CC: JB

South Louisiana Electric Cooperative Association

P.O. BOX 4037
HOUMA, LOUISIANA 70361

RECEIVED
AUG 30 2022
LA Public Service Commission

August 15, 2022

Mr. Brandon Frey
Secretary, Louisiana Public Service Commission
P.O. Box 91154
Baton Rouge, Louisiana 70821-9154

RE: Docket No. X-35394. Louisiana Public Service Commission, ex parte. In re: Proceeding to Examine Options Pertaining to Pole Viability, Pole Attachments, and all Areas that may Affect the Reliability and Sustainability of Louisiana's Electric Utility Distribution Grid.

Dear Mr. Frey,

Please find the attached South Louisiana Electric Cooperative Association's (SLECA) responses to the Louisiana Public Service Commission's data request issued in the LPSC's pole viability and distribution grid reliability rulemaking.

If you have any questions or require additional information, don't hesitate to contact me.

Sincerely,

Joseph A. Ticheli

Joe Ticheli
General Manager

Ecc: Brett Ledet, Manager of Engineering - SLECA

Attachment

ROUTE TO / ROUTE FROM

DEPT. Reads DATE 8/30 DEPT._____

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LC DS

1-1 Confirm how many of the company's employees have full-time, sole responsibility for the maintenance and repair of utility towers and poles. Please show this information in an organizational chart.

SLECA Response 1-1: SLECA's Operations Department has three (3) construction crews who are charged with the maintenance and repair of SLECA's distribution system. Each crew is comprised of the following personnel:

- One (1) foreman
- Two (2) linemen
- Three (3) apprentices

1-2 Provide a description of the organization, division, or unit within the utility responsible to provide direction to inspection and maintenance contractors that the utility has presently under contract.

SLECA Response 1-2: SLECA's operations personnel is solely responsible for the maintenance of SLECA's distribution system. SLECA's operational policies and departmental practices require all poles that are worked on by SLECA personnel be inspected prior to the work commencing. In addition, all outside employees of SLECA are required to report any poles which they believe are subject to failure. In addition to that, SLECA has a contractor (OSMOSE) which is under contract annually to perform pole inspections and report their findings.

1-3 Please provide a description of the performance criteria the utility uses in its contracts for pole inspection and maintenance, wherein the technical criteria contractors must follow is enumerated.

SLECA Response 1-3: Annually, SLECA hires a 3rd party (OSMOSE) to perform pole inspections throughout its distribution system. The pole inspection process is completed on a 10 year cycle. We designate an area to be inspected each year (10 year cycle). OSMOSE personnel inspects each pole in the designated areas, both above the ground and below the ground. Below ground inspections are completed by excavating several feet into the ground around the pole to visually inspect, along with sounding and boring into the pole. Depending on the field assessment, OSMOSE either treats the pole in the field or recommends that the pole be changed out.

1-4 Describe how the performance of contractors the company uses in inspections, improvements, including any bonus or penalty provisions applicable to such contractors.

SLECA Response 1-4: The contractor that is utilized by SLECA for pole inspection does not have any bonus or penalty provisions. SLECA's contractor inspects the distribution poles using several methods such as visual inspections, sounding, boring, etc. The contract between SLECA and the contractor is based on line-item pricing, meaning that the pole age and overall condition in the field determines the type of inspection method and corrective actions to be taken. Each type of inspection method/corrective actions are billed based on the line item price identified in the contract.

1-5 Identify the various storage locations where the utility stores and maintains equipment needed to be used as replacements, including poles

SLECA Response 1-5: SLECA currently uses two warehouses for storing materials. The primary warehouse is located at SLECA's headquarters at 2028 Coteau Rd, Houma LA 70361 and the second warehouse is located at SLECA's District office located at 2903 Lake Palourde Rd, Amelia, LA 70340.

1-6 Provide the selection criteria of the above-referenced storage sites.

SLECA Response 1-6: Both warehouses are used for the same purposes though the service areas are different; however, SLECA's warehouse located in Houma is larger due to the fact that the service area it is used for is much larger than that of SLECA's District office.

1-7 Describe any steps the utility has taken in the upgrading of pole systems to increase reliability and safety of the circuits provided to the customers, as opposed to only inspecting and replacing damaged poles.

