DTE Electric Company
One Energy Plaza, 1635 WCB
Detroit, MI 48226-1279

Carlton D. Watson
(313) 235-6648
carlton.watson@dteenergy.com

March 3, 2025

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Lansing, MI 48917

Re: In the matter of the Application of DTE Electric Company for authority to increase its rates, amend its rate schedules and rules governing the distribution and supply of electric energy, and for miscellaneous accounting authority. Case No. U-20162

Dear Ms. Felice:

Attached for electronic filing in the above-captioned matter is DTE Electric Company's 2025 Tree Trim Annual Report.

Very truly yours,

Carlton D. Watson

Digitally signed by Carlton D. Watson
Date: 2025.03.03 10:34:56 -05'00'

Carlton D. Watson

CDW/cdm
Attachment

DTE Electric Company

Tree Trim Annual Report

March 1, 2025

On May 2, 2019, in Case No. U-20162, the Commission directed DTE Electric Company (DTE Electric or Company) to file an annual report to detail the progress of the Surge Program and Enhanced Tree Trim Program (ETTP) performance. As detailed in the Order from Case No. U-20162:

> *Thus, the annual report shall also break out all activity, costs, and miles trimmed under any and all tree trimming programs (including hardening) in the City of Detroit, to provide information on the progress made in the City of Detroit with each program. The reporting shall include measurable data for the efforts, including miles completed by service center, performance of ETTP circuits compared to non-ETTP circuits, the costs of the efforts, number of employees directly involved in the efforts, tree-related outage reductions, SAIDI reductions, and whether the funding for the efforts is a capital expense or O&M cost. Further, the report shall track ETTP circuit performance, comparing average outages for the three years prior to the enhanced trimming with outages in the years after the trimming has been performed. The first report is due in this docket March 1, 2020, and an annual report is due on March 1 of each year thereafter.*

Per the Orders in Case Nos. U-20162 and U-20561, this report includes the requested information and is split into six sections as follows:

1) Miles Completed to ETTP Standard – Annual ETTP maintenance miles are reported by Service Center over the 2015-2024 time period. City of Detroit miles are broken out separately.
2) O&M and Capital Spend on Tree Trimming Activities – Annual tree trim spend is reported by Service Center over the 2016-2024 time period. City of Detroit spend is broken out separately. Costs from 2015 are excluded as the ETTP specification makes up a relatively small portion of the overall tree trim spend in that year.
3) Tree Trim Circuit Performance (formerly ETTP Circuit Performance) – A new methodology for measuring reliability will be introduced in DTE Electric's next rate case filing, Case No. U-21860, as 2025 is expected to be the final year of the Surge Program.
4) Spot Tree Trimming – Description of spot trimming work completed on the ten-worst performing circuits.

5) Tree Trim Workforce – A 2024 summary of the tree trim workforce broken down by DTE Electric employees and contractors.
6) Incremental Funding for Tree Trim Program – Description of the additional work completed in 2024 from the pull-ahead funding approved in Case No. U-21799, in which the Company was authorized to spend up to $15M of its 2025 regulatory asset.

Section 1 – Miles Completed to ETTP Standard

Since the inception of the ETTP standard, the Company has trimmed 42,898 miles, including 4,348 miles that were trimmed in 2024 as part of the Surge Program. As described and shown below:

Table 1 breaks out ETTP miles trimmed by distribution and subtransmission,

Table 2 details ETTP miles trimmed by service center and year,

Table 3 shows total miles trimmed to ETTP, which may include second and third cycle ETTP trimming. It has a breakdown of only unique miles trimmed to ETTP, which does not count the second or third cycle of ETTP trimming. It also shows miles in backlog (off-cycle), average density and work location by service center. Previous filings from the Company also included manual/climbing trimming data by service center, which was from a onetime study performed by a third-party consultant. The Company does not collect climbing data for each circuit trimmed, however, backlot work is strongly correlated with manual/climbing trimming,

Table 4 shows ETTP miles trimmed in the City of Detroit, and

Table 5 covers miles trimmed as part of the 4.8kV Hardening Program.

