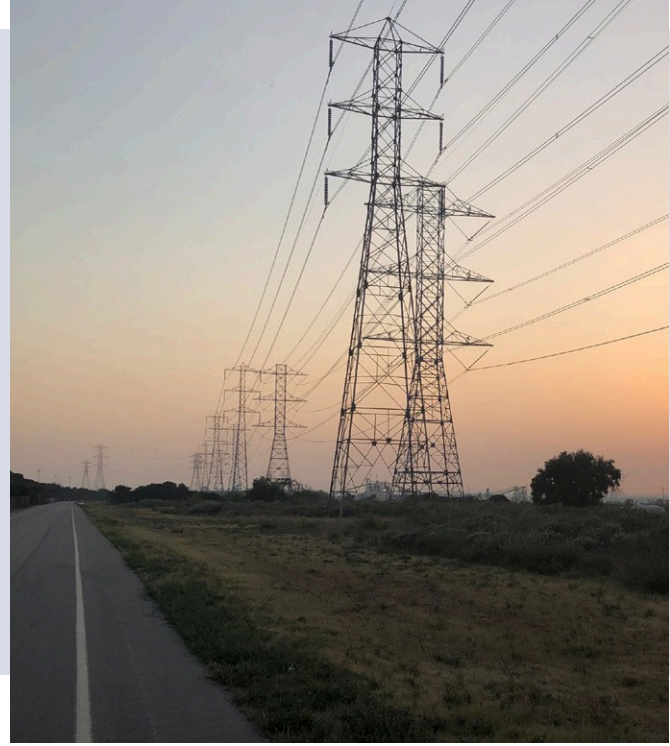


ACHIEVING RIGHT-OF-WAY (ROW) ACCREDITATION

An Overview for Utilities



About the Right-of-Way Stewardship Council (ROWSC)

In 2003, electric transmission lines sagged into trees, setting in motion cascading failures across the power grid. The result was the largest blackout in U.S. history. Despite resulting vigorous enforcement and compliance efforts by vegetation managers that drove improvements in power system reliability and reductions in potential liability, there were still unintentional environmental and reliability consequences.

The founders of the ROWSC recognized that the way forward meant renewing the utility industry's commitment to integrated vegetation management (IVM). The intended outcome was the creation of a means to recognize excellence in the application and practice of IVM on the North American electric power grid.

Today, the ROWSC is the only accreditation program that has established standards for responsible ROW vegetation management. Through this approach, utility companies validate their commitment to environmental stewardship, environmental, social, and governance (ESG) principles, and the communities they serve.

The ROWSC was established in 2013 as a program within Dove-tail Partners, a 501(c)(3) nonprofit environmental think tank, serving as program administrator. The organizational structure of the ROWSC includes diverse volunteer representatives from non-governmental environmental organizations, academia, the utility vegetation management industry, utilities, government, and the public at large.

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The Benefits of Achieving Right-of-Way Steward Accreditation

ONE

Institutionalized Reliability and Sustainability

Through this approach to IVM, accredited utilities sustain power system reliability while achieving a balance in the three pillars of ESG sustainability. ROWSC principles guide member utilities in establishing, implementing, maintaining, and continually improving their vegetation management practices, consistent with the globally recognized International Organization for Standardization (ISO) 14001 Environmental Management Systems. The accreditation process also encourages risk-based thinking that promotes integration of vegetation management with the requirements of other organizational-management structures (e.g., quality, occupational health and safety, financial management).

TWO

Assured Regulatory Compliance

ROWSC accreditation provides assurances to regulatory agencies that the IVM framework is implemented consistently within an organization's practices and that compliance-related outcomes are appropriately considered in the vegetation management system.



THREE

Enhanced Community Relations

ROWSC accreditation can enhance a company's reputation and instill stakeholder confidence. Criteria within the accreditation standards help to foster more comprehensive strategic communication, education, and engagement with the public and internal and external stakeholders.

FOUR

Distinction as a "Right-of-Way Steward Utility"

ROWSC's ISO-grounded accreditation model provides standards of excellence for environmental stewardship. Accreditation presents the opportunity for utility companies to demonstrate their commitment to such standards as a Right-of-Way Steward Utility.

FIVE

Reduced Costs

ROWSC principles emphasize proactive management and biological control methods that reduce incompatible vegetation and establish a sustainable, compatible plant community. Through this management approach, utilities can realize a reduction in treatment efforts and resulting cost savings without compromising safety and compliance outcomes.

