


SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management Program	Methodology	Doc. No.	UVM-03	 <div>SOUTHERN CALIFORNIA EDISON[®] Energy for What's AheadSM</div>
				Version	4	
Effective Date		9/1/19				
Supersedes		Version 3				
Distribution Vegetation Management Plan (DVMP)						

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**THIS DOCUMENT IS REQUIRED TO BE MAINTAINED IN ACCORDANCE
WITH ERCP COMPLIANCE DOCUMENT REQUIREMENTS**

UVM-03

Utility Vegetation Management Distribution Vegetation Management Plan (DVMP)




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1 Introduction

1.1 Purpose


Southern California Edison (SCE) maintains a reliable electric distribution system by managing vegetation located under and adjacent to electric conductors in order to minimize the risk of encroachments into the specified clearance zones.

1.2 Objectives

The SCE Distribution Vegetation Management Plan (DVMP) is designed to improve the reliability of SCE's distribution system and to comply with regulatory requirements established by the California Public Utilities Commission (CPUC) General Order (GO) 95, California Public Resource Codes (PRC), and Title 14 California Code of Regulations (CCR) by establishing maintenance and inspection procedures to:

- Manage vegetation to prevent vegetation encroachment into the clearance zones under normal conditions as stated in the following regulations, as applicable. During Force Majeure¹ events it may not be possible to ensure that an encroachment into the clearance zones will not occur.
 - GO 95, Rule 35 (Case 13 and Case 14)
 - GO 95, Rule 37
 - PRC Section 4292
 - PRC Section 4293
 - CCR Sections 1250-1258
- Document the maintenance procedures and processes used to manage vegetation to prevent the encroachment into the clearances described in the regulations noted above.
- Include consideration of 1) conductor (line) dynamics 2) vegetation movement during high winds (tree dynamics), and 3) the interrelationships between vegetation growth rates, control methods and inspection frequency.
- Provide timely notification to the appropriate Vegetation Management Operations (VM) Senior Specialist (SSP) or Manager of vegetation conditions that could cause a flash-over or Fault.
- Implement corrective actions to prevent encroachments into the clearance distances described in the regulations noted above due to work constraints.
- Inspect vegetation conditions annually or more frequently, as needed.
- Complete the annual work needed to prevent encroachments into the clearance distances described in the regulations noted above.

¹ Circumstances that are beyond a utility's control, including natural disasters such as earthquakes, fires, tornados, hurricanes, landslides, wind shear, fresh gale, major storms, ice storms, and floods; human or animal activity such as logging, animal severing tree, vehicle contact with tree, or installation, removal, or digging of vegetation. Definition is from NERC Reliability Standard FAC-003-4.

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2 Applicability

2.1 Operating Units

This document is applicable to the OUs impacted by the Energy Regulatory Compliance Program (ERCP) Compliance Requirements related to Vegetation Management, including but are not limited to:

- Transmission & Distribution (Distribution)
- Generation

2.2 Distribution Facilities

Distribution lines and equipment that are operated at 2.4 kV to 69 kV with the exception of those lines that are part of the defined Bulk Electric System or are an element of a Major Western Electricity Coordinating Council (WECC) Transfer Path or an element of an Interconnection Reliability Operating Limit (IROL)², which are managed according to SCE's Transmission Vegetation Management Plan (TVMP).

3 Definitions

Refer to the NERC Glossary of Terms, the E&C Shared Services Glossary of Terms (ECSS-02), and UVM Program Glossary of Terms (UVM-16) for any capitalized terms used in this document.

4 Details

4.1 Encroachments

4.1.1 GO 95, Rule 35 and Rule 37


Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities are to be performed to establish and maintain necessary and reasonable clearances. Minimum clearances are established in Cases 13 and 14 of Rule 35.

- For distribution lines and equipment located in Non-fire areas, GO 95, Rule 35 (Case 13) applies.
- For distribution lines and equipment located in Extreme (Tier 3) and Very High (Tier 2) fire areas, GO 95, Rule 35 (Case 14) applies.

Strategy and Supporting Documentation

In order to prevent an encroachment into the Regulation Clearance Distance (RCD) described in Table 1 and Table 2 below, SCE or its approved contractor will inspect and manage all vegetation under and adjacent to its applicable lines operating under normal conditions. During the inspection and completion of work, movement of the line conductors, movement of the vegetation, and vegetation growth shall be taken into consideration.

