

**ICC Docket No. 11-0588**

**Commonwealth Edison Company's Response to  
The People of The State of Illinois ("AG") Data Requests**

**AG 6.01 – 6.39**

**Date Received: April 26, 2012**

**Date Served: May 9, 2012**

**REQUEST NO. AG 6.18:**

Please provide ComEd's policies regarding when and where tree trimming is not ComEd's responsibility as referenced on page 10 of ComEd Exhibit 8.0.

**RESPONSE:**

VM-ED-P025-1, Exelon West Standard Clearances for Distribution, states: ComEd will not trim trees along single-building service drops on private property.

Please see ComEd's Supplemental Response to Staff Data Request OUT 1.01 for VM-ED-P025-1.

Further, ComEd informs customers that it does not trim trees along single-building service drops on private property through door cards. See the attachments labeled as AG 6.18\_Attach 1 for the current door card, AG 6.18\_Attach 2 for the revised door card, and AG 6.18\_Attach 3 for its customer service representative talking points.

\_\_\_\_\_  
Date

\_\_\_\_\_  
Time

# Dear ComEd Customer,

Our representative visited your home today.

In response to your inquiry

Please be advised:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

An investigation was made in response to an inquiry we received. As no one was home at the time of our visit, please see the reverse side for the results of our investigation.

If additional information is desired, please call: \_\_\_\_\_

Representative \_\_\_\_\_

Telephone #: \_\_\_\_\_

Department: Vegetation Management

If you have any questions,  
please call us at

**1-800-Edison-1**  
1-800-334-7661



No immediate action is necessary. The trees in question will be trimmed on the regularly scheduled cycles.

The tree(s) interfering with the electric wires will be trimmed within the next few weeks.

The tree(s) scheduled for removal does not require topping by ComEd.

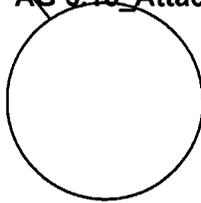
The tree(s) scheduled for removal require additional clearance to permit safe removal by you or your tree service contractor. To arrange for this service, you or your contractor must contact ComEd at the number below:

Upon inspection, we found no emergency to your lines from pole to home. ComEd's easement lines (top wires) from pole to pole will be trimmed on its normal maintenance cycle. If you called about tree limbs near the wiring going from the pole to your meter, it is the homeowner's responsibility to trim for this service wire. Please call us at 1-800-Edison-1 two days prior to scheduled trimming to request a service drop at no charge. This ensures that you or a private tree contractor can safely trim away limbs without interference from energized service lines. Once trimming is finished, ComEd will re-connect your service wire that same day.

Comments:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**1-800-Edison-1**  
1-800-334-7661



\_\_\_\_\_ Date

\_\_\_\_\_ Time

## Dear ComEd Customer,

- Our representative visited your home today
- In response to your inquiry

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- An investigation was made in response to an inquiry we received. As no one was home at the time of our visit, please see the reverse side for the results of our investigation.

If additional information is desired, please call the representative below during business hours (7am to 3:30pm).

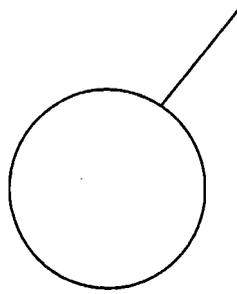
Representative: \_\_\_\_\_

Telephone #: \_\_\_\_\_

Department: Vegetation Management

If you have any questions please call us at:  
1-800-EDISON-1 (1-800-334-7661)





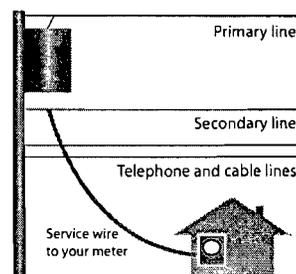
- No immediate action is necessary. ComEd trims trees for the primary line on regularly scheduled cycles. Any trees requiring trimming will be trimmed during this regular cycle.
- No trimming will be performed for the secondary line at this time.
- ComEd does not maintain trees for phone and/or cable lines.
- ComEd does not perform non-emergency tree trimming for the wire running directly to customers' meters (the service wire). If you called about tree limbs near the service wire, the current conditions do not warrant emergency trimming by ComEd. However, trimming trees near power lines is dangerous! If you plan to do any trimming on your own, or plan to hire a contractor to trim, please call us at **1-800-EDISON-1 (1-800-334-7661)** at least five days prior to your scheduled trimming. ComEd will drop your service wire, and once trimming is finished, ComEd will re-connect your service wire. There is no charge for this service.

