

(270) 465-4101 • Fax (270) 789-3625
(800) 931-4551

December 14, 2007

Director of Engineering
Public Service Commission
P. O. Box 615
Frankfort, KY 40602-0615

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COMMISSION

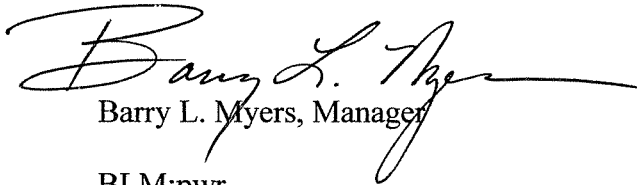
Dear Director:

This is in response to the Commission's Order dated October 26, 2007.

If you should have questions or need additional information, please contact my office.

Sincerely,

TAYLOR COUNTY RURAL ELECTRIC
COOPERATIVE CORPORATION



Barry L. Myers, Manager

BLM:pwr

Enc.

TAYLOR COUNTY RECC

P O BOX 100

CAMPBELLSVILLE, KY 42719

1-800-931-4551

RIGHT-OF-WAY MAINTENANCE

December 14, 2007

I. IDENTIFY THE RIGHT-OF-WAY CLEARING CYCLE

- A. Trimming and clearing
 - 1. Five to six year rotation-Entire System
 - 2. Contractor crews trim circuits – work orders and service tickets on a needs basis
 - 3. Taylor County RECC crews do work orders, service tickets
 - a. Policy – Service Wire Trimming (see attached)
- B. Width of Right-of-Ways
 - 1. Attempt to secure 60' right-of-ways for work orders and new builds
 - 2. Attempt to cut all trees instead of trimming
- C. Right-of-Way Spraying/Herbicide Application
 - 1. Four-year rotation
 - 2. Notify consumers by Kentucky Living Magazine
 - 3. Contact consumers before spraying
 - 4. Mowing-Limit to right-of-ways not sprayed

II. IDENTIFY THE RELIABILITY CRITERIA AND RELIABILITY REPORTS USED TO DEVELOP THE VEGETATION MANAGEMENT PLAN AND THOSE REGULARLY REVIEWED AS PART OF THE MONITORING OF PLAN EFFECTIVENESS

- A. Review outage reports on a timely basis to determine causes
- B. Meter Readers, Line Inspectors, Servicemen or any field employee is to document and report any area that needs attention

III. EXPLAIN HOW A UTILITY DETERMINES WHEN TO PERFORM MAINTENANCE

- A. Maintenance is performed on a yearly basis
- B. Trimming/Clearing Right-of-ways and Herbicide Application/Spraying are part of each years budget

IV. EXPLAIN HOW THE EFFECTIVENESS OF THE PLAN IS EVALUATED

- A. Trimming/Clearing and Herbicide Application/Spraying is to be monitored by Taylor County RECC personnel making sure certain areas are completed and the work done properly
- B. Outage reports are to be evaluated
- C. Maintain system maps, color coded, showing the areas that are trimmed/sprayed on an annual basis

Taylor County RECC has no plans to change the Right-of-way Program in the upcoming year.

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Rural Electric Cooperative
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8/12/04

Re: Right of Way Policies – Consumer Service Wires

As of today, Taylor County RECC is instituting a new policy pertaining to trimming of consumer service wires – active orders received prior to this date will be worked via previous policies. Presently, crews are spending an exorbitant amount of time on service wire jobs thereby taking away from efforts to maintain primary clearances. This being noted, the new policy will rearrange priorities putting primary clearances as the highest priority while service clearances will be shifted to a lower priority position.

On consumer requests dealing specifically with service wires, TCRECC will “wind trim” the service but will no longer top or cut the tree(s) involved. “Wind trim” will entail trimming out a 3’ to 4’ area around the service wires with no additional clearance work being completed. TCRECC will continue to grind brush/clean up as part of the “wind trim” process.

Should the consumer relate that the tree must have more detailed attention, above and beyond the “wind trim”, then TCRECC will arrange for a serviceman to drop the service thereby allowing consumer arranged work to be completed.

As part of the new policies, Asplundh crews will be assigned individual circuits for which primary clearance will be obtained from substation to open points. Additionally, the Asplundh crews will handle most of the work order jobs that are produced via day-to-day operation of the engineering department. Lastly, the Asplundh crews will handle some of the miscellaneous primary clearance jobs that are identified by TCRECC personnel or consumers.

TCRECC’s right of way crew will handle most ‘wind trim’ jobs. Additionally, cutter work, timber work, cut-n-leave, etc. will be generally handled via the TCRECC crew.

Given this allocation of work, service wire clearance jobs will be completed as scheduling will allow. Efforts will be made by the TCRECC crew to get to each county per week (Taylor = week 1, Adair = week 2, Green = week 3, Casey = week 4) but this may be unobtainable at times, especially during busy summer months. Additionally, should a service clearance order be received on a circuit that Asplundh is currently assigned, then that crew will pick up that job as part of the overall circuit clearing.

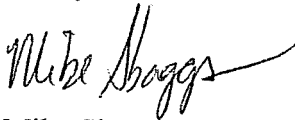
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Given the above, all personnel responsible for the production of RoW orders should ascertain the specifics of the job and note/communicate the specifics that are now tied with service wire clearances, should they apply. All orders made specifically for service wire clearance should be clearly noted as such.



Mike Skaggs
System Engineer