² Major WECC Transfer Paths and IROLs are managed as described in SCE's Transmission Vegetation Management Plan (TVMP)

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Confirmation that SCE or its approved contractor managed vegetation to prevent encroachments into the RCD will include:

- Attachment A: Utility Vegetation Management (UVM) Inspection Report / Grid Cover Sheet
- Attachment B: UVM Post Work Verification Report
- UVM Annual Work Plan

Vegetation inspections and maintenance should be completed annually or more often as deemed necessary. SCE or its approved contractor will verify the completion of annual vegetation maintenance.

4.1.2 Public Resource Code (PRC) § 4292


Any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or forest covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for fire protection of such areas, maintain around and adjacent to any pole or tower which supports a switch, fuse, transformer, lightning arrester, line junction, or dead end or corner pole, a firebreak which consists of a clearing of not less than 10-feet in each direction from the outer circumference of such pole or tower (see Figure 2).

4.1.3 Title 14, California Code Regulations (CCR) Section § 1254 – Minimum Clearance Provisions PRC § 4292

The firebreak clearances required by PRC § 4292 are applicable within an imaginary cylindrical space surrounding each pole or tower on which a switch, fuse, transformer or lightning arrester is attached and surrounding each dead-end or corner pole, unless such pole or tower is exempt from minimum clearance requirements by provisions of Title 14, CCR, § 1255 or PRC § 4296. The radius of the cylindroid is 3.1 m (10 feet) measured horizontally from the outer circumference of the specified pole or tower with height equal to the distance from the intersection of the imaginary vertical exterior surface of the cylindroid with the ground to an intersection with a horizontal plane passing through the highest point at which a conductor is attached to such pole or tower. Flammable vegetation and materials located wholly or partially within the firebreak space shall be treated as follows:

Distribution lines and equipment located in Fire areas where PRC § 4292 applies:

- At ground level - remove flammable materials, including but not limited to, ground litter, duff and dead or desiccated vegetation that will allow fire to spread, and;
- From 0 - 2.4 m (0-8 feet) above ground level remove flammable trash, debris or other materials, grass, herbaceous and brush vegetation. All limbs and foliage of living trees shall be removed up to a height of 2.4 m (8 feet).
- From 2.4 m (8 feet) to horizontal plane of highest point of conductor attachment remove dead, diseased or dying limbs and foliage from living sound trees and any dead, diseased or dying trees in their entirety.

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Strategy and Supporting Documentation

In order to prevent vegetation growth and maintain a firebreak at the base of poles that support non-exempt equipment, SCE or its approved contractor will inspect and manage vegetation at the base of poles, in accordance with PRC 4292 where feasible and permissible. In Tier 2 and Tier 3, SCE or its approved contractor will clear the base of exempt poles or apply a fire retardant to the base of the pole in a 10 foot radius.

Confirmation that SCE or its approved contractor managed vegetation to prevent vegetation growth at the base of poles that support non-exempt equipment shall include:

- Attachment A: UVM Inspection Report / Grid Cover Sheet
- Attachment B: UVM Post Work Verification Report
- UVM Annual Work Plan

Vegetation inspections and maintenance should be completed annually or more often as deemed necessary. SCE or its approved contractor will verify the completion of annual vegetation maintenance. Maintenance work will be reviewed in accordance with the requirements established in Procedure UVM-07, "Post Work Verification and UVM Program Oversight" to provide reasonable assurance the work is completed in accordance with the work specification.

4.1.4 Public Resource Code (PRC) § 4293


Any person that owns, controls, operates, or maintains any electrical transmission or distribution line upon any mountainous land, or in forest-covered land, brush-covered land, or grass-covered land shall, during such times and in such areas as are determined to be necessary by the director or the agency which has primary responsibility for the fire protection of such areas, maintain a clearance of the respective distances in all directions between all vegetation and all conductors which are carrying electric current

Strategy and Supporting Documentation

In order to prevent an encroachment into the RCD described in Table 1 below, SCE or its approved contractor will inspect and manage all vegetation under and adjacent to its applicable lines, as described in Section 2 above, operating under normal conditions. During the inspection and the completion of work, movement of the line conductors, movement of the vegetation, and vegetation growth shall be taken into consideration.

