

Q: *Why is it necessary to cut down trees when you have pruned them in the past?*

A: In an effort to protect against electric outages like the one that occurred in the Blackout of 2003, the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC) drafted stringent standards governing how utilities operate their transmission grids. The standards cover a broad range of topics, including vegetation management. Utility companies engaged in transmission must eliminate all power outages caused by vegetation interference with power lines. Failure to meet this zero-outage mandate may lead to fines of up to \$1 million per day. To meet this stringent federal mandate and because vegetation growth can be aggressive (especially in summer months), ITC and its subsidiaries have adopted an approach that calls for tree removal, where necessary and permissible, to maintain the safety and reliability of the transmission grid.

Q: *We have ordinances governing how vegetation and trees are maintained in our community. Is ITC obligated to follow these local ordinances?*

A: ITC and its subsidiaries must follow all local, state and federal laws in operating their transmission business, including laws relating to vegetation management.

Q: *Are the people making ITC's vegetation management decisions trained?*

A: Yes, ITC employs certified foresters, master gardeners and trained professionals to oversee its vegetation management program.

Q: *How does ITC give back to communities in its service territories?*

A: ITC engages in a wide variety of community activities and sponsorships to help protect and develop natural environments. For example, the company has partnered with the U.S. Fish and Wildlife Service on habitat restoration in the Detroit River International Wildlife Refuge, a unique 48-mile-long preservation area situated along the banks of the Detroit River and western Lake Erie. The company has also worked with this agency to improve wildlife habitat at Humbug Marsh, located near Gibraltar and Trenton in the Detroit River International Wildlife Refuge. Work included control of invasive plants, such as phragmites, buckthorn and autumn olive, which degrade natural ecosystems and decrease native food necessary for migratory waterfowl and other wildlife. ITC has worked with local communities to create recreational trails in its transmission corridors. Additionally, the company celebrates Arbor Day and Earth Day each year by reaching out to local communities with tree planting programs and event sponsorships that emphasize how individuals can reduce, reuse, and recycle in their everyday lives.

Q: *Has ITC faced legal challenges concerning vegetation management activities?*

A: ITC and its subsidiaries are mandated by the federal government to maintain their transmission systems to meet a zero-outage standard. The companies take this responsibility seriously and, in the past, have been engaged in legal proceedings to ensure they can perform the vegetation management actions necessary to meet the federal standards. ITC seeks to resolve community and individual property owner concerns in a non-litigious manner whenever possible.



Frequently Asked Questions

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Q: *Why does ITC and its subsidiaries come back to the same community more than once to handle vegetation management activities? When will you be done with your work?*

A: Vegetation growth can be aggressive, especially in summer months. ITC and its subsidiaries must constantly engage in vegetation management activities to ensure that they are in compliance with the federal mandate of zero vegetation-related power outages. Constant monitoring is required. Also, repeated visits may be necessary due to field crew availability, weather conditions, or understandings with individual property owners. ITC strives to work as efficiently and expeditiously as possible while maintaining a safe working environment for its crews and communities.

Q: *We don't see ITC trucks in the areas where the trees are being removed. Who is handling the work for ITC?*

A: We have contracted with several professional tree companies to handle our vegetation management activities. All subcontractor trucks are clearly marked with an ITC logo.

Q: *How are you communicating with residents and community leaders about your vegetation management activities?*

A: ITC uses a variety of methods to notify residents and community leaders about potential vegetation management activities in their neighborhoods and communities. ITC and its subsidiaries utilize door tag hangers that provide information about the vegetation management program and how to contact the companies. Field crews also regularly interact with residents and answer questions. In addition, ITC has run print and broadcast ads and has conducted community leader meetings to discuss upcoming activities. Finally, the companies have an established customer service phone line for residents to use when they have questions about the activities.

Q: *How can a resident register a concern or question with your company?*

A: ITC has established a customer service phone number (1-877-ITC-ITC9, 1-877-482-4829) that residents can call to request further information about the vegetation management program or to register questions. In addition, residents can speak directly with foresters and field crews who are working in the corridors. If the forester or field crews can't answer a resident's questions, they will ensure that a company representative gets back to the resident with the information being sought.

