



Filing Receipt

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PROJECT NO. 52667: STATUS OF NON-COMPLIANT DISTRIBUTION LINES

In response to PUCT's Notice of Non-Compliance with Section 6 of House Bill 4150 and PURA §38.004(b), Related to Clearance Standards of Transmission and Distribution, dated March 2, 2022 (the "PUCT Notice"), United Electric Cooperative Services (United) submits this progress report on the status of its line segments identified as having clearance violation issues in its previous filing of its "Project 52667: Filing of Attestation Demonstrating Compliance with H.B. 4150" ("United's Attestation"); such lines being the first 83 listed (now corrected to 77 after subtracting duplicates).

United is intending to bring its lines in compliance with all applicable requirements, but United is not intending by its Attestation to indicate that lines listed with height requirement violation issues are in all instances out of compliance with the National Electrical Safety Code Standard ANSCI(c)(2), as adopted by the American National Safety Institute in effect at the time of construction.

With respect to the requests stated in the PUCT Notice, please consider the following:

PUCT Request 1: "Progress reports for each non-compliant distribution line identified within UECS's January 6, 2022 attestation (attestation);"

The attached table summarizes the progress on each of United's distribution line segments with clearance violation issues without regard to grandfathering which may be applicable to the time of construction. As of the date of this progress report, 14 jobs out of 67 jobs have been completed (or 14 out of 77 line segments (of the original 83 line segments with noted violation issues (minus inadvertent duplicates) brought into compliance).

PUCT Request 2: "Permitting, if any, obtained for jobs identified within its attestation;"

Most of the jobs are not believed to require permits. Any jobs where lines cross or run in TXDOT rights-of-way will require permits, as indicated in the table. As a normal part of the process, additional easements are sometimes required and obtained, especially when rerouting lines or converting overhead lines to underground.

PUCT Request 3: "Mapping that identifies the location of each non-compliant line identified in the attestation;"

The attached maps for each lake indicate the location of the line segments referenced in the attached table. Note that these labels indicate a single or group of line spans, or segments, that were flown to verify compliance, and not entire lines (circuits or feeders). The table also indicates the associated circuit for each of these smaller line segments. Note that in many cases the line segments with violation issues are at some distance from the boundary of the lake at normal levels, but due to the extent of the flood plain and if the flood plain is considered as part of the subject lake, they are listed as being required to meet the appropriate NESC or USACE clearance for sailboats regardless of the likelihood or possibility of their use.

PUCT Request 4: "Job specifications for each job identified within its attestation to bring non-compliant lines into compliance, including but not limited to:

- a. Estimated or actual start date;**
- b. Estimated or actual completion date;**
- c. Current status of the job"**

The attached table has a narrative describing the remediation contemplated for each line with violation issues. The start date, or date the job was assigned for work to begin, is indicated in the table. The table also identifies the quarter in which we anticipate the completion of the project, or the actual completion date if applicable. Due to the current supply chain issues nationwide, some anticipated completion dates are asterisked to indicate jobs that depend on delivery of pad-mounted transformers and other underground distribution equipment that are in limited supply. The current status of the job is also indicated in the table following a progression of: Assigned for Staking > Staking in Progress > Released for Construction > Construction in Progress > Complete. United's intention is to complete all remediation as soon as possible, but no later than the end of 2022, including contracting additional resources if necessary.

PUCT Request 5: "Measures taken by UECS to make the public aware of the non-compliant lines while the lines are in the process of being brought into compliance."

United is in the process of doing two things to achieve this goal. Aerial marker balls have been ordered that will be installed on those lines with violation issues to bring awareness to the location of the overhead line until they are brought up to current standards without regard to exceptions which may be applicable. Second, a section of United's website has now been created that has information about the Power Line Safety Act and the location of the line segments with potential violation issues.

