

September 15, 2009

Ms. Renee J. Jenkins
Director, Administration Department
Secretary to the Commission
Docketing Division
The Public Utilities Commission of Ohio
180 Broad Street
Columbus, OH 43215-3793

Ms. Doris McCarter
Director, Service Monitoring and Enforcement Department
Public Utilities Commission of Ohio
180 East Broad Street
Columbus, Ohio 43215-3793

Re: Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, the "Companies") programs for inspection, maintenance, repair, and replacement of transmission and distribution circuits and equipment required under O.A.C. 4901:1-10-27(E); and requests for revisions and amendments to that program pursuant to O.A.C. 4901:1-10-27(F).

Dear Ms. Jenkins and Ms. McCarter:

Enclosed for filing, please find revised pages to Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company vegetation management programs for inspection, maintenance, repair, and replacement of transmission and distribution circuits and equipment, pursuant to O.A.C. 4901:1-10-27(F),

Should you have any questions, please feel free to call me at 330-384-5969.

Very truly yours,

A handwritten signature in cursive script that reads "Ebony L. Miller".

Ebony L. Miller

Enclosures

Ohio Edison Company ("Ohio Edison")

Inspection, Maintenance, Repair and Replacement
Programs

Program Description

Pursuant to Ohio Administrative Code ("O.A.C") 4901:1-10-27(E)(1)(f), Ohio Edison Company ("Ohio Edison") hereby requests to revise its current distribution vegetation management program. Ohio Edison performs vegetation management to help ensure the continued safe and reliable operation of the distribution system. The Standard Specification for vegetation management is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. Ohio Edison's currently approved vegetation specification provides vegetation to be pruned to achieve 4 years of clearance, removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to receive the Standard Specification as well as enhanced vegetation removal techniques, which includes removal of certain healthy limbs, based on tree species and condition, which overhang primary conductors.

For portions of a circuit that have not experienced a primary voltage interruption due to a vegetation-caused outage over the period of a 4 year cycle (subject to the levelization process), a proactive Inspect/Maintain process will target selective vegetation removal for continued reliable system operation. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the Standard Specification.

The Inspect/Maintain Specification may be utilized to levelize Ohio Edison's circuits over the period 2010-2013. This levelization process is necessary due to a disproportionate workload associated with the circuits scheduled for maintenance in certain years. The levelization process enables Ohio Edison to make responsible vegetation management decisions, without an impact to the safe and reliable performance of the distribution system, when shifting work from one calendar year to the next, and could also be used on circuits designated for Enhanced or Standard Specification work processes. Ohio Edison plans to complete the levelization by the end of 2013.

Corrective Maintenance

Corrective maintenance methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment-mounted saws, mowers or other devices, and various herbicide application techniques such as, selective basal herbicide applications, stem foliage applications and cut stubble applications.

Justification

Distribution vegetation management activities are performed in accordance with the following:

- Applicable statutory law and regulations.
- Generally accepted industry practices.
- All routine vegetation clearing work is performed in compliance with ANSI Z133.1 and A-300 Standards and according to the requirements given by OSHA and the National Electrical Safety Code (NESC).

Nothing in this Vegetation Management Program, the Company's Contractor Guidelines or the Commission rules and regulations is intended to limit or modify the grant of legal rights to the Company under a right-of-way or easement. To the extent that a question arises regarding the legal rights, including the existence and scope of easements and right-of-ways, such questions remain in the exclusive jurisdiction of a court of law.

The Cleveland Electric Illuminating Company (“CEI”)

Inspection, Maintenance, Repair and Replacement
Programs

Revised Distribution Vegetation Management Inspection, Maintenance, Repair and Replacement Program

Program Description

Pursuant to Ohio Administrative Code ("O.A.C") 4901:1-10-27(E)(1)(f), The Cleveland Electric Illuminating Company ("CEI") hereby requests to revise its current distribution vegetation management program. CEI performs vegetation management to help ensure the continued safe and reliable operation of the distribution system. The Standard Specification for vegetation management is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. CEI's currently approved vegetation specification provides vegetation to be pruned to achieve 4 years of clearance, removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to receive the Standard Specification as well as enhanced vegetation removal techniques, which includes removal of certain healthy limbs, based on tree species and condition, which overhang primary conductors.

For portions of a circuit that have not experienced a primary voltage interruption due to a vegetation-caused outage over the period of a 4 year cycle (subject to the levelization process), a proactive Inspect/Maintain process will target selective vegetation removal for continued reliable system operation. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the Standard Specification.

The Inspect/Maintain Specification may be utilized to levelize CEI's circuits over the period 2010-2013. This levelization process is necessary due to a disproportionate workload associated with the circuits scheduled for maintenance in certain years. The levelization process enables CEI to make responsible vegetation management decisions, without an impact to the safe and reliable performance of the distribution system, when shifting work from one calendar year to the next, and could also be used on circuits designated for Enhanced or Standard Specification work processes. CEI plans to complete the levelization by the end of 2013.

