

ENVIRONMENTAL REPORT



2025



OUR COMMITMENT TO THE ENVIRONMENT

ITC Holdings Corp. is the largest independent electricity transmission company in the United States and has established a strong track record of using our systems and property to improve the environment.

We integrate sustainability into everything we do as a company, whether enabling the transmission of new sources of renewable energy or actively reducing our own carbon footprint.

Since our transmission systems cross all types of urban, suburban and rural environments, it's important that we co-exist with these surroundings as good stewards of the land, water and air. This ethic begins in our **workplaces** and extends to **building, operating** and **maintaining** our transmission systems.



WORKPLACE STEWARDSHIP

Our commitment to the environment begins with our hundreds of employees who embrace waste reduction, conservation and habitat projects across ITC’s regional operating companies in eight states.

WASTE REDUCTION & RECYCLING

ITC commissioned a waste audit of our facilities and identified items suitable for recycling or reuse. Recycling programs have been implemented across the company’s headquarters, regional offices and warehouses. Our teams have reduced the waste generated at our warehouse and office facilities by approximately 50%.

OUR FACILITIES

Corporate Headquarters: ITC’s corporate headquarters campus demonstrated its commitment to environmental stewardship by achieving the WHC Gold Certification in 2018, 2021 and 2024. In 2025, ITC was recognized with the Gold Program of the Year Award for work completed in 2024. ITC looks forward to continue promoting sustainability, wildlife preservation, biodiversity and environmental education within its 92 acres of naturalized transmission corridor, woodlands, open green spaces, wetlands, pond and nature trail. ITC also installed ground-based and canopy solar panels at the Novi headquarters. The arrays generate approximately 450 megawatt-hours of electricity annually to power the headquarters building and eliminate 291 metric tons of CO₂ per year.

EV Chargers: ITC has a total of 53 EV chargers at our offices in Cedar Rapids, Iowa and in Ann Arbor and Novi, Michigan.

Rain Gardens: Rain gardens significantly reduce the amount of pollution reaching creeks, streams and rivers by up to 30 percent. ITC has installed several rain gardens, including at our Iowa City, Iowa warehouse.

WILDLIFE HABITAT COUNCIL CONSERVATION CERTIFICATIONS:

ITC currently holds 13 Wildlife Habitat Council (WHC) certifications in Michigan and Iowa through the WHC Conservation Certification® program, powered by Tandem Global, which recognizes our long-standing commitment to wildlife habitat enhancement, individual species management and conservation education activities on corporate lands.

Michigan:

- **ITC Headquarters**
Oakland County
- **Stony Creek Metropark Corridor**
Macomb County
- **Wolcott Mill Metropark Corridor**
Macomb County
- **Chippewa Nature Center Corridor**
Midland County
- **Crow Island State Game Area**
Saginaw County
- **Sand Point Nature Preserve**
Huron County
- **Tomlinson Arboretum**
Macomb County
- **Sterling State Park Corridor**
Monroe County

Iowa:

- **Iowa City Warehouse**
Johnson County
- **Beverly Park**
Linn County
- **McLoud Run Park**
Linn County
- **Sac and Fox Trail**
Linn County
- **Wanatee Park**
Linn County



PLANNING & CONSTRUCTION

Building the power grid of the future requires creative, innovative transmission solutions. ITC constantly works to connect new sources of renewable energy to the grid in more sustainable ways.

When planning transmission projects, we work with state and federal agencies to conduct environmental assessments and apply best practices to limit impacts to wetlands, threatened and endangered species, and other sensitive habitats. By prioritizing these considerations early in the transmission line route analysis, we can often adjust the placement or timing of construction to avoid or limit the environmental impact. We also implement sustainable construction and recycling practices to reduce our carbon footprint.

MICHIGAN: MULTI-YEAR ENVIRONMENTAL PLANNING & PERMITTING

The 70-mile Riggsville–Port Calcite–Rockport Transmission Line Rebuild Project demonstrates ITC’s ongoing commitment to the operational efficiency and reliability in Michigan’s high-voltage transmission grid and exemplary environmental planning.

