

Vegetation Management Distribution Inspection

Attachment 3, Exemptions to Minimum Distance Requirements (MDRs)

SUMMARY

This attachment provides guidance for exceptions and exemptions applied to vegetation within the Minimum Distance Requirements (MDR) required by General Order (GO) 95, Rule 35 and Public Resources Code (PRC) Section 4293, as described in GO 95, Rules 35 and 57.4-C and California Code of Regulations (CCR), Title 14, Sections 1257 and 1258.

TARGET AUDIENCE

REFER to the Target Audience section in the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#)

PROCEDURE STEPS

1 Roles and Responsibilities

- 1.1 VM Field Personnel must IDENTIFY MDR exemptions in the field.
- 1.2 PG&E Leadership must DETERMINE if the identified exemptions are to be applied.

2 Exemption Requirements

- 2.1 Each exemption type requires a Level 2 inspection during each scheduled VM patrol.
 1. Major Woody Stem (MWS) trees require annual inspection by a Certified Arborist or Registered Professional Forester.
- 2.2 Each tree exemption must have current GPS coordinates, and the most recent inspection date associated with the tree, regardless of whether tree work is prescribed.
- 2.3 These exemptions do NOT apply to Hazard Trees as identified and explained in the [Cal Fire Power Line Fire Prevention Field Guide](#) and the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#)
 1. Hazard Trees should be prescribed for mitigation as described in the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#)

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3 Types of Exemptions

Three types of exemptions apply to the MDR for primary conductors in limited situations.

3.1 Exemption Type 1: Raychem and Covered Conductor Wire(s) such as Tree Wire, Medium Voltage Line Cover (MVLC), etc. (Relevant Regulations: 14 CCR 1257(a)(1)(A)-(B) (in State Responsibility Areas) and GO 95, Rule 35, Exception (1))

Raychem and insulated Tree Wire, maintained with the high density, abrasion resistant outer covering intact, or insulated self-supporting aerial cable, maintained with the insulation intact fall within this exemption. This is often referred to as "covered conductor," "Tree Wire" or "MVLC" in PG&E's standards and procedures. (SEE [Appendix A, "Identifying Insulated Wires."](#))

1. APPLY the covered wire exemption in extremely limited circumstances where:
 - Portions of a tree may break the MDR between annual work cycles
 - Where temporary, intermittent contact is possible with covered wire, but constant contact will not occur
2. For all field applications of this exemption, PG&E Leadership must ENSURE all other mitigation options have been reviewed and exhausted.

NOTE

IF growth within the MDR or signs of contact are observed,

THEN FOLLOW the Utility Procedure [TD-7102P-17, "Vegetation Management Priority Tag"](#) or the Utility Procedure [TD-7102P-09, "Reporting Abnormal Field Conditions."](#)

3. REPORT covered wire(s) that appear to be compromised or has been displaced on a conductor (refer to the Utility Procedure [TD-7102P-09, "Reporting Abnormal Field Conditions."](#))

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4. Table 1 lists examples for when the covered wire exemption could be applied.

Table 1. Examples of Acceptable Covered Wire Exemption Applications

Example Situations	Instructions for VM Field Personnel
<p>A tree trunk located within the MDR is resprouting at line height and has no signs of constant contact with the covered conductor at any time of observed patrol.</p> <p>NOTE: In the system of record, selecting "MWS" is for tracking purposes only.</p>	<ol style="list-style-type: none"> 1. SELECT "MWS" and "Raychem/Tree Wire" in the system of record. 2. LIST the tree for mitigation work as described in the Utility Procedure TD-7102P-01, "Vegetation Management Distribution Inspection." 3. FOLLOW the Utility Procedure TD-7102P-17 "Priority Tag Procedure" in these instances: <ul style="list-style-type: none"> • Growth is observed within the MDR • Contact with covered conductor is observed OR • The tree exhibits conditions as found in Appendix A, "Overview of Tree Defects and Site Conditions in the TD-7102P-01, "Vegetation Management Distribution Inspection" procedure. 4. CONTINUE to follow mitigation options described in TD-7102P-01-Att05, "Bi-Annual Tree Management and Reduction Strategy."
<p>A palm tree has constraints for removal described in TD-7102P-01-Att01, "Strategies to Manage and Reduce Palms" AND a frond is breaking MDR under windy conditions, with no signs of constant contact with the covered wire at any time of the patrol.</p>	<ol style="list-style-type: none"> 1. LIST the tree for mitigation work described in the Utility Procedure "TD-7102P-01, "Vegetation Management Distribution Inspection." 2. FOLLOW the PTT if growth is observed within the MDR or if the tree exhibits failure criteria described in the Utility Procedure TD-7102P-17, "Vegetation Management Priority Tag." 3. CONTINUE to follow mitigation options described in TD-7102P-01-Att01, "Strategies to Manage and Reduce Palms."