SLECA Response 1-7: As a part of SLECA's operation and maintenance budget, SLECA has a contractor which is responsible for testing the structural integrity of all poles throughout SLECA's entire service territory. The contractor is on a 10-year cycle, meaning every 10 years, all poles throughout the system are tested. Additionally, all personnel in SLECA's Operations Department do field inspections as they are completing maintenance throughout the system and receive training on how to spot damaged poles.

Approximately 90% of the SLECA distribution system was destroyed during Hurricane IDA and rebuilt during the restoration. SLECA is currently working to harden all critical infrastructure throughout its distribution system through various funding sources of the federal government. These projects differ in size and scope but aim to harden SLECA's system and create a more reliable infrastructure to withstand future storm events, particularly those areas which serve critical loads such as hospitals, nursing homes, flood control structures, etc.

1-8 Provide the number of complaints received by the company as a result of hurricanes in 2018, 2019, 2020 and 2021. If the utility classifies them by type of complaint, please provide the breakdown showing such information.

SLECA Response 1-8: SLECA does not have a record of how many complaints have been received in previous years. We do not have the capability to track this information without implementing new software capabilities which could be quite expensive. All complaints received are given top priority by SLECA's member services department and are reviewed and managed on a case-by-case basis by the executive staff of SLECA to ensure timely responses and to ensure conflict resolutions.

1-9 What has been the approximate average time to close satisfactorily customer/public requests (or complaints) during the years 2018, 2019, 2020, and 2021?

SLECA Response 1-9: SLECA currently does not have a way to track the average time to close customer requests (or complaints). Having said that, if a complaint is made and SLECA verifies the issue which would require a pole changeout, the job must be routed through the Engineering Department for staking/mapping. The 811 call must be made (which by law, the 811 contractor has 48hrs to complete), and then SLECA construction crews can complete the work. Assuming there are no other emergencies which require SLECA's immediate attention, this process usually takes 4-6 business days. Also, please keep in mind that each pole replacement is evaluated individually to determine the severity of the timeline to replace the pole. SLECA then weighs the severity of the pole replacement to other major issues/jobs at the time that requires our attention.

1-10 If a pole requires replacement, indicate how many days, on average, your company requires between receipt of the complaint and replacement of the pole.

SLECA Response 1-10: When a pole requires replacement or a complaint is made regarding a pole, SLECA personnel discuss the issue at hand with the consumer to validate the complaint. Once the complaint has been validated, a job order is created. Once the field crews receive the job order, they visit the site to confirm the complaint and correct the issue while at the site if necessary. If not, the work order is routed to the Engineering Department (staking) who draws up the staking sheets and calls in the dottie (811). The job is then routed to SLECA's Operations Department for construction. This entirety of this process typically takes between 3-10 business days, including a 48-hour period required for utility locates (dottie) prior to any work commencing. Please keep in mind that the duration can fluctuate on a case-by-case basis and is driven by several different factors such as the extent of the severity of the pole in question, public safety, whether or not SLECA is experiencing other emergencies such as power outages on our system, etc. Once the construction is complete, the job is returned to the Engineering Department so it can be corrected on our mapping system. In an effort to track the progress, once the job is closed, it is then inspected during the monthly work order inspections for completion and code compliance.

1-11 Describe how many distribution poles the utility has determined need to be replaced at the present time, but have not yet been replaced, and the major reasons why they have not been replaced.

SLECA Response 1-11: SLECA's contractor typically begins the inspection during the last quarter of each calendar year. In 2021, the area that was set to be inspected was devastated by Hurricane IDA and all poles in that area were replaced as a result of the storm. Further, in the months following Hurricane IDA restoration, SLECA personnel was busier than they have ever been with follow up and cleanup work from the storm. Completing pole inspections at that time would have proved futile and would have resulted in inspection reports of the new poles that would more than likely require no corrective actions to be taken and result in a waste of resources at a time when SLECA's overall financial wellbeing was in turmoil from the 100+ million-dollar restoration effort. Having said that, SLECA intends to have the contractor begin pole inspections in the 3rd quarter of this year and the designated areas for the inspections will be areas which were mostly unaffected by the storm.

