Columbia Water & Light Department's Vegetation Management Plan

Our Mission: To provide Safe and reliable electric service, through education and communication of utility forestry and customer service.

Introduction

Columbia Water & Light is responsible for maintaining the integrity and reliability of the electric distribution system which includes managing vegetation that could interfere with the electrical distribution system.

Columbia Water & Light recognizes its responsibility to maintain its electrical distribution constructions and hardware in the manner that most appropriately balances avoiding unreasonable risks of harm to the environment, neighbors, occupants, workers, and users of the properties on which the distribution system lies, promoting reliability and minimizing the expense of vegetation management over the long term.

Columbia Water & Light Vegetation Management Plan (VMP) will be written, implemented, and updated every 10 years following a complete cycle of the VMP by Columbia Water & Light's Lead Consulting Utility Forester and Electric Services Superintendent. These staffed positions shall be adequately trained in Utility Vegetation Management.

Goals and Objectives

The goal of this VMP is to establish a dependable vegetation management plan that is sustainable through a complete cycle. Columbia Water & Light manages vegetation based on line voltages to prioritize resources. Columbia Water & Light does a yearly assessment on its transmission and subtransmission lines (Refer to Columbia Water & Light's TVMP). 3-phase, Single-phase, secondaries, service drops, and fiber are assessed in 3 different areas of the city every 3 years. Columbia Water & Light manages ⅓ of the city yearly during the dormant season with exceptions to hazards and reliability issues. This reduces stress and regrowth in trees allowing for healthier trees and more reliability. 3-phase distribution circuits are again assessed every other year for increased reliability. Any of the work scheduled at this time is pruned during the growing season with exceptions to hazards and reliability issues.

In order to accomplish this goal, Columbia Water & Light utilizes a system of vegetation management that manages plant communities in which compatible and incompatible vegetation are identified, action thresholds are considered, control methods are evaluated, and selected controls are implemented to achieve a specific objective. Choice of control methods will be based on safety, environmental impact, effectiveness, and site characteristics. The IVM (Integrated Vegetation Management) procedures promotes sustainable plant communities that are compatible with the intended use of the site and discourage incompatible plants that may pose concerns, including safety, security, access, fire hazards, electric service reliability, emergency restoration, visibility, line-of-site requirements, regulatory compliance, environmental, or specific concerns.

Columbia Water & Light is in compliance with ANSI A300 standards (Part 1) and Tree Line USA standards (Appendix A). Contracted crews are instructed and audited on proper pruning techniques and follow quality tree care guidelines. Contracted crews continuously undergo weekly training on safety and proper tree care.

Columbia Water and Light has a Lead Consulting Utility Forester and a Consulting Utility Forester, with oversight by the Electrical Services Superintendent. The 2 foresters are responsible for scheduling routine work for its contractors, auditing routine work done by the contractors, checking customer ticket requests, and responding to reliability and outage issues. The Lead Consulting Utility Forester further works with sensitive customers, special projects, and community outreach.

Safety Policy

Section 1.0

All crews performing vegetation management work on or near Columbia Water & Light facilities or rights-of-way shall follow approved safety guidelines and procedures. All contractors performing work for Columbia Water & Light shall comply with all applicable governmental safety and health regulations and the safety and health provisions of their contract.

All contractors must also, at all times, be aware of the nature and characteristics of Columbia Water & Light's electric facilities before work begins. Contractors need to understand that electric facilities must remain energized during the performance of work unless special arrangements are made with an authorized Columbia Water & Light representative.

The following procedures pertain to contractors performing vegetation management work for Columbia Water & Light:

- The contractor shall obtain from Columbia Water & Light full information as to the voltage of its circuits before starting the work.
- The contractor shall at all times conduct work in a manner to safeguard the public from injury and property from damage.
- The contractor must use all necessary protection for its employees and the public and guard against interference with normal operation of the circuits. If, in the judgement of the contractor's general foreman/supervisor, it is hazardous to prune or remove trees with the circuits energized, the contractor must contact an authorized Columbia Water & Light representative. If appropriate, Columbia Water and Light will provide the necessary protective materials or de-energize circuits to ensure the safe pruning or removal of the tree(s).
- Should the contractor knock down or come into contact with Columbia Water & Light conductors, the contractor must notify Columbia Water & Light immediately and take the necessary protective measures. All contractor-caused electric service interruptions are subject to repair at the contractor's expense. This would include any damage to customers' property, including any electrical damage.
- In the event a contractor becomes aware of any dangerous, broken, loose, or faulty Columbia Water & Light line facilities in the normal course of its line clearance performance, the contractor shall promptly advise Columbia Water & Light as to the exact pole location(s) and nature of the condition found.