#### *ComEd's Options for Tree Trimming Assistance*

Trimming trees near power lines is dangerous! ComEd can assist in trimming or removing any tree(s) near the power lines. You have a few options:

- For a fee, ComEd's qualified line clearance tree trimmers can provide clearance from primary or secondary lines so that a private contractor can safely trim or remove the rest of your tree. Please call the representative on the other side of the card to get more information about this service and a written estimate for the work.
- ComEd will, in certain cases, stop the electricity flowing through the power lines near your tree, allowing a private contractor to work safely near the de-energized lines. Please contact ComEd at **1-800-EDISON-1 (1-800-334-7661)** and request a "line maintenance investigation" (LMI).
- You could also consult a non-ComEd tree contractor that employs line clearance qualified tree trimmers (in accordance with industry safety requirements found in the current version of ANSI Z133.1-2006) to trim or remove your tree.

**Typical residential power line configuration**



**ComEd** | powering lives  
CSW 0006294

## Tree Trimming – Vegetation Management

Updated: 2/14/2012

This reference covers the following topics:

Tree Trimming and Vegetation Management at ComEd

Broken Trees or Branches or Emergency / Hazardous Conditions / Storm

Responding to Storm Damage (from [www.ComEd.com](http://www.ComEd.com))

Customer Received a Postcard –or- Request for a Vegetation Management Representative

Routine Cycle Tree Trimming (Pole-to-Pole wires)

Vegetation Management Dispute Process

Non-Emergency Trimming (Pole-to-Pole wires)

Customer Requests for Tree Topping (pole to pole wires)

Non-Emergency Trimming (Pole-to-House Wires)

Customer Arranged Trimming (Pole-to-House wires)

Escalation Process

Woodchips

Substation and Right-of-Way Mowing

Tree Trimming Policy Matrix

### Tree Trimming and Vegetation Management at ComEd

Please use the following guidelines:

- ComEd's Vegetation Management Department handles tree trimming requests, reports of broken trees and broken limbs, and grass mowing issues at substations and in transmission ROWs. Issue the appropriate service order or trouble ticket, depending on the call type.
- Inform the customer someone from Vegetation Management will contact them within 2 - 5 business days, under normal circumstances. Inform the customer that conditions may cause a delay in Vegetation Management's response of up to 8 business days.
- If the customer has not received a response within 5 business days, and/or has made multiple calls regarding the same issue, please follow the **Escalation Process** to contact Vegetation Management directly.
- ComEd has internal management staff for vegetation management, as well as contractors that perform inspections and tree trimming.
- Vegetation employees are required to have valid ComEd I.D or contractor's I.D.

Please see the **Tree Trimming Policy Matrix** below for further information.

- Much of this information on Tree Trimming is available on the [www.ComEd.com](http://www.ComEd.com) website.
  - [www.ComEd.com](http://www.ComEd.com) >> Customer Service >> Service Request >> Trees & Powerlines
  - [www.ComEd.com/trees](http://www.ComEd.com/trees)

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## **Broken Trees or Branches or Emergency / Hazardous Conditions / Storm**

- Tree trimming or tree removal may be necessary at any time in order to restore service or eliminate hazardous conditions from overhead lines.
- Brush clean up and disposal of brush is the responsibility of the customer.
- If ComEd trims or removes a tree to restore power to the customer, ComEd is not responsible for the debris, branches, or logs.
- If a customer reports that there is a **broken tree or broken tree limb on the wires or a broken tree or broken tree limb likely to fall on the wires**, whether the customer has power or not, process an **Electric Trouble order**:
  - Select **Electric Trouble** Iconic Push Button on the Bill Account window
  - Choose either **Pole-to-House** or **Pole-to-Pole**
  - Enter details in the **Comments** field (see questions below)
  - Process

## **Responding to Storm Damage (from www.ComEd.com)**

Trees and tree limbs damaged from strong winds and storms can threaten overhead electric lines and lead to service interruptions. To prevent service interruptions and eliminate potentially dangerous situations, ComEd emergency crews respond immediately to remove any damaged trees or tree limbs from contact with the electric lines.