1-12 Describe the utility's closeout system for customer complaints.

SLECA Response 1-12: As described in the response to question 1-10, once the job has been completed in the field, it is returned to the Engineering Department to ensure that SLECA's mapping system is updated, then the work order is closed out. Once a work order is closed out, SLECA's Engineering

Department, in conjunction with a 3rd party consultant engineer, perform work order inspections on a monthly basis to ensure the job is built to all applicable codes and standards.

1-13 Provide a description of the classification your company uses for its pole systems to demonstrate their criticality during and after storms versus other poles in your grid system. Include the basis of these criticality designations and describe any studies conducted to support these criticality designations

SLECA Response 1-13: In response to any hurricanes or storms which affect SLECA's service territory, the first thing that is done is a complete assessment of SLECA's entire system utilizing in-house personnel and professional damage assessors, starting with the substations, followed by transmission lines, and lastly, the distribution system. During the damage assessment, it is noted whether poles are damaged, missing, leaning, etc. Once the power is restored after a storm, a final assessment of the system, including a pole loading analysis is completed to ensure all work was done in compliance with applicable NESC regulations, along with any applicable codes and standards.

1-14 Provide a description of the performance criteria the utility uses in its contracts for vegetation management of pole systems, including any bonus or penalty provisions applicable to such contractors.

SLECA Response 1-14: SLECA currently uses a contractor for vegetation management. SLECA's Operations and Maintenance budget for vegetation management is consistently budgeted anywhere from $600,000-$750,000 dollars. SLECA's vegetation management program is based on a three cycle, meaning that a 3rd of SLECA's rights-of-way are maintained every year. We have found over the implementation of this program that SLECA's system is significantly more reliable during mild weather events than years past, which has drastically improved our SAIDI/SAIFI markers, along with decreased payroll expenses from reduction in overtime pay due to decreased outages.

1-15 Provide the procedures, protocols, or standards the company uses in managing its personnel and/or contractors to perform the inspections and maintenance work in accordance with the utility performance goals.

SLECA Response 1-15: SLECA currently does not have a written pole inspection and maintenance plan; however, SLECA's operational policies and departmental practices require all poles that are worked on

by SLECA personnel be inspected prior to the work being commenced. In addition, all outside employees of SLECA are required to report any poles which they believe are subject to failure. SLECA also hires a 3rd party inspector to inspect the system on a yearly basis. Additionally, SLECA also has an inspection program (OSMOSE). OSMOSE generates a weekly report to ensure completion. Also, SLECA uses a 3rd party consulting engineer to complete work order inspections on a monthly basis to ensure that installations are complete and within compliance of any governing codes.

1-16 Provide a description of the upgrades your company is performing on the pole systems as it inspects and maintains the pole systems in the grid.

SLECA Response 1-16: Each year, pole inspections are completed and the results of which are reported back to SLECA. If the pole can be treated and extend the life of the pole, it is done so by the inspecting company in the field at the time of the inspection to help expedite the process and to avoid double costs of sending a separate contractor out to the same pole to treat it at a later date. If the inspection calls for a pole to be changed, SLECA personnel change the pole as soon as feasible.

SLECA has been proactive in its effort to harden critical facilities. Just prior to the storm, SLECA completed the construction of a steel pole transmission line (approximately one mile in length) which feeds 34.5KV power into the Matherne Substation. This portion of the steel pole line suffered no damage during the storm while the remaining 9 miles of transmission comprised of wood pole construction suffered 100% damage. This project was the first phase and, as a result of the storm, SLECA is working with FEMA to harden the rest of the line as it serves some critical infrastructure. That is not the only project SLECA is working on to harden its grid. SLECA is currently working with FEMA (within their established guidelines) to harden all applicable lines and substations (approximately 20 projects in total) in an effort to provide safe and reliable power, which will ultimately result in quicker response times and an overall decrease in outages and outage times following storm events.

1-17 Describe the communication protocols or processes you have established with pole attachers during normal maintenance and during storms affecting their pole attachments.