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3.2 Exemption Type 2: Tree Lines or Tree Connect(s) (Relevant Regulations: In State Responsibility Areas, 14 CCR 1257(a)(1)(C); 14 CCR 1258)

When electric conductors and subordinate elements are fastened to living, sound trees, commonly referred to as tree lines or tree connects, the vegetation clearing requirements of PRC 4292 and 4293 shall apply the same as to a pole or tower line. (See 14 CCR 1258) Only the tree trunk utilized as a pole and the proximity of the trunk to the conductor is exempt for MDR. (See 14 CCR 1257(a)(1)(C))

IF vegetation growth or failure potential is identified on a tree line/connect that may encroach with the MDR prior to the annual patrol cycle,

THEN the tree must be prescribed for work described in the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection"](#) or [TD-7102P-17, "Vegetation Management Priority Tag."](#)

1. IF a tree line/tree connect is identified with conditions found in the Hazard Trees/Vegetation Clearance section of the ["California Power Line Fire Prevention Field Guide."](#)

THEN LIST the tree line/tree connect for removal in the system of record.

- a. NOTIFY PG&E leadership to create an Electric Corrective tag (EC tag) with the appropriate tag description to replace the tree with a pole.

2. IF only a portion of the tree connect is trimmed or removed prior to the tree connect being replaced,

THEN VMI should CONTINUE to perform a Level 2 inspection of the remainder of the tree trunk during planned inspection patrols and ensure an active EC tag is in place.

- a. IF the EC tag completion timeline does not meet the mitigation timeline required,

THEN CHANGE the EC tag type to appropriate timeline

OR

IF the remaining tree trunk shows signs of failure prior to the next inspection cycle,

THEN FOLLOW the instructions in the Utility Procedure [TD-7102P-17, "Vegetation Management Priority Tag"](#) or [TD-7102P-09, "Reporting Abnormal Field Conditions."](#)

3. SELECT "MWS" and "tree connect" in the system of record for VM tracking purposes.

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3.3 Exemption Type 3: Major Woody Stems (Relevant Regulations: 14 CCR 1257(a)(3) (in State Responsibility Areas) and GO 95, Rule 35, Exception (4))

1. Major Woody Stem (MWS) refers to mature trees (e.g., "exempt trees") whose trunks and major limbs are located more than six inches, but less than the distance required for clearance by PRC 4293 or GO 95 Rule 35, from primary distribution equipment (conductor and energy carrying hardware, generally less than 35 kilovolts).

NOTE

IF covered conductor or tree line/tree connect(s) is present,

THEN follow the exemption criteria in sections 3.1 or 3.2 of this procedure.

2. All MWS trees require a Level 2 inspection annually by a Certified Arborist or a Registered Professional Forester.
3. In order to qualify for a major woody stem (MWS) exemption, the VMI must ENSURE that a tree meets **all** of the following exemption criteria:
 - Wood is more than 6 in. from high voltage conductors.
 - There is no evidence of prior contact between any portion of the tree branches or trunk and the conductor, including abrasion and/or incidental contact. (This does NOT apply to burn marks due to previous contact that has been mitigated.)
 - The tree has been established in its current location for at least 10 years.
 - The tree is at least 10 in. in diameter at breast height (DBH).
 - The tree or limb at the conductor level is at least 6 in. in diameter.
 - The tree is not resprouting at the conductor level at the time of inspection.
 - The tree is not easily climbable, with scaffold branches present below 8.5 ft. from the ground.
 - The tree is not hazardous per the [Cal Fire Power Line Fire Prevention Field Guide](#).
4. If the tree qualifies for a MWS exemption,

The VMI ENTERS the qualification into the system of record.

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5. If the tree does NOT qualify for a MWS exemption,
THEN in the system of record, the VMI must:
 - a. SELECT the appropriate MWS description in the system of record
 - b. PRESCRIBE tree mitigation work (REFER the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#))
 - c. Document any constraints in the system of record (REFER the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#))
6. Vegetation Management will EVALUATE the list of exempt MWS and SUBMIT the list applicable to PRC 4293 annually to CalFire by July 1st of each year (for the previous calendar year).

NOTE

Any tree(s) listed as non-exempt or that fall under other exemptions such as covered wire or tree connect are not included in the annual MWS report submitted to CalFire.

END of Instructions

DEFINITIONS

REFER to the Definitions section in the Utility Procedure [TD-7102P-01, "Vegetation Management Distribution Inspection."](#)

REVISION NOTES

Where?	What Changed?
Entire Document	Added relevant regulations to exemption types. Added definition for "Tree Wire" in the Definitions section of TD-7102P-01, "Vegetation Management Distribution Inspection." Updated hyperlinks.

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Appendix A, Identifying Insulated Wires

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Additional information on Tree Wire ID is available in the "[Cal Fire Power Line Fire Prevention Field Guide](#)."

Figure 1. Examples of Insulated Wire Types

Description	Illustration
Illustrated examples of some installation types that are associated with Tree Wire.	<p>Figure 1 Installation on Tie Top Insulator</p> <p>Figure 2 Angles Over 15° (see Note 3 on Page 1)</p> <p>Figure 3 Dead-End Construction (see Note 4 on Page 1)</p> <p>Figure 4 Tap Connection</p>
Non-metallic tie wire	

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Description	Illustration
Side Tie and Cover	
Raychem Wire Covering or Medium Voltage Line Cover (MVLC) Raychem wire covering or MVLC is exempt from Rule 35 and PRC 4293 if installed correctly and described in the definition in this document.	
Weather Proofing Weather proofing can look similar to Tree Wire but is NOT a sufficiently insulated material. It cannot be used as an exemption to Rule 35 or PRC 4293 requirements.	