



July 28, 2011

Jaelyn A. Brillling  
Secretary  
State of New York  
Department of Public Service  
Three Empire Plaza  
Albany, New York 12223

Dear Ms. Brillling,

Re: Case 10-E-0155 – Proceeding on Motion of the Commission as to New York State’s Electric Utility Transmission Right-of-Way Management Practices

Central Hudson Gas & Electric Corporation (Central Hudson) is responding to New York State Public Service Commission Case 10-E-0155 – Electric Utility Transmission Right-of-Way Management Practices recommendation item numbers 4 through 7 that apply to all New York State utility companies. Recommendation item numbers 1 through 3 only apply to Consolidated Edison and Orange & Rockland Utilities.

Recommendation #4 – All companies shall submit, for Staff review and acceptance, updates to their websites and any printed materials, detailing the rationales and practices governing their ROW management programs.

Response: Central Hudson’s website includes a section dedicated to both Distribution and Transmission Vegetation Management practices that outlines the rationale for these programs. The website also provides the contact information to inquire directly with the appropriate personnel on these programs (Attachment #1). Central Hudson’s Transmission Vegetation ROW Management notification letter (Attachment #2) is utilized to inform affected landowners along the transmission corridor of upcoming vegetation management activities. This letter also provides Central Hudson’s rationale for performing these activities as well as the appropriate contact information.

Recommendation #5 – All companies shall establish a direct line of communication between the public and the Companies’ vegetation management personnel for questions regarding ROW vegetation management work. Information advising of the opportunity for such communication and how such communication can be accessed shall be made available on the Companies websites, on all required notifications, and provided by field personnel and contractors upon request.

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Poughkeepsie NY 12601

(845) 452 • 2700  
www.CentralHudson.com

Response: As indicated in response to Recommendation #4 above, Central Hudson provides the appropriate contact information in both its Transmission Vegetation ROW Management notification letter (Attachment #2) and on its website (Attachment #1) to afford customers with the opportunity to contact us via phone to obtain information or address any questions or concerns that may arise associated with our Transmission Vegetation ROW Management Program. Central Hudson's Call Center personnel are all trained to receive calls and address basic questions pertaining to our Transmission Vegetation ROW Management Program. The Call Center can also provide customers with the contact information for the appropriate Central Hudson vegetation management personnel to respond to more specific questions or concerns.

Customer inquiries made in the field when the Transmission Vegetation ROW Management activities are being performed are addressed by the contractor performing the work or relayed to the appropriate Central Hudson Line Clearance Foremen for immediate attention. Contractor line clearance personnel maintain all necessary Central Hudson contact information while operating in the field.

Recommendation #6 – All companies shall develop, for Staff review and acceptance, sections in their Plans, to address the circumstances and criteria pursuant to which replanting is warranted.

Response: Central Hudson proposes to amend its Long Range Management Vegetation Plan (LRVMP) to outline the criteria where replanting along a transmission corridor would be warranted to include:

“ Central Hudson does not generally provide replanting of vegetation along its transmission corridor and takes each request for planting on a case by case basis. In determining if replanting is warranted, Central Hudson would consider current and future land use of the area affected by vegetation management practices, current and future vegetation management activities required at the site to maintain regulatory compliance, proximity to transmission facilities, extent of work conducted at the location, anticipated re-growth/regeneration of affected site during vegetation management cycle, if property was owned in fee or easement rights, restrictions associated with said easements, the potential impact of invasive species introduction, topography of site, general soil conditions, along with regulatory and permit compliance. If plantings are determined necessary and/or required within the transmission corridor, only low growing shrub and/or tree species approved by Central Hudson will be planted.”

In the past, Central Hudson has generally considered replanting in association with various regulatory compliance issues, easement resolutions or construction related projects, or as part of negotiations with property owners for removal of danger trees located outside of the transmission corridor.

Recommendation #7 – All Companies shall develop if one does not exist or enhance if one does, for Staff review and acceptance, sections in their Plans, detailing when and where various types of vegetation will be allowed to remain on a ROW. The

sections shall incorporate, to the extent possible, a vegetation management approach that recognizes that removal of desirable species is neither required nor preferred. Commensurate training and oversight of field personnel shall also be addressed.

