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## **PROJECT NO. 32182**

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PROCEEDING TO REVIEW INFRASTRUCTURE RELIABILITY, EMERGENCY MANAGEMENT AND HOMELAND SECURITY MATTERS

#### **PUBLIC UTILITY COMMISSION**

**OF TEXAS** 

# <u>RESPONSES OF ENTERGY GULF STATES, INC. TO THE STAFF'S RQUESTEDRA</u> <u>WRITTEN DESCRIPTION OF ITS VEGETATION MANAGEMENT AND GROUND-</u> <u>BASED INSPECTION PROGRAMS</u>

Entergy Gulf States, Inc. ("EGSI" or "the Company") files the following responses to the Staff's request, dated August 22, 2006, for a written description of EGSI's:

- 1) vegetation management program for overhead facilities, and;
- 2) on-going cyclical, ground-based inspection program for overhead facilities.

### 1. EGSI's Vegetation Management Program

The distribution line vegetation management program consists of both a cycle based proactive and reactive element. The cycles are examined annually and are determined by a number of factors including growth rates, type and density of side and floor vegetation, vegetation related outage information, time from last maintenance, and reliability. Based on these factors, the present cycle is approximately 5 years per feeder circuit. Identified circuits or areas are maintained using a combination of both conventional side trimming and herbicides depending on the specific application. The reactive program consists of investigating potential problem areas that are identified by both company personnel and the public and determining the appropriate course of action.

Transmission rights-of-way boundaries are maintained on a 3 to 8 year cycle depending on the width of the right-of-way. vegetation density and average growth rates. The floor of all transmission rights-of-ways are maintained on a 3 year cycle, depending on growth rates, by herbicide or mowing depending on location and surface conditions. Mowing may be as frequent as several times a year on select rights-of-ways that are the property of Entergy Gulf States and fall under the requirements of various local government jurisdictions. The status of the vegetation management program is monitored by aerial patrols conducted twice a year.

## 2. EGSI's Ground-Based Inspection Program

The pole inspection program at EGSI is a proactive preventative program that targets approximately 8% of the company's distribution poles for inspection resulting in a 12 year cycle. The program consists of both visual and physical inspection of the structure, which includes the pole, cross-arms, insulators, etc. The recommended actions depend on the findings of the inspection. Poles judged to be sound are tagged and receive no further action. Those that have been identified as needing additional attention are either treated in the field or reinforced, depending on the condition of the pole. Those that are deemed beyond treatment or reinforcement are identified and scheduled for replacement. In addition to the proactive pole inspection program, the following reliability based programs also have a significant inspection element.

*Targeted Circuit:* This program targets select circuits that meet certain reliability thresholds. All circuits are analyzed on a quarterly basis. The identified circuits are given a detailed inspection by qualified personnel in the Reliability and Technical Services department with

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the primary focus aimed at reliability related issues. Items are identified and analyzed and corrective actions are planned and implemented.

*TACTICS:* This program examines the outage history at the level of individual devices on a circuit such as a line fuse. Outage reports are analyzed daily and those devices whose last operation resulting in an outage meeting certain criteria are identified. The lines served from these devices are given a detailed inspection to determine the cause or contributing items to the outage history. Corrective actions are then planned and implemented.

Transmission facilities are inspected on a 10 year cycle either through ground or aerial inspections. This is accomplished for wood structures using ground based inspections. Inspections of steel pole or tower circuits are done by a slow, deliberate, and methodical aerial inspection: it is Entergy's experience that aerial inspections on these types of structures are the most efficient and effective method. In addition, higher speed aerial patrols are done on a minimum of a 2 year cycle. In the course of these inspections, if is the company determines that a closer look is needed, a climbing inspection of a structure(s) or entire line section will be scheduled.

In addition to these specific programs mentioned above, field personnel, in the course of their normal daily activities, look for abnormalities that could affect the reliability of the transmission and distribution electric systems. Entergy also encourages its interconnected wholesale customer's who have trained field personnel to report any abnormalities in Entergy's electric facilities to Entergy.

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