Table 1 – ETTP Miles Trimmed by Circuit Type

Circuit Type	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total	% of System
Distribution[1]	257	2,270	2,733	3,128	3,181	4,583	5,021	5,991	4,566	3534	35,264	91%
Subtransmission[2]	188	1,030	868	540	1,006	1,006	726	723	733	814	7,634	100%
Total Miles	**445**	**3,300**	**3,601**	**3,668**	**4,187**	**5,589**	**5,747**	**6,714**	**5,299**	**4,348**	**42,898**	**92%[3]**

[1] Some miles are on their second cycle of ETTP trimming and are included in the numbers more than once.
[2] Some subtransmission miles are on their second or third cycle of ETTP trimming and are included in the numbers more than once.
[3] The numerator includes only unique miles (miles are only counted once even if the miles are on their second or third cycle of ETTP trimming).

Table 2 – ETTP Miles Trimmed by Service Center

Service Center	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
ANN	5	143	566	309	246	537	285	585	423	328	3,427
CAN	40	60	62	271	307	335	360	375	244	103	2,157
HWL	192	272	445	262	264	603	659	719	320	186	3,922
LAP	13	341	390	423	378	653	584	555	616	276	4,229
MAR	70	351	419	432	303	334	395	776	781	632	4,493
MTC	23	250	259	115	321	430	274	335	79	502	2,588
NAE	42	693	470	533	557	463	826	793	605	564	5,546
NPT	5	159	263	342	254	536	561	196	437	149	2,902
PON	6	426	230	237	424	567	618	551	443	413	3,915
RFD	24	219	112	381	670	444	300	922	466	697	4,235
SBY	8	111	102	207	129	114	181	377	453	109	1,791
WWS	17	275	283	156	334	573	704	531	433	388	3,694
Total Miles	**445**	**3,300**	**3,601**	**3,668**	**4,187**	**5,589**	**5,747**	**6,714**	**5,299**	**4,348**	**42,898**

Table 3 – ETTP Miles Trimmed, Miles of Backlog, Average Tree Density and Mix of Work by Service Center

Service Center	Cumulative Miles Trimmed ETTP[4]	Total System Miles		For the 2024 Plan Only			
		Unique Miles Trimmed to ETTP[5]	Remaining Miles of Backlog to ETTP[6]	2024 Unique Miles Trimmed to ETTP[5]	Total 2024 Miles Trimmed	Avg. Tree Density[7] (trees/mile)	Work Location[7] (% Backlot)
ANN	3,427	2,102	134	12	328	265	74%
CAN	2,157	1,423	4	36	103	288	95%
HWL	3,922	2,417	12	13	186	191	80%
LAP	4,229	2,669	0	24	276	162	85%
MAR	4,493	2,875	108	426	632	126	71%
MTC	2,588	1,856	715	491	502	135	73%
NAE	5,546	3,245	537	358	564	90	92%
NPT	2,902	1,953	0	10	149	81	71%
PON	3,915	2,652	200	38	413	257	82%
RFD	4,235	3,304	113	310	697	180	89%
SBY	1,791	1,258	52	19	109	93	79%
WWS	3,694	2,962	387	619	388	209	88%
Total Miles	**42,898**	**28,715**	**2,259**	**2,356**	**4,348**	**215**	**82%**

[4] Includes second or third cycle of ETTP trim.
[5] Does not include second or third cycle of ETTP trim.
[6] Remaining miles in backlog post 2024 trimming.
[7] Density and work location are calculated based on task points identified by the planners during planning (includes brush).

Table 4 – ETTP Miles Trimmed in the City of Detroit by Service Center

Service Center	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total	% of City
CAN	40	42	60	234	293	291	326	246	240	88	**1,860**	**-**
MTC	-	-	6	-	-	6	-	**-**	5	-	**17**	**-**
RFD	5	87	27	251	464	90	129	259	192	265	**1,769**	**-**
Total Detroit Miles[8]	**45**	**129**	**93**	**485**	**757**	**387**	**455**	**505**	**438**	**352**	**3,646**	**97%[9]**

Table 5 – ETTP Miles Trimmed as Part of the 4.8kV Hardening Program[10]

Service Center	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024	Total
CAN	-	-	-	20	0	106	198	199	143	95	**761**
RFD	-	-	-	127	158	161	129	325	100	171	**1,171**
Total 4.8kV Miles	**-**	**-**	**-**	**147**	**158**	**267**	**327**	**524**	**243**	**266**	**1,932**

Section 2 – O&M and Capital Spend on Tree Trimming Activities

The 2024 O&M Tree Trim expenditures of $159,193,398 are presented in five categories in **Table 6** with years 2016 through 2023 included for reference, as detailed below:

1) Line Clearance Maintenance – Comprises costs associated with maintenance activities such as contractor labor and equipment, general foreman cost, per diems, and overtime premiums.
2) Trouble – Expenditures on non-storm, unplanned reactive tree trim work related to outage or non-outage problems on the electric system.
3) Tree Trim Program/Other – Includes customer-requested tree trimming, auditing, software maintenance, herbicide program, training, safety, and other miscellaneous costs associated with Tree Trim.
4) DTE Electric Staff Expense – Staff expenditures related to the tree trim program.
5) COVID Expenses – Includes expenditures associated with the additional safety measures implemented attributable to the COVID-19 Pandemic.

[8] Some miles are on their second cycle of ETTP trimming and are included in the number more than once.
[9] The numerator includes only unique miles trimmed to ETTP, therefore, avoids double-counting miles on second cycle or beyond.
[10] Program began in 2018 and miles in Table 5 are a subset of miles in Tables 1-3.

Table 6 – Annual O&M Tree Trim Spend by Category[11] (in $000s)

O&M Spend	2016	2017	2018	2019	2020	2021	2022	2023	2024
Line Clearance Maintenance	$59,156	$69,344	$71,758	$116,749	$151,021	$140,203	$209,270	$149,227	$134,021
Trouble	$10,738	$11,395	$12,967	$16,557	$12,238	$10,668	$12,683	$9,536	$11,988
Tree Trim Program/Other	$2,772	$1,813	$2,501	$10,229	$6,840	$15,670	$13,014	$6,483	$8,475
DTE Staff Cost	$1,497	$1,704	$1,884	$2,667	$3,723	$4,373	$4,603	$4,423	$4,709
COVID-19[12]					$1,341	$746			
O&M Total	**$74,162**	**$84,256**	**$89,109**	**$146,202**	**$175,163**	**$171,659**	**$239,570**	**$169,670**	**$159,193**

Table 7 further breaks down the "Line Clearance Maintenance" costs in **Table 6** by service center.

Table 7 – Annual Maintenance Tree Trim Spend by Service Center (O&M Only) (in $000s)

Service Center	2016	2017	2018	2019	2020	2021	2022	2023	2024
ANN	$4,081	$12,104	$9,489	$6,700	$18,811	$11,077	$19,664	$17,458	$14,464
CAN	$3,312	$1,200	$8,851	$18,828	$11,254	$6,702	$14,190	$4,914	$919
HWL	$4,838	$12,562	$6,269	$6,523	$19,745	$23,573	$20,366	$10,943	$7,365
LAP	$5,146	$5,820	$4,385	$5,307	$12,866	$8,215	$6,297	$9,272	$5,422
MAR	$3,680	$4,450	$5,022	$2,757	$5,088	$3,445	$8,968	$11,317	$8,435
MTC	$3,869	$4,094	$1,961	$3,771	$9,914	$3,728	$4,874	$2,259	$11,832
NAE	$3,100	$2,242	$2,616	$3,137	$5,336	$3,858	$5,567	$4,197	$5,282
NPT	$1,990	$4,844	$5,288	$3,400	$9,635	$12,826	$6,520	$11,731	$3,326
PON	$12,294	$8,620	$8,168	$24,884	$27,769	$29,346	$31,446	$19,291	$21,431
RFD	$5,929	$3,762	$11,026	$28,999	$12,310	$6,817	$42,188	$27,138	$32,460
SBY	$3,352	$3,078	$4,338	$2,656	$3,982	$2,864	$15,144	$13,381	$1,841
WWS	$7,564	$6,568	$4,344	$9,786	$14,312	$27,751	$34,046	$17,328	$21,246
Total	**$59,156**	**$69,344**	**$71,758**	**$116,749**	**$151,021**	**$140,203**	**$209,270**	**$149,227**	**$134,021**

[11] Table does not include any spot-trimming expenses from other programs because they are not part of the tree trim maintenance costs. This table does not include tree trimming expenditures related to storm; such costs are allocated outside the tree trim budget.

[12] These expenses were mainly for the one-person per vehicle policy, and PPE for DTE Electric employees and contractors.

Table 8 details the 4.8kV Hardening capital spend in 2018-2024.