Confirmation that SCE or its approved contractor managed vegetation to prevent encroachments into the RCD shall include:

- Attachment A: UVM Inspection Report / Grid Cover Sheet
- Attachment B: UVM Post Work Verification Report
- UVM Annual Work Plan

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Vegetation inspections and maintenance should be completed annually or more often as deemed necessary. SCE or its approved contractor will verify the completion of annual vegetation maintenance.

Maintenance Work Validation

Maintenance work will be validated in accordance with UVM-07, "Post Work Verification and UVM Program Oversight," to provide reasonable assurance the work is completed in accordance with the work specification.

5 Clearance Requirements

5.1 Distribution Lines

Based on the conditions described below, the subsequent processes are to be used to establish the clearance requirements in the Encroachment Zones:

5.1.1 Fire Areas (reference Table 1)

Applicable regulations:

1. PRC § 4293
2. GO 95, Rule 35, Case 14

Grid Resiliency Clearance Distances (GRCD) are established to mitigate fire risk and maintain compliance with PRC § 4293 and GO 95, Rule 35 requirements.

- GRCD-A and GRCD-B are to be established at time of maintenance work based on line voltage
- Trigger Clearance Distance³ (TCD) for UVM work to be initiated based on line voltage
- Compliance Clearance Distances⁴ (CCD) to be maintained at all times based on line voltage
- Drop-in Zone is to be cleared of all vegetation as appropriate

5.1.2 Non-Fire Areas (reference Table 2)

Applicable regulation:


1. GO 95, Rule 35, Case 13

GRCDs are established to maintain compliance with GO 95, Rule 35 requirements.

- GRCD-A and GRCD-B are to be established at time of maintenance work based on line voltage
- CCD to be maintained at all times based on voltage

³ TCD = CCD + 3-feet

⁴ CCD = RCD x 1.5 (Safety Margin) rounded up

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5.1.3 Restricted Areas

Restricted Areas may result in conditions preventing the GRCD-A or GRCD-B, TCD or CCD for Tables 1 or 2 from being implemented. Examples may include crops, orchards, environmentally sensitive areas or lack of easement rights.

When restricted areas are encountered and the clearances specified in Tables 1 or 2 cannot be achieved, then:

- GRCD-A or GRCD-B can be modified and documented to address the specific circumstances or restrictions at each specific location
- Ensure sufficient clearance is achieved to maintain RCD for 12 months

5.1.4 Low Voltage Lines (Fire and Non-Fire Areas)

Low voltage lines, 750 volts and below, are categorized as follows:


- Secondary – Pole to pole
 - Aerial Cable or Open Wire (Insulated or Uninsulated)
- Service Drop – Pole to weatherhead
 - Triplex and Quadruplex (Bundled), or Open Wire

Low voltage line clearances are described in Tables 1 and 2.

Fire Areas						
PRC 4293 and GO 95, Rule 35, Extreme and Very High Fire Areas (Case 14)						
Nominal Voltage	Grow-in Zone Clearance Distance at Time of Maintenance GRCD-A	Blow-in Zone Clearance Distance at Time of Maintenance GRCD-B	Grow-in & Blow-in Zones Clearance Distance that Triggers Work TCD	Grow-in & Blow-in Zones Clearance Distance to be Maintained for Compliance CCD	Drop-in Zone	Regulation Clearance Distance RCD
2.4 - 69kV	12' ⁵	12'	9'	6'	Clear of all Vegetation where Practical	4.0'
2.4 – 12kV Aerial Cable	4'	4'	Strain or abrasion	n/a	n/a	No strain or abrasion
≤ 750 volts Open Wire, Aerial and Bundled	4'	4'	Strain or abrasion	n/a	n/a	No strain or abrasion

Table 1: Clearance Distances – Fire Areas

⁵ GO 95 Rule 35 Appendix E recommended clearance (Case 14)


