Vegetation Management

POLE CLEARING ACTIVITY

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1 PURPOSE

This document describes the procedures for pole clearing including customer notification, mechanical pole clearing, herbicide assessment and application, and re-clear pole clearing.

2 APPLICABILITY

This document is intended for use by:

- Vegetation Management Contractors and Vegetation Management internal staff.
- Internal or external groups that need to understand the Pole Clearing Activity for accountability and compliance purposes.

3 REGULATORY AND OTHER REQUIREMENTS

Table 1: Codes, Regulations, and Internal Requirements

Code, Regulation, or Requirement	Description
CPUC Rulemaking 18-10-007).	Implements the provision of Senate Bill (SB) 901 that requires electrical corporations under the California Public Utilities Commission's (CPUC's) jurisdiction to submit annual Wildfire Mitigation Plans (WMP).
ESP113.1	This document describes the procedures used for coordination of fire suppression and San Diego Gas & Electric (SDG&E) operations during wildland fires that have SDG&E facilities or equipment within or adjacent to an active fire boundary.
NCCP/HCP	This plan, developed in collaboration with the U.S. Fish and Wildlife Service and California Department of Fish and Wildlife, covers 2,245,800 acres of the service area and was designed to avoid, minimize, and mitigate impacts to 110 Covered Species and their habitats while allowing SDG&E to install, maintain, operate, and repair its existing gas and electric system and undertake anticipated expansion of that system.
NERC FAC-003-5	In addition to meeting state requirements, utilities must meet federal reliability standards for clearances between vegetation and transmission lines. These standards for the nation's bulk-power system are set by the Federal Energy Regulatory Commission (FERC) and the North American Electric Reliability Corporation (NERC). The Transmission Vegetation Management Reliability Standard, FAC-003-5, establishes a minimum vegetation clearance distance (MVCD) that must be maintained at all times between trees and certain transmission voltage conductors. Federally required clearances vary depending on voltage and in some cases are less stringent than state standards.
PRC§4292	This law is administered by the California Department of Forestry and Fire Protection (CAL FIRE). It requires a minimum clearance of 10 feet around the base of the pole cleared of all flammable vegetation down to bare soil. Limbs within the 10-foot radius are removed up to 8 feet above ground. All dead branches below

Code, Regulation, or Requirement	Description
	the cross arms and within the 10-foot radius must be removed. This rule is applicable within the State Responsibility Area (SRA).
Title 14 of the California Code of Regulations (CCR)	Section 1252 discusses where PRC§4292 applies in the SRA. Section 1253 discusses when PRC§4292 applies. Section 1254 details the minimum clearance provisions laid out in PRC§4292. Section 1255 details exemptions to PRC§4292 minimum clearance requirements.