The 45-mile Riggsville–Port Calcite line was completed and energized in November 2025, with final work continuing into spring 2026. The initial 25-mile section of the line, Rockport–Port Calcite, was completed in 2021.

This long-lived project required extensive coordination with local, state and federal agencies to complete comprehensive environmental reviews, conduct multi-year field assessments and biomonitoring for state- and federally-listed species, and to secure required permits. Specifically, ITC worked closely with the Michigan Department of Environment, Great Lakes and Energy (EGLE), the Michigan Department of Natural Resources (MDNR), the Michigan Department of Transportation (MDOT), the U.S. Fish Wildlife Service (USFWS), and the U.S. Army Corps of Engineers (USACE). At the local level, ITC secured permits from Presque Isle and Cheboygan counties.

Early planning and coordination with USFWS and MDNR throughout the project allowed ITC to implement best management practices, conduct biomonitoring and train

construction personnel to avoid or mitigate impacts to sensitive species – including the Eastern massasauga rattlesnake (federally threatened), the Hine’s emerald dragonfly and its designated critical habitat (federally endangered), and the wood turtle (state threatened).

Through this effort, ITC demonstrated how to successfully advance system reliability upgrades while meeting or exceeding environmental regulatory requirements.

IOWA: ITC MIDWEST STRENGTHENS COMMUNITY PARTNERSHIPS

In 2025, ITC Midwest supported the advancement of the Spirit Lake Trail project in partnership with local, state and federal agencies. A portion of the trail intersects the Pelican Circuit 69 kV line in Dickinson County, Iowa. Working closely with the Dickinson County Trails Board, Executive Director Erin Reed and the Board of Supervisors, ITC Midwest helped secure the necessary easement and coordinated key permitting requirements. Collaboration included site meetings, environmental reviews—including a survey for a federally protected plant—and discussions on vegetation management and trail access. Construction is underway, with ITC Midwest providing weekly updates to reduce user disruption. This partnership will continue throughout future maintenance efforts, which highlights ITC Midwest’s commitment to community collaboration and environmental stewardship.

**MICHIGAN:
FIRST NETWORK PROGRAM**

ITC's First Network program in Michigan represents a strategic investment in modernizing the state's high-voltage transmission infrastructure by installing Optical Ground Wire (OPGW) on existing transmission lines. OPGW technology enhances the grid by combining grounding and high-speed communications capabilities, and improving system reliability.

Many First Network projects are undertaken each year. In 2025, the 138 kV Aphis-Chopin and 138 kV Cobb-Chopin projects were especially notable for their complex environmental considerations. Targeted planning was required to protect federally- and state-threatened and endangered species— including the Eastern massasauga rattlesnake, Karner blue butterfly, bald eagle and several turtle species— while minimizing potential impacts and permitting needs. Best management practices included active-season biomonitoring, strategic access routing, reduced work-area footprints and construction timing adjustments to avoid the Karner blue's flight period and maintain a 1,000-foot buffer around a bald eagle to avoid the need for a USFWS Disturbance Permit. Additional environmental coordination included securing a Section 10 Permit from the USACE to cross the Muskegon River, and working with the MDNR to obtain access through the Muskegon State Game Area.

**MICHIGAN:
WOOD POLE REPLACEMENT PROJECTS MAINTAIN TRANSMISSION LINE INTEGRITY**

ITC's Wood Pole Replacement Projects (WPRs) are critical to modernizing aging transmission infrastructure and support higher capacity grid demands.

The 16-mile, 138 kV Lindeman-Tippy Wood Pole Replacement Project in Manistee County is one of the 57 WPRs completed in 2025, and it exemplifies the extensive environmental planning and multi-agency coordination characteristic of these efforts. To complete the project, ITC secured wetland and floodplain permits from EGLE. ITC also implemented sensitive-species protection measures during construction activities to avoid impacts to the federally protected Eastern massasauga rattlesnake as well as the Eastern box and wood turtles, which are both protected in Michigan. ITC proactively coordinated with U.S. Forest Service to install new poles within the Manistee and Huron-Manistee National Forests. Additionally, the replacement of existing wood structures with taller, steel monopoles also required Federal Aviation Administration aeronautical review to ensure airspace safety and prevent interference with aviation operations.