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Non-Fire Areas						
GO 95, Rule 35 (Case 13)						
Nominal Voltage	Grow-in Zone Clearance Distance at Time of Maintenance GRCD-A	Blow-in Zone Clearance Distance at Time of Maintenance GRCD-B	All Zones Clearance Distance that Triggers Work TCD	All Zones Clearance Distance to be Maintained for Compliance CCD	Drop-in Zone	Regulation Clearance Distance RCD
2.4 - 69kV	6 ⁶⁷	6'	n/a	3'	Clear of all Vegetation where Practical	1.5'
2.4 – 12kV Aerial Cable	4'	4'	Strain or abrasion	n/a	n/a	No strain or abrasion
≤ 750 volts Open Wire, Aerial and Bundled	4'	4'	Strain or abrasion	n/a	n/a	No strain or abrasion

Table 2: Clearance Distances – Non-Fire Areas

⁶ Although GO95 Rule 35 Appendix E Case 13 (non-Fire Areas) recommends 4' clearance for 2.4kV to 72kV, SCE is adopting a 6' clearance

⁷ Required vegetation maintenance shall ensure RCD for 12 months

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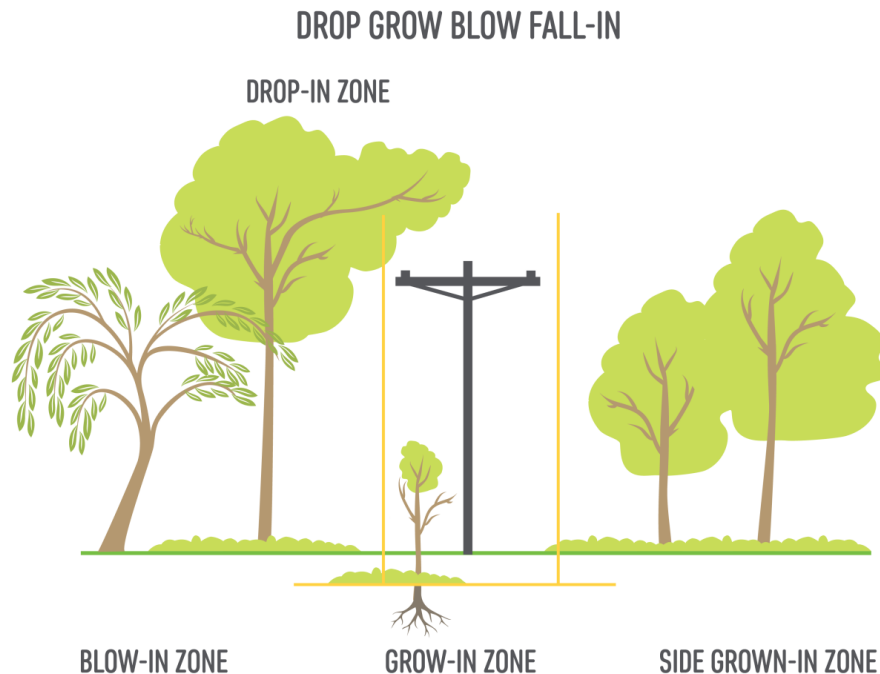



Figure 1: Encroachment Zones

- Vegetation in the Grow-in Zone, Blow-in Zone and Side Grow-in Zone must be cleared to, and maintained per the clearance distances (Table 1 and Table 2). All fast growing tree species located in the Grow-in Zone shall be removed as appropriate⁸. All fast growing tree species are described in Attachment C.
- Where practical and achievable, all vegetation in the Drop-in Zone (overhangs) within the designated fire areas shall be removed.
- Vegetation identified as a Hazard Tree will be mitigated in accordance with UVM-04, "Hazard Tree Management Plan."
- If RCD plus 12 months growth clearance cannot be attained at the time of scheduled maintenance due to easements, other legal agreements, or regulations that restrict vegetation management practices, the maximum allowable amount of vegetation will be removed or otherwise controlled as appropriate. These Exception Tree(s) will be documented in the work management system and re-inspected as necessary throughout the year.

⁸ Trees that have the capability to encroach into the clearance distance at maturity shall be removed

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The following clearances around poles are to be maintained as required in PRC 4292 and CCR 1254.

