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INVESTIGATION OF METHODS TO§IMPROVE ELECTRIC AND§TELECOM INFRASTRUCTURE THAT§WILL MINIMIZE LONG TERM§OUTAGES AND RESTORATION§COSTS ASSOCIATES WITH GULF§COAST HURRICANES§

PUELIC DYLLLY COMMISSION FILING COMMISSION OF TEXAS

CAP ROCK ENERGY CORPORATION'S DESCRIPTION OF ITS VEGETATION MANAGEMENT AND LINE INSPECTION PROGRAM

I. INTRODUCTION

Cap Rock Energy Corporation ("Cap Rock") provides electric service to its customers located in West Texas, Central Texas and Northeast Texas. Each of these geographical areas has differing vegetation management requirements due to the diverse and/or unique foliage of the respective region. The Northeast Texas region has more trees and underlying brush than does the West Texas region. Cap Rock has an established vegetation management and line inspection program to address the diversity of each of these distinct service areas in a manner to assure reliable electrical service to all of its customers. Cap Rock strives to maintain the highest quality of service possible through the use of its determined vegetation management and inspection procedures.

II. RESPONSE TO STAFF'S AUGUST 22, 2006 LETTER

On August 10, 2006, the staff of the PUC presented its report in Project No. 32182 to the Commissioners. In that report the staff recommended that each utility file a written description of its vegetation management and annual line inspection programs by October 1, 2006. On

August 22, 2006, a letter was sent as service of notice to make such filings by that date. Cap Rock is filing the following comments in response to that letter and the staff recommendations.

1. On-Going Vegetation Management

Cap Rock has a program to review annually its tree trimming and vegetation management needs. Every year company personnel review the distribution system and measure trees that need to be trimmed. A work plan is developed on a per foot basis as though all the work would be performed by its in-house employees. Cap Rock also sends out at least 6 RFPs to perform that same work on a per-foot basis. In this manner, management can review both alternatives on the same basis and decide which method, or combination of methods, best achieves the objectives of the work plan. The decision may result in some work being performed by employees and some contracted with outside vendors.

When using outside vendors for tree trimming and ROW clearing, Cap Rock has a standard form contract. The contract terms provide a description of the work, a description of the contract, a requirement of the vendor to meet certain bonding limits, the timing of the work, performance requirements, supervision and inspection requirements, and other requirements that may be necessary.

The criterion used for tree trimming and cutting by both in-house employees and outside vendors is discussed herein. Trees within 5' of the power lines (neutral or primary) will be cut or trimmed. Willow trees located within 6' of the line will be trimmed or cut. All trees within the clearance identified above will be cut to the ground if there is not a compelling reason for the tree to remain. Some of the ROW agreements require the approval of, or agreement of, the land owner in performing this work. If such a requirement is in effect, and the land owner does not agree to removal of the tree, then the tree will be trimmed. All trees will be trimmed such that

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there is at least 10' of clearance in all directions from the closest wire. Trees within 8' of the span will also be cut as discussed above. All stumps will be treated with a mixture of Garlon 4 after being cut.

Spraying will include trees that are less than 6" in basal diameter and less than 10' tall. In the case of spraying, there are certain restrictions that must be followed. No spraying shall be applied a) on ditches used for irrigation water, b) where run-off or irrigation water may flow onto agricultural land, c) where lactating animals graze, d) where hay will be harvested within the next year or e) where there are any fruit, cedar, pine, or ornamental trees. Maps and staking sheets will show areas and footage to be cut, trimmed, and/or sprayed.

2. On-Going Cyclical, Ground-Based Inspection Program

Cap Rock's current practice is to rely upon reports of its service men. Service men are assigned territories within the service area and are responsible for the maintenance of the utility's electric delivery facilities within those respective areas. In the course of day-to-day operations and maintenance, service men visually review segments of the network as they are performing other maintenance and construction related activities. If needs are identified, then work orders are prepared to address those concerns. Reporting on ground-based pole conditions identifying poles with rotting concerns is generally not an issue in West Texas. The dry conditions there greatly reduce the pole rot problem which is the common cause of pole failure.

III. CONCLUSION

Cap Rock submits these comments on its current practices in regards to its vegetation management and inspection programs. Cap Rock understands the concern for restoration activities due to major storms and hurricanes. However, any recommendations proposed should

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recognize the geographical diversity that exists across the state. Modifying loading and structural requirements to address one type of climatic event may not be sufficient or proper in an area that experiences different climatic events. As the staff pursues its analysis and review of procedures and practices to address hurricane related events, Cap Rock requests that staff also recognize that there are other weather related events that must be respected for those areas not prone to hurricanes. Issues around tornados, high winds, icing, etc. are weather related events that must be reviewed in determining any changes in the engineering or management requirements of the system. Annual review programs for vegetation management provide the first level of defense for weather related events, but the structures must be designed in a manner that respects the geographical and climatic realities of the areas in which the facilities are located. Cap Rock looks forward to working with the staff in finalizing recommendations in regards to vegetation management and cyclical inspection programs.

Respectfully submitted,

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John W. Rainey Chief Regulatory Officer

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