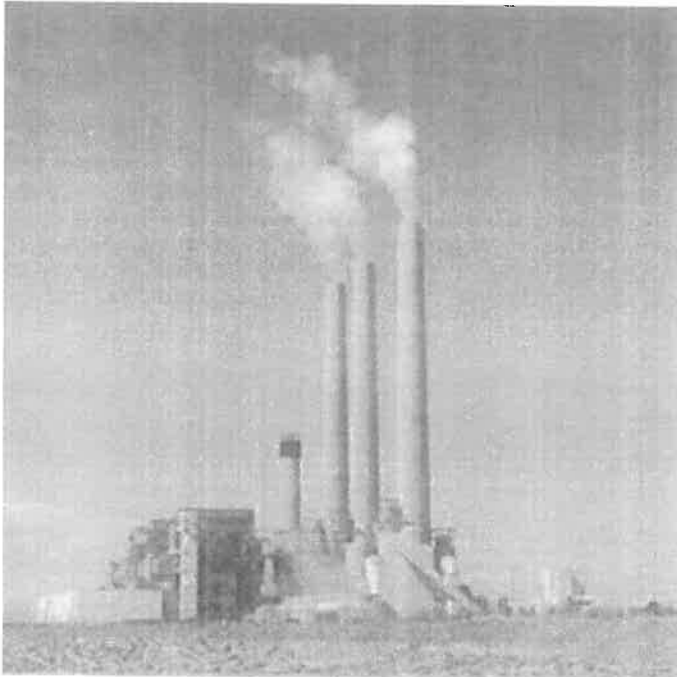
In suburban areas such as neighborhoods or maintained yards, the company will clean up any wood and debris as a result of our work. The company does not clean up trees or debris in unmaintained wooded areas on or near the right-of-way.

Will my electric service be interrupted during the project?

No. There should be no reason to interrupt your electric service as crews work to clear, trim and remove trees that have grown too close to the overhead electric transmission lines. If you do experience an electric service interruption, we encourage you to report it to your energy provider, just as you would report an interruption that would occur any other time. To report an electric outage to KU, call 800-981-0600.

Fair, just and reasonable but for who?

Some issues with utility regulation:



- With current business models, utility and public interests conflict.
- The regulatory system was designed before renewable and distributed renewable energy was available.
- The PSC has historically operated in a way that is reactive to utility proposals instead of proactive for the good of the public
- The PSC has continually been underfunded

Most of our utilities are regulated monopolies

They are granted the exclusive right to provide service in service area. In return for this monopoly, their rates and capital expenditures are regulated.

Regulation is supposed to ensure:

- Reliability of service
- Safety of service
- Fair, just and reasonable rates



In Kentucky most of our electric utilities are **vertically integrated**, which means they own the generation, transmission and distribution of electricity.

From: Napier, Heather (KYOAG) <Heather.Napier@ky.gov>
Sent: Friday, October 22, 2021 8:12 AM
To: dharta@aol.com
Subject: from KY OAG

Ms. Atchison:

KU's response is below. I followed up asking if any environmental studies were performed due to the federal consent decree regarding storm water.

KU is obligated to provide safe and reliable electric service to its customers.

Prior to transitioning to a cycle-based approach, from 2012-2016, 19% of LG&E and KU transmission were caused by trees falling into lines.

In the same period, 30% of all outages could not be positively determined and based on the experience of the Companies' field technicians, a significant portion of these unexplained outages were likely caused by vegetation, in particular by limbs and trees swaying or blowing into and making temporary contact with 69kV lines. Narrow corridors are especially vulnerable to these types of outages.[1] Failure to maintain clearance could eventually result in widespread and potentially long-lasting outages, especially in extreme weather circumstances.