**KANSAS:
THISTLE SUBSTATION POLLINATOR HABITAT**

ITC's environmental team was involved in the design, installation and management of pollinator habitat located at the Thistle Substation in Medicine Lodge, Kansas. This nearly 11-acre habitat improves stormwater quality via infiltration and serves as an important larval host by providing nectar and pollen resources for pollinators. This habitat also helps save declining wildlife species like the monarch butterfly, native bumble bees and grassland-nesting birds.





OPERATIONS & MAINTENANCE

Implementing best practices on transmission corridors prioritizes safety and reliable performance and also incorporates diverse and impactful environmental management practices. This includes recycling of replaced infrastructure and creating diverse, stable greenways where grasses, wildflowers and low-growing shrubs thrive.

EQUIPMENT RECYCLING: DIVERTING THOUSANDS OF TONS OF MATERIALS FROM LANDFILLS ANNUALLY

In addition to building new transmission lines, we are rebuilding hundreds of miles of aging transmission infrastructure, which includes power lines and electrical substations. Replacing old equipment poses the challenge of how to responsibly handle retired components, which include conductor (wires), oil-filled transformers, circuit breakers, underground cable, structural metal, wood poles, batteries and concrete. Fortunately, most components of decommissioned electrical equipment can be recycled:

- Station back-up power batteries are sent to a battery recycling facility, where the lead and acid are separated and reclaimed.
- PCB-contaminated oil and metal is sent to a federally licensed treatment facility for de-chlorination and recycling.
- Concrete pads from construction projects are sent to recyclers where they are crushed and used as aggregate in new concrete production.
- Utility poles are often donated to the landowner.
- Untreated wood is often sent to a recycling facility for reuse as landscaping mulch or used as fuel in a cogeneration power plant.