If a customer observes a broken tree limb lying on a power line or likely to fall on a power line, it should be reported by calling 1-800-EDISON-1 (1-800-334-7661). Always advise customers to stay clear of tree limbs near power lines and do not make contact with the tree. If possible, customers should also notify neighbors to stay clear.

If there is the ability to safely observe the situation, customers should provide information that addresses the following questions in their report to ComEd:

- **Is the broken tree limb contacting power line or could it potentially fall on the power line?**
- **Is the power line between two poles, or between a pole and the home/building**
- **Are there any other potentially dangerous developments evident?**

**Please advise that ComEd clearance crews do not dispose of branches, logs or other debris associated with trees damaged by storms, ice, winds, or other natural circumstances.** Their first priority in response to any storm is to restore electric service to customers as quickly and safely as possible and to keep electrical facilities safe. Assisting customers with disposal of tree debris would impede their ability to respond to the large number of calls related to restoration of power or alleviation of safety concerns related to our facilities.

Tree trimming near electrical lines is very dangerous and should only be performed by professionals who have been trained to work around electrical lines. ComEd crews are specially trained to prune trees near power lines using the proper arboricultural techniques. ***Please note the corrective work may involve cutting the limbs from the tree and placing the tree limbs on the ground.***

## **Customer Received a Post Card –or- Request for a Vegetation Management Representative**

- Customers are notified of scheduled tree trimming via a postcard mailed to their service address by feeder. (see Routine Cycle Trimming below)
- This notification is required by Illinois State Law.
- If a customer requests to speak to a Vegetation Management Representative, please issue a Tree Trimming Investigation Service Order (see below); in the comments enter the request for a call back and a description of the request.

## **Routine Cycle Tree Trimming (Pole-to-Pole wires)**

- Trees will be trimmed or removed as required following notification to customers. The property owner's permission is not required.
- Customers may be asked to sign permits for tree removals.
- Waste branches resulting from tree trimming (non-emergency related) will be removed by the line clearance crew during routine cycle tree trimming.
- **Logs which cannot be put through the chipper will be cut in firewood lengths and left on site for the owner.**
- Service drops (pole-to-house wires) are not cleared during routine cycle tree trimming. (Refer to Tree Trimming Policy Matrix.)
- If a customer still has questions related to planned cycle trimming, please issue the service order.

### **Issue a Tree Trimming Investigation Service Order**

- Select **Actions/Account Actions/Service Order/Issue Investigation Service Order**
- Select **Order Details** from the Task List
- Select **Tree Trimming**
- Enter details of the request in the **Comments** field
- Select **Process**
- The customer should expect a response by phone within 2-5 days; ComEd will field inspect the tree and wires, per the customer's request.

## **Vegetation Management Dispute Process**

- Per an ICC mandate, property owners may appeal or dispute tree-trimming activities.
- ComEd must also make a dispute process available to these customers.
- As mandated, on our notification materials to customers, ComEd provides an 800 number allowing a customer to dispute or appeal the tree trimming activities. The CSR should follow the process below if a customer disputes tree trimming. This includes issuing a tree trimming service order, or if requested, a written statement (**CIMS Send Literature Code VEG**).
- This information is also available on [www.ComEd.com/trees](http://www.ComEd.com/trees)
- As part of the mandate, ComEd publishes monthly notices informing customers of planned tree trimming activities and the dispute process in the following publications, which appear the first Monday of every month:
  - Chicago Sun-Times
  - Chicago Tribune
  - Joliet Herald
  - Rockford Register Star
  - Daily Southtown

### CSR Responsibilities for Tree Trimming Disputes - Complaints:

- Issue a **Tree Trimming Investigation Service Order** in CIMS. For details on how to issue a Tree Trimming service order, see the **Routine Cycle Tree Trimming** section above.
- Clearly note in comments - **DISPUTE** - and provide additional details of the Customer's complaint, dispute or appeal.
- If the customer wishes to receive the above information in writing, send via the new CIMS Send Literature Code **VEG - Tree Trimming Inquiry**.
- Someone from Vegetation Management will respond to the customer's dispute.