Program Talking Points:

- LGE-KU Maintains approximately 5,400 circuit miles of transmission lines, 734 miles of which are BES lines (>200kV). This equates to approximately 65,000 right of way acres to maintain.
- In 2014, a third party performed a Program Assessment and recommended conversion from reactive (hot spotting) maintenance to cycle maintenance to reestablish rights of way, cost effectively maintain them, and to prevent outages due to vegetation.
- Cycle Maintenance enables the utility to implement an Integrated Vegetation Management Program (IVM) which is the art of controlling plant populations based on scientific principles and is recognized as an industry best practice.
- This proposal for conversion to cycle maintenance was included in the Transmission System Improvement Plan (Case No. 2016-00370) approved by the PSC, effective July 1, 2017.
- The cycle based proactive process involves reclaiming, establishing, and sustaining the right of way.
- In rural areas, rights of way are reclaimed to easement width.

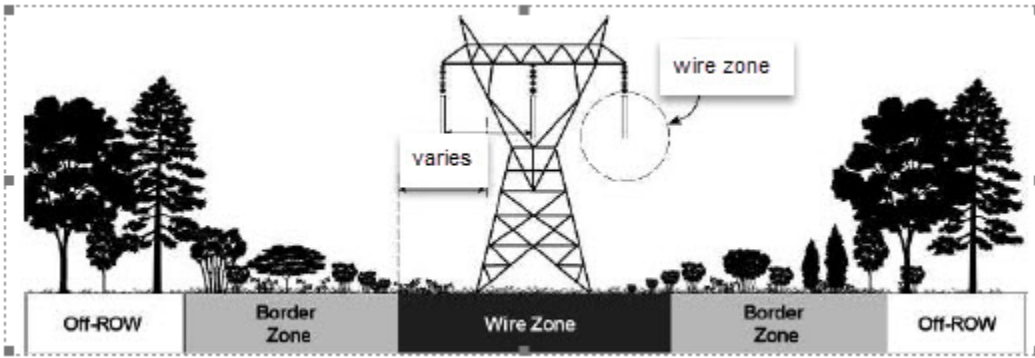
LGE-KU uses a wire zone/border zone approach for urban areas when appropriate.

For each circuit the wire zone is established from centerline using National Electrical Safety Code (NESC) blow out (48mph wind perpendicular to conductor) plus a flash over buffer and a year of trim. Most often, this is approximately 30' from center.

The border zone is the next 10' of the easement in which slightly taller trees can be located without posing a hazard to workers or the lines. Remaining trees within the easement and overhanging the border zone will be trimmed. This approach allows for side trimming every five years without the trees posing a grow in hazard to the conductors.

- o Wire zone trees must mature to a height of 15' or less.

- o Border zone trees are evaluated for fall in risk or blowout contact
- ♣ This is typically communicated that a tree must mature to height of 25' or less, pending evaluation.



- Arborists perform on site evaluations for wire zones and border zones to determine what vegetation is compatible with the program.
- Tree removals include stump grinding, debris disposal, and reclamation as needed
- Mitigation for yard trees consist of \$250/yard tree up to \$1,500 maximum/property. A yard tree is defined as a tree in a maintained area, generally mowed around.
- Replanting in community areas such as medians, parks, and HOA common areas are performed in collaboration with the city, the parks, and the HOA's.

Our goal is to supply our customers with reliable service. Tree growth under our transmission lines and near them create unnecessary outages for our customers.

We want our customers to be able to have the power they need supplying their homes and businesses, when they need it.

Again, KU continues to perform vegetation management within the boundaries set by easements and right-of-ways. I have inquired if customers will have to file for reimbursement or if it is automatic based upon the number of trees cut, and if there is an appeal process for certain trees on a case by case basis.

Sincerely,

Heather Napier
 Consumer Complaint Investigator II
 Office of the Attorney General
 Rate Intervention
 1024 Capital Center Drive, Suite 200
 Frankfort, KY 40601
heather.napier@ky.gov

502-696-5453 Phone
 502-564-2698 Fax

From: dharta@aol.com <dharta@aol.com>
Sent: Monday, October 25, 2021 1:36 PM
To: 'Napier, Heather (KYOAG)' <Heather.Napier@ky.gov>
Subject: RE: from KY OAG

Hi Heather,

Thank you so much for speaking with me on Thursday and following up with KU. I have reviewed KU's response to your inquiry to them. I have questions about the "facts" they have provided.

