



**KEFENOKE**  
RURAL ELECTRIC MEMBERSHIP CORPORATION  
"OWNED BY THOSE WE SERVE"

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March 1, 2022

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:

Okefenoke REMC herewith files the attached report on Standards of Construction for  
Calendar Year 2021.

Regards,

/s/ Ernie Thomas

Ernie Thomas  
System Engineer  
Okefenoke 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 2021**

**1) Introduction**

Okefenoke Rural Electric Membership Corporation  
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**2) Members Served**

As of December 31<sup>st</sup> 2021, Okefenoke Rural Electric Membership Corporation serves 28,107 active meters in the state of Georgia, and 11,124 active meters in the state of Florida. The total number of active meters served system-wide is 39,231.

**3) Standards of Construction**

No report required for this year.

**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) 2021 Inspections**

Okefenoke Rural Electric Membership Corporation inspected 9,378 distribution poles per the guidelines of Section 4a above in the year 2021. A contractor was used for most of these inspections. This represents approximately 15.8% of the 59,237 wood poles on the system as of December 31, 2021.

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 2021. 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 2021 inspections program and status of corrections:

**Total Inspections for 2021**

	<b>Total</b>	<b>Rejects</b>	<b>Repaired</b>	<b>Attention Needed</b>
<b>Total Inspections</b>	12,672	280	109	172
<b>Overhead</b>	9,378	96	0	96
<b>Meter Base</b>	2,720	94	60	34
<b>Under Ground</b>	574	91	49	42

The remaining 172 issues are planned for correction in 2022.

**c) Rejections**

During the 2021 pole inspections per section 4a guidelines, 96 distribution poles were rejected. This represents a rejection rate of approximately 1.0 % of the 9,378 poles inspected by Osmove in the year 2021. The cause for the rejection of each of these poles is summarized in the table below:

**Summary of OREMC 2021 Pole Inspection Rejections.**

<u>Cause of Rejection</u>	<u>Quantity of Poles</u>
Ground Rot	53
Above Ground Damage	43
<b><u>Total Rejects</u></b>	<b><u>96</u></b>

**d) Replacement and Remediation**

The 2021 pole inspection was completed late in the year 2021. Therefore the reject poles are scheduled to be replaced in the second or third quarter of year 2022.

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	422	127
200/300	System Improvement	89	59
606	Pole Replacement	280	276
607	Miscellaneous Replacements	21	25
608	Conductor Replacements	39	38
609	Misc. Plant Additions	7	3
610	Road Moves	30	25
611	Line Relocations	39	36
702	Outdoor Lighting	31	5
999	Retirement Only	0	106
Totals		958	700

The cooperative continues its pole inspection process with the assistance of Osmose as a 3<sup>rd</sup> party contractor. The program will include approximately 7,500 poles to be inspected in 2022.

Though the cooperative did not experience a direct hit from a major hurricane during 2021, 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) 2021 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 2021, the cooperative trimmed approximately 536.5 miles of right of way.

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

**Historical Trimming**

<b>Year</b>	<b>Miles</b>
2018	516.40
2019	511.40
2020	486.67
2021	536.51

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 2021 we utilized contractors (NaturChem) to treat approximately 270 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.

In 2021 OREMC began a pilot program where herbicide spray was used to side trim the ROW. Helena was contracted to treat approximately 15 miles of line in Glynn County. This pilot was very successful in controlling limbs and overhang in the target ROW. Moving forward in 2022 we have plans to grow the process by treating up to 5 times as much line as in 2021. OREMC should be able to extend the trimming cycle up to 8-10 years in these areas.

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 2021 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 1,116 danger trees and disposed of the threat to our distribution lines.

Below is an overview of the data from the program as of 2021 YTD.

<b>Foreman</b>	<b>Danger Trees Removed</b>
Buddy	512
Brian	75
Richard	70
Ronald	71
Randall	72
Clay	146
Brooks	83
Other	87
<b>Total</b>	<b>1,116</b>

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.