Job Number	Work Order	Name of Line Segment(s)	Feeder	Name of Lake	Date Verified	Start Date (Assigned)	Completion Date (* indicates UG equipment needed)	Status	Permit Required	Permit Obtained	Narrative
20000	1681331	W48	PO01	Whitney	7/8/2021	5/29/2020	4/8/2021	Complete	Y	Y	Bury line to remove OH clearance violation
20001	1716746	W67	MG13	Whitney	7/20/2021	5/29/2020	9/8/2021	Complete	Y	Y	Bury line to remove OH clearance violation
20002	1738629	J2	SP21	Joe Pool	7/22/2020	12/21/2020	2/9/2022	Complete	Y	Y	Bury line to remove OH clearance violation
20003	1738637	J3	SP21	Joe Pool	7/22/2020	12/22/2020	12/28/2021	Complete	Y	Y	Bury line to remove OH clearance violation
20004	1737279	J4	SP23	Joe Pool	7/22/2020	12/22/2020	3/30/2022	Complete	Y	Y	Bury line to remove OH clearance violation
20005	1737277	J5	SP23	Joe Pool	7/22/2020	12/22/2020	3/1/2022	Complete	Y	Y	Bury line to remove OH clearance violation
20006	1746023	W4	GC02	Whitney	7/1/2021	1/21/2021	Q2 2022	Staking in Progress	Y	N	Bury line to remove OH clearance violation
20007		W26,W27, W28,W29	MG13	Whitney	7/20/2021	1/21/2021	Q2 2022*	Staking in Progress	Y	N	Bury line to remove OH clearance violation
20008	1772482	W30	MG13	Whitney	7/20/2021	1/21/2021	Q2 2022	Staking in Progress	Y	N	Bury line to remove OH clearance violation

Job Number	Work Order	Name of Line Segment(s)	Feeder	Name of Lake	Date Verified	Start Date (Assigned)	Completion Date (* indicates UG equipment needed)	Status	Permit Required	Permit Obtained	Narrative
20009	1772481	W31	MG13	Whitney	7/20/2021	1/21/2021	Q1 2022	Construction in Progress	Y	Y	Bury line to remove OH clearance violation
20010	1758436	W8	NR21	Whitney	7/1/2021	1/21/2021	Q1 2022	Construction in Progress	N	N	Bury line to remove OH clearance violation
20011	1812094	W14	NR23	Whitney	7/1/2021	1/21/2021	Q4 2022*	Released for Construction	N	N	Bury line to remove OH clearance violation
20012	1748164	W13	NR23	Whitney	7/1/2021	1/21/2021	12/22/2021	Complete	N	N	Bury line to remove OH clearance violation
20013	1757754	W15	NR23	Whitney	7/1/2021	1/21/2021	8/16/2021	Complete	N	N	Bury line to remove OH clearance violation; install 55' poles where not buried
20015		PK2	PK11	PK Lake	11/18/2020	3/3/2020	Q4 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20016		PK4	PK11	PK Lake	11/18/2020	3/3/2020	Q4 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20017	1742728	W9	NR21	Whitney	7/1/2021	3/3/2020	7/1/2021	Complete	N	N	Bury line to remove OH clearance violation

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20018		G2	PR11	Granbury	7/27/2020	3/4/2020	Q1 2022	Staking in Progress	N	N	Install 45' poles to increase clearance
20019	1760483	G10	HD03	Granbury	7/27/2020	3/5/2020	Q1 2022	Released for Construction	N	N	Install 45' poles to increase clearance; add lift pole center span
20020	1814253	PK9	PK15	PK Lake	11/18/2020	5/5/2021	Q3 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20021	1814245	PK7	PK11	PK Lake	11/18/2020	5/5/2021	Q4 2022	Staking in Progress	N	N	Retire 1 section of OH and reroute service to come from the south
20022	1745687	G11	FC23	Granbury	7/27/2020	5/6/2021	Q3 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20023		PK17	PK21	PK Lake	11/18/2020	5/6/2021	Q3 2022	Staking in Progress	N	N	Reroute line
20024		PK10	PK12	PK Lake	11/18/2020	5/6/2021	Q3 2022	Staking in Progress	N	N	Reroute line
20025	1814247	PK12	PK15	PK Lake	11/18/2020	5/6/2021	Q3 2022	Staking in Progress	N	N	Reroute line and retire crossing
20026		PK14	PK14	PK Lake	11/18/2020	5/7/2021	Q3 2022	Staking in Progress	N	N	Reroute line
20027		G3	PR16	Granbury	7/27/2020	5/7/2021	Q2 2022	Staking in Progress	N	N	Increase pole height to 50'
20028	1760479	G8	HD03	Granbury	7/27/2020	5/7/2021	11/30/2021	Complete			Increase pole height to 45' and add lift pole

