

A photograph of a power line tower in a field of yellow wildflowers under a cloudy sky. The tower is a dark wooden structure with multiple cross-arms and insulators. It stands in a field of bright yellow wildflowers. In the background, there is a dense line of green trees. The sky is blue with large, white, fluffy clouds.

DEMCO Right of Way Line Clearance Procedures Manual

January 1, 2021

DEMCO
www.DEMCO.org

**Sam Rosso, Manager, Lands & Right of Way
Jeremy Wascom, Supervisor, Right of Way**



POST OFFICE BOX 15659
BATON ROUGE, LA 70895
1-844-MyDEMCO (1-844-693-3626)
www.DEMCO.org

December 17, 2020

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

Dear Mr. Frey:

This “DEMCO Line Clearance Procedures Manual” is being submitted in response to the Louisiana Public Service Commission’s General Order dated September 13, 1993 on Utility Line Clearance Practices. The manual dated January 1, 2021 replaces the manual you currently have on file.

If you have questions or need additional information, please do not hesitate to call us at 225-262-3097 or 225-262-3098. Thank you for helping us provide safe and reliable service to our members.

Sincerely,

/s/Sam Rosso
Manager of Lands & Right-of-Way

/s/Jeremy Wascom
Supervisor, Right-of-Way

Enclosure

cc: DEMCO

DEMCO RIGHT-OF-WAY LINE CLEARANCE PROCEDURES MANUAL January 1, 2021

I. PREFACE

Dixie Electric Membership Corporation (“DEMCO”) submits this manual in response to Louisiana Public Service Commission (“LPSC”) General Order dated September 13, 1993 and entitled “*Investigation of Utility Line Clearing Practices in Louisiana.*”¹ DEMCO first submitted its Line Clearance Procedures Manual to the LPSC in 1994. The following revised Line Clearance Procedures Manual shall be considered effective January 1, 2021.

II. INTRODUCTION

DEMCO was established on August 8, 1938 as a private, non-profit electric membership cooperative dedicated to the principle of providing its members with reliable electric service at the lowest possible rates. A significant aspect in furthering this principle is effective vegetation management within the cooperative’s rights-of-way.

Management of the vegetation in and adjacent to DEMCO’s rights-of-way enables it to significantly reduce exposure of electrical hazards to the public at large, encourages healthy forests, and promotes long-term, cost-effective maintenance of DEMCO’s electric distribution and transmission system. A failure to maintain adequate clearance between electric lines and trees increases the chance of critical injury to the public, increases the chance of critical injury to DEMCO’s line personnel, increases the chance of critical injury to third party contractor or licensees who perform work on DEMCO’s lines, causes “blinking lights” and power outages, and leads to significant “line loss”. Line loss is the diversion of electricity from its intended flow path due to the contact of an electric line with a foreign object, such as a tree. Line loss increases the cost of providing electric service to DEMCO’s members, a cost which is passed on in the form of higher electric bills.

Over the past 82 years, DEMCO has utilized a variety of methods to manage its rights-of-way. From 1993 to 2001, DEMCO continually increased its total spending on management of its rights-of-way. During that time period, the cooperative invested over \$31 million to clear and establish its unmaintained rights-of-way system wide. From 2002 to 2019, DEMCO invested over \$55 million in right-of-way management at an average cost of \$3.2 million per year. Since 1993, DEMCO has invested over \$87 million in its right-of-way program at an average cost of \$3.3 million per year. This continued investment results, in large part, from greater reliability expectations of the members and the LPSC for the provision of reliable low-cost electric service.

