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March 1, 2021

State of Florida
Public Service Commission

RE: Filing of Report on Standards of Construction
Pursuant to Rule 25.6.0343, F.A.C.

To Whom it may Concern:

Okefenokee REMC herewith files the attached report on Standards of Construction for
Calendar Year 2020.

Regards,

/s/ Ernie Thomas

Ernie Thomas
System Engineer
Okefenokee REMC

Serving - Brantley, Camden, Charlton, Glynn, Ware, Wayne, Baker and Nassau Counties

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Report to the Florida Public Service Commission
Pursuant to Rule 25-6.0343, F.A.C.
Calendar Year 2020

1) Introduction

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2) Members Served

As of December 31st 2020, Okefenoke Rural Electric Membership Corporation serves 27,555 active meters in the state of Georgia, and 10,946 active meters in the state of Florida. The total number of active meters served system-wide is 38,501.

3) Standards of Construction

a) National Electric Safety Code Compliance

Construction standards, policies, guidelines, practices, and procedures at the Okefenoke Rural Electric Membership Corporation comply with the National Electrical Safety Code (ANSI C-2) [NESC]. The edition of the NESC in effect at the time of the facility's initial construction governs electrical facilities.

b) Extreme Wind Loading Standards

The design of Okefenoke Rural Electric Membership Corporation's facilities is not guided by the extreme loading standards on a system wide basis. The cooperative continues to make conscious efforts to improve the resiliency of the distribution system when replacing poles and constructing new lines. These efforts typically involve increasing the pole class, size, and strength of pole-top materials, as well as reducing conductor span lengths. Many older, weaker poles were removed and/or replaced in conjunction with the projects enumerated in Section 4d of this report.

Okefenoke Rural Electric Membership Corporation has participated in the Public Utility Research Center's (PURC) granular wind research study through the Florida Electric Cooperative Association. The investor-owned utilities, municipal utilities, and the rural electric cooperatives in the state of Florida formed a committee and collectively sponsored a project to collaborate on research on infrastructure hardening. See the annual Report on Collaborative Research for Hurricane Hardening, which is sent directly to the Florida Public Service Commission.

c) Flooding and Storm Surges

Okefenoke Rural Electric Membership Corporation has participated through the Florida Electric Cooperative Association in the Public Utility Research Center's (PURC) study on the conversion of overhead electric facilities to underground (Under-grounding) and the effectiveness of under-grounding facilities in preventing storm damage and outages. See the annual Report on Collaborative Research for Hurricane Hardening, which is sent directly to the Florida Public Service Commission.

d) Safe and Efficient Access of New and Replacement Distribution Facilities

Electrical construction standards, policies, guidelines, practices, and procedures at the Okefenoke Rural Electric Membership Corporation provide for placement of new and replacement distribution facilities so as to facilitate safe and efficient access for installation and maintenance. Wherever new facilities are placed (i.e. front, back or side of property), all facilities are installed so that Okefenoke Rural Electric Membership Corporation's facilities are accessible by its crews and vehicles to ensure proper maintenance/repair is performed as expeditiously and safely as possible. Okefenoke Rural Electric Membership Corporation decides on a case-by-case basis whether existing facilities need to be relocated. If it is determined that facilities need to be relocated, they will be placed in the safest, most accessible area available.

e) Attachments by Others

The majority of pole attachment agreements between Okefenoke Rural Electric Membership Corporation and third-party attaching companies include language which specifies that the attaching company, not the cooperative, has the burden of assessing pole strength and safety before they attach to the pole. The attaching company is required to submit detailed attachment plans along with the attachment application, which will ensure that the new attachments fully comply with the latest edition of the National Electrical Safety Code. Okefenoke Rural Electric Membership Corporation performs follow-up audits of attachments to ensure the attachment is properly installed and maintained.

The AT&T of Georgia, the AT&T of Florida, and the BCI-James Cable LLC pole attachment license agreements all require that the attaching party at all times maintain all of its attachments in accordance with the specifications of the agreement. This includes as a minimum, the requirements of the National Electrical Safety Code (NESC) and subsequent revisions thereof. As a part of the permitting process for new attachments, the attaching company is required to submit all technical information necessary for verification by the pole owner of compliance with the NESC. Okefenoke Rural Electric Membership Corporation performs follow-up audits of attachments to ensure the attachment is properly installed and maintained.

4) Facility Inspections**a) Guidelines, Practices, and Procedures**

Okefenoke Rural Electric Membership Corporation uses RUS Bulletin 1730B-121, entitled "Pole Inspection and Maintenance" as a guideline for inspecting its distribution lines, poles,

and structures. The cooperative owns no transmission facilities. The cooperative has utilized both contractors and cooperative personnel to administer the inspection and maintenance program. This procedure includes visual inspection from ground-line to the top of the pole, sound and bore with excavation, and chemical treatment of the poles.

b) 2020 Inspections

Okefenoke Rural Electric Membership Corporation inspected 9,326 distribution poles per the guidelines of Section 4a above in the year 2020. A contractor was used for most of these inspections. This represents approximately 15.8% of the 58,957 wood poles on the system as of December 31, 2020.

In addition to the standard pole inspection program, Okefenoke Rural Electric Membership Corporation also performed visual inspections of a substantial number of poles in conjunction with the engineering and construction of many capital projects throughout the year 2020. The capital projects included new construction, system upgrades, pole replacement projects, conductor replacement projects, road moving jobs, line relocation projects, and other miscellaneous projects. Many older poles were retired and replaced with these projects.

