



Control Number: 32182



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**Sam Houston**

ELECTRIC COOPERATIVE, INC.

**CORPORATE OFFICE**

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November 24, 2008

Mr. James Galloway, Filing Clerk  
Public Utility Commission of Texas  
1701 N. Congress Ave.  
P.O. Box 13326  
Austin, Texas 78711-3326

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2008 NOV 24 PM 2:52  
PUBLIC UTILITY COMMISSION  
FILING CLERK

RE: Project No. 32182 – “PUC Investigation of Methods to Improve Electric and Telecommunications Infrastructure to Minimize Long Term outages and Restoration Cost Associated with Gulf Coast Hurricanes”

Dear Mr. Galloway:

In Response to David Featherston's letter dated October 15, 2008 this letter contains the requested information concerning Sam Houston Electric Cooperative Inc.'s programs related to vegetation management and ground-based inspections for overhead facilities. Sam Houston Electric Cooperative, Inc. does not operate any transmission lines within fifty miles of the Texas coast. Accordingly, Sam Houston Electric Cooperative, Inc. is not filing an inventory of transmission facilities.

**Vegetation Management:**

Sam Houston Electric Cooperative, Inc.'s written vegetation program (“Plan”) provides guidelines for rights-of-way (“ROW”) maintenance. Activities associated with the Plan include: Trimming, mowing underbrush, and cutting of dead trees. The Plan specifies ROW trimming for distribution lines will be completed on a four or five year cycle depending on species, soil, and moisture conditions. Approximately sixty percent of the system is on a four year trim cycle and the remainder is on a five year cycle. Mowing underbrush on distribution ROW is completed at the same time during the trimming cycle. Additionally, mowing underbrush is also conducted between trim cycles. Transmission ROW is monitored and trimmed on an eight to ten year cycle. Mowing and underbrush removal along transmission lines is completed every two years. Both distribution and transmission ROW is inspected twice a year for dead trees or potential problems.

**Ground-Based Inspections**

Sam Houston Electric Cooperative, Inc. provides a ground-based inspection of all transmission and distribution lines every eight years. The inspections consist of checking the integrity and proper operation of the poles and equipment. Poles are climbed and

further inspected 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 inspections, wood pole ground line treatment, fumigant application, and preventive wrap treatments are performed. So far in 2008, Sam Houston Electric Cooperative, Inc. has performed the inspection and various treatments listed above on approximately 17,506 poles.

Sincerely,

A handwritten signature in black ink, appearing to read "Kyle J. Kuntz". The signature is fluid and cursive, with the first name "Kyle" and last name "Kuntz" clearly distinguishable.

Kyle J. Kuntz  
CEO/General Manager  
Sam Houston Electric Cooperative, Inc.