¹ Exhibit 1 LPSC General Order – Investigation of Utility Line Clearing Practices in Louisiana

The demand for reliable electric service became evident at an LPSC hearing in the year 2000 whereby customers/members voiced a need for more reliable electric service. As a result of the hearing, the LPSC ordered Louisiana's electric companies to meet the expectations of its customers/members. At that time, DEMCO reviewed all reliability related issues and prepared a reliability work plan which recommended, among other things, a reduction in the length of its right-of-way maintenance cycles. Historically, DEMCO performed mechanical maintenance on a seven to nine-year cycle. However, DEMCO decided to allocate additional funding to its program in order to reduce the length of its maintenance cycles and, concomitantly, meet its members' demands for more reliable electric service. In 2001, DEMCO invested \$11 million in its right-of-way management program and, as a result, was able to reduce its mechanical maintenance cycle to five years and its herbicide applications cycle to two years. Conversely, in 2015, DEMCO increased its mechanical cycle to 6 years, while maintaining a 2-year herbicide application cycle. This enabled the cooperative to decrease the total monetary amount spent on mechanical right-of-way maintenance each year, while at the same time continue to provide its members with safe and reliable power.

The DEMCO right-of-way vegetation management program entails mechanical trimming of rights-of-way from substations to the end of circuits. An emphasis is placed on the removal of all trees that are located within the Cooperative's rights-of-way. Herbicide applications follow within six to twelve months thereafter. Selective herbicide applications and natural control methods are utilized until the next mechanical trimming cycle. This method of right-of-way maintenance is very cost effective for the cooperative members while also having many wildlife and environmental benefits.

DEMCO utilizes vegetation management schedules^{2&3} to track the timing of circuit maintenance on its distribution and transmission lines. The maintenance items on these schedules include both mechanical trimming and herbicide applications.

Overall system safety and reliability has improved since DEMCO first submitted its Line Clearance Procedures Manual to the LPSC in 1994. The cooperative's right-of-way management program is biologically sound, economically feasible, aesthetically pleasing, and benefits native wildlife species. DEMCO is a leader in the field of right-of-way management in Louisiana and beyond. The cooperative can confidently state that its right-of-way management program has resulted, and continues to result, in the benefits mandated by the LPSC's September 13, 1993 General Order discussed above, namely, long-term cost-effective maintenance of its electric distribution and transmission system, reduction of tree related service outages, greater service reliability, increased member satisfaction, and improved health of trees located outside of rights-of-way.

² Exhibit 2 DEMCO's Distribution Management Schedule for the years 2021-2038

³ Exhibit 3 DEMCO's Transmission Management Schedule for the years 2021-2035

III. DEFINITION OF WORKLOAD

DEMCO serves primarily rural areas in the parishes of Ascension, East Baton Rouge, East Feliciana, Livingston, St. Helena, Tangipahoa and West Feliciana. DEMCO currently provides electric service to approximately 112,000 members.

DEMCO manages approximately 4,170 miles of overhead distribution line rights-of-way and 230 miles of transmission line rights-of-way. System-wide, DEMCO must maintain approximately 17,300 acres of overhead distribution and transmission rights-of-way in order to effectively distribute electricity to its members.

DEMCO's target mechanical pruning cycle is five years. This five-year cycle is based primarily on the provisions of the National Electrical Safety Code ("NESC"). Section 218 of the NESC⁴ lists the following factors to be considered in determining the extent to which rights-of-way must be acquired and maintained: normal tree growth, the combined movement of trees and conductors under adverse weather conditions, voltage, and sagging of conductors at elevated temperatures.

DEMCO utilizes the circuit method as the basis for management of its rights-of-way. Circuits are bid out annually based on limb re-growth, years elapsed since last cut, safety, and concerns for the reliable distribution of electricity. Circuit maintenance is tracked on DEMCO's vegetation management schedules⁵. Although subject to change at DEMCO's discretion, the schedules are nonetheless intended to be a guide through the year 2038.

IV. DEFINITION OF PROGRAM GOALS

DEMCO's overriding goal as an electric cooperative is the distribution of electricity in a safe, reliable, and cost-effective manner. Right-of-way management is the primary means by which it accomplishes this goal.