1. When and where have 19% of outages due to trees interfering with transmission lines occurred? Were these in urban or rural areas?
2. As to the 30% of outages that are unexplained, how can they attribute "a significant portion of these outages" to trees in transmission lines? Were the vast majority of the lines serving us being distribution lines taken into consideration? This is an unsubstantiated conclusion.
3. Who was the third party who performed the program assessment and what was the true purpose? Was this for cost-saving for KU and increased profit to shareholders?
4. In the Integrated Vegetation Management Program cited, what are the scientific principles and what are their standards for distances as to vegetation? We were told over a year ago that this program was in response to a federal mandate. We later found out that they had "misspoken". I have talked to a NERC official and was told there are not distances set as a national standard. The distances KU is using are self-determined. I would like to know what proof they have that these distances are necessary.
5. The case cited, Case No. 2016-00370 is an Application for an adjustment of its electric rates and for certificates of public convenience and necessity. There is no mention of vegetation management in the style of the case.
6. What constitutes an appropriate situation for the wire zone/border approach for urban areas?
7. More explanation of the distances in the easement zone and border zone are needed. How could a mature tree of say 20-25 feet interfere with a line that is 35-40 feet above that height?
8. Do the arborists who perform the on site evaluations explain the reasons for KU's policy to the property owner?
9. They say they will remove trees, grind stumps, remove debris and do reclamation as needed. We were told that in the case of Lansdowne Drive (where they plan to cut 137 trees) that they would only grind stumps where there would be replacement planting done.
10. Proof should be provided that tree growth under and near transmission lines over 10 feet can cause outages. As referenced earlier, it appears almost impossible for a 15 foot tree to interfere with those lines.
11. Within the 19 pages sent to me by Kevin Montgomery, which are only parts of different cases and documents, on page 30 beginning with line 11, KU describes their new approach to vegetation and a "hazard tree identification and removal program. Hazard trees are those that are dead, dying or diseased, including those trees impacted by the emerald ash borer.will enable the Companies to restore existing rights-of-way through tree trimming, herbicide application, hazard tree patrol and removal, and an emerald ash borer mitigation program." There is no mention of cutting healthy trees in or near transmission lines.
12. What are "NERC" mandatory standards"?
13. Will the reduced costs of vegetation management be passed on to the consumer?

There are many other issues to be examined before this program moves forward, including storm water run-off, flooding, erosion, loss of wildlife habitat, lowered property values, loss of enjoyment and higher utility bills due to loss of shade.

I am not an attorney but even I can see that the program does not address its repercussions to homeowners, subdivisions, HOAs and the City of Lexington. A Lexington Councilman will present a resolution to the council tomorrow for the LFUCG to file a formal complaint with the PSC. I look forward seeing to further responses from KU and the PSC. I so appreciate your counsel and attention to this matter. The people of Kentucky deserve better than what is being forced upon them now.

Diane H Atchison
859-621-9379

From: Napier, Heather (KYOAG) <Heather.Napier@ky.gov>
Sent: Friday, November 5, 2021 2:02 PM
To: dharta@aol.com
Subject: from KY OAG

Ms. Atchison:

I received a response from KU stating they have addressed questions posed by you in the past, however they were advised by their legal dept. that they are not required to respond to multiple informal data requests and that the company is in direct contact with the mayor's office. You may want to direct your questions on how vegetation management will affect you to the Lexington Mayor's Office.

Sincerely,

Heather Napier
Consumer Complaint Investigator II
Office of the Attorney General
Rate Intervention
1024 Capital Center Drive, Suite 200
Frankfort, KY 40601
heather.napier@ky.gov

My name is Rebecca Farris I live at 1741 Lakewood Lane Lexington KY. Our home is approximately 300 feet from the KU power lines that run along Glen Hill Road. We can see the lines from our home and all the trees which provide some visual buffer from these lines.