Table 8 – Annual 4.8kV Hardening Tree Trim Capital Spend by Service Center

(in $000s)

Service Center	2018	2019	2020	2021	2022	2023	2024
CAN	$2,136	-	$5,879	$11,757	$10,676	$7,819	$9,424
RFD	$7,858	$10,082	$12,026	$10,275	$25,314	$10,955	$17,654
Total	**$9,994**	**$10,082**	**$17,905**	**$22,032**	**$35,989**	**$18,775**	**$27,078**

Table 9 highlights the $33,745,039 tree trim spend in the City of Detroit for the year 2024, which includes $25,907,529 of Capital spend. City of Detroit spend in 2018 through 2023 is included for reference.

Table 9 – Annual Detroit O&M and 4.8kV Hardening Capital Tree Trim Spend

(in $000s)

	2018	2019	2020	2021	2022	2023	2024
Detroit - O&M	$14,071	$40,513	$7,334	$3,875	$8,468	$9,754	$7,838
Detroit – 4.8kV Hardening Capital	$9,326	$10,082	$11,888	$21,408	$28,866	$16,149	$25,908
Detroit Total	**$23,397**	**$50,595**	**$19,222**	**$25,283**	**$37,334**	**$25,903**	**$33,745**

Section 3 – Tree Trim Circuit Performance

Calculation Methodology

As discussed in U-21534, the Company recognizes the usefulness of the previously used calculation methodology is beginning to diminish with the majority of circuits now trimmed to the ETTP specification. Thus, the remaining non-ETTP population is becoming too insignificant to be an effective comparison to ETTP trimmed circuits. Moving forward, the Company plans to develop and implement a new methodology to track ongoing circuit performance for maintaining our current program that will be presented in Case No. U-21860. An addendum to this report will be filed by June 1, 2025 reflecting the effectiveness of the tree trim program using the new methodology.

Section 4 – Spot-Trimming on Worst Performing Circuits

DTE Electric provides an annual power quality investigation report, which contains data pertaining to all primary customer power quality investigations conducted in the past year for end-use customers, derived from customers' power quality meters. This section contains 2024 calendar year inclusive of the ten-worst performing circuits based on outage frequency as compared to the rest of the system (based on all cause codes, not just tree-related events). Table 17 lists these circuits and the spot trimming that was completed in 2024 on planned maintenance trimming.

Table 10 – Tree Trimming on 2024 Ten-Worst Performing Circuits

Circuit	sysSAIFI[13]	sysSAIFI ex MED[14]	Spot-Trimming		Last Maintenance Trimming Year
			Performed in 2024?	Number of Poles Trimmed	
JSLYN9140	0.00713	0.00539	Yes	100	2015
CLKSN9113	0.00689	0.00476	No		2023
CLYDE9079	0.00597	0.00585	Yes	17	2021
MTMRA8035	0.00591	0.00566	No		2021
BEACH8601	0.00542	0.00535	No		2021
BISMK8458	0.00516	0.00354	No		2013
WDLOW9064	0.00514	0.00394	Yes	46	2021
BELVL9356	0.00504	0.00244	No		2021
CASVL8819	0.00484	0.00414	No		2024
TAMRK9031	0.00472	0.00382	No		2022

Section 5 – Tree Trim Workforce

DTE Electric personnel directly involved in Tree Trimming is detailed in **Table 18**. In 2024, the average number for contractors on property were 1,188. Contractor headcount fluctuation over the course of 2024 is shown in **Chart 1**.