- Where practical and achievable all vegetation is cleared from above the 8 foot cylinder height established by PRC 4292 to the bottom of the conductors

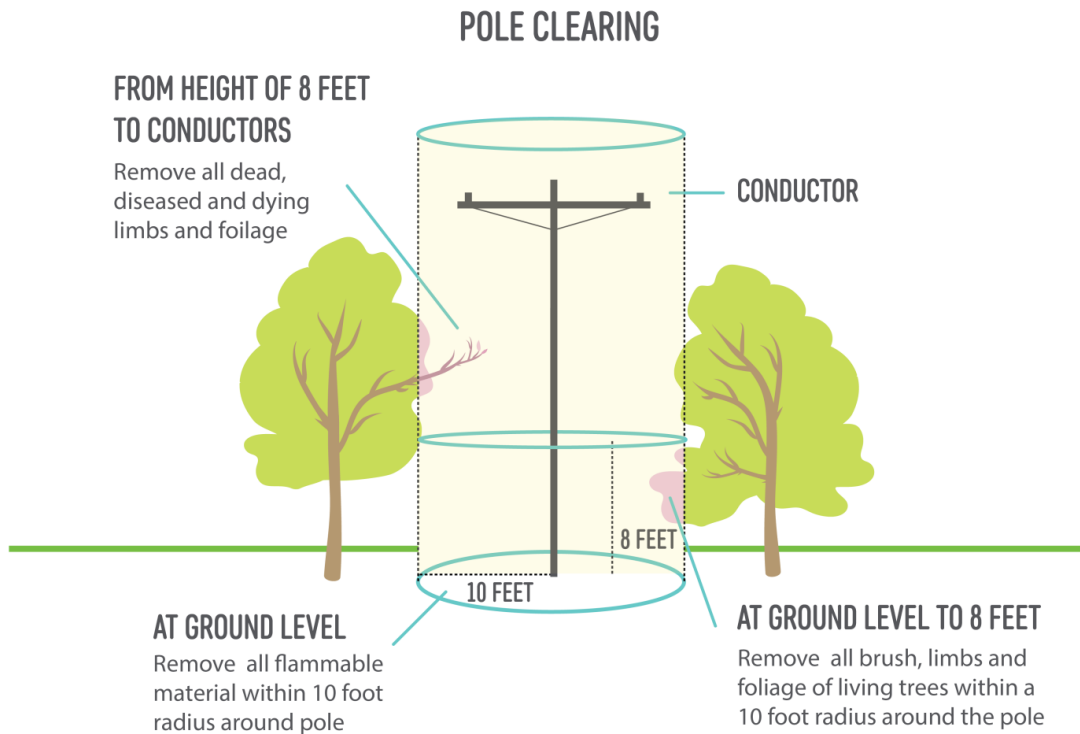



Figure 2: PRC §4292 & CCR §1254 Pole Clearance

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6 Other Program Elements

6.1 Inspection Types

6.1.1 Pre-inspections

SCE conducts Pre-Inspections of applicable lines to identify:

- 1) Vegetation management work needed to maintain compliance with applicable regulations
- 2) Potential CCD and RCD encroachments
- 3) Hazard Risk Trees, see UVM-04, Hazard Tree Management Plan
- 4) Exception Trees

6.1.2 Supplemental Inspections

Supplemental inspections are performed by qualified Distribution Operations personnel throughout the year. Identified conditions requiring vegetation-related work are documented and reported to the VM personnel and scheduled for remediation.

6.2 Inspection Methods

6.2.1 Ground Inspections

SCE shall conduct inspections, for lines with identified vegetation, from vehicles or by foot from the source point to the end of line.

6.2.2 LiDAR Inspections

LiDAR should be used where lines cannot be readily accessed by ground or the clearances between vegetation and conductors cannot be obtained both vertically and horizontally from an aerial patrol. Based on topography, line construction, and ecosystem type, LiDAR inspection shall be scheduled as needed.


Vegetation concerns identified from evaluation of the LiDAR data will be supplemented by foot/ground patrols to validate concerns and/or other required information, as applicable.

6.2.3 Ground Inspections Using Previously Acquired LiDAR Data

Slow-growing plant communities or Subject Trees near or beyond the Border Zone can have valid LiDAR data older than five years from the original LiDAR inspection detailed in section 6.2.2. In these instances, ground inspections using previously acquired LiDAR data can be used to identify changes/growth of vegetation and assessment of required pruning/maintenance to achieve required clearance. When using this method of inspection, the preinspector is required to inspect from the source point to the end of line.