I have worked in the environmental field in Kentucky, South Carolina, Washington DC and Maryland. My experiences include working for NOAA, EPA, NPS, environmental consulting firms, numerous nonprofits and environmental educational programs. My depth of knowledge of our ecosystems and human impacts on the environment is based on education and career experiences. It is very clear what will happen if KU is allowed to proceed with this unnecessary tree removal. There are many topics I could discuss today but I will try to just mention two- rain and trees.

Trees have extensive root systems underground- which stabilize soil when it rains and absorb water. Tree root systems are 2-3x the size of the canopy of a tree. For each tree we see above ground the roots extend 2-3x that underground. Without the mature trees with miles of root system in our neighborhood there will be flooding in our homes and in the streets. Something we already struggle with during rain events. There is a natural spring in our neighborhood and our properties as well as the street stay wet for days after a rain event. We have many rain events in Lexington. Lexington averages over 45(3'9") inches of rain annually. In 2020 we had 50" of precipitation and 56" in 2019. We need EVERY tree and more to absorb all the rain we receive. The rainwater that isn't taken up by trees and vegetation travels downhill to the sewer drains.

To put it simply helping KU's bottomline by allowing KU to clearcut the trees will only increase problems for LFUCG residents/KU customers. We will have to do more to fix our already stressed sewer system and WE will end up paying the price of run off into the storm drain systems for each tree that KU cuts down. Additionally, trees keep the temperatures down around our homes. By removing these trees residents will notice hotter temperatures around their homes in the summers. Residents/KU customers will have to use more energy (and spend more money) to keep their homes the same temperature once the tree coverage is gone. Again, WE will end up paying the price for each tree KU is allowed to cut down.

Lastly, I'll mention a personal note. My grandfather worked for PP&L (KU parent company) for 40 years. He also worked on the Civilian Conservation Corp (CCC). The CCC planted 3 billion trees between 1933-1942. If he was still alive not only would he be against this KU tree cutting policy but he would be standing here with me AND at PP&L headquarters to get this policy changed.

Thank you for your time.



a PPL company

Kentucky Utilities Company
Transmission Operations
Department
One Quality Street
Lexington, KY 40507
www.lge-ku.com

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Chris Wheeldon
Manager, Transmission Line Services
T 859-367-5423 (Press 1)
vegetation.management@lge-ku.com

RICHARD BROADBENT
1747 LAKEWOOD LN
LEXINGTON, KY 40502

9/15/21

Transmission Line Clearance Work Near 1747 LAKEWOOD LN

Dear RICHARD F BROADBENT,

Within the next few weeks, KU will begin removing trees and clearing around overhead electric transmission lines in your area. These may be trees that have only been trimmed in the past. This work is necessary to strengthen the transmission grid for our region, maintain continued service reliability, and minimize the potential for service interruptions from storm related events.

To prevent trees from falling even close or growing into our transmission lines, some trees will be removed from areas we have not cleared before. In most areas, this will involve clearing underneath the lines up to a total width of 80 feet and trimming the remaining trees that overhang.

Prior to any work taking place, a company representative working on this project will make a personal visit to your property and address any concerns or questions you may have. Please note that the clearing work will take place in existing KU easements.

Safety of the general public, our employees and crews performing the work is our number one priority. For your awareness and safety, our employees and contractors drive vehicles marked with the LG&E and KU logo.

MAYOR LINDA
GORTON



LEXINGTON

CHARLES H. MARTIN, P.E.
DIRECTOR
WATER QUALITY

**RE: Required Sanitary Sewer Inspection - 2nd Notice
1747 LAKEWOOD LN**

10/13/2021

Richard F IV and Pattie R Broadbent
1747 Lakewood Ln
LEXINGTON, KY 40502

Dear Richard F IV and Pattie R Broadbent:

In a letter dated 08/05/2021, you were notified the property at 1747 LAKEWOOD LN has been selected for inspection as part of the Lexington-Fayette Urban County Government (LFUCG) Private Infiltration and Infill Elimination Program. It is **very important** that you respond to this notice in the next twenty (20) calendar days to **avoid penalty and/or enforcement action** as described in Code of Ordinance Chapter 16, Article XI.