Corrective Maintenance

Corrective maintenance methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment-mounted saws, mowers or other devices, and various herbicide application techniques such as, selective basal herbicide applications, stem foliage applications and cut stubble applications.

Revised Distribution Vegetation Management Inspection, Maintenance, Repair and Replacement Program

Justification

Distribution vegetation management activities are performed in accordance with the following:

- Applicable statutory law and regulations.
- Generally accepted industry practices.
- All routine vegetation clearing work is performed in compliance with ANSI Z133.1 and A-300 Standards and according to the requirements given by OSHA and the National Electrical Safety Code (NESC).

Nothing in this Vegetation Management Program, the Company's Contractor Guidelines or the Commission rules and regulations is intended to limit or modify the grant of legal rights to the Company under a right-of-way or easement. To the extent that a question arises regarding the legal rights, including the existence and scope of easements and right-of-ways, such questions remain in the exclusive jurisdiction of a court of law.

The Toledo Edison Company (“Toledo Edison”)

Inspection, Maintenance, Repair and Replacement
Programs

Program Description

Pursuant to Ohio Administrative Code ("O.A.C") 4901:1-10-27(E)(1)(f), The Toledo Edison Company ("Toledo Edison") hereby requests to revise its current distribution vegetation management program. Toledo Edison performs vegetation management to help ensure the continued safe and reliable operation of the distribution system. The Standard Specification for vegetation management is designed to support line reliability, maintain access, make repairs, or restore service and to support safe and reliable service. Toledo Edison's currently approved vegetation specification provides vegetation to be pruned to achieve 4 years of clearance, removal of selected incompatible trees within the clearing zone corridor, removal of certain defective limbs that are overhanging primary conductors, controlling selected incompatible brush mechanically and/or using herbicide, and removal of off-corridor priority trees that are dead, dying, diseased, and leaning or significantly encroaching the corridor.

Portions of a circuit that experience high customer interruption minutes due to vegetation-caused outages may be targeted to receive the Standard Specification as well as enhanced vegetation removal techniques, which includes removal of certain healthy limbs, based on tree species and condition, which overhang primary conductors.

For portions of a circuit that have not experienced a primary voltage interruption due to a vegetation-caused outage over the period of a 4 year cycle (subject to the levelization process), a proactive Inspect/Maintain process will target selective vegetation removal for continued reliable system operation. This process involves inspection of the vegetation to evaluate the extent of potential for vegetation to interfere with energized conductors. Factors to consider in the evaluation are the voltage and height of the conductor, the type of tree, its growth rate and branching habit. Trees that will impact safety or reliability will be maintained to the Standard Specification.

The Inspect/Maintain Specification may be utilized to levelize Toledo Edison's circuits over the period 2010-2013. This levelization process is necessary due to a disproportionate workload associated with the circuits scheduled for maintenance in certain years. The levelization process enables Toledo Edison to make responsible vegetation management decisions, without an impact to the safe and reliable performance of the distribution system, when shifting work from one calendar year to the next, and could also be used on circuits designated for Enhanced or Standard Specification work processes. Toledo Edison plans to complete the levelization by the end of 2013.

Corrective Maintenance

Corrective maintenance methods used to manage and control vegetation include manual control methods using hand-operated tools, mechanical control using equipment-mounted saws, mowers or other devices, and various herbicide application techniques such as, selective basal herbicide applications, stem foliage applications and cut stubble applications.

Justification

Distribution vegetation management activities are performed in accordance with the following:

- Applicable statutory law and regulations.
- Generally accepted industry practices.
- All routine vegetation clearing work is performed in compliance with ANSI Z133.1 and A-300 Standards and according to the requirements given by OSHA and the National Electrical Safety Code (NESC).

Nothing in this Vegetation Management Program, the Company's Contractor Guidelines or the Commission rules and regulations is intended to limit or modify the grant of legal rights to the Company under a right-of-way or easement. To the extent that a question arises regarding the legal rights, including the existence and scope of easements and right-of-ways, such questions remain in the exclusive jurisdiction of a court of law.

This foregoing document was electronically filed with the Public Utilities

Commission of Ohio Docketing Information System on

9/15/2009 3:27:37 PM

in

Case No(s). 09-0802-EL-ESS

Summary: Request Ohio Edison Company, The Cleveland Electric Illuminating Company and The Toledo Edison Company (collectively, the "Companies") programs for inspection, maintenance, repair, and replacement of transmission and distribution circuits and equipment required under O.A.C. 4901:1-10-27(E); and requests for revisions and amendments to that program pursuant to O.A.C. 4901:1-10-27(F). electronically filed by Ms. Ebony L Miller on behalf of American Transmission Systems, Inc. and Ohio Edison Company, The Cleveland Electric Illuminating Company, The Toledo Edison Company