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MRECTORS

KALE GRIFFITH

KEITH YOUNGBLOOD

DB LANGEORD

M DREAUT, JR.

November 25, 2008

Public Utility Commission of Texas P. O. Box 13326 Austin, TX 75711-3326

+32182

RE: Vegetation Management Plan

Dear Public Utility Commission Staff:

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

Vegetation Management:

Cherokee County Electric Cooperative Association's (CCECA) written vegetation management program ("Plan") provides guidelines for rights-of-way ("ROW") and mechanically), mowing, and herbicide applications. The Plan specifies that an aerial or ground based inspection of all ROW shall be performed annually, that ROW mowing shall be performed every five years on average, and that tree trimming shall provide which indicate the minimum trimming clearances for each applicable distribution voltage performed herbicide application on approximately 348 miles of distribution lines and trimmed and mowed 338 miles of distribution lines

Ground-Based Inspections:

Cherokee County Electric Cooperative Association (CCECA) completes a ground —based inspection of all distribution lines every year. 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 on an average 10% of the total distribution system each year.

Please do not hesitate to contact us if you need further information.

Sincerely,

Greg Jones

General Manager