The Lexington-Fayette Urban County Government (LFUCG) is required to reduce sanitary sewer overflows (SSOs) as part of its court ordered settlement with the United States Department of Justice, the US EPA and the Commonwealth of Kentucky's Energy and Environmental Protection Cabinet (the "Consent Decree"). A critical component of reducing SSOs is the elimination of unauthorized discharges of surface or ground water into the sanitary sewer system. While private sump pumps are the most common example of a connection that illegally discharges clean water into the sanitary sewer system, downspouts, driveway and foundation drains are other examples. For information about the impact of SSOs, go to: <http://www.lexingtonky.gov/privateInfil>

Upon inspection, it may be determined that you do have an unauthorized discharge on your property. LFUCG understands that the situation may pre-date the purchase of the property, and has budgeted money to offset the property owner's cost of some if not all corrective actions that may be required.

The first important step in determining whether the Private Infiltration and Inflow Elimination Program impacts your property is to schedule an inspection. **You are required to schedule this inspection by Code of Ordinances 16-112. Please contact Logan Coslow at (859) 425-2443 or ccoslow@lexingtonky.gov or LexCall at 425-2255 (311) to schedule this inspection by 11/2/2021.**

Sincerely,

Logan Coslow
Division of Water Quality




2:35

◀ Mail

5G

ferc.gov

**FERC**

What is the federal rule or regulation governing transmission line vegetation management and what does it require? 

The **Vegetation Management Reliability Standard, FAC-003**, establishes a **minimum clearance between trees and transmission lines in the right-of-way, which must be maintained at all times in order to achieve service reliability and public safety.** The standard does not specify how a transmission company should conduct its vegetation management (e.g., pruning, herbicides or tree removal). Rather, it specifies that the company must manage its vegetation plan to minimize electricity outages from power line contact with trees in or adjacent to the transmission line rights-of-way. Reliability Standard FAC-003 can be found here: (<http://www.nerc.com/pa/Stand/Reliability%20Standar003-4.pdf>).

The **current standard only requires that a minimum clearance distance be achieved. Decisions related to any clearance practice that goes above and beyond the minimum clearance distance set in the standard are at the sole discretion of the transmission owner, subject to applicable requirements set by state and local authorities.**

Written Statement To The Committee

To the esteemed chairperson and members of the committee,

My name is Ben Aguilar, and I am a citizen of the Commonwealth of Kentucky, specifically of one of its rural places, the town of Port Royal here in Henry County. Upon learning of the continuing issues in Lexington relating to utility clear-cutting of public lands in the interest of 'cost savings', I was reminded of similar issues which have occurred in the more rural parts of this state for some years, and would like to offer an additional perspective on the matter.

Many before you today can and will make good arguments in regards to the aesthetic destruction and commensurate decrease in property values, both for individual homeowners and for neighborhoods and townships more broadly. You will also likely hear about the destruction of natural resources, the elimination of wildlife habitat, reductions in tree canopy and shade cover in metro areas which desperately need both, and compromised drainage and stormwater handling which will lead to increased costs for water and sewage infrastructure, road maintenance, and erosion concerns often paid for by city, county, or state budgets. As such, any of these 'savings' touted by the utility in question are exclusively to the benefit of an out-of-state corporation at the double expense of the taxpaying citizens of Kentucky, both in the share of their tax dollars dedicated to infrastructure spending and their paid utility rates which, it should be noted, have not decreased to reflect said savings.

I would like to add to these arguments that an indiscriminate tree clearance policy will also negatively affect the bottom line for thousands of Kentucky farmers and landowners. In addition to the aforementioned benefits of managed woodlands like stormwater handling and wildlife and pollinator habitat, there are countless other reasons to preserve as much of these wooded areas as possible, including but not limited to erosion control for farmers on hilly ground, preserving shade and forage which is vital for livestock production particularly in the hotter parts of the summer as we are experiencing now, and the preservation of profitable timber and woodland resources like fruit and nut crops (whether harvested by farmers or their livestock). Once undone, these woodland systems can take generations to restore, and to have an agent of the public utility be responsible for said destruction without planning, recourse, public input, or oversight is unconscionable.