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20029	1776898	G4	HD01	Granbury	7/27/2020	5/7/2021	12/2/2021	Complete	N	N	Increase pole height to 45'
20030	1750558	PP1	LG02	Palo Pinto	11/12/2020	5/7/2021	Q1 2022	Released for Construction	N	N	Increase pole height to 55'
20031		PK11	PK14	PK Lake	11/18/2020	5/7/2021	Q2 2022	Staking Complete, Waiting to Release	Y	N	Bury line to remove OH clearance violation
20032		A1	LK02	Alvarado	7/27/2020	5/10/2021	Q2 2022*	Staking Complete, Waiting to Release	N	N	Bury line to remove OH clearance violation
20033		PK19	PK21	PK Lake	11/18/2020	5/10/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20034		PK1	PK11	PK Lake	11/18/2020	5/11/2021	Q2 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation and retire line that is no longer necessary
20035		PK16	PK14	PK Lake	11/18/2020	5/11/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20036	1761299	PK5	PK11	PK Lake	11/18/2020	5/25/2021	4/1/2022	Complete	N	N	Bury line to remove OH clearance violation

Job Number	Work Order	Name of Line Segment(s)	Feeder	Name of Lake	Date Verified	Start Date (Assigned)	Completion Date (* indicates UG equipment needed)	Status	Permit Required	Permit Obtained	Narrative
20037	1812709	S1	HC13	Squaw Creek	7/27/2020	5/25/2021	Q1 2022	Released for Construction	N	N	Add two 50' poles to increase clearance
20038	1812786	PK20	PK21	PK Lake	11/18/2020	5/26/2021	Q1 2022	Staking Complete, Waiting to Release	N	N	Add two 50' poles to increase clearance
20039		PK18	PK21	PK Lake	11/18/2020	5/26/2021	Q1 2022	Staking in Progress	N	N	Reroute line
20040	1750359	PP2	LG03	Palo Pinto	11/12/2020	5/27/2021	Q1 2022	Released for Construction	N	N	Increase pole height to 50'
20041	1750317	PK15	PK14	PK Lake	11/18/2020	5/27/2021	Q1 2022	Released for Construction	N	N	Increase pole height to 50'
20042	1760809	W1	NR21	Whitney	7/1/2021	7/7/2021	4/8/2022	Complete	N	N	Increase pole height to 55' (2 poles)
20044		W5,W6	NR21	Whitney	7/1/2021	7/9/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20045		W7	NR21	Whitney	7/1/2021	7/9/2021	Q4 2022	Assigned for Staking	Y	N	Bury line to remove OH clearance violation

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20046	1805910	W10	NR21	Whitney	7/1/2021	7/13/2021	Q4 2022	Assigned for Staking	N	N	Bury line to remove OH clearance violation
20047	1805915	W11	NR21	Whitney	7/1/2021	7/13/2021	Q4 2022	Assigned for Staking	N	N	Bury line to remove OH clearance violation
20048		W12	NR21	Whitney	7/1/2021	7/13/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20049		W16	NR23	Whitney	7/1/2021	7/14/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation
20050		W17	NR23	Whitney	7/1/2021	7/14/2021	Q2 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20051		W18	NR23	Whitney	7/1/2021	7/15/2021	Q1 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20052		W19	NR23	Whitney	7/1/2021	7/15/2021	Q2 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20053		W20	NR23	Whitney	7/1/2021	7/16/2021	Q3 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20054		W21,W22, W23	NR23	Whitney	7/1/2021	7/16/2021	Q2 2022	Staking in Progress	N	N	Bury line to remove OH clearance violation

Job Number	Work Order	Name of Line Segment(s)	Feeder	Name of Lake	Date Verified	Start Date (Assigned)	Completion Date (* indicates UG equipment needed)	Status	Permit Required	Permit Obtained	Narrative
20055	1761944	W24	NR23	Whitney	7/1/2021	7/16/2021	2/7/2022	Complete	N	N	Bury line to remove OH clearance violation
20056		W53	PO01	Whitney	7/8/2021	8/2/2021	Q4 2022	Assigned for Staking	Y	N	Retire line on north side and reroute line from south
20057		W36	MG13	Whitney	7/20/2021	8/5/2021	Q2 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20058		W39	MG13	Whitney	7/20/2021	8/5/2021	Q2 2022*	Staking in Progress	Y	N	Bury line to remove OH clearance violation; retire line that feeds transformer with no meter
20059		W41	MG13	Whitney	7/20/2021	8/6/2021	Q2 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation
20060		W44	PO01	Whitney	7/8/2021	7/20/2021	Q4 2022*	Assigned for Staking	N	N	Bury line to remove OH clearance violation
20061		W45	PO01	Whitney	7/8/2021	7/20/2021	Q4 2022	Assigned for Staking	N	N	Increase pole height to 55' (2 poles)
20062		W49,W50, W52	PO01	Whitney	7/8/2021	7/21/2021	Q4 2022*	Assigned for Staking	Y	N	Bury line to remove OH clearance violation