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### Non-Emergency Trimming (Pole-to-Pole wires) – and -- Customer Requests for Tree Topping (Pole-to-Pole wires)

- If a customer reports trees growing into primary Wires (**Pole-to-Pole**):
  - **Issue a Tree Trimming Investigation Service Order**
    - Select **Actions/Account Actions/Service Order/Issue Investigation Service Order**
    - Select **Order Details** from the Task List
    - Select **Tree Trimming**
    - Enter details of the request in the **Comments** field
    - Select **Process**
- ComEd will field inspect the tree and wires, per the customer's request.
- **If the field inspector finds it necessary to trim away the tree branches before the regular cycle trim, the line clearance crew will complete the job. If the tree situation is not an emergency, the trees will be trimmed on the next regular cycle trimming. Please do not make any guarantees to the customer. The field inspector must inspect the situation to determine what action will be done.** The field inspector will provide follow up to customers in person, or via a phone call or door hanger, in response to their request.
- ComEd must inspect requests for removing trees & tree trimming adjacent to overhead high-voltage wires (**Pole-to-Pole**).
- Tree trimming within 10 feet of an energized high-voltage wire normally require trimming by a certified line clearance trimmer due to OSHA safety regulations.
- If the Vegetation Management Department determines the trimming needs to be performed by a certified line clearance trimmer, they will inform the owner.
- If the owner wishes, ComEd's Line Clearance Contractor can perform this work. **There may be a charge for this service.** This service is referred to as the **Top For Removal** Program.
- **Please DO NOT tell customers these services are free. Depending on the situation, there may or may not be a charge for this service.** Vegetation Management determines whether there will be a charge.
  - CSRs: Please do not speculate – or tell the customer this service is free for pole-to-pole wires.
- **All wood/debris** generated by the line clearance department performing this work **will be left on site** for the customer to dispose of.

This information is available on the ComEd website. [\(back to top\)](#)

### Non-Emergency Trimming (Pole-to-House wires)

- ComEd does not perform preventive tree trimming for service drops (pole-to-house wires).
- Please refer these customers to the "Customer Arranged Trimming" process for a line drop.
- For emergency situations, please refer to the "Broken Trees or Branches or Emergency / Hazardous Conditions"

section.

## Customer Arranged Trimming (Pole-to-House wires)

ComEd will temporarily disconnect a customer's service drop (pole-to-house) in order for the customer or the customer's contractor to perform work at the premise:

- Electrical repairs (NOTE: Refer electrical upgrades/revisions or service drop relocations to New Business – do NOT process using the LMI)
- Customer-hired contractor performing tree trimming around service drop (pole-to-house) (NOTE: ComEd performs tree trimming on primary (pole-to-pole wires) on a periodic basis. If customer requests that ComEd do pole-to-pole tree trimming off-cycle, process a Tree Trimming service order)
- Installation/removal of siding, painting, or other constructions work near the service drop

NOTE: There is no charge for a temporary disconnection of the service drop

NOTE: Emergencies and system problems will be priorities before temporary disconnection of service drops.

### **Advance notice required: 5 business days**

- For temporary disconnection of service drops (Pole-to-House) due to repairs or tree trimming, the customer should give Com Ed 5 business-days advance notice Monday through Friday (weather permitting) to temporarily disconnect the power.
- Advise the customer that ComEd performs this type of work between the hours of 10 a.m. – 2 p.m. on normal business days (M-F).
- If the customer requests that this work be done on a weekend or holiday, or outside the 10 a.m. – 2 p.m. window, advise the customer that ComEd will attempt to satisfy their requested date/time, and that someone will contact them to schedule the job if there are any problems scheduling the work.
- For same day restoration, inform customer to call back when work is completed, prior to 2 p.m.

If an appointment is canceled due to bad weather, the company (Operations Work Control Coordinator) will notify the customer if possible and will reschedule the work.