General Guidelines

Section 2.0

2.1 - Explanations of terms and methods

Qualified Line Clearance Tree Trimmer:
Personnel who meet the qualifications of "line clearance tree trimmer and/or trimmer trainee" as defined by OSHA 1910.269, ANSI Z133.1 and any other applicable federal, state or local laws, codes, or regulations.

Distribution Pruning Cycle (13.8 KV - 3-phase, 7.96 KV - Single phase):
City of Columbia Water & Light uses scheduled pruning cycles based on line construction, voltages, and areas to prune trees along lines. Scheduled critical feeder lines will be assessed as often as necessary to ensure its reliability.

Trimming around primary and secondary wires:
City of Columbia Water & Light will identify and schedule for maintenance, any trees that are a hazard or a potential hazard to the supply or reliability of primary or secondary power lines. Qualified line clearance tree trimmers under direction of Columbia Water & Light or its consulting utility foresters are to perform selective tree-branch removal to prevent or correct hazardous situations that may result in outages or endanger life or property. They are to make field judgement as to what amount of clearance is necessary to obtain reliability.

Pole-to-house and street light service wires:
Pole-to-house and street light service wire should only be pruned if a branch is significantly pushing against or is lying on the wire. Trees obstructing illumination of street lights will be assessed and pruned as necessary.

General guidelines for tree/conductor clearance:
The exact amount of clearance needed to maintain reliability depends on the type of tree, its location and condition, and the type of power line and its voltage, as well as many other factors. Columbia Water & Light and its contractors will consider all factors when deciding how much clearance is necessary.

Columbia Water & Light and its contractors will use their professional judgement in determining what these clearance will be in each situation, based on the proposed routine maintenance cycle for the area in which they are working. The maintenance cycle is dependent upon electric reliability requirements of the system.

Circuit prioritization and scheduling:
During a year, circuits are prioritized based on the following factors:

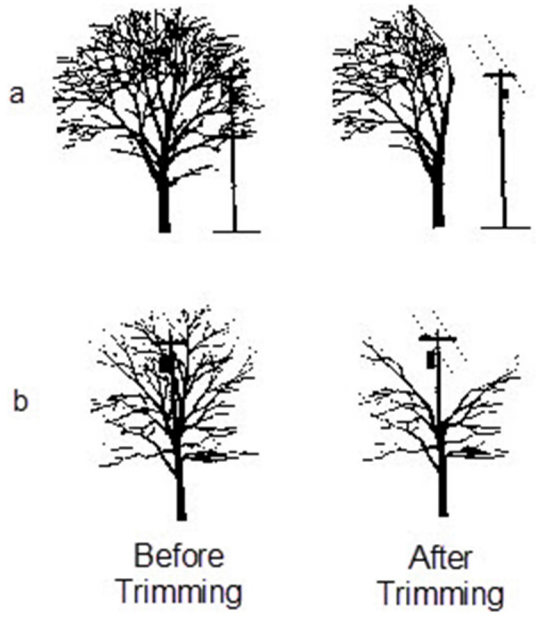
- Reliability - The circuits due to be trimmed for any given year are ranked based on customer minutes interrupted by tree-related causes. Circuits that have the highest number of customer minutes interrupted by tree growth outages are scheduled first.
- Customers Affected - Circuits are ranked by customer count. Circuits with high numbers customers or circuits with critical customers are ranked higher.

- Customer Vegetation Conditions - The current vegetation conditions on a circuit will be used to prioritize it. Customer requests for tree trimming are also taken into consideration when determining the current vegetation conditions of a circuit.
- Other - Other factors that are considered when scheduling are circuit load, customer complaints and political issues.

Pruning:

Tree pruning is the selective removal of branches that are not an adequate distance from the power lines, or that will grow too close to the power lines within the next routine maintenance cycle.

Trees are pruned to provide adequate clearance from Columbia Water & Light facilities. As a general rule, trees should be pruned to improve or re-establish the clearance provided from all previous tree maintenance performed.



