

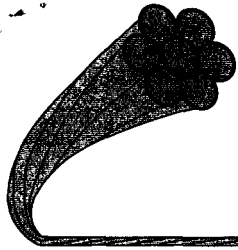


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## SOUTH TEXAS ELECTRIC COOPERATIVE, INC.

2849 FM 447 • P.O. Box 119 • Nursery, Texas 77976 • (361) 575-6491 • Fax (361) 576-1433

September 27<sup>th</sup>, 2006

David Featherston  
Director, Infrastructure Reliability Division  
1701 North Congress Ave.  
P.O. Box 13326  
Austin, Texas 78701

Re: Project No. 32182 – Investigations of Methods to Improve Electric and Telecom Infrastructure That Will Minimize Long Term Outages and Restoration Costs.

Dear Mr. Featherston:

I am writing in response to the Staff recommendation in the August 10<sup>th</sup>, 2006 report to the Commissioners on Project No. 32182 that written descriptions of the South Texas Electric Cooperative (STEC) vegetation management program and overhead facility ground-based inspection program should be filed on October 1<sup>st</sup>, 2006.

STEC's written vegetation management program includes general considerations as a guideline for personnel responsible for rights-of-way maintenance. These considerations include guidance on contacting landowners and the need to check individual property easement definitions and restrictions. The document then lists restrictions on right-of-way maintenance procedures such as mowing, hand sawing, and tree trimming. A list is included that indicates specific documentation that right-of-way maintenance personnel are expected to record as a minimum. The program specifies that an aerial or ground based inspection of all rights-of-way shall be performed annually, that right-of-way mowing shall be performed every five (5) years on average, and that tree trimming shall provide adequate clearances for a minimum of three (3) years. A drawing is included in

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the written program that indicates the minimum trimming clearances for each applicable transmission voltage as a guideline for the right-of-way maintenance personnel.

STEC completes a ground-based patrol of all transmission lines every two years. This patrol checks for wood pole integrity both at the ground line and the pole top. A climbing inspection during this patrol is made if there is visual evidence of insulator or hardware corrosion, pole damage, or cross-arm damage that requires a closer look to ascertain the extent of the problem. In addition to the patrol, wood pole ground line internal inspection, fumigant application, and preventive wrap treatments are performed on an average 10% of the total transmission system each year. In 2007, STEC plans to perform wood pole ground line treatment on about 215 miles of transmission line. When this section is complete all STEC lines will have undergone ground line inspection and treatment since 2000.

If you need further information, please contact me at (361) 485-6132.

Sincerely,

A handwritten signature in black ink, appearing to read "Cory Allen", with a stylized, flowing script.

Cory Allen  
Manager of Operations and Engineering  
South Texas Electric Cooperative, Inc.