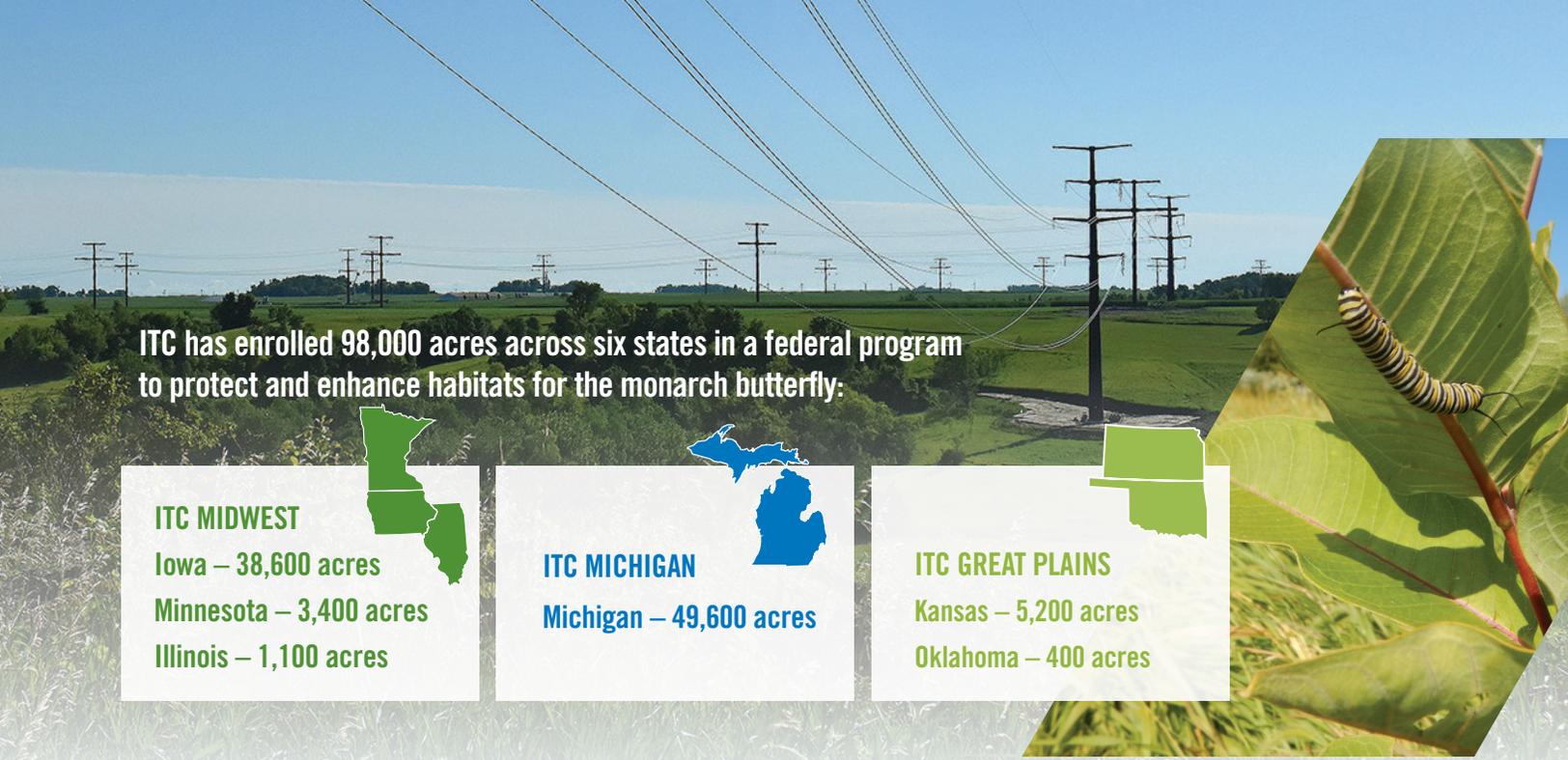
BUILDING RESILIENCE: ITC'S 2025 CLIMATE VULNERABILITY ASSESSMENT

In 2025, ITC completed a Climate Vulnerability Assessment (CVA) to evaluate how five key climate hazards — extreme heat, inland flooding, wildfire, winter weather and high winds— may affect its assets and operations. The study also identified potential strategies to strengthen system resilience and mitigate climate-related risks.

Findings showed that all ITC operational processes face some level of climate-related risk. Winter weather and extreme heat pose the highest overall risks, while inland flooding is a region-specific risk in Michigan and the Midwest. Resilience strategies being considered by ITC include: evaluating and relocating high-risk substations outside of flood-prone areas to reduce risk associated with flooding and prevent service interruptions, and replacing aging wood poles in select regions to increase the resiliency of the transmission infrastructure against extreme weather events. These and other potential adaptation strategies build on ITC's strong foundation of resilience planning and highlight the need for continued action to address resilience gaps to ensure long-term system reliability.

These results were incorporated into the 2026 Fortis Climate Resiliency Report, which consolidated climate risk and vulnerability assessments from all Fortis utilities. The Fortis group operates 16 jurisdictions across Canada, the United States and the Cayman Islands.

In 2025, ITC recycled 97,796 gallons of oil and 10,224,748 pounds of metal.



ITC has enrolled 98,000 acres across six states in a federal program to protect and enhance habitats for the monarch butterfly:



ITC MIDWEST

Iowa – 38,600 acres

Minnesota – 3,400 acres

Illinois – 1,100 acres



ITC MICHIGAN

Michigan – 49,600 acres



ITC GREAT PLAINS

Kansas – 5,200 acres

Oklahoma – 400 acres

ITC CONTINUES ITS COMMITMENT TO MONARCH BUTTERFLY RECOVERY

2025 marked ITC's fourth year of enrollment in the Nationwide Candidate Conservation Agreement with Assurances (CCAA) for the Monarch Butterfly on Energy and Transportation Lands. This agreement promotes upfront commitments to carry out conservation measures to sustain, enhance and restore habitat for the monarch butterfly – ITC's participation in this voluntary federal program demonstrates our proactive commitment to conservation efforts that benefit a species at risk. In exchange, the CCAA provides regulatory assurances that no additional endangered species requirements will be imposed by USFWS beyond the terms of the agreement.