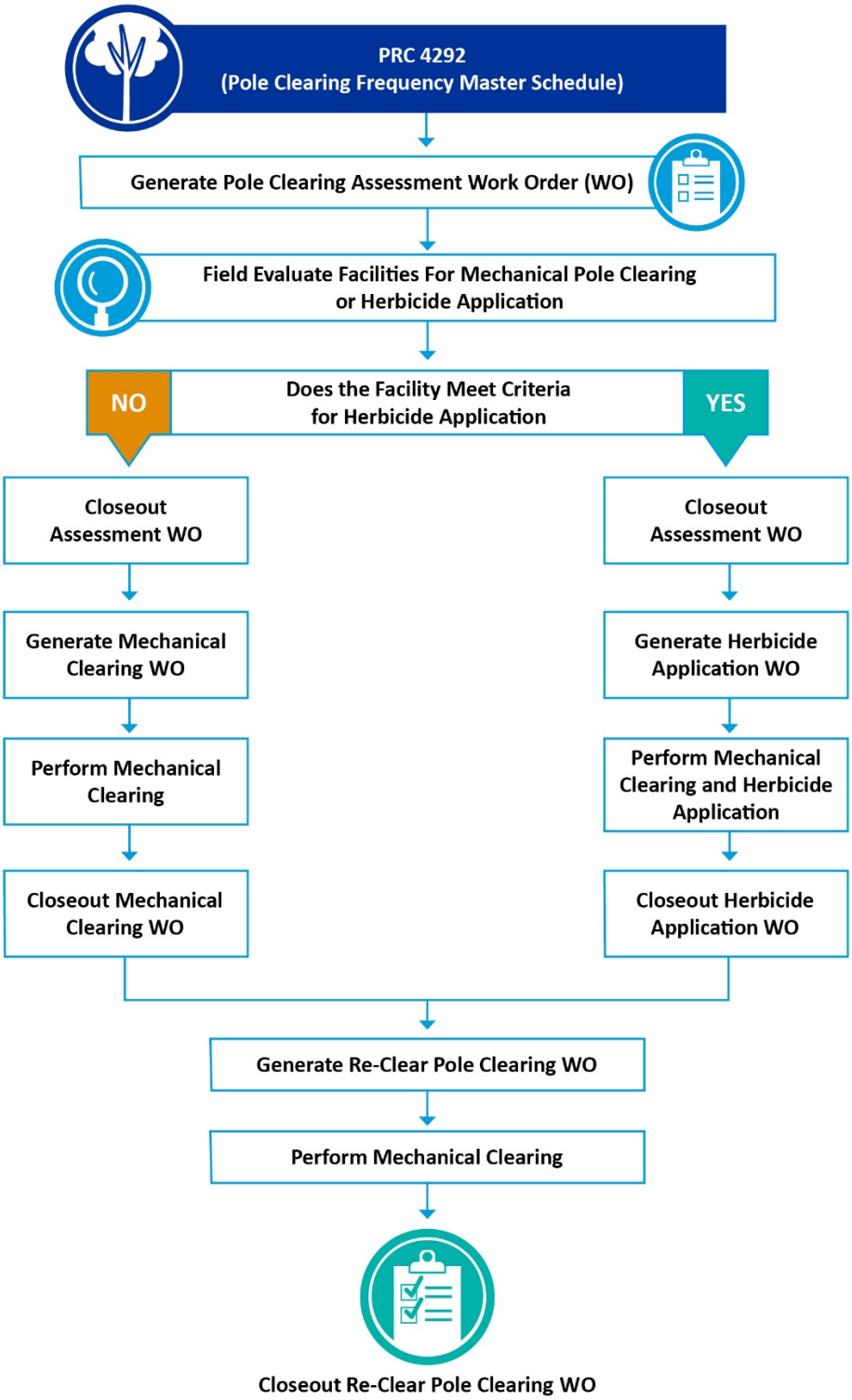
4 POLE CLEARING ACTIVITY SUMMARY

Pole clearing is the state-mandated activity of maintaining a fuel break around power poles by removing vegetation that could ignite or propagate a fire. Pole clearing is required within the State Responsibility Area (SRA) to comply with Public Resources Code (PRC)§4292 for poles that carry specific, attached, "non-exempt" equipment. Non-exempt equipment may spark, arc, and/or fail, causing hot particles to fall to the base of the pole and potentially cause an ignition. PRC§4292 requires clearing of flammable fuels for a minimum 10-foot radius from the outer circumference of non-exempt poles and towers (also called subject poles and towers). Pole clearing is also performed in areas within the Local Responsibility Area (LRA) that could support a significant wildland fire. Additionally, San Diego Gas & Electric (SDG&E) has pole clearing criterion for poles with non-exempt equipment in the LRA. These criteria include acreage, fuel type, slope, values threatened, and access. Pole clearing may be performed on a subject pole multiple times annually to maintain compliance. See Figure 1 for the Pole Clearing Process Flow.

Pole clearing is accomplished in following phases:

1. Herbicide assessment and customer notification: The assessment of a pole to determine if herbicides will be applied after mechanical pole clearance.
2. Herbicide application: Application of an Environmental Protection Agency (EPA)-approved herbicide after mechanical pole clearing.
3. Mechanical pole clearing: The removal of vegetation around a pole by mechanical means.
4. Re-clear pole clearing: The second mechanical pole clearing of all subject poles.

Figure 1: Pole Clearing Process Flow



5 POLE CLEARING ACTIVITY

5.1 Activity Readiness

5.1.1 Requirements

Required Training

The Pole Clearing Contractor is responsible for performing pole clearing activities. The Pole Clearing Contractor is responsible for hiring competent, professional individuals and providing the necessary training to ensure compliance with the applicable rules and regulations specific to vegetation management. The Pole Clearing Contractor is expected to provide the required level of resource staffing at all times to successfully perform its function and to maintain the established work schedules critical to operations.

Vegetation Control Technicians (VC Techs) perform pole clearing and must be fully prepared to perform every aspect of their job duties. This includes completing all required initial training for safety, electrical awareness, environmental awareness, pole equipment identification, customer relations, herbicide application, fire preparedness, applicable regulations, workflow processes, and computer hardware and software proficiency. VC Techs must retain all required safety and fire personal protective equipment (PPE), maintain it in proper working order, and be properly trained on its deployment and use. VC Techs must be properly trained to safely operate various types of equipment and be familiar with associated safety devices. VC Techs must be trained on and have copies of all work-related documents, regulatory requirements, and training and reference materials.

The Pole Clearing Contractor is required to develop and train employees on the details of activity processes, procedures, and workflows that are in addition to what is covered in this document.

Prior to beginning pole clearing, personnel must complete the following internal contractor training:

- Fire prevention and awareness training, including proper use of fire extinguishing equipment
- Proper use of PPE
- Operations and Maintenance (O&M) Wildland Fire Prevention Plan (ESP 113.1)
- Herbicide training, as applicable by the California Department of Pesticide Regulation
- Customer Service Training
- Vegetation Management System (VMS)
- Environmental Awareness Training
- Proper use of equipment

Required Equipment

VC Techs are required to carry the following items:

- PPE including hard hat, safety glasses, ear protection, and safety vest
- Shovel (round pointed)
- Pulaski tool

- 5-gallon, water back-pack-pump
- “2A10BC” fire extinguisher
- Device capable of measuring 10 feet horizontally and 8 feet vertically
- Employee ID badge

Required Documentation

All field personnel must retain copies (electronic or hard copy) of the following documents:

- Vegetation Management Pole Clearing Activity
- O&M Wildland Fire Prevention Plan (ESP 113.1)
- CNF O&M Fire Prevention Plan
- Natural Community Conservation Plan (NCCP) or subsequent
- PowerWorkz Pole Brush User Guide
- ESA Construction and Maintenance Pamphlet
- Powerline Fire Prevention Field Guide
- All applicable permits and licenses

5.1.2 Vegetation Management Areas

The service territory is divided into 133 Vegetation Management Areas (VMAs) that are delineated variably by city boundaries, SDG&E Districts, roads, geographical characteristics, etcetera. In addition, boundaries were drawn to contain a relatively comparable number of inventory trees within each VMA. The service territory is further delineated by jurisdictional and fire designation areas including the SRAs, LRAs, and the High Fire Threat District (HFTD). These designations determine which vegetation clearance rules and regulations apply. Each VMA has a unique three-digit identification number. The VMAs where PRC§4293 (See Table 1 for regulatory requirements) applies are identified with a second digit number of 5 or greater (ex: VMA 453; 463). One exception to this rule is VMA 552 which is located within the LRA.

VMAs are used to create the Pole Clearing Master Schedule which includes the four core annual Pole Clearing activities. The Pole Clearing Activities follow the Pole Clearing Master Schedule that runs from September through the following September (12 months).

5.1.3 State Responsibility Area

SRAs[1] are recognized by the Board of Forestry and Fire Protection as areas where the California Department of Forestry and Fire Protection (CAL FIRE) is the primary emergency response agency responsible for fire suppression and prevention. Within the service territory, there are 80 VMAs that are in the SRA (VMS defines the service territory GIS SRA layer).

5.1.4 Local Responsibility Area

LRAs are land areas where CAL FIRE, the U.S. Forest Service, or the Bureau of Land Management is not the primary fire protection agency. These are land areas that are “within the exterior boundaries of any

[1] State Responsibility Area viewer; https://bof.fire.ca.gov/projects-and-programs/state-responsibility-area-viewer/

city.[2]" Pole clearing is performed in the LRA based on criterion developed by the Vegetation Management Program[3] . In areas of the LRA which can support a significant wildland fire, poles with non-exempt equipment are recorded in the VMS and cleared to the same specifications as non-exempt subject poles in the SRA.

There are 53 VMAs located within the LRA boundary.

5.1.5 Scope

Pole clearing occurs on poles and structures within the SRA and portions of the LRA.

5.1.5.1 PRC§4292 Non-Exempt Equipment

PRC§4292 defines seven main equipment categories that are non-exempt (for examples, see the Powerline Fire Prevention Field Guide):

- Split Bolt Connectors (single bolted split bolts only)
- Hot Tap Clamps
- Lighting Arrestors
- Fuses
- Switches
- Inline Disconnects
- Solid Blade disconnects

When any non-exempt equipment is identified, the pole becomes a managed subject pole.

