

## AMERICAN TRANSMISSION CO. - GREEN TIER PARTICIPANT

In 2005, ATC became the first utility – and among the first five organizations – to be accepted into Wisconsin’s Green Tier program, the first program of its kind in the nation. Administered by the Wisconsin Department of Natural Resources, Green Tier recognizes businesses and organizations that demonstrate superior environmental performance and continual improvement.

Program participants make legal commitments to superior environmental performance through contracts and charters negotiated with the DNR. In exchange, they are given incentives to achieve their environmental goals and improve performance. This arrangement allows the DNR to focus resources on companies that need to bring their performance up to compliance.

Participation in Green Tier provides a means of ensuring internal controls, a systematic method of improving relationships with the DNR and a productive way to change how ATC and the DNR approach environmental resource conservation.

Green Tier recognizes ATC’s environmental leadership through its progressive and proactive approach to environmental issues. The program also acknowledges our reputation as an innovative and forward-thinking organization among regulators and environmental organizations. As a Green Tier participant, we commit to incorporating environmental sensitivity, protection and restoration into the design and construction of our electric transmission lines.

Collaboration is a hallmark of ATC’s business approach. We continually involve the public, environmental groups and regulators in the design and location of new electric transmission facilities. Green Tier takes collaboration to a higher level by

changing the way the DNR interacts with ATC as a business. This allows us to improve work processes, better manage costs and reduce the time needed to permit a project.

ATC participates in Green Tier at the Tier 1 level. This requires a strong environmental compliance record with no civil or criminal judgments, a commitment to a formal environmental management system, annual performance reviews, prompt follow-up on non-compliance and continual improvement. Tier 1 companies are generally environmental innovators with proactive management teams that are building systems needed to maintain and exceed environment standards. Green Tier allows ATC to work in collaboration with the DNR to achieve environmental protection and avoidance goals, while recognizing the business needs of ATC.

### KEY FEATURES AND COMPONENTS OF GREEN TIER INCLUDE:

- DNR contact. One person is assigned by DNR to oversee an agreement and becomes the one-stop shop for the participant.
- DNR encourages the participants to focus on minimizing waste generation, recycling and pollution prevention.
- Self-reporting. If a participant discovers a violation of a permit condition, regulatory requirement or commitment, it must report this to the DNR contact assigned to oversee the agreement.
- Deferred DNR enforcement of any violations discovered during annual performance reviews.



## ATC'S GREEN TIER AGREEMENT

ATC's Green Tier agreement focuses on system-wide construction projects and combines the following components:

- Complete development and implementation of ATC's environmental management system.
- Minimize impacts of construction, maintenance and operation by incorporating impact avoidance and natural resource protection into the design of the project/facility.
- Use construction techniques to protect those environmentally sensitive areas that are not avoidable.
- Minimize generation of waste, recycle as much waste as possible and build pollution prevention into procedures and work practices.
- Use native vegetation around all ATC facilities whenever practicable.
- Control or eliminate invasive species on fee-owned land along rights-of-way whenever practicable.
- Continue participation in the Karner Blue butterfly habitat conservation plan partnership.

## OUR ENVIRONMENTAL POLICY

Our environmental policy is built upon our core values – service to our customers, honesty, social responsibility, stakeholder inclusion, financial and environmental sustainability, and respect for our employees and customers.

We are committed to environmental leadership in all aspects of our business. We seek to demonstrate this commitment through the following six actions:

1. Comply with all applicable laws, regulations and orders.
2. Reduce environmental impacts of construction, operation and maintenance through use of innovative practices, cost-effective technologies and, where appropriate, environmental mitigation and enhancement.
3. Involve employees in environmental stewardship through job responsibilities and encouraging volunteerism.

4. Provide employees the tools to participate in environmental stewardship through education and training.
5. Address transmission-related environmental issues proactively with regulators and other stakeholders through partnerships and collaborative working relationships.
6. Adhere to an environmental appraisal process to ensure we continue to meet our environmental goals.

We support sustainable environmental policies and actions through balancing environmental stewardship with financial, engineering and maintenance requirements and societal impacts. Pairing our environmental commitment with partnerships among regulators, stakeholders and employees provides a powerful venue for creative, innovative and entrepreneurial resolution of issues. Environmental stewardship translates into good business with the implementation of these philosophies.



ATC is a Green Tier company, selected by the Wisconsin DNR for demonstrating superior environmental performance and continual improvement.

Information current as of June 2011



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