AVIAN PROTECTION PROGRAM & SPECIES PROTECTION

ITC developed a voluntary Avian Protection Plan to mitigate risks associated with avian interactions with electric transmission infrastructure. The plan follows best practices and guidelines developed cooperatively by the Avian Power Line Interaction Committee (APLIC), USFWS and other stakeholders.

ITC is committed to training forestry staff and contractors – we hold two in-person annual trainings focused on threatened and endangered species protection and vegetation management for sensitive species and habitats. Additionally, as part of an Integrated Vegetation Management (IVM) program, ITC foresters utilize measures to reduce invasive species establishment.

GREENHOUSE GAS INITIATIVES

ITC actively seeks opportunities to reduce environmental impacts related to greenhouse gases such as those associated with fleet emissions, energy consumption and transmission equipment. One prime example is related to high-voltage circuit breakers that are filled with a unique insulating gas (sulfur hexafluoride, or SF₆). Since 2005, ITC has been part of the Environmental Protection Agency's (EPA) SF₆ Emission Reduction Partnership for Electric Power Systems, a collaborative effort between EPA and the electric power industry to identify, recommend and implement cost-effective reductions to reduce SF₆ emissions. ITC tracks and reports SF₆ emissions to the EPA annually, and implements company-wide protocols for proactive leak detection and equipment repair and replacement. The EPA recognized ITC as an industry leader with the SF₆ Team Leadership Award because of our ongoing commitment to SF₆ emission reductions.

DID YOU KNOW?

ITC actively supports local environmental organizations through employee volunteers and philanthropic donations.



PARTNERSHIPS

ITC Michigan:

Belle Isle Conservancy
Comstock Public Schools
Conservation Resource Alliance
Ducks Unlimited
Friends of Grand Rapids Parks
Friends of the Rouge
Huron River Watershed Council
State of MI – MI DNR
Treasurer, Pennfield Charter Township
West Bloomfield Parks
West Michigan Trails & Greenways
Wildlife Habitat Council,
powered by Tandem Global

ITC Midwest:

Cedar Rapids Public Library Foundation
Dubuque Arboretum & Botanical Gardens
Hawkeye Area Council
Indian Creek Nature Center
Iowa Environmental Council
Iowa Natural Heritage Foundation
Iowa Project AWARE
Mississippi Walleye Club
Trees Forever
Wildlife Habitat Council,
powered by Tandem Global

ITC Great Plains:

Ducks Unlimited
Friends of the Topeka Zoo
Kansas Association of Conservation Districts (KACD)
Kansas Chamber of Commerce & Industry
Kansas Grazing Lands Coalition Inc
Natural Areas Association
Oklahoma Association of Conservation Districts
Pheasants Forever – Ninescah Chapter
Sand County Foundation



**FOR THE
GREATER GRID.**

27175 Energy Way | Novi, MI 48377 | 877.ITC.ITC9
www.itc-holdings.com

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ABOUT ITC:

ITC Holdings Corp. is the largest independent electricity transmission company in the United States. ITC provides transmission grid solutions to improve reliability, expand access to markets, allow new generating resources to interconnect to its systems and lower the overall cost of delivered energy. Through its regulated operating subsidiaries ITC *Transmission*, Michigan Electric Transmission Company, ITC Midwest and ITC Great Plains, ITC owns and operates high-voltage transmission infrastructure in Michigan, Iowa, Minnesota, Illinois, Missouri, Kansas, Oklahoma and Wisconsin. These systems serve a combined peak load exceeding 24,500 megawatts along 16,000 circuit miles of transmission line, supported by 900 employees and 1,000 contractors. ITC is based in Novi, Michigan. For further information visit www.itc-holdings.com. ITC is a subsidiary of Fortis Inc., a leader in the North American regulated electric and gas utility industry. For further information visit www.fortisinc.com.