In the SRA, PRC§4292 requires a clearance of 10 feet within an imaginary cylindrical space surrounding each pole or tower on which a switch, fuse, or lightning arrester is attached unless such pole or tower is exempt from minimum clearance requirements by provisions of California Code of Regulations (CCR) 14§1255 or PRC§4296. The 10-foot radius is measured horizontally from the outer circumference of the specified pole or tower and the height is equal to the distance from the intersection of the imaginary vertical exterior surface of the cylindroid with the ground to an intersection with a horizontal plane passing through the highest point at which a conductor is attached to such pole or tower (see Figure 2 and Figure 3).

[2] Power Line Field Prevention Guide 2021, Section 4127 (b), p. 28
[3] For details, see the Pole Brush Pre-Inspectors/Auditors Procedures document (2024), Appendix 4

Figure 2: Clearance Requirements around Poles

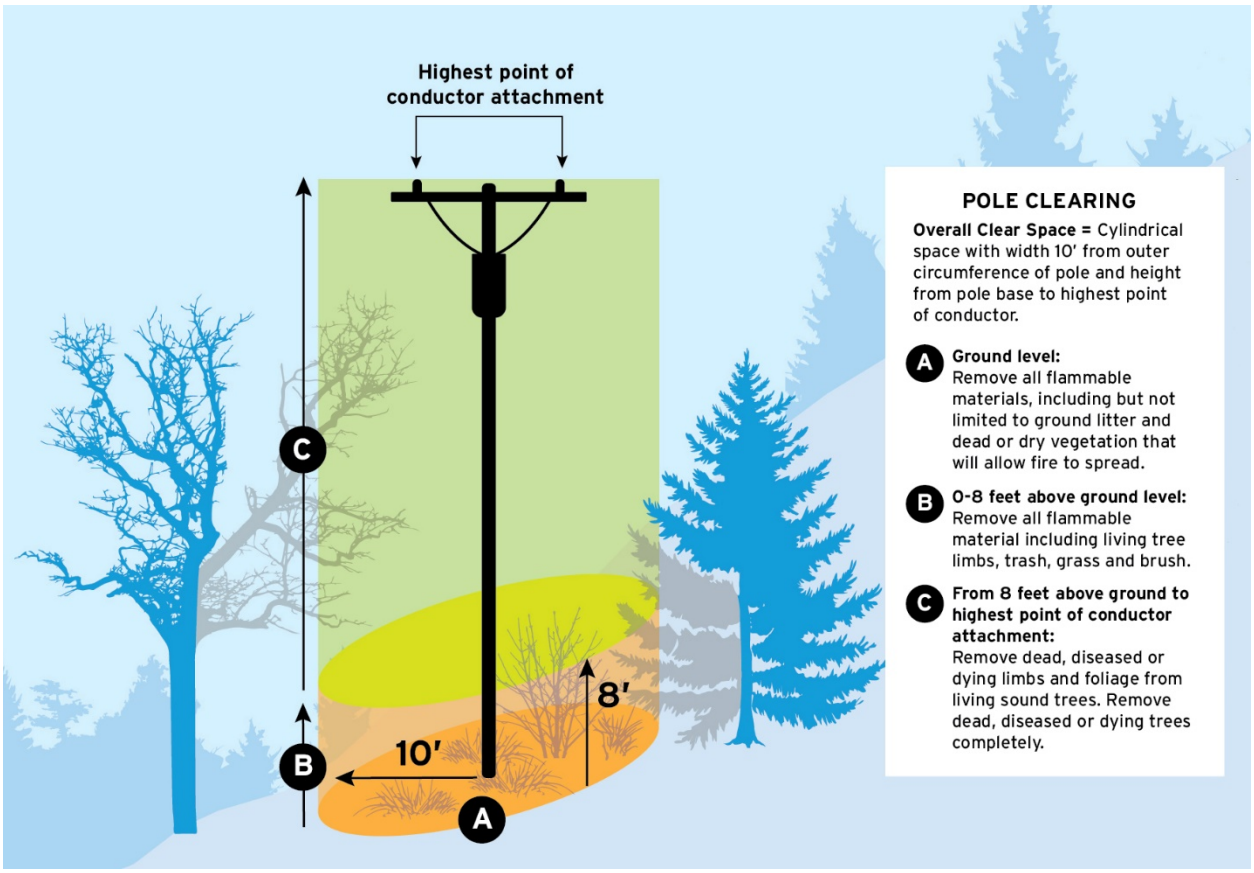


Figure 3: Clearance Requirements around Non-Exempt Structures

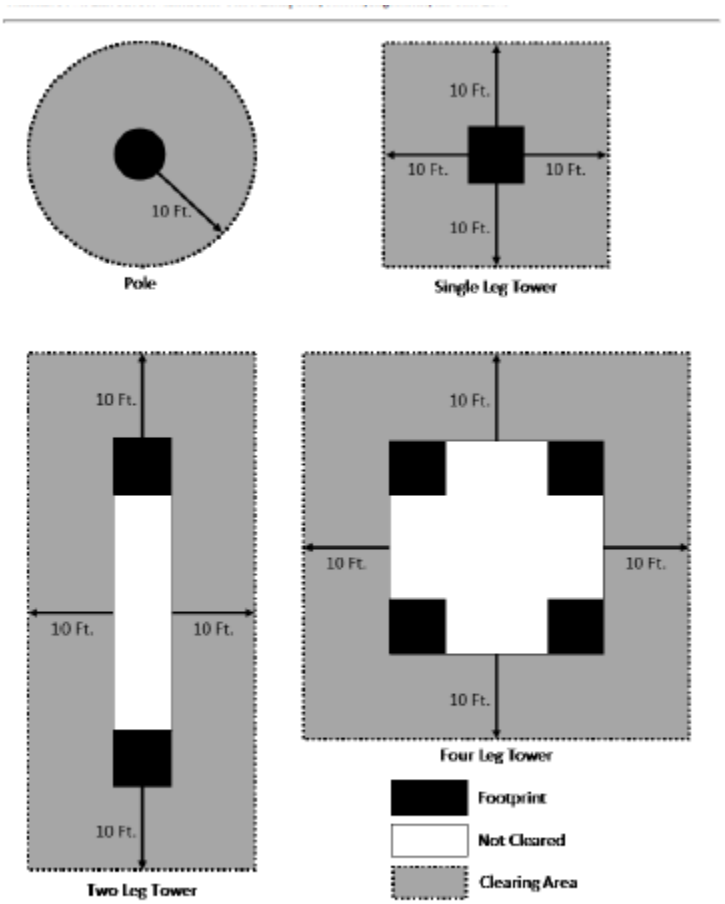


Figure 10: PRC 4292 and 14 CCR 1251 Definition of Outer Circumference Examples (Plan View at Ground Level)