DEMCO has set the following specific goals with respect to its right-of-way management program:

- **Reduction of right-of-way related outages to 1.5 hours or less per member per year.** Right-of-way related outages were 1.16 hours per member in 2014, 1.78 hours per member in 2015, 1.23 hours per member in 2016, 1.37 hours per member in 2017, 1.17 hours per member in 2018, 1.50 hours per member in 2019 and 1.42 hours per member thus far in 2020.
- **Six-year mechanical maintenance cycle (per LPSC Docket No. U-35359), with an ultimate goal of five-year, and two-year herbicide maintenance cycle.**

⁴ Exhibit 4 Section 218 of the NESC

⁵ Exhibit 2 DEMCO's Distribution Management Schedule for the years 2021-2038

Exhibit 3 DEMCO's Transmission Management Schedule for the years 2021-2035

V. SPECIFICATIONS

Safety is the paramount consideration in determining line clearance distances. DEMCO utilizes the NESC, the Occupational Safety and Health Standards set forth in 29 CFR 1910.266⁶, 29 CFR 1910.269⁷, the ANSI Z133.1-2017⁸ Standard, and the Association of Louisiana Electric Cooperatives Safety Manual⁹. These specifications are set forth in an addendum entitled “Special Specifications: Right-of-Way Re-Clearing”¹⁰ which is attached to each contract entered between DEMCO and the contractors it retains to assist in right-of-way vegetation management.

DEMCO Right-of-Way Department Employees supervise the cutting and trimming to ensure the work is performed in accordance with the *International Society of Arboriculture Certification Manual* and the *Pruning Trees Near Electric Utility Lines* manual as mandated by the Louisiana Horticulture Law, La. R.S. 3:3801 et seq.¹¹ Special care is exercised when performing right-of-way maintenance near trees listed in the Registry of Historic Trees¹².

DEMCO must also maintain the vegetation in its rights-of-way in accordance with right-of-way agreements between it and the landowners/members. The widths specified in these right-of-way agreements have varied over the years. Many older right-of-way agreements do not specify a width. In such cases, the above standards and regulations as well as the needs and expectations of DEMCO and the landowner control the width of the right-of-way.

It is DEMCO’s practice to record right-of-way agreements in the public records of the parish in which the property is situated. This ensures that the right-of-way agreement will “run with the land” and be binding upon subsequent landowners into perpetuity. Notwithstanding, La. R.S. 12:428 affords protection to electric cooperatives who have failed to record a right-of-way agreement or failed to acquire a right-of-agreement from a landowner by granting to them a servitude by prescription. In this regard, La. R.S. 12:428 provides:

A cooperative shall acquire a servitude on an immovable, unless such immovable is owned by the federal or state government or any agency or subdivision thereof, for the operation and maintenance of its electric transmission and distribution lines, along, upon, under or across any such immovable by virtue of the uninterrupted maintenance of such lines without the written or other consent of the owner thereof, along, upon, under or across the immovable for a period of one year; provided such servitude and operation does not interfere with the use of said property by other public utilities; provided further that in all cases where the written consent of the

⁶ Exhibit 5 29 CFR 1910.266

⁷ Exhibit 6 29 CFR 1910.269

⁸ Exhibit 7 ANSI Z133-2017 Standard

⁹ Exhibit 8 Association of Louisiana Electric Cooperatives Safety Manual – ROW Maintenance Section

¹⁰ Exhibit 9 DEMCO Mechanical Contract - Special Specifications Right-of-Way Re-Clearing

¹¹ Exhibit 10 Louisiana Horticulture Law

¹² Exhibit 11 Registry of Historic Trees

owner for the establishment of a servitude has been obtained and a line has been constructed along, upon, under or across the property under said consent it is not necessary that the written consent be recorded in the conveyance or other records of the parish where the property is located in order to make the servitude effective as to third parties.