Some factors to consider before pruning include:

- The growth rate of the tree species (how fast the branches grow back);
- The wood strength of the tree species (what is the chance of the branch branch breaking under load of strong wind, snow, or ice);
- The voltage conducted by the line (the hazard presented by the branch contacting the line; the higher the voltage, the greater the hazard);
- Tree removal considerations. In some cases, it may be preferable to remove the tree. For example, when repeated severe pruning is necessary or when the tree is declining and unsafe;
- Limb overhanging Columbia Water & Light facilities. Remove or shorten dangerous limbs - those overhanging limbs with a high potential for breaking or bending into Columbia Water & Light conductors due to ice, snow, or wind loading (be aware of included bark at the branch bark ridge);

- ANSI A300 procedures and techniques will be followed in addition to fulfilling Arbor Day Foundation's Tree Line USA standards.

Manual/Mechanical removal of vegetation:

- Remove all tall-growing trees within the width of the previously maintained right-of-way.
- Remove all tall-growing brush and volunteers that impedes access and has the potential to grow into the conductors when mature.
- Removal all brush and vines around poles and other Columbia Water & Light equipment.
- All trees and brush should be cut as close to the ground as practical.
- Remove all fast-growing and undesirable tree species.
- Remove all second growth from stumps cut on previous routines pruning cycles.
- Remove all trees that present an obvious or potential hazard to Columbia Water & Light facilities.
- Unmarketable fencerow trees that currently lack ability to be beneficial shade.
- Trees located in such a manner that ANSI A300 (Part 1)-2001 Pruning cannot be followed while attaining clearance.
- Edge trees of no market value that yield no additional benefit due to adjacent or otherwise available shade.
- Trees located in areas not manicured, accessible and inaccessible alleys, or not associated with a residence.

Stumps are to be treated to prevent re-sprouting.

Hazard trees:
Trees that are located beyond the edge of the right-of-way, have a high probability of failure and are of sufficient height to contact the conductors/and or structures and guy wires, if they were to fall in that direction, are classified as danger trees, and should be considered for removal.

Considerations could include but are not limited to the following:

- Dead or dying
- Leaning trees
- Weak branches
- Shallow root system
- Root failure
- Internal decay
- Canker or canker root

Follow up:
Follow up assessments are done by Columbia Water & Light's Consulting Utility Forester once the line clearance contractor has completed work in an area. Foresters will be checking for adequate clearance, proper pruning, clean up, and complaints. If necessary, Columbia Water & Light will send the contractor back to the property to fix any issues.

Right-of-way screens:
Right-of-way screens are strips of vegetation consisting of established trees and brush purposely left on the right-of-way in designated areas where it is required by federal, state, and/or local laws or regulations and/or it is desirable to reduce the visual impact of the cleared right-of-way to the general public. Along certain roads and other areas frequented by the public,

screens of trees may be left on the right-of-way so the natural tree line is not interrupted by the cleared right-of-way, and to reduce the “corridor” appearance of a cleared right-of-way. Screens should be composed of low-growing trees and shrubs that will not normally grow to conductor height.

2.2 - Columbia Water & Light Scheduled Routine Tree Pruning

Procedure:
Columbia Water & Light and its consulting utility foresters will inspect trees near power lines scheduled for pruning and determine which trees should be pruned or removed. Attempts will be made to notify homeowners or residents before pruning is done.

Limb and branch disposal:
Columbia Water & Light and its contract crews will dispose of all debris resulting from their tree and pruning operations that are small enough to be fed through a chipper unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site.

Brush/Volunteer removal:
Brush is defined as a tall-growing tree stem that is less that 5 inches in diameter at breast height (DBH). Brush should normally be removed rather than pruned.

2.3 - Columbia Water & Light Scheduled Tree Removal

Removal Procedure:
Columbia Water & Light and consulting utility foresters will inspect the trees near power lines scheduled for routine maintenance and determine which trees should be removed. If a tree is a candidate for removal, the homeowner or resident will be contacted to ask to authorize Columbia Water & Light and its contractors to remove the tree as low to the ground line as possible.

Tree disposal:
Columbia Water & Light and its contract crews will dispose of all debris resulting from their tree and pruning operations that are small enough to be fed through a chipper unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site.

Stumps:
Columbia Water & Light and its contract crews will NOT grind out stumps, unless special arrangements have been agreed upon. All stumps shall be treated with an approved herbicide unless a property owner has requested that the stump not be treated or if the herbicide label warns against treatment of stumps in particular situations.