6.2.4 Aerial Inspections

Where vegetation to line clearance cannot be readily accessed from the ground but the horizontal and vertical clearance between the vegetation and conductors can be determined from an aerial inspection, then aerial inspections are an acceptable form of inspection. Aerial inspections are also an acceptable method for conducting post-storm/post-fire emergency inspections.

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6.3 Abnormal Field Conditions

Inspections that cannot be completed due to inaccessibility or restrictions will be promptly reported to the VM Compliance and Support Event Expeditor for managing the condition in accordance with UVM-14. When these conditions are identified by SCE Vegetation contractors, the condition shall be documented on the Abnormal Field Condition Form (Attachment D) and provided to the applicable SSP for review and resolution of the identified condition.

In the event that any imminent threat condition is observed, Vegetation Management Operations (VM) personnel, or the Grid Control Center (GCC) will be contacted without any intentional time delay and the steps outlined in UVM-08 will be followed.

6.4 Vegetation Control Techniques

SCE utilizes industry standard Integrated Vegetation Management (IVM) techniques to perform scheduled and required work. These techniques may include:

- Manual (Pruning and Removal)
- Chemical (Herbicides)
- Mechanical (Mowing, Mastication, Feller Bunchers, etc.)
- Other cultural and biological practices to promote desirable, stable, low - growing plant communities that will resist invasion by tall growing tree species

Prescriptions for required work are generally developed on a case by case basis and consider a myriad of local factors.

6.5 Post Work Verifications


VM SSPs perform a Post Work Verification after completion of contractor(s) work. A report such as UVM Post Work Verification Report (Attachment B) is issued. The VM SSP review occurs after the clearing work is completed. Review samples are selected in accordance with UVM-07, Post Work Verification and UVM Program Oversight.

7 Distribution and Data Retention

The approved version of the document shall be stored on the Vegetation Management SharePoint site while in effect and for at least seven (7) years thereafter.

Distribution:

- T&D VM Managers
- Impacted OU Touchpoints
- E&C PMO

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8 Approvals

Program Manager	Signature	Date
Melanie Jocelyn, Principal Manager	Melanie Jocelyn / Approved by E-mail	8/28/19

9 Revision History

Revision Number	Date	Description of the Revision	By	Next Review Date
1	9/27/18	Initial DVMP for the UVM Program	UVM Build Team	2019
2	2/1/19	Updated clearance distances in all tables Formatted Attachments	Bill Kotteakos	2019
3	5/17/19	General Document Refresh	Bill Kotteakos	5/17/20
4	9/1/19	Table 2: Reduced GRCD clearance from 12' to 6' and eliminated TCD for voltages 2.4 – 69kV Added clearance for HV Aerial Cable	Bill Kotteakos	9/1/20


10 References

External References

- NERC Glossary of Terms
- CPUC General Order (GO) 95
- Cal Fire Public Resource Codes (PRC) 4292 and 4293 and 4296

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- Title 14, CCR, § 1255

Internal References

- ECSS-02, E&C Shared Services Glossary of Terms
- UVM-04, Hazard Tree Management Plan
- UVM-06, LiDAR Reference Guide
- UVM-07, Post Work Verification and UVM Program Oversight
- UVM-11, Qualification of UVM Senior Specialists
- UVM-12, Employee and Contractor Training
- UVM-14, Manage Refusal Events
- UVM-16, UVM Program Glossary of Terms

11 Attachments

Attachment A: UVM Inspection Report / Grid Cover Sheet

Attachment B: UVM Post Work Verification Report


Attachment C: Tree Species in SCE Service Territory

Attachment D: Abnormal Field Conditions Form

12 Key Contacts

UVM Senior Manager, Operations: Jeff Copeland, [REDACTED]

UVM Senior Manager, Compliance & Support: Bill Kotteakos [REDACTED]

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Attachment A
UVM Inspection Report / Grid Cover Sheet

Circle one: **DISTRIBUTION** or **TRANSMISSION**

Zone: District: Grid: ISO:

Pre-Inspection		Tree Contractor		SCE Senior Specialist	
2018 Inventory		2018 Performed Trims		% GRCD Trims Achieved	
2018 Prescribed Trims		2019 Performed Trims		% Approved Exceptions	
2019 Inventory		2019 Performed Removals		% Unapproved Exceptions	
2019 Prescribed Trims		Total Hours Invoiced		Trim Refusals Pending	
2019 Prescribed Removals		Approved Exceptions		Removal Refusals Pending	
2019 Removals Approved		Unapproved Exceptions		P1 Not Permanently Res.	
Total Hours Invoiced		Priority 1 Permanently Res.		SCE Field Review	
Approved Exceptions		Additional Compliance			
Unapproved Exceptions		Add Locations			
Priority 1		Abnormal Field Conditions			
Additional Compliance					
Notification Consultant					

Company Name:	Notes:
Pre-Inspector:	
Start Date:	
Completion Date:	
I certify the work I performed within this grid to be accurate and in accordance with the applicable Statement of Work"	
Print/Signature:	

Company Name:	Notes:
VM Contractor GF:	
Start Date:	
Completion Date:	
I certify the work I performed within this grid to be accurate and in accordance with the applicable Statement of Work"	
Print/Signature:	


SCE Senior Specialist PI Review Date:	
SCE Senior Specialist TC Review Date:	
Senior Specialist Print/Signature (PI):	Senior Specialist Print/Signature (TC):

Date Received by SCE:	
Date Updated in Database:	

EXAMPLE




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Energy for What's AheadSM

SCE	Legal, Regulatory, and Compliance	Transmission & Distribution Utility Vegetation Management Program	Methodology	Doc. No.	UVM-03	 <div>SOUTHERN CALIFORNIA EDISON[®] Energy for What's AheadSM</div>
				Version	4	
Effective Date		8/16/19				
Supersedes		Version 3				
Distribution Vegetation Management Plan (DVMP)						

Attachment C

Tree Species in SCE Service Territory

Species Name	Growth Rate	Species Name	Growth Rate
Acacia-Blow	Medium	Cherry	Medium
Ailanthus	Fast	Chinaberry	Medium
Albizzia	Medium	Citrus	Slow
Alder, White	Medium	Coral	Medium
Almond	Medium	Cottonwood	Fast
Ash	Fast	Cow Itch	Slow
Aspen	Slow	Crape Myrtle	Slow
Athel	Medium	Cypress	Slow
Avocado	Medium	Deodara	Slow
Bamboo	Fast	Dogwood	Slow
Banana	Slow	Elder, Box	Medium
Bay	Slow	Elderberry	Medium
Birch	Slow	Elm	Fast
Bird of Paradise	Medium	Eucalyptus	Fast
Bottle	Slow	Eugenia	Medium
Bottlebrush	Slow	Ficus	Medium
Brisbane Box	Medium	Fig	Medium
Buckeye	Slow	Fir	Slow
Camphor	Medium	Floss, Silk	Medium
Carob	Medium	Ginkgo	Slow
Carrotwood	Medium	Golden Rain	Slow
Casuarina	Medium	Grevillea	Fast
Catalpa	Medium	Hackberry	Medium
Cedar	Slow	Jacaranda	Fast
Century Plant	Slow	Joshua	Slow

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Attachment D

Abnormal Field Conditions Form

Abnormal Field Conditions Form

General Information:

Date:	Reporter:	Inspector Name and Company:	Local TSP:	Transmission Supervisor:

Location Information:

Circuit ID#	
Circuit ID Name	
Substation Origin	
Substation Destination	
Line Voltage	
Location Address(es)	
Property Owner(s)	
Location Origin GPS Coordinates	
Location Destination GPS Coordinates	
Origin Tower	
Destination Tower	
Span or Partial Span Length	

Restrictions:

Weather Conditions:										
Access Restrictions:										
Biological /Archaeological Restrictions?	Y	N	If yes, explain:							
Previous Inspection Date:			Method:							
Refusal Location:	Y	N	What easement rights do we have?							
What is the ROW width at this location?			Maximum line sag for this span:		Maximum line sag for the location					
Tier 1 Imminent Threat Location:	Y	N	Tier 2 Emergent Threat Location:	Y	N					
How often does the location need to be re-inspected?										
Is this an orchard?	Y	N	Will there be crop lost?	Y	N	Should this location be considered for orchard?	Y	N		

Comments:

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EXAMPLE

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