SIX

Recognition Through Continuous Improvement

Even upon accreditation, utilities must continue to demonstrate their commitment to continuous improvement. Throughout the accreditation process and beyond, ROWSC enlists third-party experts that perform regular checks and audits of ongoing IVM practices. This independent verification ensures the sustainability of these practices and heightens recognition of these utilities to the public, regulators, and the industry at large.

ACCREDITED UTILITIES

The ROWSC has accredited utilities in the United States and Canada. A common characteristic of these utilities is their recognition that organizational sustainability includes protecting the environment, responding to changing environmental conditions, and ensuring safety, security, access, and regulatory compliance.

Accredited utilities, recognized by the ROWSC as "A Right-of-Way Steward Utility," include:



NEW YORK POWER AUTHORITY
(NYPA)



SACRAMENTO MUNICIPAL
UTILITY DISTRICT
(SMUD)



VERMONT ELECTRIC
COMPANY
(VELCO)

Steps in Achieving ROWSC Utility Steward Accreditation

STEP ONE

Application

The process begins with an application, accompanied by a few required documents (as described below) and an application fee of \$2,500.

Applicants are asked to provide background information about the utility and its IVM program. This information includes a map of the utility's ROW and a description of the IVM program's scale, such as the states or provinces in which the utility operates and how many miles of transmission lines are maintained. ROWSC may request additional information during the application review to support the gap assessment process and to help develop a cost estimate and scope of work for a full assessment.

Once submitted, the application is referred to the audit committee chair. The committee chair works with the applicant to review the audit process and determine costs, and then selects an independent lead auditor if the utility decides to proceed to the next step (gap assessment). The lead auditor then becomes the utility's primary point of communication and contact for the process moving forward.

STEP TWO

Gap Assessment

The gap assessment includes review of the utility's documents and information to establish a preliminary assessment of compliance with the ROWSC standards. The process may include one or more meetings with the lead auditor (or an audit team) to create a gap assessment summary that addresses the utility's readiness for a full assessment (including field audit).

The assessment summary identifies any obvious gaps between the requirements for accreditation and the utility's vegetation management program. Documents that may be requested during the gap assessment include:

Additional map(s) of ROW.

ROW management plan(s), tactical plan(s), and a summary of recent annual activities.

Information, listings, or references to applicable laws, regulations, and standards.

Information about any research or demonstration projects related to IVM that the utility is conducting or supporting.

Policies or other written statements related to the risks and benefits of each IVM method used and required worker precautions.

Information about education and qualifications related to IVM, other training programs and related plans for worker development, and public education and outreach activities.

Results of the most recent public opinion surveys (if available).

Steps in Achieving ROWSC Utility Steward Accreditation

STEP THREE

Decision to Proceed

The decision to proceed to a field assessment lies with the utility after the gap assessment, based on their determination of readiness for a field audit.

From the ROWSC administrator's perspective, an applicant should be determined ready for a field assessment if all required materials have been submitted, the application fee has been paid, and all parties have signed the auditing contract or other necessary agreement forms. At this point, if the utility wishes to proceed, the lead auditor and the utility coordinate a field audit.

STEP FOUR

Field Audit

During this crucial stage, an audit team (including the lead auditor and up to three additional auditors) visits the utility. Onsite, the ROWSC team completes further document reviews and interviews staff and contractors to ensure consistency with previous submissions, and reviews workplace safety and hiring practices, documentation of vegetation management implementation, and stakeholder engagement.

The team also visits randomly selected field sites along the ROW to verify compliance with ROWSC standards. The field audit addresses variances identified in the gap assessment, confirms procedure implementation, reviews chemical use, observes water and wildlife protections, examines crew and worker conditions, assesses interactions with stakeholders, and evaluates road and infrastructure conditions.

Before the field audit is complete, a closing meeting is held. At that meeting, the lead auditor provides the utility with a preliminary summary of the anticipated accreditation outcome and team members discuss next steps.

STEP FIVE

Full Accreditation Decision

Once the field audit is completed, the lead auditor and the audit team write a draft audit report. The report documents the process of the assessment, details the level of conformance with the standards, provides the audit team's findings, and specifies the final recommendation regarding accreditation of the utility.

The draft report is provided to the applicant utility and the ROWSC administrator for review and comment before it is finalized. The utility may provide additional information or request a meeting to discuss or correct errors, address omissions, or clarify findings and the accreditation recommendation.