2.4 - Customer requested tree pruning policy

Columbia Water & Light will promptly respond to legitimate requests related to tree/right-of-way maintenance, assign a priority level for scheduling and inform the property owner of the results of the investigation. All requests are legitimate to the customer. Columbia Water & Light will

decide if the work requested will benefit the overall safety and reliability of the electric system and its customers and the general public.

Columbia Water & Light should follow the following guidelines:

- Document all requests using its incident reporting system (Tyler Incident Management)
- Screen all requests by phone by asking questions from a list of prompts.
- Assess the property to follow up on the request that cannot be resolved by phone. If no one is home when assessment occurs, a phone call will be made to the customer notifying them of the decision that was made and if the work will be completed, deferred or denied. This practice can increase efficiency for assessments that are completed when property owners are not home.

Procedure:
When a customer requests Columbia Water & Light to prune a tree away from pole-to-pole lines, the company will send out a consulting utility forester to make a determination of any potential hazards that exist. If it is determined that a potential hazard does exist, Columbia Water & Light will schedule a crew to perform all necessary pruning and/or removal. If the tree is not a potential hazard, Columbia Water & Light will inform the customer that the tree will be re-evaluated when that particular area is scheduled for routine maintenance.

Limb and Branch Disposal:
If it is determined that a potential hazard does exist, Columbia Water & Light and its contract crews will dispose of all debris resulting from their tree and pruning operations that are small enough to be fed through a chipper unless different arrangements have been made with the homeowner or resident. Wood too large to be chipped shall be cut and stacked at the site. If the tree is not a potential hazard and pruning and/or removal is still agreed to, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.

2.5 - Customer Tree Removal

Procedure:
When a customer wants to remove a tree and Columbia Water & Light's facilities make it hazardous for the customer or customer's agent to accomplish the work, Columbia Water & Light will do one of the following:

- Temporarily drop the conductors while the customer or customer's agent performs the work. To make arrangements, call Columbia Water & Light at 573-874-7111.
- Prune or remove the portion of the tree that is contributing to the hazard.
- A Columbia Water & Light consulting utility forester will inspect the request within three working days.

Note: Columbia Water & Light will not remove trees to clear house (pole-to-house), or street light service wires.

Tree disposal:
When Columbia Water & Light prunes or removes trees at the customer's' request, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.

2.6 - Customer Pruning with Columbia Water & Light Assistance

Procedure:
When a customer desires to prune a tree close to Columbia Water & Light lines for reasons other than line clearance, and it is hazardous to complete the work, Columbia Water & Light will do one of the following after customer notification:

- Temporarily drop the conductors while the customer or customer's agent performs the work. To make arrangements, call Columbia Water & Light at 573-874-7111.
- Prune or remove the portion of the tree that is creating the hazard.

Limb and branch disposal:
When Columbia Water & Light assists the customer to prune or remove trees at the customer's request, the disposal of the debris is the responsibility of the property owner unless otherwise agreed to in writing.

2.7 - Customer pruning near Columbia Water & Light Facilities

Procedure:
When a customer desires to prune trees near Columbia Water & Light lines, the following conditions must be met:

- Only qualified line-clearance tree trimmers and/or trimmer trainees are allowed within 10 feet of any energized conductors (OSHA 1910.269 and ANSI Z133.1 and any other applicable federal, state or local laws, codes or regulations). Qualified line-clearance tree trimmers will do all pruning around Columbia Water & Light facilities. Columbia Water & Light must be notified in advance of customer's agent performing the work.

Limb and branch disposal:
Cleanup and disposal of all limbs, branches and debris resulting from this clearing operation are the responsibility of the property owner.

2.8 - Tree Pruning and Removal During Storms/Acts of Nature

Procedure:
When trees fail or branches break during storms or in isolated incidents, and they make contact with or cause failure of Columbia Water & Light facilities, Columbia Water & Light will do the necessary pruning or removal to clear its facilities and restore power.

Note: Due to the emergency conditions that exist during storms, Columbia Water & Light and its contract crews may not be able to contact all customers before pruning or cutting trees. Crews may make a courtesy knock on the customer's door to let them know that work will be performed at that location.