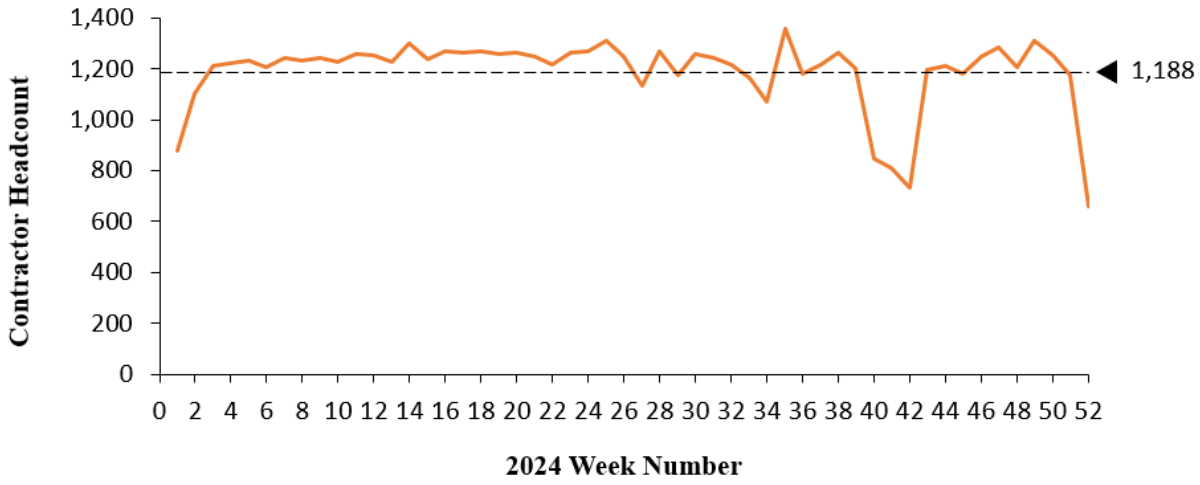
Table 11 – 2024 DTE Electric and Contractor Tree Trim Headcount

Facilitator – Arborists	13
Supervision	8
Regional Foresters	5
Strategy and Planning	5
DTE Electric Employees involved with ETTP	**31**

2024 Average # of Contractors	**1,188**

[13] sysSAFI is the number of customer interruptions on a specific circuit divided by the number of system customer interruptions.
[14] Major Event Days (MED).

Chart 1 – 2024 Contract Tree Trim Headcount by Week



The 2024 average local journeymen trimmers were 648, and the number of local apprentices was 212. Outsourced journeymen trimmers averaged 328 for 2024. It is typical for the workforce numbers to fluctuate over the year, especially in the late fall when many outsource trimmers return to their home states for the holidays. The outsource trimmers then gradually return through the first quarter of the year based on the Company's capacity needs.

The Company is participating in three programs in an effort to increase the number of local trimmers. The three programs are the Parnall Correctional Facility Vocational Village Training Program, the City of Detroit Tree Trim Academy, and the IBEW Local 17 Traditional Boot Camp. Below is an update on each of the programs:

A1. Parnall Correctional Facility – The Parnall Tree Trimming Program is designed to provide returning citizens the skills needed to start as an apprentice tree trimmer. DTE Electric has partnered with the Michigan Department of Corrections to provide qualified instructors and the required training support within the prison facility before participants are released. The company has paired 34 graduates with jobs.

1. Tree Trim Academy – The Company has partnered with the City of Detroit, IBEW Local 17, and its tree trimming contractors to develop and implement a pre-woodsman training pilot program to satisfy the demand for qualified tree trimmers. The pilot tree trimming academy is located within the City of Detroit and facilitates training that is aimed at preparing local resident candidates to work as woodsmen. Once candidates complete the pre-woodsman program graduates enter the nine-day boot camp that was

previously designed in partnership with the Company, IBEW Local 17, and the Company's tree-trimming contractors.

To date, the tree trimming academy has trained and graduated 216 individuals. Graduates leave the program with marketable climbing experience, a Class B CDL, and a federally-required Pesticide Applicator certification.

2. Traditional Boot Camp – IBEW continues to conduct scheduled boot camp training for apprentices at a training facility in Wales, MI.

Section 6 – Incremental Funding for Tree Trim Program

On September 24, 2024 the Company proposed pull-ahead funding of up to $15 million from the Company's approved 2025 regulatory asset as part of Case No. U-21799. The intent of the pull-ahead funding was to mitigate the risk that the Company would need to slow down its trimming efforts by reducing the number of trimmers on property, resulting in a larger ramp up of resources in January 2025. The Commission approved the Company's request on October 10th, 2024.

The Company spent $1.7 million of the approved pull-ahead funding in 2024. The pull-ahead spend was significantly impacted by the very active 2024 hurricane season (11 hurricanes, five of which were Category 3 or higher). As a result, the Company's tree trim crews were re-assigned to support restoration efforts outside of Michigan. The Company anticipates spending the remaining $13.3 million of this pull-ahead regulatory asset in 2025. Lastly, on January 23rd, 2025 the Commission approved an additional $87 million Tree Trim regulatory asset in support of the Company's surge program, which is expected to be completed by the end of 2025.