Q: *How do I obtain a schedule for the vegetation management work you are planning to do in my community?*

A: General time frames are provided in the print and broadcast ads. Local officials also are typically provided with a notice of general timeframes for anticipated vegetation management activities through phone calls, e-mails, web site postings and other forms of communications.

Q: *How do residents obtain information about their easement rights?*

A: Easement information can be obtained from the county Register of Deeds or County Clerk's offices.

Q: *What hours will field crews be working?*

A: Hours vary depending on a number of factors, including weather conditions and crew availability. Generally, however, field crews work standard business hours. They also consult with communities and other legislative entities when developing project work schedules and comply with local ordinances.

Q: *Residents are complaining that you are entering their property without permission. How are you securing permission from residents to cross or work on their property?*

A: ITC's legal rights concerning individual properties are generally controlled by easements, which are legal instruments. Where ITC's vegetation management activities are not controlled by an easement, ITC and its subsidiaries will seek permission from the property owner to do the work.

Q: *Do you remove wood and stumps and clean the area up after you take down the trees?*

A: ITC's general practice is to not remove stumps. Crews generally leave the wood in a stacked pile, and remove vegetation debris.

Q: *Do you use herbicide treatments on stumps and sites?*

A: ITC and its subsidiaries generally recommend using herbicide treatments to discourage regrowth of removed species.

Q: *How do you handle property damaged during vegetation management activities?*

A: Vegetation management-related property damages claims are investigated and processed by ITC's Legal Department. Alleged claims may be directed to: 1-877-ITC-ITC9 (1-877-482-4829); ITC Holdings Co., Legal Department, 27175 Energy Way, Novi, MI 48377.

Q: *What are your clearance standards?*

A: Within the Wire Zone: Trees growing within the wire zone (the area under and 10 feet outside the wires) shall be targeted for removal with priority emphasis given to incompatible, tall-growing species. Where we lack removal rights in the wire zone or permission is not obtained, trees shall be pruned to the maximum allowable height directing growth laterally away from wires.

Outside the Wire Zone, but within remaining ITC Rights-of-Way: Trees growing outside the wire zone but within ITC Rights-of-Way will be targeted for removal, where necessary, to maintain safety and reliability, with priority emphasis given to incompatible, tall-growing species. Where we lack tree removal rights within the Rights-of-Way, or where permission is not obtained, trees shall be pruned to the maximum allowable height.

Adjacent to ITC Rights-of-Way: Trees growing outside and adjacent to ITC Rights-of-Way, and posing a safety or reliability threat, will be pruned to the edge of our Rights-of-Way. Permission will be sought from the affected property owner to remove or prune the tree outside of the ITC Rights-of-Way.

Frequently Asked Questions

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Q: *Residents have received door hang tags saying ITC will begin work in their neighborhoods. When will it take place?*

A: In general, ITC leaves door hang tag notices for residents about impending vegetation management work one to six weeks in advance of the actual work.

Q: *Why is vegetation management important?*

A: Vegetation management is important because, as demonstrated by the Blackout of 2003, vegetation can interfere with transmission lines and cause significant reliability and safety concerns. ITC and its subsidiaries are responsible for ensuring the dependability and integrity of approximately 15,000 miles of high-voltage transmission lines throughout Michigan's Lower Peninsula and in parts of Iowa, Minnesota, Illinois and Missouri. As the transmission operator for these states, ITC and its subsidiaries are mandated to maintain their systems to prevent outages resulting from vegetation interfering with lines. ITC supports the federal standard of zero vegetation-related outages as a critical factor of every community's safety and security.

Q: *Have reliability standards governing transmission vegetation management been developed?*

A: Yes. In August 2005, Congress passed the Energy Policy Act of 2005 which requires the FERC to certify an Electric Reliability Organization (ERO) to develop mandatory and enforceable reliability standards subject to FERC review and approval. In February 2006, FERC certified NERC to handle this task. NERC developed vegetation management reliability standards that were adopted by the federal government in March 2007. These standards became mandatory in June 2007.

Q: *Does FERC require ITC to cut down trees in its transmission corridors?*

A: The federal government gives utility companies discretion in how they will meet the zero-outage mandate. ITC has determined that a proactive vegetation management approach, including removal of tall-growing species in the corridor where permissible, is essential to secure the reliability and safety of its systems.

