Executive Summary
Since its inception in 2001, ATC has maintained an environmental leadership strategy. In 2013, we continued to incorporate resource protection and preservation that supports business goals and growth. Being a Green Tier company is an important recognition of ATC’s commitment to environmental protection and enhancement and to doing more than simple compliance with regulations. Our commitment to the environment has become an integral part of ATC’s culture, throughout our footprint, as evidenced by our acceptance into the Michigan Department of Environmental Qualities Clean Corporate Citizen (C3) program. Whether it is our transmission line and substation work, our right of way maintenance activities, or our involvement in the community, protecting the environment is a priority that is closely aligned with the way we conduct our business.

Our commitment to environmental stewardship benefits the state by protecting and enhancing the resources that make Wisconsin a wonderful place to live and work. Many of these benefits are the result of investments in research, environmental species protection and enhancements, and community programs supported through the various stewardship opportunities.

As an example of our continued innovation and implementation of environmental commitment, ATC received the Environmental Innovation Award from Wisconsin Manufacturers & Commerce for its work designing and building transmission structures in the Yahara wetlands along the Beltline Highway in Madison, Wis. Award winners were selected by an independent panel of judges representing industry, the Department of Natural Resources, the University of Wisconsin and environmental groups.

Evidence of our environmental commitment is also demonstrated by ATC acceptance and involvement into the State of Michigan’s Clean Corporate Citizen (C3) program. Similar to the Green Tier program, The C3 program, administered by the Michigan Department of Environmental Quality, recognizes environmental stewardship. As a commitment of our high environmental standards we elected to join the program, ensuring environmental stewardship, protection and preservation is consistently applied across ATC’s entire footprint.

Environmental Performance
We take our environmental commitments seriously. At ATC we have systematically embraced Green Tier and have incorporated Green Tier requirements and environmental awareness into our everyday practices. Many of our successes continue to build upon and maintain excellent performance accomplishments as we strive for continued improvement and environmental
excellence. The following sections illustrate how ATC continues to meet our Green Tier commitments.

Minimize generation of waste and recycle.

ATC’s recycling activities continued to be strong in 2013. We work with our contractors to identify opportunities for recycling construction and office materials. In 2013, ATC and our contractors achieved an incredible rate of reusing or recycling 99% percent of non-hazardous construction waste. This included over 4,864 tons of material including various metals, glass, wood, concrete and cardboard. The success of our recycling program translated into more than $495,608 in savings on ATC projects.

Recycling of office waste at ATC offices resulted in nearly 167 tons of waste diverted from landfills, saving nearly 120 million cubic yards of landfill space. Recycling of office waste alone saved over 2,800 trees, 5,618 barrels of oil, and nearly 40 million gallons of water that would have been necessary to produce virgin office products.

ATC understands that minimizing the use of first generation products can have a significant effect on waste generation. In our offices, the paper we use is constituted of 30% recycled products and two sided copies are a company standard. Serving plates and utensils at each office are constructed from quickly renewable sources such as soy and potato. Each office continues to implement unique recycling, and re-use programs including plastic cap and bag, battery, shoe and other clothing recycling events.

Pollution Prevention

In the years since ATC has been in Green Tier, we have worked with our contractors to develop comprehensive preventative maintenance and inspection programs aimed at reducing the frequency and severity of fuel and oil spills on our work sites. Work crews consistently conduct equipment inspections prior to work activities, identifying conditions that otherwise may result in releases to the environment. All field crews have been outfitted with spill kits, and crews are trained on appropriate implementation of spill response. Because of this, we have seen a downward trend in the number of spills from 79 in 2010 and a high of 86 in 2011, to 67 spills in 2013. We continue to work with our contractors, identifying measures that can be taken to further reduce the number and nature of spills occurring on our projects, ultimately resulting in less pollution released to the environment.

The Rockdale to West Middleton transmission line put into service in 2103 is more efficient and results in significant reductions of coal plant operation; it is estimated that this more-efficient line will eliminate 34,000 to 140,000 metric tons of carbon emissions each year.

To prevent pollution and sedimentation reaching our wetlands and waterways ATC works with our contractors to anticipate, plan for and implement erosion and sediment control measures on all projects creating soil disturbance. ATC’s
contractors conduct dewatering activities by means that protect adjacent wetlands and waterways from sedimentation. Whenever possible, water is pumped to an upland location and allowed to infiltrate. On several projects, ATC’s contractors have utilized on-site retention basins composed of straw bales, stakes and geo-tech fabric that effectively filter sediment laden water. Filter bags are also used during dewatering operations.