Disposal:
If Columbia Water & Light and its contract crews prune or remove trees following storm emergencies, all limbs and logs will be left on the customer's premises. The disposal of limbs and/or logs is the responsibility of the property owner.

2.9 - Pruning and Removal of Diseased Trees

Pruning:
Where trees are encountered that are suspected of being diseased (Dutch elm disease, oak wilt, etc.) the customer should be notified and a determination made as to whether the tree should be pruned. If the customer is not willing to agree the tree is diseased, Columbia Water & Light will refrain temporarily from pruning the tree, if possible, until symptoms are more visible or the hazard is too great. Contract crews should report the matter to their supervisor.

Removal:
When diseased trees are near Columbia Water & Light lines, Columbia Water & Light and its contract crews will do one of the following:

- Prune the trees to clear Columbia Water & Light facilities
- Temporarily drop the conductors while the customer or customer's agent removes the tree. For a temporary drop, customer should contact Water & Light 573-874-7111.

Disposal:
Should a tree be condemned by a municipal jurisdiction as having Dutch elm disease, oak wilt or another tree disorder, Columbia Water & Light has no responsibility for the removal or disposal of the tree except when the tree is located on property owned by Columbia Water & Light. Removal and disposal of diseased trees is the responsibility of the property owner.

2.10 - Customer Contact Policy

Scheduled Routine Pruning/Removal:
A Columbia Water & Light representative or consulting utility forester will attempt to contact each customer/homeowner whenever possible before pruning any trees or in accordance with any pending special conditions mandated by an appropriate regulatory body.

For normal pruning:
A Columbia Water & Light representative or consulting utility forester will knock on the door to talk with the homeowner and explain the necessary pruning. If no one is home, a notice will be left on the door.

If the homeowner does not contact Columbia Water & Light within a couple days, a second attempt will be made to knock on the door to meet the homeowner and explain the necessary pruning. If no one is home, a second notice will be left.

If the homeowner does not contact Columbia Water & Light within a couple more days, a consulting utility forester will change the status of the property to "work ready to commence".

Contract tree trimmers will be dispatched to the properties where "work ready to commence" statuses are located and will do the necessary pruning scheduled on the property. Before

starting the line clearance work, the contract trimming crew will attempt a courtesy contact with the property owner by knocking on the door.

If the pruning is necessary and the homeowner refuses permission, the crew will turn the matter over to Columbia Water & Light's Consulting Utility Foresters. If the CUF's are unable to develop concurrence with the customer regarding the necessary pruning, the CUF's will notify appropriate Columbia Water & Light Superintendent of Electric Services.

Pruning on Public Property:
When pruning involves trees on public property or rights-of-way, it is recommended that Columbia Water & Light Consulting Utility Foresters or its contractors contact the appropriate public agency to discuss any special concerns. Columbia Water & Light will acquire any licensing required by other departments or by the State of Missouri for pruning trees.

For Tree Removal:
Before removing a tree, homeowners will be contacted and informed of the necessary work. Columbia Water & Light representative or Consulting Utility Forester will secure a signed permit before starting the work unless otherwise approved by Columbia Water & Light.

Customer-Requested Pruning/Removal:
Emergency and hazardous conditions will be addressed immediately. If the pruning has been agreed to over the phone, (for normal pruning) the crew will make a courtesy knock on the door before starting the work. If the work requires signed permission for tree removal, the crew will follow the same procedure as outlined for schedule work.

Storm Work/Acts of Nature:
Due to emergency conditions that occur during a storm, Columbia Water & Light and its contract crews will prune and remove trees necessary to restore power without contacting every homeowner.

A courtesy knock will be made at each house to inform them of the work being done, however, the work will proceed even if the customer is not home.

Tree Replacement

Section 3.0

3.1 - General Guidelines

Tree pruning is expensive for Columbia Water & Light and its customers. It may be preferable to remove and replace certain trees that pose a particular hazard to the power lines (fast-growing, tall trees directly under primary wire for example). They grow back quickly into the wires and can cause repeated outages. Poplars, elms, willows, and silver maples are some fast-growing trees that need frequent pruning near power lines.

Columbia Water & Light will work with property owners to remove and replace trees using Columbia Water & Light's Trade-A-Tree program. Columbia Water & Light offers Trade-a-Tree vouchers to negotiate removals that are necessary for reliability. Columbia Water & Light works with property owners on tree species and placement in relation to the power lines. The Trade-A-Tree program has 13 species of trees, bushes, and grasses to choose from at Superior Gardens Center, all of which will not reach the power lines at maturity.