OREMC’s in-house line and system visual inspection program continues. Meter men and line staking personnel have the necessary tools to conduct routine line, service wire, and meter base inspections as a part of their daily activities. Following is a summary of the 2020 inspections program and status of corrections:

Total Inspections for 2020

	<u>Total</u>	<u>Rejects</u>	<u>Repaired</u>	<u>Attention Needed</u>
Total Inspections	16,963	2,112	1,773	339
Overhead	9,326	1,178	1,110	68
Meter Base	7,574	921	658	263
Under Ground	66	13	5	8

The remaining 339 issues are planned for correction by the end of 2nd Quarter, 2021.

c) Rejections

During the 2020 pole inspections per section 4a guidelines, 39 distribution poles were rejected. This represents a rejection rate of approximately 0.5% of the 8,124 poles inspected by Osmove in the year 2020. The cause for the rejection of each of these poles is summarized in the table below:

Summary of OREMC 2020 Pole Inspection Rejections.

<u>Cause of Rejection</u>	<u>Quantity of Poles</u>
Ground Rot	32
Above Ground Damage	7
<u>Total Rejects</u>	<u>39</u>

d) Replacement and Remediation

The 2020 pole inspection was completed late in the year 2020. Therefore approximately most of the reject poles are scheduled to be replaced in first or second quarter of year 2021.

In the course of engineering and construction of the capital projects mentioned in section 4b above, many poles were replaced or retired from the Okefenoke REMC system. The following table summarizes the projects in which poles were replaced or retired:

Work Plan Code	Description	New Poles Added	Poles Retired
100	New Construction to to new Members	290	69
200/300	System Improvement	59	39
606	Pole Replacement	140	130
607	Miscellaneous Replacements	11	18
608	Conductor Replacements	109	92
609	Misc. Plant Additions	7	1
610	Road Moves	51	44
611	Line Relocations	28	21
999	Retirement Only	0	84
Totals		695	498

The cooperative continues its pole inspection process with the assistance of Osmose as a 3rd party contractor. The program will include approximately 7,500 poles to be inspected in 2021.

Though the cooperative did not experience a direct hit from a major hurricane during 2020, it did experience tropical storm force winds from a couple of storms during the year. The OREMC distribution system withstood the tropical storm force winds well, with no pole failures due to the storms. Most of the outages were the result of trees and debris on the

conductors. The minimal pole failure rate is attributed to the cooperative's past philosophy and practice of upgrading pole class and strength ratings of pole-top equipment.

5. Vegetation Management

a) Guidelines, Practices, and Procedures

Okefenoke Rural Electric Membership Corporation utilizes contractors for its vegetation management programs, with supervision from the cooperative's staff. Vegetation control practices consist of complete clearing to the ground-line, trimming, and herbicide application. The herbicide is generally applied to the sections of line cleared the previous year, thereby extending the clearing cycle beyond what would normally be needed. The cooperative is also widening right of ways from twenty to thirty feet wide, wherever practical. These practices have allowed the cooperative to move to a five-year trim cycle, rather than a three-year cycle.

Problem trees outside the right of way or easement are handled on a case-by-case basis. Often a landowner will contact the cooperative, requesting danger tree removal. The cooperative's right of way foreman will investigate and facilitate the tree removal if it is feasible to do so. In other instances, problem trees are reported by cooperative employees or other persons, and the right of way foreman will attempt to obtain landowner permission to remove the problem tree. If permission is granted, the process is essentially the same as if the landowner reported the problem tree. The majority of the cooperative's system is rural, and the rural consumers are generally very supportive of the effort to remove the problem trees to help avoid power interruptions.

b) 2020 Vegetation Management

Okefenoke Rural Electric Membership Corporation has traditionally used 500 miles as a targeted annual goal for right of way trimming and clearing. For the year 2020, the cooperative trimmed approximately 395.66 miles of right of way.

The reduction in mileage in 2020 is in part due to approximately 6 weeks of hurricane and storm work that was done in other areas by our Contractors. We release our contractors to go help other Utilities during times of need.

Below is a summary of the past 4 years of Annual Trimming Cycle.

Historical Trimming

Year	Miles
2017	578.75
2018	389.85
2019	395.97
2020	395.66

In addition to our routine cut and trim cycle, we are also incorporating a similar 5 year plan to spray herbicide to the floor of our existing right of way. In 2020 we utilized contractors (NaturChem) to spray approximately 512 miles of right of way. We typically wait one year after the mechanical cut and trim crews have side trimmed an area before we use herbicide to help maintain the woody vegetation that remains on the floor of the right of way.

OREMC is a proud sponsor and attendee at the annual Woodbine GA Tree seminar. The cooperative strives to take advantage of educational and networking opportunities such as this at every opportunity.

In an effort automate our ROW program OREMC has implemented the Partner Software ROW module. We have been collecting and posting data to the system since January 2017. The software will allow us to keep track of our trimming and herbicide cycles. It also allows us to keep track of issues like danger trees, cycle busters, and no work zones like organic farms.

In 2020 OREMC implemented a “Danger Tree Program” to target trees that may not be within our right of way, but will damage our lines if they fall. This program has targeted dead, weak, or leaning trees throughout our system.

With the use of our Partner Software package we have documented 1,562 danger trees and disposed of the threat to our distribution lines.

Below is an overview of the data from the program as of 2020 YTD.

Foreman	Danger Trees Removed
Buddy	421
Brian	186
Richard	110
Ronald	83
Randall	167
Clay	234
Brooks	243
Other	118
<u>Total</u>	<u>1,562</u>

Okefenoke REMC will continue to consider these and other areas for improvement in its vegetation management processes and will participate in any future conferences or discussions concerning utility best practices. The cooperative has multiple employees who have achieved the Certified Arborist qualifications, as well as licensed pesticide applications, with emphasis on wood treatment and right of way herbicide spraying.