Poles that have non-exempt equipment can be exempted from pole clearing based on landscape or hardscape conditions (see the Pole Clearing Pre-Inspectors/Auditors Procedures document, the Powerline Fire Prevention Field Guide, CCR 14§1255, and PRC§4296) The minimum clearance provisions of PRC§4292 are not required around poles and towers, including line junctions, corner, and dead-end poles and towers, for the following areas:

- Fields planted to grow crops, plowed or cultivated fields, or producing vineyards that are plowed or cultivated if fire will not propagate thereon.
- Fields in non-flammable summer fallow.
- Irrigated pastureland.
- Orchards of fruit, nut or citrus trees that are plowed or cultivated.
- Christmas tree farms that are plowed or cultivated.
- Swamp, marsh, or bog land.

- Where vegetation is maintained less than 12 inches (30.48 centimeters) in height, is fire resistant, and is planted and maintained for the specific purpose of preventing soil erosion and fire ignition.

5.1.5.2 Internal Pole Clearing Sources

In addition to PRC§4292 compliance (scope), there are internal thresholds/requirements/policies for determining if a structure needs to be cleared.

- Transmission Construction Maintenance (TCM) Steel Transmission Pole Clearing:
    - Steel poles 138 kilovolts (kV) and above without non-exempt equipment: Vegetation is cleared 5-feet around the base of the structure and trees are trimmed back from the climbing legs.
    - Steel Towers 230 kV and above without non-exempt equipment: Vegetation is cleared to 5-feet around the base of the footers and trimmed to 4 inches above ground level underneath the tower frame and trees are trimmed back from lattice (see Figure 4).
- TCM Transmission Reliability Clearing: 138 kV wooden structures without non-exempt equipment. Vegetation is cleared to 10 feet around the base of the structure (see Figure 5).
- Sunrise Powerlink Clearing: Trimmed on a biennial basis in compliance with the Sunrise O&M Plan:
    - Outside of Cleveland National Forest (CNF): 230 kV and 500 kV steel towers without non-exempt equipment are cleared within the 100-foot-by-100-foot permanent work boundary underneath and around steel towers (see Figure 6).
    - Within the CNF 500 kV steel towers without non-exempt equipment: Vegetation within the footing boundary zone (red zone in Figure 7) and underneath the tower is trimmed down to 6 inches. In the zone outside of the footing boundary (green zone in Figure 7) hard chaparral is cut down to 4 inches and herbaceous vegetation, grass, and weeds are not trimmed.
    - Tower Staging Access Pads and Helicopter Landing Platforms: Vegetation within the Tower Staging Access Pad (grey zone in Figure 8) is cleared within a 10-foot radius to bare packed soil. Vegetation in the Tower Staging Access Pad/Helicopter Landing Platform outer radius (green zone in Figure 8) is cleared within a 40-foot radius to 4 inches. Vegetation in footpaths to Tower Staging Access Pads and Helicopter Landing is cleared 3-feet wide to 4-inches above ground level.
    - Mono-Poles: Vegetation is cleared within a 20-foot radius from the edge of the footing to 4 inches above ground level.
    - Crane Pads: Vegetation is cleared within the permanent work boundary markers to 4 inches above ground.

- Bird nests on structures can become a fire hazard. If there is a bird next with eggs or fledglings, the Pre-Inspector will evaluate the risk and if necessary, the pole may be cleared.