Job Number	Work Order	Name of Line Segment(s)	Feeder	Name of Lake	Date Verified	Start Date (Assigned)	Completion Date (* indicates UG equipment needed)	Status	Permit Required	Permit Obtained	Narrative
20063		W54,W55, W56	PO01	Whitney	7/8/2021	7/22/2021	Q4 2022*	Assigned for Staking	N	N	Bury line to remove OH clearance violation
20064		W57	PO01	Whitney	7/8/2021	7/23/2021	Q1 2022	Staking in Progress	N	N	Retire line - no active meters
20065		W43	MG13	Whitney	7/20/2021	8/6/2021	Q4 2022*	Assigned for Staking	N	N	Bury line to remove OH clearance violation
20066		W59	PO01	Whitney	7/8/2021	8/11/2021	Q1 2022	Staking in Progress	N	N	Retire line - no active meters
20067		W61	PO02	Whitney	7/8/2021	8/11/2021	Q3 2022	Staking in Progress	N	N	Increase pole height to 50' (2 poles)
20068		W66	PO02	Whitney	7/8/2021	8/11/2021	Q3 2022*	Staking in Progress	N	N	Bury line to remove OH clearance violation

Alvarado Park Lake

Legend

- Complete
- Incomplete

A1

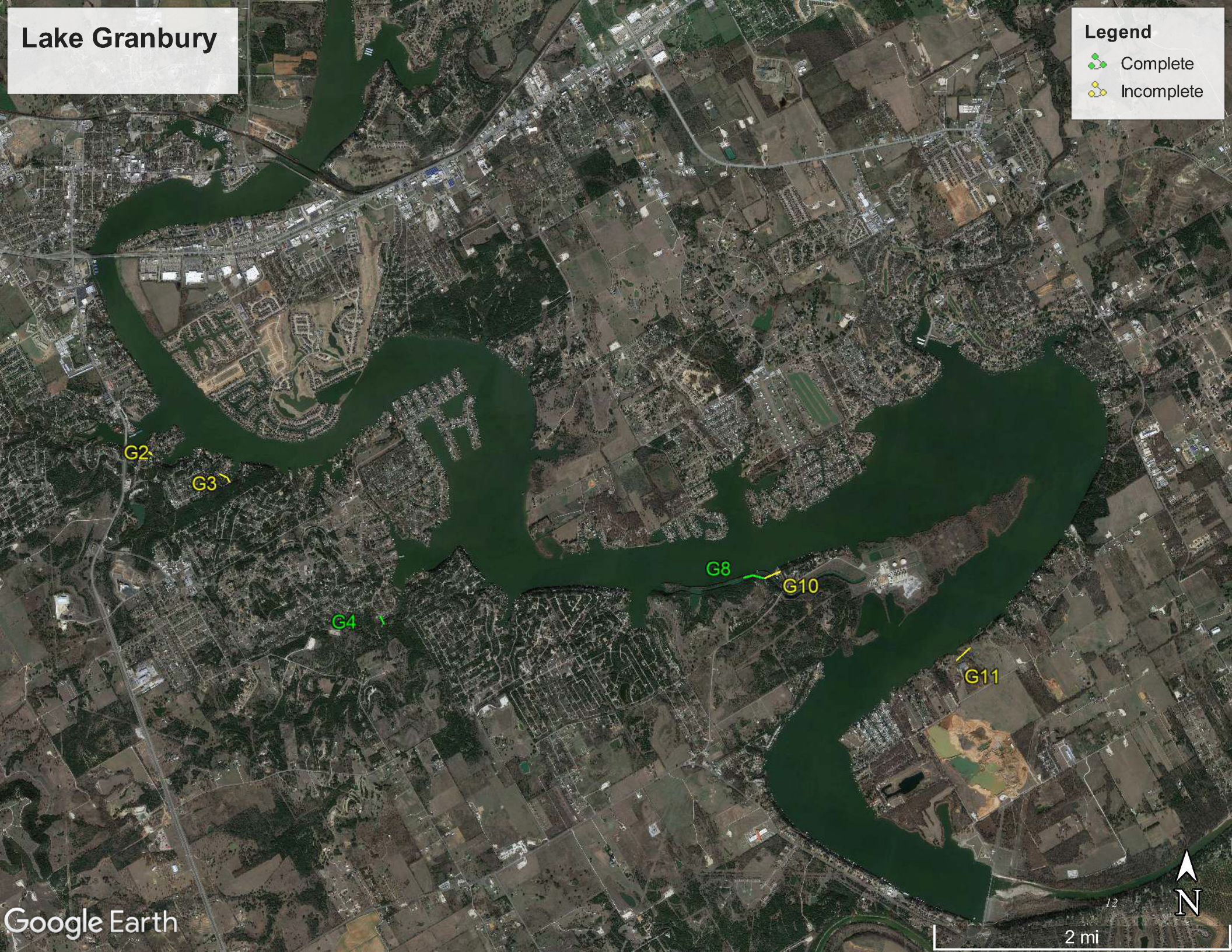


Lake Granbury

Legend


 Complete

 Incomplete



Joe Pool Lake

Legend

 Complete





Joe Pool Lake

J2
J3
J4
J5

Lake Palo Pinto

Legend

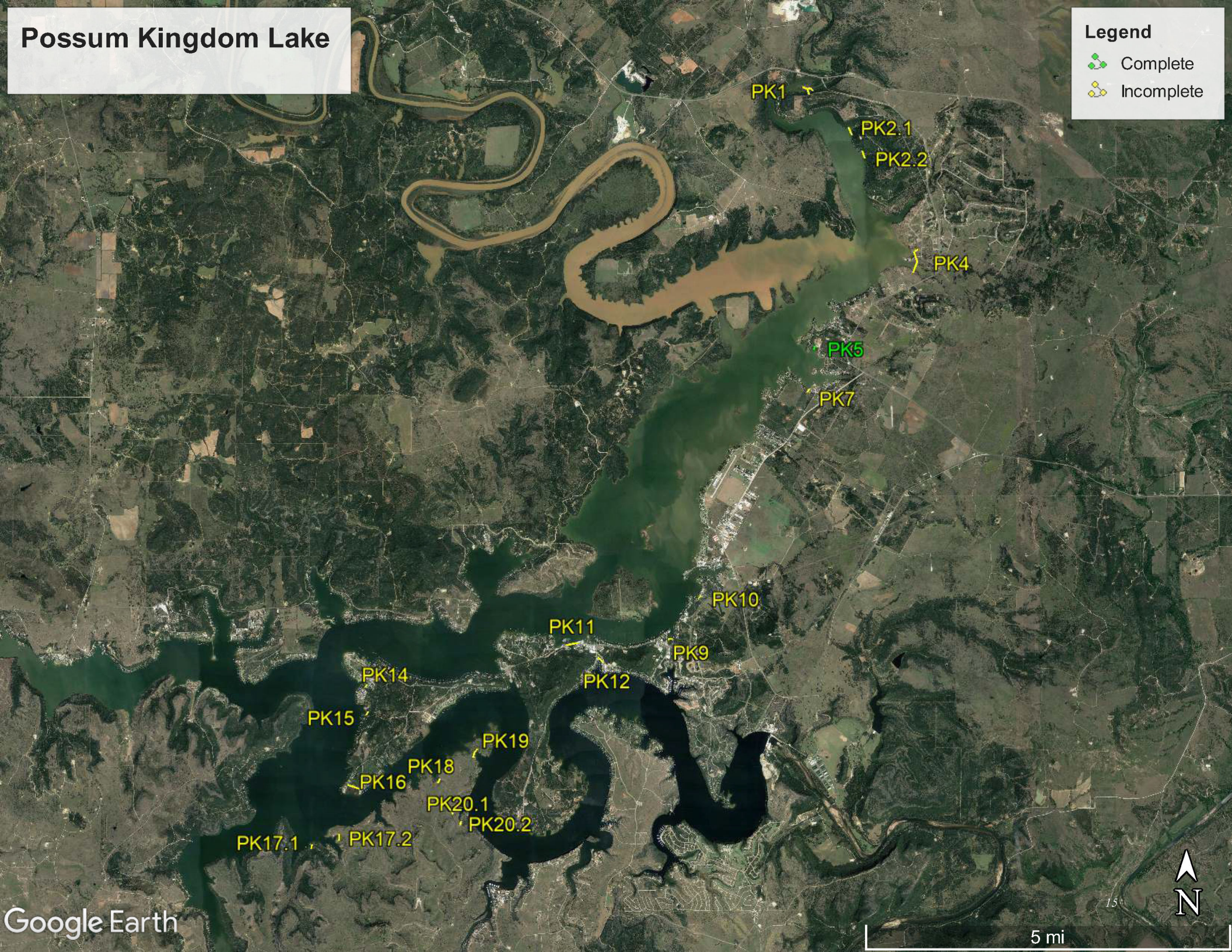
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Possum Kingdom Lake