Where ground disturbance occurs, temporary erosion control measures are taken. Erosion control devices are regularly monitored and maintained. ATC’s contractors also develop and implement innovative erosion control techniques for each project that meet the technical standards. Upon site stabilization, in our continued effort to reduce waste streams, ATC’s contractor’s attempt to reuse erosion control devices in order to minimize the amount of material going to landfill and save on material cost.

**Environmental Impact Avoidance**

On every project, ATC includes environmental impact avoidance during project planning. Facility location and construction methods which would have no environmental impact are given special consideration. Where impacts cannot be avoided, ATC works with our contractors to develop siting and construction options that minimize those impacts. We have developed and continue to improve on environmental construction practices that eliminate and minimize environmental impacts. Our construction practices address wetland and waterway protections, erosion control, invasive species control, protection of threatened and endangered species and their habitats, and vegetation management. They describe the techniques and goals that we expect to achieve on all of our projects to minimize environmental impacts. ATC provides training to our contractors so that they have a clear understanding of the standards we expect to achieve.

Environmental access plans (EAP) that indicate where specialized access or construction techniques should be implemented have been developed for all of our facilities and are updated whenever work on a facility is planned. By utilizing construction access mapping and project specific training, contractors have the tools necessary to be able to identify where and which practices should be applied that protect our resources.

The use of heavy equipment in wetlands is avoided whenever possible. When wetland access is required, disturbance to wetland soils and vegetation is reduced by implementation of specialized construction techniques such as; timing wetland construction during dry conditions, utilizing ice roads and frozen conditions, low ground pressure equipment and specialized track vehicles, and/or construction matting.

Stream crossings with heavy equipment are avoided whenever possible. When stream crossings are required, ATC will install temporary clear span bridges (TCSB) to cross the waterway and avoid disturbances to the stream and streambed.
Minimizing impacts of construction, maintenance and operations.

Minimizing environmental impacts resulting from our activities is inherent at ATC. In 2013 ATC developed a cross functional team comprised of Environmental, Legal, Asset Maintenance and Business Development to ensure that ATC is fully compliant with all applicable federal and state avian laws and is reacting in a timely manner to address avian interaction issues. Extensive Legal analysis concluded that ATC is fully compliant and risk is effectively mitigated through current processes and procedures.

In May, our environmental construction and project planning practices helped us earn recognition from the Wisconsin Manufacturers & Commerce for innovation on the Rockdale-West Middleton project. ATC received the Environmental Innovation Award for its work designing and building transmission structures in the Yahara wetlands along the Beltline Highway in Madison, Wis. Award winners were selected by an independent panel of judges representing industry, the Department of Natural Resources, the University of Wisconsin and environmental groups.

Placing structures in the wetlands required us to address the challenges of accessing the wetland right-of-way and setting structures without causing significant or long-term environmental impacts. Careful planning and regulatory collaboration helped us meet our goals of minimal impacts during construction by using unique access plans—which included helicopters and low ground-pressure vehicles—along with an innovative foundation design and structure installation. Crews also installed bird flight diverters in four areas along the route to make shield wire more visible, increasing the likelihood that the birds will see the wire and adjust their flight patterns to avoid it. All of the work was completed with no environmental violations.

ATC and our contractors also used micropile technology to replace an aging transmission structure on an island in the Wisconsin River in Stevens Point. Micropiles are high-performance drilled and grouted foundations that can be installed in environmentally sensitive locations using lightweight specialty equipment. In this case, a micropile will eliminate the need for bringing heavy concrete trucks on to the island. This technology eliminated the need to construct bridges and develop access paths up to and across the Wisconsin, thereby significantly reducing impacts to that sensitive environment. River Seawalls were installed along the shore in Bukolt Park in Stevens Point to accommodate a barge that will be used to ferry crews and equipment to the island when the work was performed during the winter.

Demonstrating that environmental stewardship is important across ATCs footprint, ATC protected sensitive environmental areas on our Straits-Pine River
Transmission Line Rebuild Project near St. Ignace, Michigan. Much of this line runs through the Hiawatha National Forest, and includes significant wetlands. Performing construction work when the ground is frozen results in fewer impacts; we also made extensive use of timber mats to protect the ground and provide a stable work surface.

**Environmental Management System.**

As result of the 2012 self-assessment ATC revised and implemented changes to the Self Assessment procedure. The new streamlined procedure, allows ATC to easily assess the functionality of our Environmental Management System and identify where there are opportunities for improvement. The 2013 self assessment focused on areas where risk of environmental impacts are highest; environmental access plans, communication, environmental training, minimizing impacts, environmental monitoring, early identification of issues (i.e. no surprises), spill/emergency response and roles/responsibilities.

