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**Environmental, Health and Safety  
Supplemental Requirements  
Vegetation Management**

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**PURPOSE**

The purpose of the Environmental, Health and Safety (EHS) Supplemental Requirement document is to define business unit EHS requirements not included in the Duke Energy EHS Handbook. Contractors are to comply with all Federal, State and Local EHS regulations, the Duke Energy EHS Handbook, these business unit EHS Supplemental Requirement and Contractor-owned programs or procedures.

Contractors shall have on site the Duke Energy EHS Handbook, the EHS Supplemental Requirement document and/or any Contractor-owned programs or procedures which define work practices exceeding Duke Energy requirements.

Contractors shall periodically make available at Duke Energy's request their management systems, programs, processes and procedures that are designed to achieve the Duke Energy Health and Safety Vision stated in the Duke Energy EHS Handbook.

**KEYS TO LIFE (VEGETATION MANAGEMENT)**

Duke Energy's Health and Safety vision is to have an injury- and illness-free workplace.

Keys to Life support the vision by identifying hazards of high-risk activities known to cause fatalities and serious injuries. They outline standards and define expectations, behaviors and controls necessary to prevent serious events.

Keys to Life do not replace existing safety procedures, policies or manuals. It is one tool of Duke Energy's fatality and serious injury prevention program.

Duke Energy expects Contractors to assess their work-scope safety risks to ensure they have effective controls in place and to follow behaviors and standards defined by Keys to Life.

- **Driving safely** - Wear seat belts, follow posted speed limits and comply with all other motor vehicle regulations. While driving, do not send or read texts or emails, minimize use of cellphones, use hands-free devices only and avoid any distractions that would remove your focus from the road. Before moving a parked vehicle, circle the vehicle to ensure there are no obstacles around, above, or below it and that the vehicle is safe to operate. Position vehicles to minimize the need for backing. Pull through or back into parking spaces when possible and use a backing guide when available.
- **Personal protective equipment** – Wear appropriate personal protective equipment (PPE) for the hazards involved in the work. Use PPE to provide protection from injuries to the head, eyes, body, hands and feet.
- **Work zone safety** – Work zones shall be established at all work sites where vehicle traffic is a hazard. Traffic control warning devices shall be appropriately placed before work is begun.
- **Electrical safety** – Grounding Lines – before any tree work is started, appropriate grounding shall be done on any conductors lying on the ground and in situations where trees cannot be cleared from overhead conductors safely. A conductor is only considered de-energized after it has been isolated, tested for voltage, locked and/or tagged out, and grounded. MINIMUM APPROACH DISTANCES (MAD) – Qualified line-clearance arborists and trainees shall reference the Occupational Safety and Health Administration (OSHA) tables in 1910.269 (l) for the minimum approach distance (MAD) for energized lines or equipment. Tree workers and bucket operators shall avoid all indirect line contacts with all conductive objects.
- **Falls from elevation** - Utilize fall protection equipment when required for work at heights greater than 4 feet. Inspect equipment before use and use it properly. Maintain three points of contact when changing elevation. When utilizing a chain saw aloft, climbers shall use a second point of attachment/securement such as a work positioning lanyard or double crotched rope.
- **Pre-job briefings** – Prior to performing any work activities, identify hazards associated with the task during a thorough job briefing. Contractors shall also clearly identify strategies to eliminate or mitigate hazards and create clarity for the role of each crew member. Job briefings are required at the following times: the start of the work activity; when personnel, condition, equipment, or exposures change; or when new personnel arrive on scene.

- **Falling objects/line of fire** – when overhead work is being performed, a clearly defined drop zone is needed when setting up the work zone. When a tree felling operation is being performed, a clearly defined fell zone is needed when setting up the work zone. No one shall enter the fell or drop zone without suspending overhead work activities, establishing three-way communications and receiving permission to enter. Consider “line of fire” when setting up work sites to ensure that objects that could fall or move suddenly due to stored energy do not cause injury to employees or the public.
- **Hostile situations** – be on the lookout for hostile situations and maintain situational awareness of your surroundings. Contact local law enforcement as needed and be prepared to leave an escalating situation. Leave yourself an exit route.

## EVENT REPORTING AND INVESTIGATIONS

1. It is imperative that the Duke Point of Contact (POC) remain abreast of all aspects of contractor performance. Contractors shall verbally notify the POC immediately after any event or near miss. The POC can assist with ensuring the appropriate event response action is taken. When in doubt, notify the POC.
  - \* **Customer Delivery Suppliers will adhere to the Customer Delivery Contractor Event Reporting Flow**
2. Contractors shall report the following events **within 24 hours of occurrence** by submitting the “*Preliminary Incident Report*” (PIR) accessible on the Contractor Portal.
  - a. Occupational Safety and Health Administration (OSHA) recordable injuries
  - b. Environmental Events - Reportable Environmental Event (REE)-1, REE-2 and Category 3 environmental event when a notification is made to an external agency.
    - Duke Energy management may request a PIR be submitted for other environmental events to allow EHS evaluation on classification and reporting requirements.
  - c. Cardinal Vegetation Rules (CVR) – Events
  - d. Outages
  - e. Utility Property Damage \*
  - f. Customer Property Damage \*
3. The PIR shall be submitted within two hours for a Fatality, Life-Altering injury (LAI) or Serious Injury. \*
4. REE-1's, REE-2's, Fatalities, Life Altering Injuries, Serious Injuries (SIF's) and Significant Customer Outage events caused by a contractor will require a causal analysis. The causal analysis investigation will be in accordance with the contractor's procedures but must meet the defined elements of the Duke Energy Corrective Action Program (CAP) (See ADMP-ADM-OPX-00065, Corrective Action Program or the respective Business Unit CAP program).
5. Contractors may be requested to conduct causal analysis investigations on Significant Near Misses based on the discretion of business unit leadership.

