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Houston County Electric Cooperative, Inc.

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TEXAS 89 HOUSTON P.O. BOX 52 PHONE: (936) 544-5641 CROCKETT, TEXAS 75835 OFFICE: 1701 SE LOOP 304 FAX: (936) 544-4628 1-800-657-2445

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

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 Houston County Electric Cooperative, Inc. programs related to vegetation management and ground-based inspections for overhead facilities. Houston County Electric Cooperative, Inc. does not operate any transmission lines within fifty miles of the Texas coast. Ac cordingly, H ouston County Electric C ooperative, Inc. is not filing an inventory of transmission facilities.

Vegetation Management:

Houston County Electric Cooperative, Inc.'s ("HCEC") written vegetation management program ("Plan") provides guidelines for rights-of-way ("ROW") maintenance. HCEC's 4,600 miles of energized line is divided in to five sections utilizing system maps. The ROW in each section is re-cleared from floor to ceiling every five years which involves mowing and side trimming of the ROW. Side trimming is conducted utilizing Giraffe serial devices, bucket trucks and manual climbing methods. The Plan also includes a two year rotation in which a herbicide treatment is utilized to control any re-growth of vegetation occurring in any of HCEC's ROW. The ROW Supervisor is responsible for ensuring that re-clearing and spraying is performed properly, including monthly crew inspections. ROW re-clearing under the five year plan is performed year-round. Additionally, hot-spot clearing is done as required based on crew inspections or as requested by members.

HCEC's inspection of it ROW is ongoing. HCEC crews inspect the physical condition of ROW daily as a part of their daily work routine. HCEC crews document ROW that has been inspected on any given day by completing an inspection ticket and turning it in to the ROW Supervisor. The ROW Supervisor maintains a record of the daily inspections.

Ground-Based Inspections

"Owned By Those We Serve" www.houstoncountyelec.com



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HCEC has a continuous pole inspection program that is implemented by HCEC crews. HCEC also conducts an inspection program utilizing Osmose Utility Services Inc. ("Osmose") on a nine year rotation which began in 1999. HCEC maintains copies of the inspection reports from Osmose. Once the inspection reports are received from Osmose, the staking department works directly with Osmose and draws up "staking sheets" for any required replacement work found during the inspection. These staking sheets are processed just like work orders, and the required replacement work is completed by HCEC crews or by contractors. In 2008, 8,541 poles were inspected and 155 poles were rejected resulting in a rejection rate of 2.2%. In 2009 HCEC will start the rotation over, and HCEC expects a lower rejection percentage.

Sincerely,

ody Dirrell

Melody Pinnell General Manager Houston County Electric Cooperative, Inc.

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