Our self-assessment evaluated EMS and how each of the Green Tier requirements are being met. The team also confirmed that recommendations from last year’s self-assessment had been addressed and that the Clean Corporate Citizen requirements are also being met.

Overall, our self assessment indicated that our EMS is functioning and that contractors and consultants are communicating well, environmental issues are being identified early and adequately planned for, and there is a strong overall awareness of ATC’s environmental policy.

Our self assessment identified some opportunities for improvement including having improving coordination between project planning teams and construction field personnel, and on improving project specific environmental training. ATC is addressing these opportunities as part of our 2014 goals.

**Use native vegetation around ATC facilities.**

The landscape surrounding the ATC headquarters building is dedicated to open, undeveloped space with native prairie plantings, bioswales and bio-infiltration basins that capture the water from parking lot run-off. The native landscape theme extends to the main building's roof, parts of which are covered with interlocking vegetative trays containing drought-tolerant plant species. The vegetation enables the roof to absorb a tremendous amount of rainfall, eliminating storm water, while providing an excellent layer of insulation.

We continue to incorporate the use of native seed mixes and plantings at our facilities, fee owned land, and on our ROW’s with landowner consent. We have developed and include in our construction specifications six native seed mixes for use in a variety of environments. ATC engages landowners about the value of native plantings, educates them on how to include native landscaping on their
property, and facilitates communication between and natural resource stakeholder groups aimed at increasing natural habitat.

**Control and eliminate invasive species on rights of way and fee-owned land.**

This is an ongoing effort in conjunction with our construction projects as we manage rights of way. Occurrences of invasive species are recorded during fieldwork, along with wetland and waterway delineations. These occurrences are noted on access plans, and taken into consideration during construction access planning so that appropriate invasive species protocol can be implemented during field activities.

Some measures ATC implements to minimize the possibility of invasive species being spread from a known existing population along the corridor to an uninfested area, include cleaning stations installed where loose soil and vegetation particles can be cleaned off and contained. If significant snow cover is present within an area infested with invasive species and snow plowing is necessary, plowing may be conducted in such a manner that the plowing direction will be toward the documented invasive populations.

We also supported efforts to curb the spread of invasive species by supporting an Oconto County Land Conservation Division educational outreach program. With our help, the LCD was able to purchase life-like replicas of garlic mustard, purple loosestrife, sea lamprey, zebra mussel clump, curly-leaf pondweed and other invasive species for use in education programs to facilitate training on identification of invasive species.

**Continue to participate in the Karner Blue Butterfly Habitat Conservation Partnership.**

ATC continues its active participation in this important partnership through both funding and staff participation. We continue to train and work with construction and vegetation management teams to ensure Karner Blue habitat is maintained and species protections are consistently implemented. Each year we conduct habitat and species surveys on our right-of-ways.

ATC participated in a three year study with utilities across the nation, the USACE and the New Jersey Institute of Technology to evaluate the effects of a variety of vegetation management techniques on the population and effectiveness of native pollinators. The final report will be available in 2014 and initial results indicate that the vegetation management practices ATC employs provides suitable habitat and does not negatively impact native pollinator habitat. Native pollinators numbers are in decline nationally, and dependence upon native pollinators has increased as honey bees populations have suffered significant impacts in recent years.
**Environmental Stewardship**

We continued our strong commitment to funding environmental organizations in 2013. We were recognized for our environmental stewardship and strong support with the inaugural Friends of Wisconsin State Parks President’s Award. Our significant contribution will help advance environmental education opportunities around the state and fund other programs that help preserve our parks and trails. We continued our support of the Natural Resources Foundation this year with the adoption of several State Natural Areas in Wisconsin. In fall, we were proud to offer support to the Gathering Waters Conservancy, which helps groups and individuals protect land and water resources.

In Michigan, we supported the Keweenaw Invasive Species Management Area, which facilitates cooperation and education to prevent and manage invasive species.

ATC’s has successfully implemented mitigation plans on various projects with protected species including bald eagle, wood turtle, Blanding’s turtle, Hine’s emerald dragonfly, Houghton’s goldenrod, slender glass lizard and several other state and federal threatened and endangered plant species.

ATC and their contractors have also installed bird flight diverters on several transmission lines. Typical areas where diverters are installed include major river crossings, wetlands or waterways where migratory birds are known to congregate, and areas identified as having high bird flight activity. The bird flight diverters, installed on the shield wires of power lines is completed, have shown to be an effective method of minimizing the potential for bird collisions with the power line.

As part of our Avian Protection Program, we installed additional perch deterrents on a line north of Green Bay to discourage birds from landing or sitting on the transmission towers. Birds of prey, particularly hawks, like to hunt from the top of the structures, which may put the birds at risk for collisions with ATC transmission lines.