**CONTRACTOR COMPANY PRE-QUALIFICATION PROCESS**

1. Pre-qualification is required for Prime Contractor Companies who perform either
  - a. Medium EHS Risk Work with a PO/Contract 1-year or longer, OR
  - b. High EHS risk work.
2. Prime Contractor Companies must register an account with Avetta, which is a 3rd party web-based application pre-approves data and documents submitted by contractor companies. The pre-approval process consists of safety evaluations/ratings and manual audits. Avetta reviews, verifies, documents data submitted by contractors to Duke Energy's Avetta account. A green rated = Approved (passed) Safety Rating is required for DE to issue PO or Contracts.
3. Avetta conducts the safety & environmental evaluation/rating, compares data against Duke Energy and Business Unit specific safety targets, and issues either an Approved (Green/Pass) or Not Approved (Red/Fail) safety rating. (See Targets below)
  - a. Prime Contractor Companies shall vet and approve any subcontractor they intend to engage under their contract for Duke Energy. The prime will submit the appropriate signed "Subcontractor Technical Review Questionnaire" found on the contractor portal to the Duke Energy Contract Manager for the appropriate business unit. The Prime Contractor Company must receive authorization to subcontract work from the Contract Manager prior to any subcontractor commencing work on Duke Energy property. Prime Contractor Companies shall review all subcontractor's environmental, health and safety programs for compliance with environmental, health, and safety requirements, Local, State, Federal requirements, Duke Energy EHS Handbook requirements, and the requirements of this document i.e., EH&S Performance Targets below. Prime Contractor Companies are required to repeat this process with Duke Energy's Contract Management Team for every subcontractor engagement prior to use. Subcontractor approvals will run from June 1st to May 31st requiring previous years data.
  - b. Manual Audit is the verification by Avetta that contract companies have OSHA compliant written H&S programs. Audits occur every 3 years.
  - c. QuickVett is a module that allows contractors who do not currently participate in Avetta to provide a limited amount of information/safety data to determine if the contractor will meet Duke Energy's safety performance targets should work be awarded. This process does not allow a safety rating to be issued.
4. All targets are 3-year averages except for fatalities, Contractor shall use the following minimum requirements to pre-qualify, provide documentation as requested, and qualify sub-contractor companies:

Contract companies with 1 - 10 employees – all business units:

- a. One or fewer workplace fatalities within the previous three (3) years. If one (1) fatality, no confirmed Serious OSHA citation relating to the fatality.
- b. Experience Modification Rate (EMR) <1.00
- c. Confirmed OSHA Citations <1 serious with 0 willful or repeat Citations
- d. Environmental Notice of Violation (NOV) (federal or state) with penalties > \$100

Companies with 11 but less than 99 employees - all business units

- a. One or fewer workplace fatalities within the previous three (3) years. If one (1) fatality, no confirmed Serious OSHA citation relating to the fatality.
- b. Experience Modification Rating (EMR) = 1.0 or less.
- c. Environmental Notice of Violation (NOV) (federal or state) with penalties greater than \$1000 = one (1) or less confirmed
- d. OSHA citations = one (1) or less serious with 0 willful.
- e. Total Recordable Injuries = three (3) or less.

**Contractors must pass the fatality target (a) and three of the remaining four targets (b-e).**

Companies with 100 or more employees - all business units

- a. One or fewer workplace fatalities within the previous three (3) years. If one (1) fatality, no confirmed Serious OSHA citation relating to the fatality.
- b. Experience Modification Rating (EMR) = 1.0 or less.

- c. Environmental Notice of Violation (NOV) (federal or state) with penalties greater than \$1000 = two (2) or less confirmed.
- d. OSHA citations = two (2) or less serious with 0 willful.
- e. Total Incident Case Rate (TICR) = Business unit specific Targets. Total Recordable Incident Rate (TRIR) is an equivalent term)
- f. Days Away/Restricted Time (DART) = Business Unit Specific Targets  
**Contractors must pass the fatality target (a) and four of the remaining five targets (b-f).**

**CHIPPER OPERATIONS**

- 1. All chipping operations must comply with ANSI Z133.
- 2. The chip area shall be noted on the PJB.

**GENERAL OVERHEAD SAFETY**

- 1. When tree crews ask for a line to be grounded during outage situations (when a tree is lying on a line), the following is required:
  - a. Grounds shall be installed on both sides of the work location and as close as possible to the tree crew.
  - b. If the tree crew work involves a pole or structure, that pole or structure must also be grounded.
- 2. For qualified line-clearance arborists and trainees, Contractor shall reference the OSHA tables in 29 CFR 1910.269 (I) for the MAD for energized lines or equipment.

**EQUIPMENT OPERATIONS INCLUDING MOWING, HERBICIDE AND PESTICIDE APPLICATIONS**

- 1. When supporting Transmission VM operations, specialized mowing equipment shall not be used until Contractor identifies terrain hazards and determines the appropriate equipment to use. Contractors shall develop an appropriate work plan to safely complete the work task and include the work plan on the PJB.
- 2. Contractors are required to contact their Duke Energy VM representative when:
  - a. Equipment operator visibility or accessibility impedes the ability to conduct a hazard assessment due to field conditions, including vegetation height and/or density.
- 3. All-Terrain Vehicles (ATV) are not allowed for any VM operations. Utility Terrain Vehicles (UTV) must have seat belts and be inspected to be properly functioning before use on the right of way

**SPOTTER PROGRAM**

- 1. Contractor shall have a documented Spotter Program subject to the review of the Owner.
  - a. For Transmission VM operations, a spotter is required when operating specialized mowing equipment on Transmission rights-of -way.