## Customer Requests Service drop Disconnection – Issue Line Maintenance Investigation (LMI):

- Select **Actions / Account Actions / Service Orders / Issue Investigation Order**
- Select **Order Details** from the **Task List**
- Select **Line Maintenance Investigation** from the dropdown
- Record the essential information required to complete the customer's request:
- Enter the customer's requested date in the **Date Wanted** field

**NOTE:** Advise the customer that we need 5 business-day advance notice to preferred lead-time for a customer requested outage (disconnect the service drop) requires a 5 business-day advance notice must be given and a *preferred time*. (Do not guarantee this time and do not imply that an appointment has been made).

- Enter details about the customer's request in the in the **Comments** field.
  - Contact information: name and phone number. If the request is from a tree contractor, make sure to obtain the name of tree service and contact name and phone #.

- Preferred date and time of day for the outage
- Description of the work that needs to be done
- Select **Process**

### **Customer Requests Service drop Reconnection – Issue Electric Trouble order:**

Issue Electric Trouble order via:

- Select **Electric Trouble** Iconic Push Button on the Bill Account window
- Select **Other Potential Danger**
- Enter detailed comments.
  - State “Reconnect service drop” and include reason (e.g., Tree trimming work completed or bill paid customer cut at pole)
  - Provide contact name and phone number
- Process

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### **Escalation Process**

- If a customer has called 3 times or more without a response or progress on an issue, or **if any trouble ticket or service order has been issued, and the request has not been resolved to the customer’s satisfaction in 5 business days:**
  - Send an email to the **Vegetation Management** mailbox in Outlook
  - Include the customer name, address (including city), call back number (including area code), account number and a brief description of the inquiry.
  - The Vegetation Management mailbox is reviewed daily.
  - Inform customers they will receive a call back from Vegetation Management by the following business day.
- Remember to ask if it is a service drop (Pole-to-House). ComEd does NOT trim trees for service drops, with the exception of some broken tree limbs. See **Customer Arranged Trimming – Pole-to-House wires** for details.

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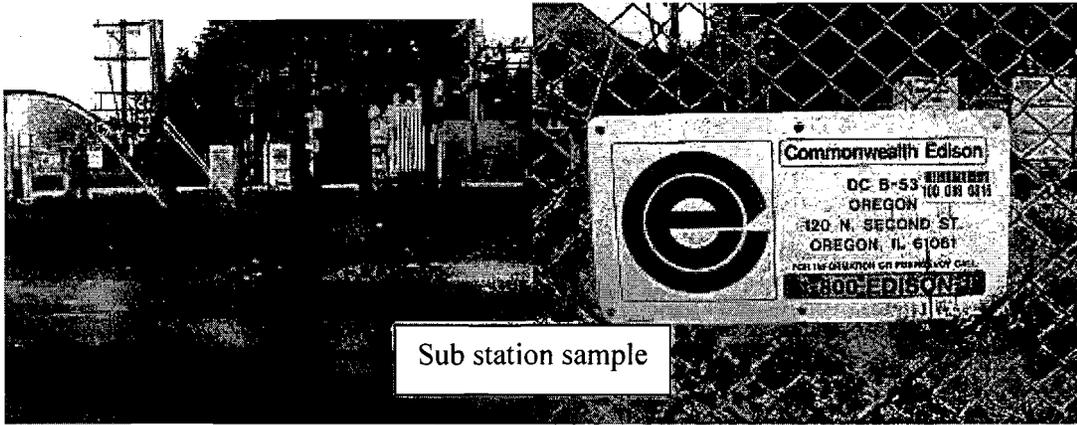
### **Woodchips**

Woodchips generated in tree trimming maintenance are **SOMETIMES** available to customers, at the discretion of the Vegetation Management Department. Please issue a Tree Trimming Investigation service order, and advise the customer that they will receive a call back from a Vegetation Management representative for follow up within 2 to 5 days.

### **Substation and Right of Way Mowing**

Select ComEd owned property is maintained by ComEd on a schedule from May thru October.

**Sub Stations** will have address labels located on the entrance gates/doors/buildings identifying the name and address along with ComEd on the label. They will also have equipment/transformers located on or near the ground that will be enclosed with fencing or brick walls.



The grass around substations will receive approximately 20 mows from May through October. This includes mowing, line trimming around obstacles and cleanup of any garbage, cans, papers etc.

**Transmission Corridors / Right of Ways** in residential areas under the steel towers will be mowed 5 times from May thru October. This includes rough mowing, line trimming around obstacles, cleanup of any garbage, cans, papers, etc.