Response: Central Hudson does maintain in its LRVMP sections detailing when and where various types of vegetation will be allowed to remain on a ROW. Section 7, Transmission Right-of-Way Goals, Objectives and Strategies starting on page 15 and ending on page 22 outlines the various goals, objectives and strategies Central Hudson uses to manage its Transmission ROW's including the encouragement of low growing shrubs and small tree species along its border zone. However, based on our review, section 7.1.2 clearing and reclaiming the full width of the Right-of-Way will be amended to add the following: "During ROW clearing and edge reclamation work, where feasible, taller shrub and small tree species that are compatible with transmission vegetation ROW management practices can be retained along the edge of the ROW within the border zone."

In addition to the aforementioned, section 8.2.3.2 The Wire Zone-Border Zone located on page 25 of the LRVMP, followed by section 8.5.2.1.8 Plant Communities and subsequent sections 8.5.2.1.9 through 8.5.2.1.11 related to compatible and non compatible vegetation species located on page 37 through 39 further supports Central Hudson commitment to maintaining a vegetation diverse transmission corridor.

Finally, all field personnel contracted by Central Hudson to perform Transmission Vegetation ROW Management activities are trained and instructed by Central Hudson personnel related to the goals and objectives of the Program to include identification of compatible low growing shrubs and tree species on an annual basis, see Appendix 13 – Annual Transmission Right-of-Way Crew Training Outline located on page 139 of the LRVMP.

If you have any questions or concerns, please feel free to contact me at 845-486-5899.

Respectfully,



Michael J. Gallucci  
Director of Line Clearance

CC: Records Management  
C.A.Freni – Central Hudson  
M. Mosher – Central Hudson



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**We care about trees - and your electric service**

Most Central Hudson customers have their electricity delivered to their homes and workplaces through a system of interconnected overhead power lines. Nearly 8,000 miles of wire is used to serve all of our customers.

When electric service is interrupted during wind and lightning storms, or due to heavy rain, snow or ice, the problem can usually be traced to trees or tree limbs that fall, breaking lines or causing short circuits.

It's a matter of service reliability. Storm-related damage to trees is the number one cause of power outages for Central Hudson customers. Interruptions are a nuisance to residents; a greater threat is posed when power is cut off to hospitals, fire and police stations, radio and television stations, newspapers, pumping stations, traffic lights and other essential public services. Some of our customers depend upon continuous, reliable supply of electrical power to operate life-support apparatus in their homes. In addition, trees that grow into contact with power lines can conduct electricity, which can create a hazard to people and property.

**Section Highlights**

- [How We Trim Trees](#)
- [Tree Plantings: Right Tree, Right Place](#)
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The best way to defend against these potential hazards is with a dedicated and thorough program of line clearance and danger tree removal, performed on a regular basis.

Central Hudson's program is carefully designed to reduce the incidents of power outages due to tree damage, while also protecting the natural and scenic beauty of the Hudson Valley. The program also complies with state and federal mandates that were enacted in the wake of the 2003 Northeast blackout, which requires all utilities to conduct an effective vegetation management program that meets standards and criteria in order to reduce power interruptions caused by trees. Central Hudson and other utilities are also required to meet specific reliability targets set by the state, and our vegetation management program is an important part in meeting these targets.

**Studies to improve service reliability**  
As a result of these regulations, and in order to improve electric service for our customers, Central Hudson conducted a formal study of the causes of power outages and developed improvement measures. These include power line and substation upgrades, but

records showed that falling trees and branches cause about 40 percent of all outages. A comprehensive study of Central Hudson's program was conducted, including tree re-growth rates throughout the Mid-Hudson Valley region. The study found that the tree density along Central Hudson's 7,240 miles of distribution lines is significantly higher than average nationwide, and that about 900,000 trees currently grow in proximity of these power lines.

- ▶ [How We Clear Trees](#)
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A team of experienced foremen/foresters from Central Hudson oversees the vegetation management program throughout the Mid-Hudson Valley, and work is performed by qualified tree service contractors. These contractors follow Central Hudson and industry standards and regulations, including those of the International Society of Arboriculture (ISA), American National Standards Institute (ANSI) and Occupational Safety and Health Administrations (OSHA).



Tree crews use a technique called "directional pruning," which means cutting branches where they join another branch or at the trunk of the tree. This technique lessens or eliminates the number of unsightly stubs and maintains a more natural appearance for the trees. This method also reduces the chances for trees to develop disease, fungus or insect infestation.