Figure 4: Internal Clearance Requirements for Exempt Transmission Structures

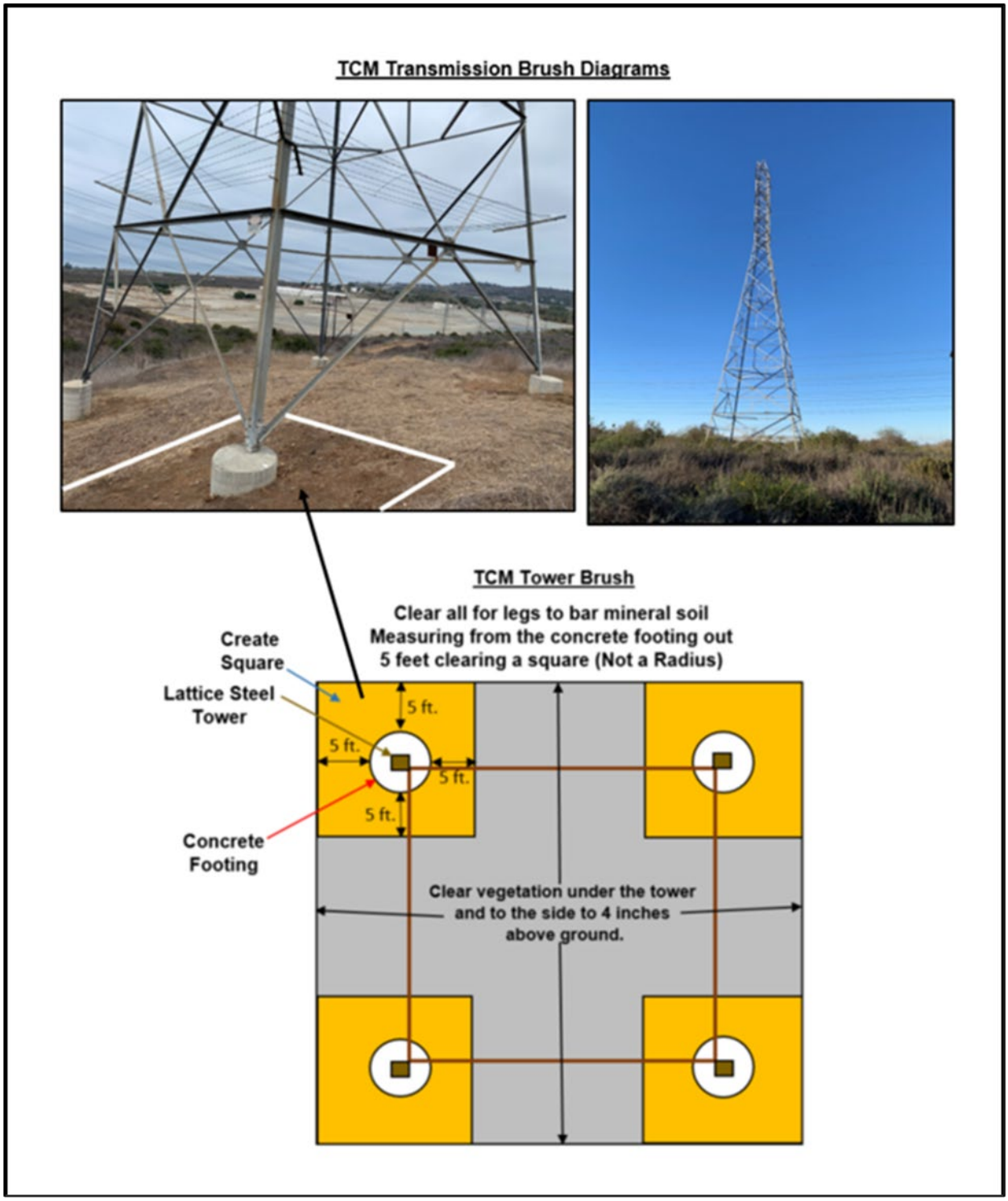


Figure 5: Internal Clearance Requirements for Exempt Transmission Structures

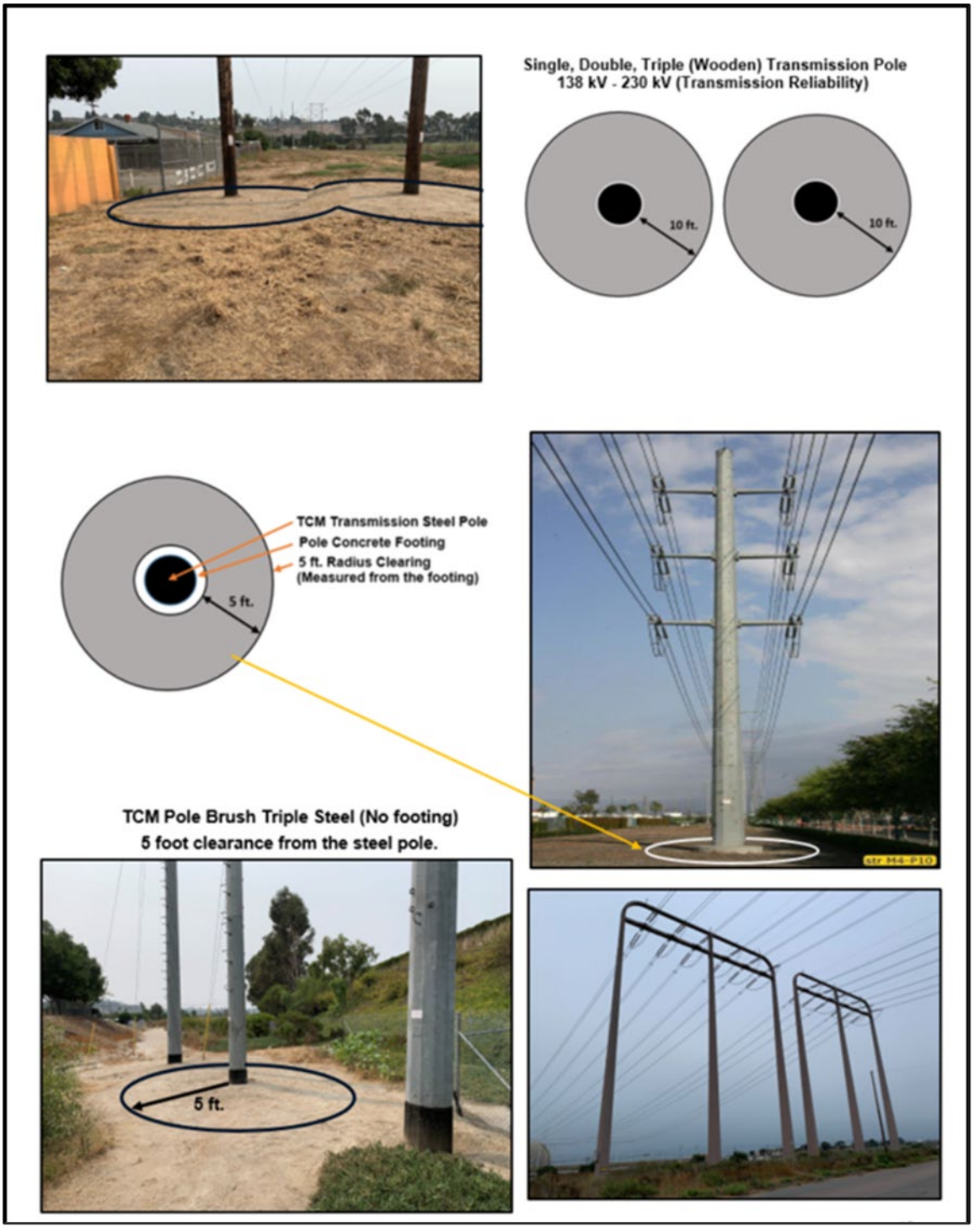


Figure 6: Sunrise Power Link Clearance Requirements for Steel Towers (non-CNF)

