

Allen Anderson, President & CEO

December 17, 2007

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Director of Engineering Public Service Commission of Kentucky 211 Sower Boulevard P.O. Box 615 Frankfort, KY 40602

RE: Administrative Case No. 2006-00494 An Investigation of the Reliability Measures of Kentucky's Jurisdictional Electric Distribution Utilities and Certain Reliability Maintenance Practices Vegetative Management Plan

Director of Engineering:

Please find enclosed the Vegetative Management Plan requested for South Kentucky Rural Electric Cooperative. Enclosed is one (1) original copy of the Vegetative Management Plan and a CD containing the written plan saved as a word document.

Should you need any additional information, please contact Steve Conover, Vice President of Engineering and Operations at 606-451-4140.

Sincerely,

- Contract

Steve Conover V.P of Engineering and Operations

Enclosures

JB/vmp-2006-00494

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South Kentucky RECC

Vegetation Management Plan (VMP)

Prepared December 2007

Introduction

South Kentucky RECC (SKRECC) is an Electric Distribution Cooperative serving approximately 63,000 members in parts of 13 counties in South Central Kentucky and Northern Tennessee. The service territory varies from flat cropland to steep, mountainous areas, and much of the terrain is covered with trees and other vegetation that requires maintenance in order to operate the 6,200 miles of distribution line owned by the cooperative.

The member density within the service territory also varies considerably from place to place. SKRECC serves many areas which are sparsely populated; however, the cooperative also serves major subdivisions, industrial and commercial areas, and areas within the city limits of incorporated towns and cities. The cooperative also operates facilities in areas governed by entities such as the U.S. Forest Service and the U.S. Corps of Engineers, and SKRECC must work closely with these agencies in meeting their needs. The diversity of the terrain along with the diversity of the development and land use within the service territory requires the cooperative to use a variety of methods and practices to provide a right-ofway program that will meet the needs of the company and its members.

Goals of the SKRECC VMP

The goal of the SKRECC VMP is to provide effective, reliable, and efficient vegetation management within our entire service area in such a way that we fulfill the vision and mission statements of the cooperative and meet the needs of all stakeholders who depend upon us.

Right-of-Way Clearing Cycle and Methods to Determine Needs

SKRECC uses a 6 to 7 year cycle for trimming of right-of-ways and a 5 year cycle for spraying and bushhogging. However, many circuits on the system have special situations that require trimming more often. An example of this would be circuits feeding subdivisions where there are many rapid growing yard-trees. SKRECC goes back and trims these areas on an as-needed-basis. Special needs such as these are determined by methods such as the system inspection program, calls from members, and feedback from employees who work in the field on a daily basis and observe right-of-way conditions.

Similarly, there are sometimes instances in which the trimming cycle can be extended. This can be due to factors such as weather conditions which decrease vegetation growth, the effectiveness of herbicide treatment, and the type of land-use associated with the circuit. If the SKRECC Right-of-Way Team Leader determines that the cycle can be extended on a particular circuit and still provide reliable service the cooperative may do so.

Methods of Maintaining and Clearing Right-of-Ways

SKRECC utilizes several methods of clearing and maintaining right-of ways. The specific methods used at any given location are dictated by the local parameters of each site.

Side-Trimming – As trees along right-of-ways grow and encroach toward the conductors, SKRECC uses bucket trucks to keep the growth trimmed back.

Topping – This method is primarily used where trees that cannot be removed under the lines encroach into the electrical space.

Spraying – Selective herbicide spraying is utilized on most areas of the system to keep down small brush and other vegetation that could hinder pulling up downed conductors or other maintenance activities.

Hand-clearing – This method is utilized primarily as an alternative to spraying in the US Forest Service territory and other environmentally sensitive sites where the terrain is so steep a tractor cannot be driven.

Bush-hogging – Bush-hogging is utilized primarily as an alternative to spraying in the US Forest Service territory and other environmentally sensitive sites where a tractor can be driven.

Clearing Widths

It is the goal of SKRECC to clear a 45 foot corridor on multiphase primary lines, and a 30 foot corridor on single phase lines. In some instances there are right-of-ways that do not fully meet these standards, and when we do maintenance on these lines we trim back to the original cutting point.

The cooperative also inspects for dead or damaged trees (hazard trees) outside the cleared corridor which are tall enough to damage the line if they were to fall. SKRECC removes these trees whenever possible as part of the regular maintenance routine.

Yard trees and ornamental trees pose a different challenge because obtaining the above mentioned clearances would require the tree to be removed. Various different pruning techniques are used to obtain at least 8 feet of clearance below the system neutral on primary lines, and the maximum obtainable distance is achieved to the sides in these situations.

The cooperative desires to clear lines with secondary voltage (120/240 volt triplex lines, etc) to prevent rubbing by tree branches. In most cases a 3 to 5 foot clearance is judged to be satisfactory, but when allowable the cooperative may trim back even more. Secondary conductors are almost always located in close proximity to the dwellings we serve, and the distance trimmed may vary due to the specific situation and species of tree encountered.

Tree Replacement Program

Many high growth trees in yards (commonly referred to as cycle busters) can be both a public hazard and a high cost to maintain due to constant retrimming. It is the goal of SKRECC to remove these trees and replace them when appropriate with a small, low growing species if the landowner will permit it. The cooperative will provide and set a replacement tree for the landowner in these instances.

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