SLECA Response 1-17: SLECA uses the National Joint Use Notification System (NJUNS) as the primary means of communication between SLECA and the pole attachers. This program notifies each party when action is required on their part and is sent via email notification. In addition to the NJUNS system, SLECA also has contracts with each of the pole attachers which covers the processes and permitting guidelines that must be followed when attempting to attach to SLECA's poles. The

permitting process requires them to submit an application for attachments, detailing the pole locations, including GPS coordinates, and project details. Once an application is submitted, SLECA verifies the work can be done safely and will not warrant any modifications in the field. If some action is required to accommodate the new attachment, the attachee is required to compensate SLECA for the associated work.

This process is critical to personnel safety while working on SLECA's poles, as well as tracking the number of attachments throughout SLECA's system. It also ensures that the responsibilities of each party are outlined (and documented), including penalties and/or other actions which could be taken if either party does not fulfill its obligations based on the executed contracts.

1-18 During its review in this docket, Staff has found that the interface between utility pole owners and third party attachers is an area of concern. Has the utility considered implementing a pole inspection program paid by pole attachers? Provide an explanation as to why such a program has, or has not been, implemented.

SLECA Response 1-18: Currently SLECA inspects its poles and is currently 100% responsible for paying for the inspection. Having said that, SLECA has not considered implementing a pole inspection program paid for by the pole attachers. SLECA is certainly open to discussions regarding the topic; however, we feel that holding the pole attachers financially responsible for costs associated with inspections of another party's infrastructure will be an uphill battle and definitely be met with steadfast resistance by the pole attachers. We believe that if this program were to be implemented, the pole attachers would/could use it as a means to reduce their rental fees for attaching to SLECA's poles.

Also, each utility has several entities attached to its poles throughout the system. Having them pay for inspections of poles where they are not necessarily attached would present another challenge.

Typically, when a 3rd party wishes to make an attachment to the pole, they submit to SLECA for a permit application. Once a permit application is received, SLECA (or contractor of SLECA) makes a field visit to the requested location to determine if the installation of a new pole attachment would result in any code violations or safety concerns. If so, the pole attacher is responsible to pay the costs of that pole replacement. So indirectly speaking, the pole attachers are somewhat responsible for the costs (on a case-by-case basis) when new attachments are requested; however, this inspection is more driven toward code violations, safety, pole loading, clearances etc. and not necessarily a true "pole inspection" when it comes to the structural integrity of the pole.

1-19 What additional coordination does the utility need from pole attachers when there is a request to attach to non-wood poles.

SLECA Response 1-19: SLECA's distribution system is 99% comprised of wood poles. Requests to attach to non-wood poles happens very seldomly; however, SLECA's steel structures serve critical infrastructure such as hospitals, nursing homes, etc. so coordination with attachers is extremely important to ensure that the structural integrity of the infrastructure is not compromised. As long as the pole attachers follow the established permitting guidelines, SLECA is confident that the permit process would ensure that any attachments made would not jeopardize its infrastructure.

1-20 Describe the process the utility has used to coordinate with pole attachers for the removal or replacement of poles and their attachments once it has been determined that a particular utility pole or poles it owns are surplus or need to be removed or replaced. Include a description of the scheduling of such work.

SLECA Response 1-20: SLECA uses the National Joint Use Notification System (NJUNS) as the primary means of communication between SLECA and the pole attachers. In addition to the NJUNS system, SLECA also has contacts with each of the pole attachers to call or email if needed. When SLECA has transferred its facilities from one pole to another (pole changeout), SLECA also mails a letter to the pole attachers letting them know that the pole has been changed out and that they need to transfer their facilities to the new pole.

1-21 Many companies in the utility industry have internal process improvement programs and undertake a detailed internal review of the company's major issues. Has your company conducted such a pole attachment systems and processes reviews? If yes, provide the results of this program and/or reports describing the results, conclusions, and recommendations, and the actions which have been taken so far affecting the pole systems under your control.

SLECA Response 1-21: SLECA has begun a detailed review of the pole attachment systems and processes. In fact, in August of this year, SLECA's Manager of Engineering attended a three-day Joint Use Seminar to learn more about joint use initiatives and how other utilities throughout the industry operate and maintain their joint use contracts, as well as gain insight on some different strategies which would enhance SLECA's overall business operation. We are still in the review process and have not made any conclusions or taken any actions as a result thereof.