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March 1, 2024

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 2023.

Regards,

/s/ Darren Crews

Darren Crews  
Manager Engineer Services  
Okefenoke REMC

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**Report to the Florida Public Service Commission  
Pursuant to Rule 25-6.0343, F.A.C.  
Calendar Year 2023**

**1) Introduction**

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

As of December 31<sup>st</sup> 2023, Okefenoke Rural Electric Membership Corporation serves 29,335 active meters in the state of Georgia, and 11,474 active meters in the state of Florida. The total number of active meters served system-wide is 40,809.

### **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. 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) 2023 Inspections**

Okefenoke Rural Electrical Membership Corporation continued with distribution inspections in 2023. Typically, OREMC inspects approximately 12 to 15% of our current system on a yearly basis. In 2023 Osmose performed 8,312 overhead pole inspections, 3,645 meter inspections, and 106 Underground facility inspections.

Okefenoke Rural Electric Membership Corporation performed visual inspections of a substantial number of poles in conjunction with the engineering and construction of many capital projects throughout the year 2023. The capital projects included new pole-line 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. Linemen, Meter Technicians and Staking Technicians all have the necessary tools to conduct routine line, service wire, and meter base inspections as a part of their daily activities. The following is a summary of the 2023 inspection programs and status of correction:

**Total Inspections for 2023**

	<b>Inspections Completed</b>	<b>Rejects</b>	<b>Repaired</b>	<b>Attention Needed</b>
<b>Overhead</b>	8,312	83	0	83
<b>Meter Base</b>	3,645	18	2	16
<b>Under Ground</b>	182	72	64	8
<b>Total Inspections</b>	<b>12,063</b>	<b>173</b>	<b>66</b>	<b>107</b>

The remaining 107 issues are planned for correction by the end of 2<sup>nd</sup> Quarter, 2024.

**c) Rejections**

Of the 8,312 pole inspections completed last year, 83 poles were found to be inadequate and therefore rejected. This represents a rejection rate of approximately 1% of poles inspected in the year 2023. OREMC is currently in the process of replacing these poles. The cause for rejection of each of these poles is summarized in the table below:

**Summary of OREMC 2020 Pole Inspection Rejections**

<b>Cause of Rejection</b>	<b>Quantity of Poles</b>
Ground Rot	19
Above Ground Damage	63
<b>Total Rejects</b>	<b>83</b>

**d) Replacement and Remediation**

During the engineering and construction of the capital projects mentioned in section 4b above, many poles were replaced or retired from the Okefenoke REMC system throughout the year 2023. The following table summarizes the projects in which poles were replaced or retired:

<b>Work Plan Code</b>	<b>Description</b>	<b>New Poles Added</b>	<b>Poles Retired</b>
<b>100</b>	New Construction to to new Members	451	113
<b>200/300</b>	System Improvement	133	72
<b>606</b>	Pole Replacement	169	171
<b>607</b>	Miscellaneous Replacements	30	43
<b>608</b>	Conductor Replacements	64	57
<b>609</b>	Misc. Plant Additions	9	2
<b>610</b>	Road Moves	0	0
<b>611</b>	Line Relocations	40	33
<b>702</b>	Outdoor Lighting	43	5
<b>999</b>	Retirement Only	0	61
<b>Totals</b>		<b>1024</b>	<b>557</b>

Though the cooperative did not experience a direct hit from a major hurricane during 2023, it did experience tropical storm force winds from a couple of named storms during the year. The OREMC distribution system withstood the tropical storm force winds well, with minimal pole damage due to the storms. Most of the outages were the result of trees and debris on the conductors. The distribution system resiliency can be 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) 2023 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 2023, the cooperative trimmed approximately 285.43 miles of right of way. Below is a summary of the previous 5 years of the Annual Trimming Cycle:

**Historical Trimming**

<b><u>Year</u></b>	<b><u>Miles</u></b>
2019	511.40
2020	486.67
2021	536.51
2022	433.00
2023	285.43

In conjunction with the routine mechanical cut and trim cycle, Okefenoke has incorporated a similar 5-year plan to apply spray herbicide to the floor of existing right of way in lieu of mechanical mowing. In 2023, Okefenoke utilized contractor (Helena) to treat approximately 400 miles of chemical floor spray on recently cut right of way. In addition to traditional right of way management, Okefenoke also utilized chemical side trim methods to treat and mitigate an additional 80 miles of side canopy.

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 to 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. This software package allows us to better document our trimming and herbicide cycles. It also allows us to oversee issues like danger trees, cycle busters, and no work zones like organic farms.

In 2023, OREMC continued to utilize 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 targets dead, weak, or leaning trees throughout our system. With the use of our Partner Software package, we have documented and addressed 1,090 danger trees posing a threat to our distribution lines in 2023. Below is an overview of the data from the program as of 2023 YTD:

<b><u>Foreman</u></b>	<b><u>Danger Trees Removed</u></b>
Troy	371
Brian	77
Ronald	218
Randall	148
Clay	127
Brooks	70
Other	79
<b>Total</b>	<b>1,090</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.