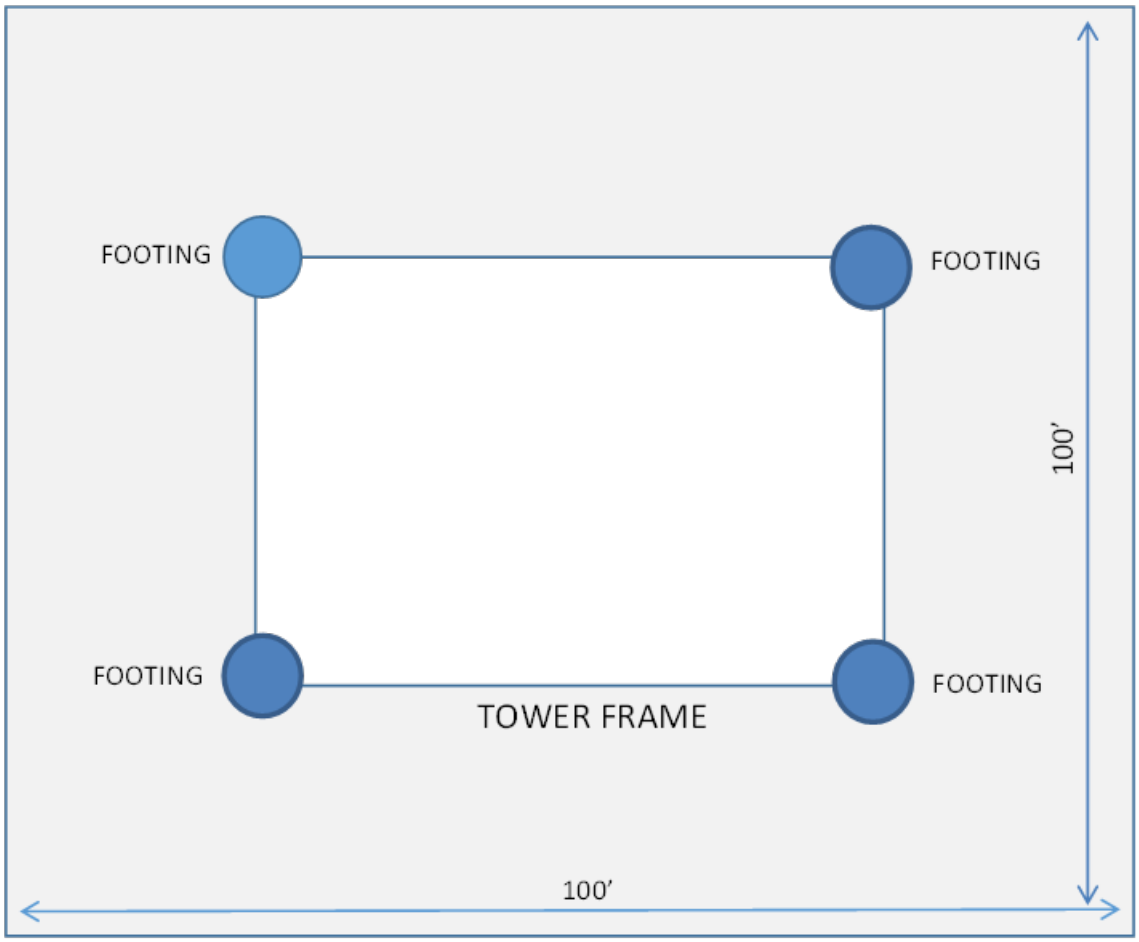


Figure 7: Sunrise Powerlink Clearance Requirements for Structures (within CNF)

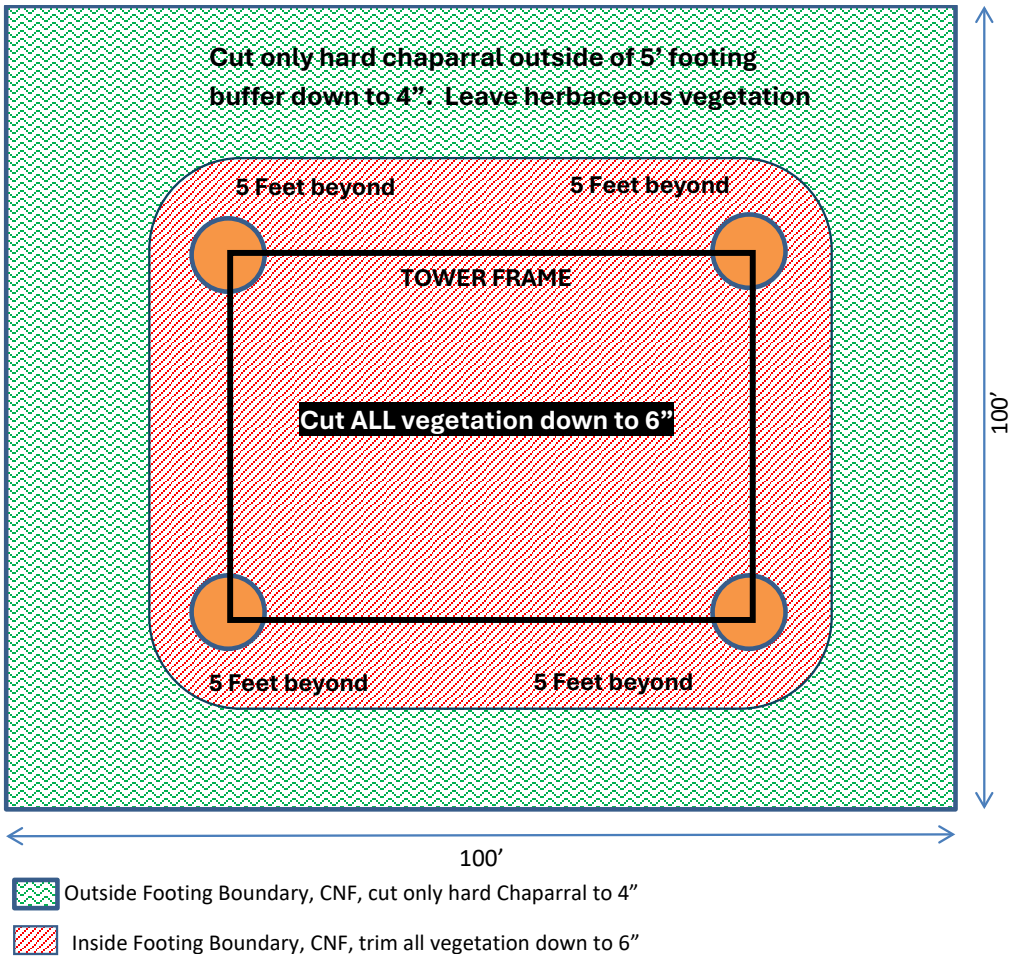
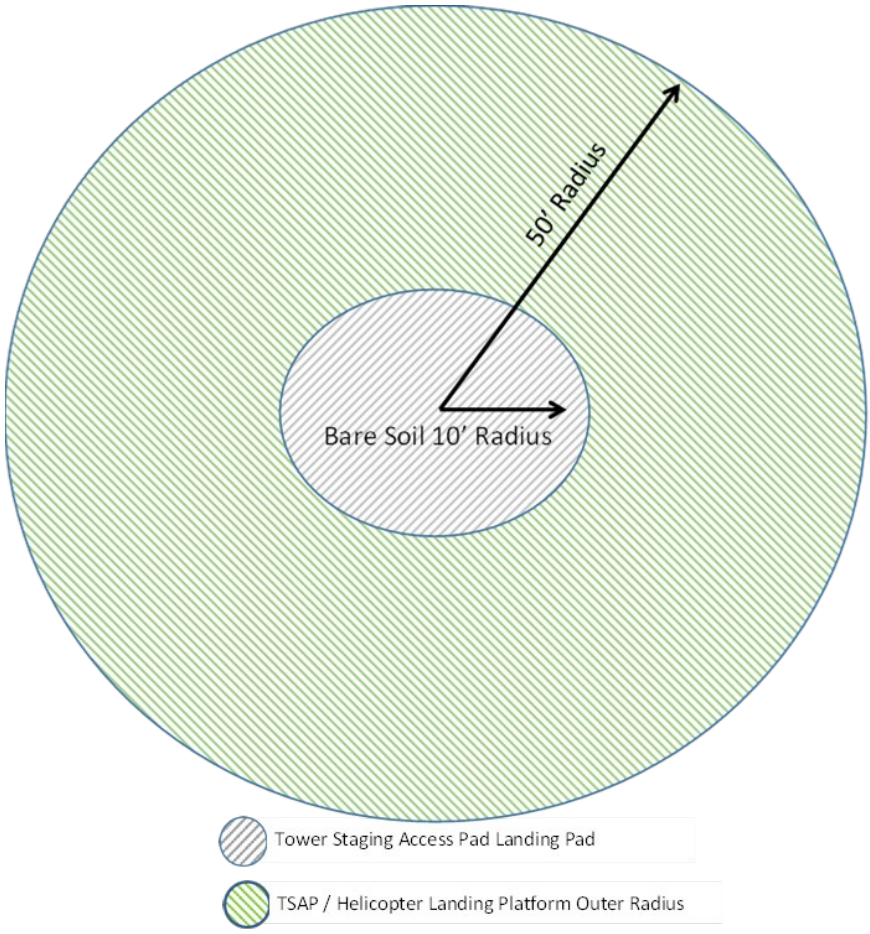