Notwithstanding, the underlying objective of DEMCO's right-of-way management program is to ensure the removal of minimal growth in successive line clearance cycles while still allowing trees to have enough green-leaf surface area to grow and develop naturally. To accomplish this, DEMCO either trims trees away from its conductors or removes them completely.

The objective of side trimming is to direct the growth away from energized conductors while permitting trees to maintain a natural growth pattern. In this regard, right-of-way workers emphasize removal of dead, dying, weak and structurally unsound wood. When making these cuts, proper pruning techniques are observed. These techniques are briefly specified in the International Society of Arboriculture's brochure entitled "Pruning Mature Trees".¹³

If excessive trimming is required to obtain safe clearance between trees and conductors and in order to prevent topping¹⁴, complete removal may be necessary. This is especially the case when trees are situated underneath conductors. Most tree species in the southern United States attain mature heights between 60' and 150' feet. Consequently, it is DEMCO's practice to remove these trees in order to maintain the vertical and horizontal clearances mandated by the NESC.

Prior to removing a tree, the DEMCO Right-of-way Department employees and its contractors always attempt to notify the member. If the member is not at home, a notice¹⁵ is left at their residence informing them that trees will be removed from the right-of-way on their property. In the event there is no physical residence to leave a card, contractors are instructed to notify DEMCO whereupon DEMCO will review its records to ascertain contact information for the member/landowner. If a landowner steadfastly refuses to permit the requested trimming or removal, the matter shall be referred to the Supervisor, Right-of-Way.

After the tree has been cut, DEMCO's Right-of-Way Contractor properly disposes of all limbs and wood. DEMCO recommends disposal of wood chips by either leaving them for the member (with the member's permission) or disposing of them at an approved wood waste disposal site. Stump grinding or tree replacement is offered at DEMCO's sole discretion. If the member requests, logs are cut into sections and left with them for firewood. Any and all debris of dead trees that are proactively cut to prevent damage to DEMCO facilities are cut up and left on site.

¹³ Exhibit 12 International Society of Arboriculture Brochure "Pruning of Mature Trees"

¹⁴ Exhibit 13 International Society of Arboriculture Brochure "Why Topping Hurts Trees"

¹⁵ Exhibit 14 DEMCO Door Notification Card

To the extent that federal, state, parish and local regulations permit, DEMCO also grinds, chips, and/or slashes the trees and brush on site.

During power restoration efforts following a major storm or event, the applicability of the above standards varies. In these situations, all debris associated with the removal of trees and vegetation entangled within, on, or around the powerlines is left on site. Trees that are considered a hazard to the public are removed as quickly as possible and without notification to the landowner.

VI. INITIAL CLEARING OF RIGHTS-OF-WAY

Prior to clearing a right-of-way, DEMCO enters into a right-of-way agreement¹⁶ with the landowner. Clearing is accomplished by removing trees, hedge, and brush from the right-of-way. Specifications and instructions are provided to the clearing crew or contract supervisor before the commencement of clearing. Special requests and agreements between DEMCO and the property owners are also conveyed at this time.

All trees are cut as low as the root structure will permit (not to exceed six inches above the ground) and the stumps are treated with EPA approved herbicides to prevent re-sprouting. An indicator dye is used to make the stump treatments visible. Trees can be cut into pulpwood or saw-log lengths (varies for pine and hardwood), cut into firewood sections, and left on site or removed depending on the landowner's wishes (if member requests for wood or logs to be left on site, it must all be removed from right-of-way before line construction commences). Wood that is removed from the site by DEMCO's contractors is delivered to an approved wood waste facility for proper disposal. If the member wishes to clear their own right-of-way, they must cut and clear the servitude according to DEMCO specifications¹⁷. No facilities will be installed on the property until the right of way clearing is inspected and verified by an authorized DEMCO employee.

All brush is cut as close to the ground line as possible by mowing or manually cutting with a chainsaw. All stumps two inches or greater that remain from brush cut with a chainsaw is treated with EPA approved herbicides to prevent re-sprouting.