ATC also installed osprey platforms in the Antigo area. We have been recognized by the Wisconsin DNR for our support of Wisconsin’s Osprey Recovery Program resulting in more than 500 nesting Osprey pairs in counties throughout the state.

One of our construction contractors, saved five baby kestrels in northern Wisconsin. Crews were working to replace wood poles on a line near Rhinelander when they discovered the nest in a woodpecker hole in the pole. They carefully lowered the pole with a boom truck, cut out a cross-section containing the nest, and delivered pole, nest and chicks to Wild Instincts Rehab Center in Rhinelander. This is a direct result of ATCs aggressive environmental training and awareness programs.
ATC participated in a three year study with utilities across the nation, the USACE and the New Jersey Institute of Technology to evaluate the effects of a variety of vegetation management techniques on the population and effectiveness of native pollinators. The final report will be available in 2014 and initial results indicate that the vegetation management practices ATC employs provides suitable habitat and does not negatively impact native pollinator habitat. Native pollinator numbers are in decline nationally, and dependence upon native pollinators has increased as honey bees populations have suffered significant impacts in recent years.

ATC actively works with our contractors to develop effective methods to identify environmental sensitivities and access requirements aimed at minimizing and eliminating environmental impacts. This process has been institutionalized at ATC, resulting in improvements in environmental performance as demonstrated by the significant reduction in reportable incidents. Our contractors understand and respect ATCs environmental focus and commitment and it has become a part of their normal operations to continually discover and apply new and proven ways to protect and enhance our natural resources.

ATCs aggressive environmental training program has contributed to our success of making environmental protection a practice in the course of our work. ATCs contractors receive general environmental training on an annual basis, and in 2013 over 500 site specific environmental trainings occurred. This training articulates ATCs environmental commitment and reinforces that through the use of good environmental practices, our natural resources can be preserved in an efficient, cost effective manner.

**Stakeholder Involvement**

ATC provides stakeholder involvement and community outreach primarily through open house programs in the communities where new projects are completed, and through our external website. The external website provides information related to our environmental policies including our Environmental Management System, partnerships and stewardship, and our involvement in Green Tier.

ATC also collaborates with and supports local organizations in their service and project areas. Such organizations include regional land trusts, cooperative weed management units, local chamber of commerce, wildlife and natural resources groups, schools and general educational initiatives.

In 2013 ATC launched a planting program to support tree and vegetation planting in communities in its service area. Under the program, eligible cities, villages, towns, counties and tribes may apply for financial support for planting projects on public property within their community.
We continued to sponsor Party for the Planet (formerly Conservation Weekend) at the Milwaukee County Zoo, a program that reaches more than 10,000 people annually. In April we sponsored environmental speakers, activities and cleanups to raise environmental awareness as part of our Earth Day is Everyday campaign.

**DNR Relationship**

ATC continues to enjoy a candid and cooperative relationship with the WDNR. In 2013, the DNR and ATC along with other utilities worked together to develop a Utility General Permit that streamlines utility wetland and waterway permitting. ATC also worked closely with the WDNR to develop wetland mitigation guidelines and in the development of a broad incidental take permit all aimed at protecting resources and streamlining WDNR processes. In 2013, under the direction of ATCs single point of contact, Dave Siebert, we have been able to navigate the complex state and federal land issues associated with the La Crosse to Madison transmission line project. We have also made significant advances toward renewing our lead paint memorandum of agreement with the WDNR, and have identified opportunities to pursue in 2014 for additional regulatory streamlining. ATC also looks forward to working with the DNR on finding ways to improve upon agreements in place and further develop ways to protect our natural resources.
## WISCONSIN DNR GREEN TIER SUSTAINABILITY METRICS

**Period Covered:** 2013

### Company Name: American Transmission Company

### Facility Name: American Transmission Company

### Address: W234 N2000 Ridgeview Parkway Court

### City, State, Zip: Waukesha, WI 53187-0047

### Environmental Coordinator: Greg Levesque

### Coordinator Phone: 608-877-3649

### Coordinator E-Mail: glevesque@atcllc.com

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<td>%</td>
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<td>Greenhouse Gas Emissions</td>
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### DEMOGRAPHICS

### LAND

### ENERGY

### WATER

### AIR

### WASTE
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**TRANSPORTATION**

- Hybrid Vehicles: X Each
- Gasoline Used: X Gallons
- Diesel Used: X Gallons
- Alternative Fuels Used: X

**ADDITIONAL METRICS**

Please list all other certifications (for example: LEED, Energy Star, ISO 14001): PWK Building - Platnium Leed