This brings me to the crux of the argument, as I see it. No-one on either side of this issue wants dangerous trees near utility lines. No-one wants power outages, no-one wants hazardous conditions for utility workers, and no-one wants to be tramping around on private land where they aren't needed. How can the utility justify a cost savings while sending out whole crews to clear-cut trees which aren't, and in many cases will never be, a threat? Surely the cost savings would be found in having a trained arborist or forester (which our universities produce in good number) take a quick look at the standing timber to be serviced before the heavy equipment and large crews to service them need be dispatched. In many cases, the findings from such a survey will be that the trees in question will never have a hope of reaching the heights necessary to interfere with the power infrastructure, or that said area will not need trimming back for decades as the trees grow. In some other cases, corrective action will be necessary, but to do so without even a notification of or input and consent by the landowner or governing civic body runs counter to every expectation and right that we have as property owners and stewards. Without a thoughtful approach to how we treat public and private land and resources we will find ourselves the poorer for it, both for the loss of these resources and the undue expenditure of effort and funds by an entity acting ostensibly on behalf of the public. We owe our neighbors and our land better than that.

As a citizen of this Commonwealth, I am grateful for your time, careful attention and consideration during these proceedings.

Ben Aguilar
P.O. Box 7
Port Royal
Kentucky

The limestone bedrock that underlies parts of Lexington has intense sinkhole development potential. We have previously identified sinkholes in the area using both US Geological Survey topographic maps and, more recently, Kentucky's statewide airborne LiDAR data. LiDAR is a form of aircraft-based laser scanning that allows us to produce detailed topographic maps and computer models, even in heavily forested areas. We are fortunate to have statewide LiDAR coverage for Kentucky and have a computational lab at KGS established specifically to find new ways to use the LiDAR data to benefit Kentuckians. The sinkholes shown on our maps are in addition to personal experiences that Lexington residents may have had with sinkholes not identifiable using LiDAR data.

In a general sense, removing vegetation may exacerbate sinkhole problems in an area because it decreases the ability of the landscape to mitigate the effects of heavy rainfall. This occurs because more rain may reach the ground and, when it does reach the ground, the soil may have less capacity to absorb the rainfall if it is already saturated because vegetation has been removed. The net effect could be an increase in stormwater runoff, which can hasten sinkhole development in sinkhole prone areas. That said, it is a complicated problem and it would take a detailed hydrologic and geologic analysis of specific neighborhoods or properties to understand if KU's planned activities are likely to have an effect on sinkhole development in the Lexington-Fayette area.

William C. Haneberg, Ph.D., P.G.

State Geologist and Director, Kentucky Geological Survey
Research Professor of Earth & Environmental Sciences

University of Kentucky

226 Mining and Mineral Resources Building

Lexington KY 40506-0107

On May 31, 2022, at 9:28 AM, David O'Connor <David.OConnor@ferc.gov> wrote:

Ms. Broadbent.

Thank you for the inquiry, follow-up tried calling the number provided a few minutes ago and it went to a full voice mail (and then we spoke later).

With the information we were able to visit US Energy Information Administration website <https://www.eia.gov/maps/> and it appears the power lines that run through your neighborhood at 69,000V (69kV) lines.

The federal jurisdiction for the North American Electric Reliability Corporation (NERC) Reliability Standards are applicable to typical power lines that 100,000V (100kV) so the lines in questions would usually fall under state jurisdiction. You can find links to your state's Public Utilities Commission through this site: <http://www.naruc.org/about-naruc/regulatory-commissions/> and Kentucky Public Service Commission: <https://psc.ky.gov/>

My colleague and I will do a little more checking and get back to you.

David O'Connor
FERC