Leaning trees, dead trees, trees with exposed root structures and diseased trees located outside the limits of the right-of-way, but tall enough to strike the wires in falling, are also proactively removed during the initial clearing and disposed of properly.

¹⁶ Exhibit 15 DEMCO Right-of-Way Agreement

¹⁷ Exhibit 16 DEMCO Initial Right-of-Way Clearing Requirements

VII. GENERAL RIGHT-OF-WAY MANAGEMENT

Members often make special requests by phone, e-mail, or in person. Their requests are recorded on service order forms¹⁸. Once a request has been made, DEMCO Field Personnel from the DEMCO Service District in which the member is located, will first inspect the tree and thereafter refer the request to the DEMCO Right-of-Way Department as necessary.

All requests are tracked by computer¹⁹ at DEMCO's headquarters and district offices. Once the request has been determined to be DEMCO's responsibility to address, the service order is issued to one of DEMCO's Right-of-Way Contractors. DEMCO requires that the contractor complete a DEMCO Contractor Information Sharing Job Briefing Form²⁰ and a DEMCO Vegetation Management Crew Worksheet²¹ before work commences. A Cutting and Trimming Agreement²² may also be used depending on the request. Open service orders are closed out by the Right-of-Way Department Employees when completed and are filed with the vegetation management crew worksheet. DEMCO Right-of-Way Coordinators routinely monitor the DEMCO Outage Reporting System²³ to determine if right-of-way related outages are frequently occurring in the same locations.

VIII. TREE REMOVAL AND REPLACEMENT

Tree removal is recommended when the main stem of the tree is located within the limits of the right-of-way. If stump grinding is necessary, the contractor selected by DEMCO to perform the work will request an underground utility locate from Louisiana One Call (1-800-272-3020 or 811). After the tree removal is completed, DEMCO may provide a tree or shrub of the member's choice to replace the tree that was removed; however, DEMCO requires that the replacement tree be planted outside the limits of the right-of-way. Smaller shrubs may be planted at closer distances to the line depending on the height it attains at maturity. The shrub or tree shall be selected from species that are native to Louisiana. The following is a brief list of recommended native trees, shrubs, and grasses:

Large Trees

- Live Oak (*Quercus virginiana*)
- Bald Cypress (*Taxodium distichum*)
- Pond Cypress (*Taxodium ascendens*)
- Cherrybark Oak (*Quercus pagodifolia*)
- Black Tupelo (*Nyssa sylvatica*)
- Laurel Oak (*Quercus laurifolia*)
- Longleaf Pine (*Pinus palustris*)

¹⁸ Exhibit 17 DEMCO Service Order Form

¹⁹ Page excerpt from DEMCO District ROW Service Order Report is attached hereto as Exhibit 18.

²⁰ Exhibit 19 DEMCO Contractor Information Sharing Job Briefing Form

²¹ Exhibit 20 DEMCO Vegetation Management Crew Worksheet

²² Exhibit 21 DEMCO Cutting and/or Trimming Agreement

²³ Page excerpt from DEMCO's Outage Reporting System is attached hereto as Exhibit 22.

Medium Sized Trees and Shrubs

- Flowering Dogwood (*Cornus florida*)
- Florida Maple (*Acer barbatum*)
- Smooth Sumac (*Rhus glabra*)
- Parsley Hawthorn (*Crataegus marshallii*)
- Tree Sparkelberry (*Vaccinium arboretum*)
- Wax Myrtle (*Myrica cerifera*)
- Carolina Laurel Cherry (*Prunus caroliniana*)

Flowers/Grasses

- Coreopsis (*Coreopsis tinctoria*)
- Buttonbush (*Cephalanthus occidentalis*)
- Trillium (*Trillium ludovicianum*)
- Red Buckeye (*Aesculus pavia*)
- Coral Bean (*Erythrina herbaceae*)
- Little Bluestem (*Andropogon scoparius*)
- Broom Sedge (*Andropogon virginicus*)

DEMCO Members can contact their local nursery or utilize internet publications provided by the LSU AgCenter for native trees²⁴ and shrubs²⁵.