Legend

- Complete
- Incomplete



Squaw Creek Reservoir

Legend

- Complete
- Incomplete

S1

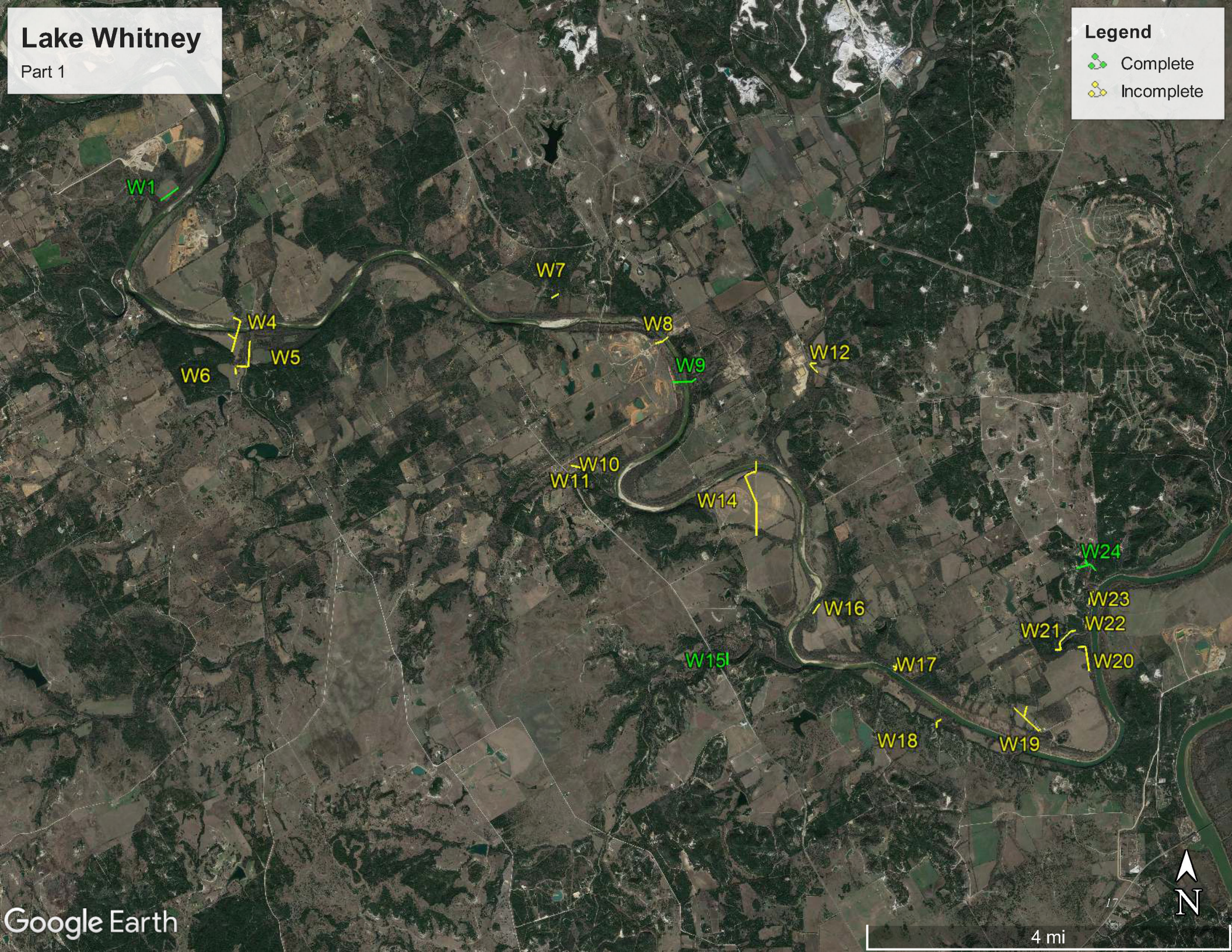


Lake Whitney

Part 1

Legend



- Complete
- Incomplete



Lake Whitney

Part 2

Legend



-  Complete
-  Incomplete



Lake Whitney

Part 3

Legend

-  Complete
-  Incomplete