Problematic trees to avoid:

The following trees are fast-growing and are susceptible to broken limbs, disease and other problems in our area:

- Silver Maple
- Lombardy Poplar
- Silver Poplar
- Weeping Willow
- Cottonwood and Hybrid Poplar
- Box Elder
- Sycamore
- Osage Orange
- Siberian (Chinese) Elm
- Tree of Heaven (Ailanthus)

Current Operations

Section 4.0

4.1 - Water and Light Vegetation Management Staff

Columbia Water and Light has 1 Lead Consulting Utility Forester and 1 Consulting Utility Forester, with oversight by the Electrical Services Superintendent. The 2 foresters are responsible for scheduling routine work for its contractors, checking routine work done by the contractors, checking customer ticket requests, and responding to reliability and outage issues.

4.2 - Water and Light Contractor's Staff (Asplundh)

Columbia Water and Light uses Asplundh to do their line clearance work. Asplundh is staffed with 2 general foreman who split responsibilities between 10 crews. In addition to splitting responsibility between crews, the general foreman mitigate situations where property damage claims are made, check crew production, and keep up general maintenance on equipment.

Asplundh is staffed:

General Forman	Truck	
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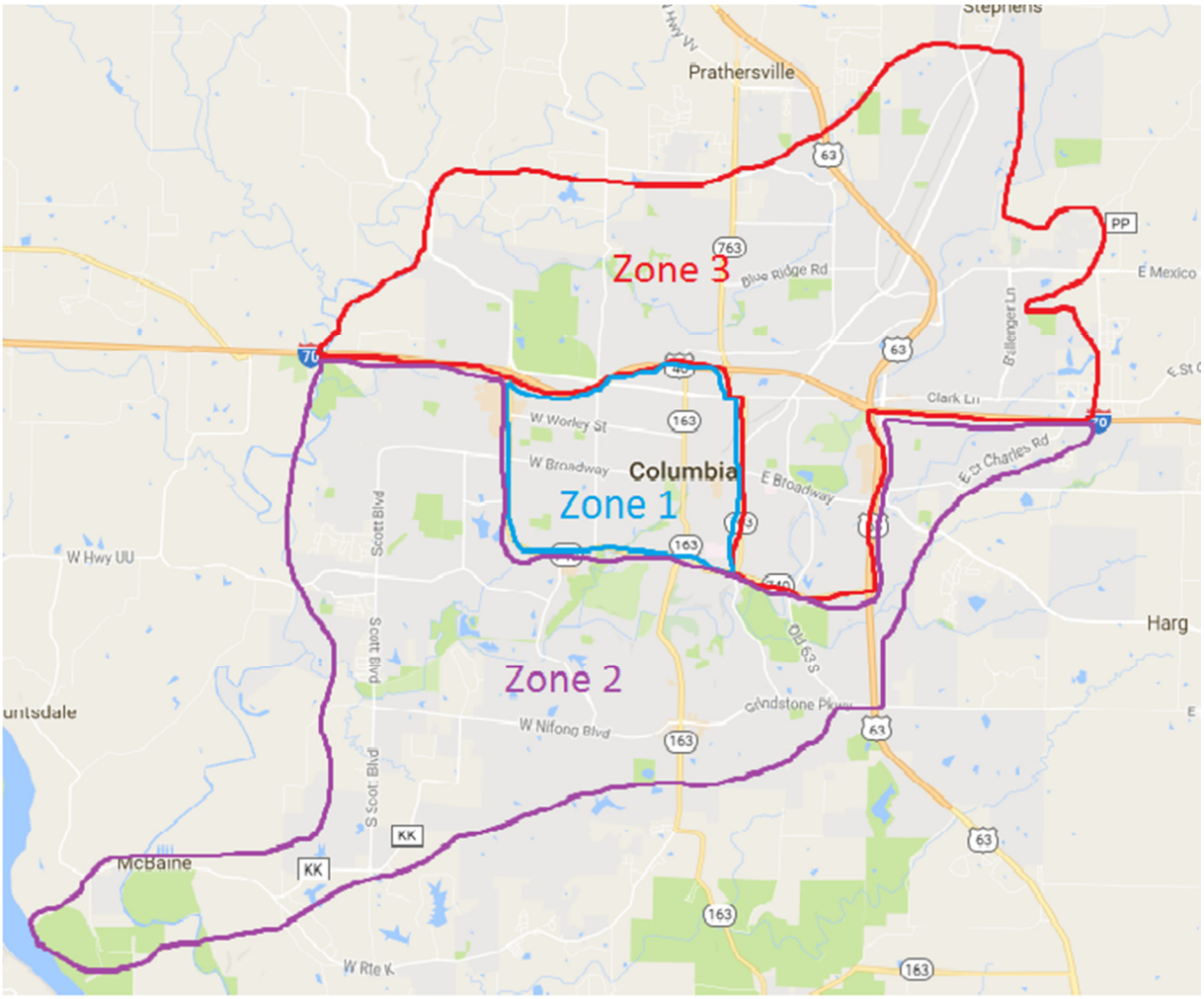
Work Planner	Truck	
Back Yard w/support	63' Backyard Machine (ALTEC)	Foreman
	Hauling truck/trailer	Trimmer
	Split dump	app 4th
	Chipper	app 4th
Back Yard	53' Backyard Machine	Foreman
	Hauling truck/trailer	Trimmer
		app 4th
Back Yard	53' Backyard Machine	Foreman
	Hauling truck/trailer	Trimmer
		app 4th
Back Yard	53' Backyard Machine	Foreman
	Hauling truck/trailer	Trimmer
		app 4th
Manual Crew	Spilt dump	Foreman
	chipper	Trimmer
		app 4th
Manual Crew	Spilt dump	Foreman
	chipper	Trimmer
		app 4th
Manual Crew	Spilt dump	Foreman
	chipper	Trimmer
		app 4th
55' Bucket with BYB	55' Bucket	Foreman

