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

Vegetation Management

PHEC's written vegetation management program ("Plan") provides guidelines for rights of way ("ROW") maintenance. Activities associated with the Plan include use of trimming equipment providing ground to sky trimming, use of herbicide spray where practical and prudent, response crew to address reported problem areas, regular mowing of ROW's where practical, and regular inspections of ROW on transmission and distribution lines. The Plan specifies that an aerial or ground based inspection of all ROW shall be performed annually, that ROW mowing shall be performed every four years on average, and that tree trimming shall provide adequate clearances for a minimum of five years. Diagrams are included in the Plan which indicate the minimum trimming clearances for each applicable transmission voltage as a guideline for the ROW maintenance personnel.

Ground-Based Inspections

PHEC completes a ground-based inspection of all transmission lines every two years and all distribution lines every ten 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 hardware degradation or pole or cross-arm damage. In addition to inspections, wood pole ground line treatment, fumigant application, and preventive wrap treatments are performed on an average of 10% of the total transmission system each year. In 2008, PHEC has performed the above referenced activities on approximately 230 miles of distribution and transmission lines.