Central Hudson performs line clearance on both the Distribution and Transmission systems.

**Distribution Lines**

Routine distribution line clearance addresses power lines that primarily run along local roadways to provide electric service to homes and businesses. Branches and limbs that may endanger electric lines are cleared to gain 10 feet of side clearance; to remove or cut back overhanging limbs; and to remove from beneath the line all undergrowth of tall growing tree species. Removal of overhanging limbs, branches and leaders from above electric lines is critical to maintaining and improving system reliability and safety. This is especially important for those branches or limbs that may contact lines under snow and ice load, as they are the leading cause of outages.

Tall growing tree species located beneath or directly adjacent to our line (within the utility Right-of-Way (ROW) with the exception of yard trees, are removed as they pose a risk to electric safety and reliability. Trees located outside of the utility ROW which may be dead, dying or are leaning heavily towards the electric lines are considered danger trees and will be removed with permission from the property owner. Notification letters are sent to customers in advance of performing line clearance along the circuit.

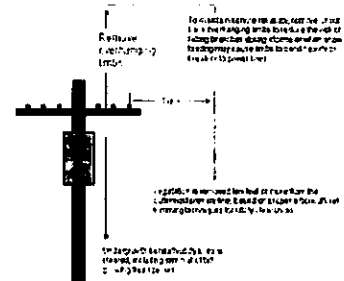
**Transmission Lines**

Vegetation management for transmission corridors addresses the nearly 600 miles of lines that deliver bulk power to the region. Transmission lines are typically located off-road, and are built on easements generally 100 feet in width. Central Hudson's Long Range Vegetation Management Plan, which is submitted, reviewed and approved by the New York State Public Service Commission, outlines how the transmission corridors will be maintained.

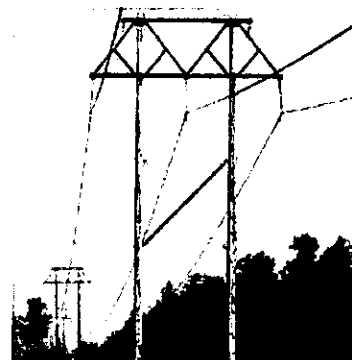
New state and federal standards for clearing and maintaining transmission corridors were enacted following the 2003 blackout that affected much of the northeastern United States. Acting on those guidelines, the New York State Public Service Commission has required by law that all electric utilities in New York must maintain their transmission right of ways as follows:

- Remove all non-compatible, tall growing tree species within the easements

**Graphic: Clearance Specifications**



[Click to enlarge](#)



## Central Hudson Gas & Electric - How We Trim Trees

- Identify and remove any hazardous or "danger" tree that could contact lines
- Control tall growing vegetation on maintenance cycles to ensure the integrity of the easement through mowing, clearing and utilization of authorized herbicides
- Maintain clear easements to their full width or limits.

All non-compatible trees within the full width of transmission easements are removed and cleared on a routine basis. Dangerous trees outside of the easements are also removed, with permission from property owners (where applicable). Selective use of EPA approved herbicides, which are applied by low volume techniques using hand operated backpack equipment, ensures minimal herbicide usage to control tree growth within the easements. Property owners are notified by Central Hudson employees or authorized contractors prior to the application of herbicides, according to New York State herbicide regulations. Central Hudson's program encourages the growth of natural brush to prevent soil erosion and to provide a more natural habitat for meadowland birds and animals.

Notification letters are sent to property owners in advance of transmission row management activities.

Central Hudson's vegetation management program utilizes an Integrated Vegetation Management (IVM) approach, which is a practice endorsed by the U.S. EPA. Click these links to read more about IVM and IVM on Rights of-Way.

### Service Wires

Service wires supply electricity from Central Hudson utility poles on local streets or roadways to homes and businesses. These lines are not cleared by Central Hudson, but can be by a contractor hired by the home or business owner. Central Hudson crews will disconnect the line so that the contractor can safely clear or remove trees, and will reconnect the line when the work is completed. Call Central Hudson at (845) 452-2700 or 1-800-527-2714 to schedule a crew.