	53' Backyard	Trimmer
	Trailer	app 4th
55' Bucket	55' Bucket	Foreman
	Chipper	Trimmer
		app 4th
70' Bucket	70' lift	Foreman
	chipper	Trimmer

4.3 - Scheduled Work

Columbia Water & Light is on 3 year cycles on 3-phase and single-phase distribution, secondaries, service drops, and fiber. The City is divided into 3 zones for the cycles. These areas are typically trimmed during dormant season to reduce stress and regrowth with the exception of hazards and reliability issues that may emerge.



3-phase circuits and fiber are assessed every other year during the growing. This enhances overall reliability and allows for critical areas to be checked more frequently. Circuit feeders from 4 of the 8 substations are reviewed every growing season.

Odd years:
Hinkson Creek
Perche Creek
Power Plant
Harmony Branch

Even years:
Rebel Hills
Grindstone
Bolstad
Blueridge

4.4 - Planning Software (ESRI)

Columbia Water & Light uses ESRI, an ArcGIS based application to manage and schedule work flow for its contractors. The software is installed on iPads used in the field with assessment points placed on each property for the given cycle. Property parcels are outlined using Boone County assessor information. Consulting Utility Foresters click on each assessment point for the property and fill out a form that gets updated and sent off to the crews when work is ready.

Appendix A

Tree Line USA® Program

Every day in communities all across America, people depend on safe, reliable electric service to power their homes, businesses, and public buildings – all while protecting and enhancing the urban forest.
The TreeLine USA® program exists to recognize best practices in public and private utility arboriculture, demonstrating how trees and utilities can co-exist for the benefit of communities and citizens.
The Arbor Day Foundation collaborates with the National Association of State Foresters on this initiative. These state foresters bring expertise in balancing the demands of expanding utility needs in our communities alongside the benefits of providing adequate care for our urban forests.

Five Core Standards

1. Quality Tree Care — Industry standards for pruning, planting, removals, trenching, and tunneling near trees are consistently followed..
2. Annual Worker Training — Utility employees and contract workers are trained at least annually in best practices.
3. Tree Planting and Public Education — Tree planting and public education programs are available to the public and paying customers, demonstrating proper tree planting, placement, and pruning while expanding the tree canopy in the community.
4. Tree-Based Energy Conservation Program — A formal tree-based energy conservation program is in place, putting special consideration on the value of trees in conserving energy.
5. Arbor Day Celebration — Sponsorship of or participation in annual Arbor Day events at the community level are documented, including collaboration with community groups whenever possible.
   Utility companies that comply with these core standards are welcome to print and submit a Tree Line USA application form to enroll