NOT ALL COMED OWNED TRANSMISSION CORRIDORS ARE MOWED.



**Distribution Lines** No mowing is performed under distribution lines/wooden poles.

Please issue a Tree Trimming Investigation Service Order for customers with further questions.

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## Tree Trimming / Vegetation Management Policy Matrix

	Emergency Hazardous Condition	Routine, Scheduled (Cycle)		Special Customer Requests	
<b>Listen For:</b>	Broken tree, uprooted tree, broken branch or limb, burnt branches on or above wires	Received a postcard, speak to a Veg Mgmt Representative, tree growth near pole-to-pole wires	Tree near service drop or pole-to-house wires	Tree Trim, tree removal, dead tree topping requested near pole-to-pole wires	Tree Trim, tree removal, dead tree topping requested near service drop
<b>Wire Type:</b>	Primary, Secondary, or Services	Primary, Secondary (Pole-to-pole)	Services (Pole-to-house)	Primary (Pole-to-pole)	Service (Pole-to-house)
<b>Tree Trimming Policy</b>	Trees shall be trimmed to restore service or eliminate hazardous conditions i.e.: broken limbs on wires	After inspection all trees in need of line clearance trimming will be trimmed to ComEd specs.	No routine trimming will be done for service drops.  (See service drop policy at right)	Non-emergency requests will be deferred until routine cycle trimming.	No trimming will be done for service drop ( <b>Pole-to-Residence</b> )
<b>Tree Removal Policy</b>	Trees may be removed when required to restore service or eliminate hazardous conditions involving overhead conductors	Trees will be removed following inspection and notification of property owner or when necessary within easement.	No removals will be done for service drops ( <b>Pole-to-House</b> ).  (See service drop policy at right)	After inspection ANSI clearance will be provided for the customer or customer's contractor to safely remove the tree. Written permission of homeowner required. <b>NOTE: There is a charge for this service.</b>	No removals will be done for service drop ( <b>Pole-to-House.</b> ).  <b>Service Drop Policy</b>  Trees shall not be trimmed or removed clear services. The Operations Dept. will drop services to allow customers or their contractors to trim a tree or remove a tree. Customer Service Rep. will issue a ticket to the Operations Dept to arrange the service drop, at least 5 workdays are required schedule the drop Operating will not drop services without customer or contractor on-site.  Operations Dept. will notify customer of schedule changes.
<b>Brush Cleanup &amp; Disposal Policy</b>	Debris will be cleared off wire and left on site as is. Disposal of debris is the responsibility of the owner of tree.	All tree limbs and brush, which can be chipped by crew, shall be removed from work site. Logs, which cannot be chipped, will be cut into firewood length and left on site.		If tree is trimmed or removed at the customer's request all wood and debris will be left on site as is.	
<b>CSR Process:</b>	<p><b>Process Electric Trouble Ticket:</b></p> <ul style="list-style-type: none"> <li>Select <b>Electric Trouble</b> Iconic Push Button on the Bill Account window.</li> <li>Choose either <b>Pole-to-House</b> or <b>Pole-to-Pole</b></li> <li>Enter details in the <b>Comments</b> field</li> <li>Select <b>Process</b></li> </ul>	<p><b>Issue a Tree Trimming Investigation Service Order</b></p> <ul style="list-style-type: none"> <li>Select <b>Actions/Account Actions/Service Order/Issue Investigation Service Order</b></li> <li>Select <b>Order Details</b> from the Task List</li> <li>Select <b>Tree Trimming</b></li> <li>Enter details of the request in the <b>Comments</b> field</li> <li>Select <b>Process</b></li> </ul>	Advise customer of Service Drop Policy (at right)	<p><b>Issue a Tree Trimming Investigation Service Order</b></p> <ul style="list-style-type: none"> <li>Select <b>Actions/Account Actions/Service Order/Issue Investigation Service Order</b></li> <li>Select <b>Order Details</b> from the Task List</li> <li>Select <b>Tree Trimming</b></li> <li>Enter details of the request in the <b>Comments</b> field</li> <li>Select <b>Process</b></li> </ul>	Advise customer of Service Drop Policy