### Tree Clearance During Storms

Central Hudson crews and contractors will perform necessary line clearing to facilitate electric service restoration. As storms are an act of nature, and due to the necessity to expedite repairs, Central Hudson does not chip or remove branches, logs or brush during storm restoration. Property owners may contact their municipality to have the brush or wood removed.

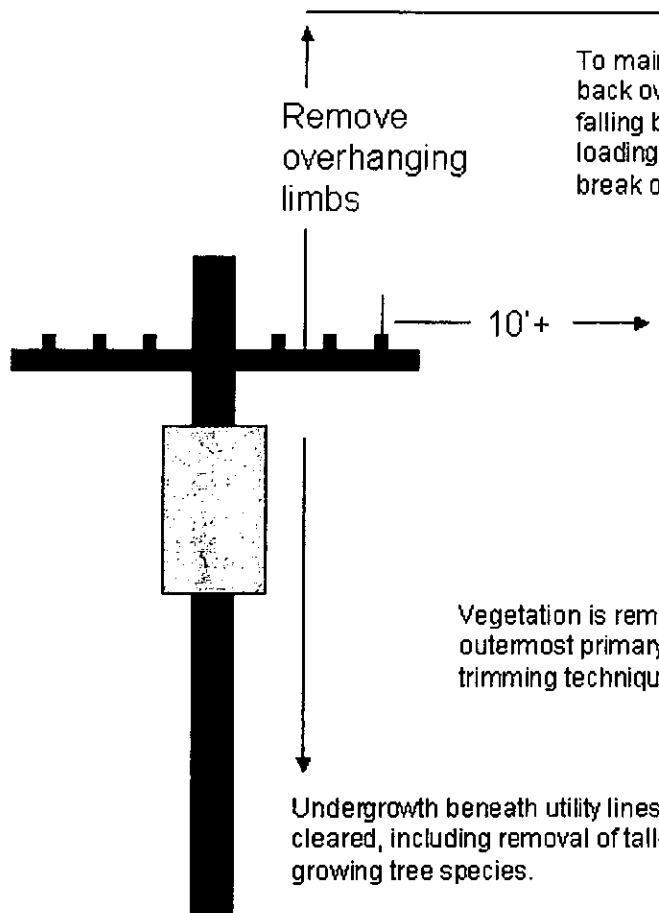
For questions related to distribution or transmission line clearance, you may speak with a customer service representative, who will assist you in your matter or put you in contact with the appropriate Central Hudson line clearance personnel, by calling (845) 452-2700 or 1-800-527-2714.

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To maintain service reliability, remove or cut back overhanging limbs to reduce the risk of falling branches during storms or when snow loading may cause limbs to bend heavily or break onto power lines.

Vegetation is removed ten feet or more from the outermost primary line, based on proper arboricultural trimming techniques for utility clearances.

Undergrowth beneath utility lines is cleared, including removal of tall-growing tree species.

**Attachment #2**



June 21, 2011

Central Hudson will soon be working along the transmission line right-of-way or easement located on or adjoining your property. These transmission lines deliver high voltage, bulk electricity into communities for use by you and your neighbors.

If you'll recall, the 2003 blackout which affected most of the northeastern U.S. was triggered when a tree, located within a transmission right-of-way, grew into contact with a 115 kv transmission line, causing power interruptions in Ohio. That outage, in turn, cascaded through the northeast power grid, putting millions of people in the dark.

As an outcome of the investigation following that event, the Federal Energy Regulatory Commission issued many guidelines to prevent another, similar catastrophic occurrence. Acting upon those guidelines, the Public Service Commission of New York State has required by law that all electric utilities in New York State must maintain their easements and rights-of-way as follows:

1. Remove all non-compatible, tall growing tree species within the rights-of-way.
2. Identify and remove any hazardous or "danger" tree that could contact the transmission line.
3. Control tall growing vegetation on maintenance cycles to ensure rights-of-way integrity, through mowing, clearing, and utilization of E.P.A. registered general use herbicides.
4. Maintain rights-of-way to their full width or limits.

Given our obligation to help ensure the public safety and to improve the reliability of vital electric service by maintaining the region's transmission system as mandated according to these new and more strict regulations, we will be performing some or all of the four operations described above in your area in the near future.

If you have any questions or concerns, please feel free to contact me at 845-452-2700. Thank you in advance for your patience and understanding.

Sincerely,

Ken Kircher  
Transmission Line Foreman