Figure 8: Sunrise Powerlink Clearance Requirements for Tower Staging Access Pads and Helicopter Landing Platforms



5.1.6 Wildfire Operating Guides

5.1.6.1 ESP113.1

The Fire Potential Index (FPI) was developed to communicate the wildfire potential on any given day to promote safe and reliable operations. This 7-day forecast product, which is produced daily, classifies the fire potential based on weather and fuels conditions and historical fire occurrences.

The FPI is represented in the following scale:

Figure 9: FPI Rating Scale

Normal	Elevated	Extreme
≤ 11	12 to 14	≥ 15

Work activities and associated fire mitigations throughout the service territory are designated for specific Operating Conditions (e.g., Normal condition, Elevated condition, Extreme or Red Flag Warning [RFW]) as outlined in the Electric Standard Practice (ESP) document: SDG&E Operations and Maintenance Wildland Fire Prevention Plan (ESP 113.1). As the fire potential increases in severity, activities that present an increased risk of ignition have additional mitigation requirements. Where risk cannot be mitigated, work activity might cease. All field personnel are required to be trained on SDG&E's fire prevention procedures annually. Fire prevention and safety is also discussed at pre-job briefings, commonly referred to as tailgates/tailboards, and built into standard work practice. These standard practices are not exclusive to the HFTD and are implemented in all areas of the service territory where at-risk activities are performed adjacent to wildland fuels.

5.1.6.2 Cleveland National Forest Operations & Maintenance Fire Plan

In addition to complying with the ESP 113.1 protocols, Vegetation Management contractors must comply with all fire prevention protocols contained within the CNF O&M Fire Plan when operating on U.S. Forest Service lands. The Plan describes the fire equipment requirements to work within specific Project Activity Levels (PALs) and when work is prohibited. PAL level severity ranges from A, the lowest, to Ev, the highest level.

5.2 Access Considerations

5.2.1 Public Agency Lands

State and federal agencies such as the Bureau of Indian Affairs, State Parks, U.S. Forest Service, Bureau of Land Management, and U.S. Fish and Wildlife Service require specific access and notification protocols for performing work on these properties that may be guided by specific easement rights, use-permits, Memorandums of Understanding (MOUs), or other agreements. These agency properties require specific environmental and/or cultural review prior to performing work. Agency lands are identified in the geographic information system (GIS) mapping layer in the electronic field application (Epoch), and within pole clearance records.

5.2.2 Military Bases

Military base facilities are identified via a GIS mapping layer in Epoch and within the inventory tree and pole clearance records under property ownership. Access to military facilities is restricted and requires advance notification and identification to gain entry. The respective SDG&E Land Management Department representative has the most current protocol for accessing specific military base installations.

5.2.3 Environmental Procedures

Procedures developed between SDG&E and state and federal wildlife agencies serve to ensure vegetation management activities follow applicable rules and regulations. SDG&E's Subregional NCCP and subsequent Habitat Conservation Plan (HCP) Amendment were developed to avoid or minimize adverse impacts to sensitive and protected flora and fauna species and for the protection of cultural resources. The NCCP follows a comprehensive habitat approach to species protection while allowing the utility to perform maintenance and construction activities to meet safety, compliance, and reliability responsibilities. All internal and contracted personnel are required to understand and follow the requirements and operational protocols outlined in the NCCP and HCP Amendment.

Environmentally Sensitive Areas (ESAs) are naturally occurring areas within the service territory that contain or provide habitat for sensitive, threatened, or endangered species or encompass protected cultural resources that are state and/or federally protected. As they pertain to Vegetation Management activities, ESAs are predominantly located within and/or adjacent to major riparian areas where nesting avian (bird) species inhabit.

In addition to procedures in ESAs and the NCCP, environmental reviews are performed annually for all existing subject poles and prior to the initial clearing of all new subject poles to review potential impacts to protected species, habitats, and resources.

5.2.4 Customer Engagement

Customer engagement and understanding of utility vegetation management is crucial to the success of the Vegetation Management Program. VC Techs actively engage and educate customers regarding work scheduled on their property.

VC Techs must follow property notes within the pole clearance records prior to entering the property and update the notes as needed to reflect current access/notification protocols and requirements. They should always place their personal safety first and leave property if safety is ever a concern. Safety incidents are communicated to the General Foreperson or other supervisor for resolution.

During the herbicide assessment, affected customers are contacted by phone or in person and notified of what services will be performed around the pole, the approximate date of services, and if herbicides will be applied. Sensitive customers are identified, and crews are notified of any specific customer situations.

Customer contact is first attempted by the VC Tech. If there is no access or the customer refuses pole clearing, then the issue is elevated to the General Foreperson, then the supervisor. If the issue remains unresolved, the supervisor and the SDG&E Representative will meet with the customer to attempt to resolve any outstanding issues. If the customer denies permission for mechanical clearing, the Customer Refusal Process is initiated, a customer signature is obtained, and the pole clearance record(s) is updated to refusal status.

