

BEFORE THE PUBLIC UTILITIES COMMISSION OF OHIO

Daniel R. Birrell,)	
)	
Complainant,)	
)	
v.)	Case No. 16-2281-EL-CSS
)	
Ohio Power Company,)	
)	
Respondent.)	

**REPORT OF OHIO POWER COMPANY DOCUMENTING COMPLIANCE WITH
VEGETATION MANAGEMENT PLAN**

In its April 3, 2019 Opinion and Order (“Order”) denying the above-captioned complaint filed against Ohio Power Company (“AEP Ohio” or the “Company”), the Public Utilities Commission of Ohio (“Commission”) directed AEP Ohio to file a report that “detail[s] the efforts taken by the Company since 2014 on the West Lafayette School distribution circuit to ensure continuing compliance with its Commission-approved vegetation management plan * *

*.” Order at ¶ 33. In compliance with the Commission’s Order, AEP Ohio submits the following report regarding its vegetation management efforts on the West Lafayette School distribution circuit (Circuit 7104802) (the “Circuit”).

Consistent with the Company’s Commission-approved Right-of-Way Vegetation Control program (the “Program”),¹ AEP Ohio fully trimmed the Circuit in 2018. Trimming began February 27, 2018, and vegetation management activities on the Circuit were complete by June 30, 2018.

¹ AEP Ohio implements its Commission-approved Program through a four-year trimming cycle of all distribution lines, including those that run in tandem with transmission lines, for its vegetation management program. *See In re the Commission’s Review of Ohio Power Company’s Revised Vegetation Management Program Resulting from Commission Case No. 11-346-EL-SSO, et al.*, Case No. 12-3320-EL-ESS, Finding and Order (Feb. 26, 2014).

AEP Ohio's 2018 vegetation management activities on the Circuit complied with both the Program and the Company's clearing guidelines. Specifically, the Company inspected the circuit for new vegetation growth and trees were trimmed and removed to provide ample clearances from conductors and appurtenances. AEP Ohio engages in the following vegetation management activities within its right-of-way throughout its service territory, including on the Circuit:

- a) Removing or trimming trees;
- b) Chemically treating trees up to 12 feet tall;
- c) Trimming mature trees that, although not currently in the distribution line, could potentially be a danger to the distribution line within a four-year period;
- d) Mowing overgrown right-of-way with a follow-up herbicide application, where possible; and
- e) Removing overhang on trees when the limb structure is not sufficient to support the load in adverse weather conditions.

Tree removals within the Company's rights-of-way are emphasized to promote long-term vegetation control. Soft-wooded, fast-growing trees are removed, where possible. If not removed, fast growing trees are trimmed to greater distances than slower growing varieties in order to minimize potential regrowth near a distribution line before the next trimming cycle.

In addition to its Program-based vegetation management activities described above, the Company has performed spot trimming of the Circuit between 2015 and the present. During an August 2017 site visit to Complainant's property, which is served by the Circuit, AEP Ohio and Commission Staff observed areas of the Circuit that reflected that the Company had recently performed spot trimming work. Further, given their often significant impact on distribution system reliability, the Company has recently increased the priority of removing danger trees from outside of its right-of-way that pose a threat to the Company's distribution facilities. The Company's efforts to remove danger trees from outside of its right-of-way for this Circuit began in June 2018. That effort is ongoing and requires permission from property owners whose

danger trees create a threat to the Company's facilities. AEP Ohio expects to complete its outside-of-right-of-way vegetation management work around the Circuit by the end of June 2019.

Respectfully submitted,

/s/ Christen M. Blend

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**Counsel for Respondent
Ohio Power Company**

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing has been served upon the individual listed below via U.S. mail, postage prepaid, this 1st day of May, 2019.

Daniel R. Birrell
22000 Emerson Street
West Lafayette, Ohio 43845

Complainant

/s/ Christen M. Blend

Christen M. Blend

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Summary: Report - Report of Ohio Power Company Documenting Compliance with Vegetation Management Plan electronically filed by Ms. Christen M. Blend on behalf of Ohio Power Company