After the utility's review, the final audit report is submitted to the ROWSC. The Council is responsible for reviewing the audit team's findings and their recommendation related to accreditation of the applicant utility. Following their review, the Council members cast their vote to accept or reject the recommendation.

If there are issues of nonconformance that hinder accreditation, the applicant utility has up to 12 months from the date of final report to remedy the situation, which may include additional auditing.

Steps in Achieving ROWSC Utility Steward Accreditation

STEP SIX Maintaining Accreditation

Initial ROWSC accreditation is awarded for five years. During this time, the following cycle applies:

YEAR 01	Application, gap assessment, field audit, and initial accreditation
YEAR 02	Desk audit
YEAR 03	Desk audit
YEAR 04	Mid-cycle audit
YEAR 05	Desk audit and preparations for full re-accreditation audit in the following year

Note that the first year of this cycle may take more than 12 months to complete. The timing of subsequent years is based on the anniversary date of initial accreditation, rather than the calendar year.

A desk audit, completed remotely, includes a request for information about any changes or updates related to the IVM program and in response to the findings and recommendations in the audit report. The mid-cycle audit may occur in Year 3, 4, or 5 (most commonly Year 4) and requires an onsite visit. A single auditor often conducts the mid-cycle audit, which is a streamlined version of the original field audit. Each annual audit includes a fee that is detailed in the cost estimate provided to the utility during the initial application process. Maintaining ROWSC

accreditation requires completion of each annual audit and payment of any associated fees.

The five-year accreditation award may be extended to the utility if the audit team feels that ROWSC standards compliance is sufficient and IVM performance is high enough that a full re-audit is not immediately necessary. This determination and auditor recommendation may occur during the mid-cycle audit and may be brought forward to the Council for consideration.

Steps in Achieving ROWSC Utility Steward Accreditation

STEP SEVEN

Re-Applying for Accreditation

A utility may decide not to proceed with a field audit immediately after the gap assessment is completed. In this case, their application remains open for 18 months and can be reactivated during this period under the same terms and without any additional application fee or change in cost estimate. If a more significant period elapses between the initial gap assessment and a decision to proceed, it may be necessary to repeat the earlier steps and the exact process of reactivating the application will be determined by the auditing committee in consultation with the Council.

STEP EIGHT

Ending Accreditation

The ROWSC may provide a 12-month timeframe to allow the utility to resume compliance before the accreditation is fully revoked. If an annual audit determines that the utility's conformance with the standard is no longer sufficient, a warning may be given or the accreditation may be suspended. Again, the Council may provide 12-months for re-compliance.

An accredited utility may also choose to voluntarily withdraw from the program at the end of the five-year cycle or at any time during the cycle by providing a written notice to that effect.

Application follows on next page.

ADDITIONAL INFORMATION

For additional information, a more-detailed description of the technical requirements for applicants seeking ROWSC accreditation, or to begin the accreditation process, please contact the ROWSC online at info@rowstewardship.org or through:

Dovetail Partners

528 Hennepin Avenue
Suite 303 Minneapolis,
MN 55403 +1 612-333-
0430



ROWSC ACCREDITATION APPLICATION

PART ONE

Contact Info

Name of Applicant Utility

Primary Contact Name

Title

Address

Phone

Email

PART TWO

**Preliminary
ROW Overview**

01 Total ROW miles (not line miles)

02 Voltages to be included and an explanation why any transmission lines might be excluded (E.g. non-NERC)

03 Please describe the ROW asset from a jurisdictional perspective (E.g. miles by state IF applicable)



ROWSC ACCREDITATION APPLICATION

PART TWO

**Preliminary
ROW Overview**
CONTINUED

04 Please describe the ROW asset from an operational perspective
(E.g. miles by operating company and/or operating areas/divisions IF applicable)

05 Please provide a brief description of any significant changes
to your IVM program over the last 5 years

06 Any additional information as necessary (e.g., desired timeline
for accreditation or other special considerations)

ROWSC ACCREDITATION APPLICATION

PART THREE

**Attachments
Requested**

01 Please attach a Map of your ROW System IF available.

02 Please include a non-refundable application fee of \$2,500 payable to Dovetail Partners, Inc. fiscal agent and administrator for ROWSC.

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This information above is true to the best of my knowledge and I understand that this information is used to guide pricing of Full Assessment Audit.

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SIGNATURE

DATE

Completed applications, as well as any questions or requests for more information can be emailed to info@rowstewardship.org.