5.3 Vegetation Management System

The VMS, PowerWorkz, is used to track and record inventory assets (trees and poles) and manage all work activities via work orders. The field (mobile) application of PowerWorkz, Epoch, is the mapping interface used to navigate and to perform data entry to record completed work. Epoch includes multiple GIS layers, electric infrastructure, land ownership, and parcel information, and houses the electronic records and activity history for all tree and pole clearing assets.

Once work is completed, VC Techs update each pole clearance record using a mobile data terminal (MDT). They also correct any errors, such as customer information or pole numbers, if necessary.

5.3.1 Pole Clearance Records

An electronic pole clearance record is created within the work management system (Epoch) for each non-exempt pole or structure. The pole clearance record includes all attributes unique to the pole including location, customer information, and activity history. New pole clearance records are created for any pole or structure that is within the scope of the Pole Clearing Activity (see Section 5.1.5 for details on scope). Poles may be deleted from the database if the pole is no longer equipped with subject equipment, the bird's nest is no longer present, or the pole has been removed from the field.

5.3.2 Work Orders

Electronic work orders are used to schedule, create, assign, and complete work for all Vegetation Management activities. A scheduling work order (SWO) is created in PowerWorkz for each annual activity within a VMA. The SWO is the assignment of the work activity to the Contractor and includes all related activity assets in the VMA. Dispatch work orders (DWO) are created within a SWO for individual work assignments and are assigned to field workers. The multiple DWOs comprise all the assets within the SWO.

Work Release Packages are issued according to the Pole Clearing Master Schedule that identify all utility poles to be cleared within each VMA and scheduled start and finish dates. Dispatch Work Orders are then prepared by contractor and issued to field crews for completion of assigned work:

- Herbicide assessment and customer notification: 14 days or 2 weeks
- Herbicide application: 2 months
- Mechanical pole clearing: 2 months
- Re-clear pole clearing: 2 months

5.4 Requirements

5.4.1 Herbicide Assessment and Customer Notification

Each structure site is visited by a VC Tech. During the visit, pole clearance instructions are verified and an herbicide evaluation is performed. During the herbicide assessment, the VC Tech uses a checklist to determine if herbicides can be applied to the pole. If so, the customer is notified of the intent to apply. If herbicides cannot be applied or if the customer refuses the application of herbicides, the customer is notified of the intent for mechanical clearing only.

Once complete, information is updated in the pole clearance record.

5.4.2 Herbicide Application

A mechanical pole clearing is performed (see Section 5.4.3 for details on mechanical pole clearing), then an EPA-approved herbicide is applied and the pole clearance record is updated. Herbicides are not permitted on Bureau of Land Management or CNF lands or on private property noted as No Chemical per Owner within the pole clearance record(s).

5.4.3 Mechanical Pole Clearing

Weeds, brush, grass, and other flammable material that has either grown or blown into the 10-foot pole radius are cleared to mineral earth. Branches of trees, shrubs, and grass may also be removed. See section 5.1.5 for clearance details.

5.4.4 Re-Clear Pole Clearing

Re-clearing is a second mechanical pole clearing performed on all subject poles. The need to revisit and clear a subject pole multiple times for compliance is not uncommon due to leaf litter cast, vegetation regrowth, or material that has blown into the clearance area that cannot be controlled by mechanical or herbicide treatments.

5.4.5 Emergency Vegetation Trimming

Poles or structures may require emergency vegetation trimming to facilitate access to facilities for emergency repairs or replacements. Emergency trimming may be requested by a District, a project, or TCM. Requests are submitted to the Help Desk using the Vegetation Electronic Ticketing System (VETS) and work is coordinated with the appropriate contractor.

6 VEGETATION MANAGEMENT CERTIFICATION PROCESS

The purpose of the Vegetation Management Certification process is to formalize the end date of completed work for each activity and VMA and to collect required documentation from the contractor. The certification process also indicates that the activity and VMA are ready for the Audit Activity to begin.

Before certification of the activity in a VMA, the contractor must obtain approval from the Area Forester who verifies all issues are addressed and any refusals and exceptions are agreed upon.

7 REFERENCE DOCUMENTS

Document Type	Document Name
Internal	Audit Activity (in development)
External	California Power Line Fire Prevention Field Guide
External	CNF O&M Fire Plan

Document Type	Document Name
Internal	ESP113.1
Internal	Pole Clearing Pre-Inspectors/Auditors Procedures
Internal	Pole Clearing Master Schedule
Internal	PowerWorkz Pole Brush Manual
External	Subregional Natural Community Conservation Plan (NCCP)
Internal	VMS Condition Code
Internal	2023-2025 WMP

8 ROLES AND RESPONSIBILITIES

Roles and Responsibilities for used in this document can be found on the Vegetation Management SharePoint site.

9 DEFINITIONS AND ACRONYMS

9.1 Definitions

Definitions for terms used in this document can be found on the Vegetation Management SharePoint site.

9.2 Acronyms

Abbreviation	Name
CAL FIRE	California Department of Forestry and Fire Protection
CCR	California Code of Regulations
CNF	Cleveland National Forest
CPUC	California Public Utilities Commission
DWO	dispatch work order
EPA	Environmental Protection Agency
ESA	Environmentally Sensitive Areas
ESP	Electric Standard Practice
FERC	Federal Energy Regulatory Commission
FPI	Fire Potential Index

Abbreviation	Name
GIS	geographic information system
HCP	Habitat Conservation Plan
HFTD	High Fire Threat District
kV	kilovolts
LRA	Local Responsibility Area
MDT	mobile data terminal
MOU	Memorandums of Understanding
MVCD	minimum vegetation clearance distance
NCCP	Natural Community Conservation Plan
NERC	North American Electric Reliability Corporation
O&M	Operations & Maintenance
PAL	Project Activity Levels
PPE	personal protective equipment
PRC	Public Resources Code
RFW	Red Flag Warning
SB	Senate Bill
SDG&E	San Diego Gas & Electric
SRA	State Responsibility Area
SWO	scheduling work order
TCM	Transmission Construction Maintenance
VC Tech	Vegetation Control Technician
VETS	Vegetation Electronic Ticketing System
VMA	Vegetation Management Area
VMS	Vegetation Management System
WMP	Wildfire Mitigation Plan

10 REVISION HISTORY AND APPROVALS

Rev. Number	Description	By	Approved By	Date
1	Document creation	Michael Moore, Michael Powell	Jimmie Webb	11/01/2024
2				
3				