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PUC INVESTIGATION OF METHODS
TO IMPROVE ELECTRIC AND
TELECOM INFRASTRUCTURE THAT
WILL MINIMIZE LONG TERM
OUTAGES AND RESTORATION
COSTS ASSOCIATED WITH GULF
COAST HURRICANES

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BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**RESPONSE OF THE EAST TEXAS ELECTRIC COOPERATIVES
TO PROPOSALS FOR HARDENING THE UTILITY
INFRASTRUCTURE IN THE GULF COAST AREA**

COMES NOW the East Texas Cooperatives and file this their response to those questions set forth in the Commission Staff's Memorandum dated February 3, 2006.

1. *What are your company's proposals for hardening the network infrastructure, and modifying utility operations to minimize outages and speed up restoration for the next 1 to 5 year time frame? Please include the applicable financial data to show how the utility intends to fund these proposals.*

As the vast majority of the East Texas Cooperatives' ("ETCs'") outages resulting from Hurricane Rita were caused by downed trees as opposed to high wind, the ETCs intend to continue to conduct routine physical inspection of transmission and distribution line rights-of-way ("ROW") for suspect trees and vegetation encroachment to ensure proper and allowable clearing of these ROWs. The ETCs' facilities are constructed in accordance with applicable national standards and the ETCs currently perform inspections on a routine basis and will continue to do so. The majority of the ETCs' transmission and distribution network is located in the Piney Woods area of East Texas, therefore, the ETCs believe there is no cost-effective manner in which to "harden" facilities to ensure against outages during a major natural disaster such as Hurricane Rita. However, the ETCs expect to reassess and revise, where necessary, their emergency action planning in order to have sufficient emergency restoration personnel, services and facilities in place, when possible, prior to another natural disaster.

The ETCs do not expect to incur significant additional costs for the above-described actions.

2. *What are your company's long-term plans to modify your network infrastructure to minimize outages and speed-up restoral in the areas prone to hurricane in Texas?*

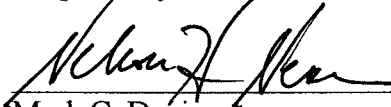
Please provide detailed information outlining your plans for the next 5 to 10 years and 11 to 20 years and beyond. Please include financial data to show how the utility intends to fund these proposals.

The ETCs believe implementing the actions described in the response to Question No. 1 will provide them with the most cost-effective mechanisms to ensure minimal outages and speedy restoration after a natural disaster.

3. *Please explain what your expectations are as to the actions of this Commission, the state and local government, the affected community and any other entity to facilitate your proposals described under items 1 and 2 above.*

The ETCs would like to see the Commission and Staff take a more active role in educating state and local officeholders, as well as intervenors in certificate of convenience and necessity ("CCN") proceedings, of the vital importance of ROW clearing, accessibility and maintenance as necessary and preventative measures against prolonged future outages. The ETCs believe the Commission understands that every pole and every span of wire is important to every electric consumer no matter where that customer is in relation to a particular pole or wire span. As such, the ETCs would appreciate the adherence to bright line rules regarding the clearing, accessibility and maintenance of utility ROWs in future CCN proceedings. All transmission and distribution providers understand the importance of private property rights, however, in areas of the state where there are significant natural obstructions, such as forested areas, the ability of a transmission and distribution provider to adequately unburden and maintain clear utility ROWs is of vital importance in reducing outages and minimizing restoration times after any type of incident or natural disaster.

Respectfully submitted,



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