The DEMCO representative will complete a Tree Replacement Form²⁶, which provides a record for following up with planting.

DEMCO recommends planting small trees that do not have to be staked. A plant that can grow and develop naturally with resistance to the wind will develop a stronger, more tapered base over time. It is DEMCO's practice to discuss with the landowner the anticipated size of the tree and its location to other objects such as homes, driveways, and utilities.

IX. MEMBER RELATIONS

Except in emergency situations, members are notified when maintenance activities are scheduled on DEMCO's rights-of-way. Members are notified by the, DEMCO IVR Phone System, door cards, and on DEMCO's website, www.demco.org.

Before any mechanical work commences on a circuit, DEMCO sends out an automated phone call using its IVR phone system. This courtesy call explains the type of work to be completed and provides the member with two phone numbers the member can call to speak with an employee of the DEMCO Right-of-Way Department. Notification is also made by individual member contact no less than two days prior to the planned work being performed. If the member is not at home, a door card²⁷ is left at the member's

²⁴ Exhibit 23 LSU AgCenter's Native Tree Growing Guide for Louisiana

²⁵ Exhibit 24 LSU AgCenter's Shrubs for Louisiana Landscapes

²⁶ Exhibit 25 DEMCO Tree Replacement Form

²⁷ Exhibit 14 DEMCO Door Notification Card

residence describing the type of work planned for the right-of-way on their property. A telephone number is also provided on the card should the member have questions or comments. After right-of-way work has been completed, a member can contact a DEMCO Right-of-way Department Representative regarding any problems or concerns they may have utilizing the following methods:

- Contact by phone 1-844-my-demco (1-844-693-3626)
- Contact by email by utilizing DEMCO's Member Service e-mail webpage²⁸
- By mail addressed to DEMCO, Right-Of-Way Department, P.O. Box 15659, Baton Rouge, Louisiana 70895.
- Visit DEMCO's headquarters in Greenwell Springs, or one of the branch offices in St. Francisville, Greensburg, Zachary, Livingston, or Galvez.

X. HERBICIDES

A long-term cost-effective right-of-way management program should incorporate mechanical, herbicide, and natural control methods. After mechanical trimming is performed, herbicides are used to control the re-growth of many tree and brush species. DEMCO employees and contractors apply herbicides according to label directions and contract specifications²⁹. Through the years 1993 to 2003, DEMCO's rights-of-way consisted primarily of non-native plants such as the Chinese tallow and privet species. These plants are invasive and constitute a source of degradation to native plant communities. However, through the selective use of herbicides over the last sixteen (16) years, DEMCO has succeeded in converting the majority of its overhead rights-of-way back to native plant communities. These natural control methods permit DEMCO to maintain its rights-of-way with low growing, native, early succession plants. The selective use of herbicides by DEMCO in its right-of-way management program has also proven to be beneficial to wildlife.

Additionally, the selective use of herbicides has proven to be a cost-effective means by which to maintain right-of-way vegetation. From 2004 to the present, DEMCO has continued to use herbicides to aid in managing the vegetation within its rights-of-way in the most cost-effective manner and efficient manner practical.

Herbicides are used by DEMCO in accordance with local, state, and federal regulations. The Federal Insecticide, Rodenticide, and Fungicide Act of 1972 and the Louisiana Pesticide Law³⁰, are the respective federal and state laws governing the application of pesticides to DEMCO's rights-of-way. Only herbicides that have been approved and registered with the Environmental Protection Agency ("EPA") for use on utility rights-of-way are used by DEMCO and its contract herbicide applicators. Additionally, only licensed applicators with a Louisiana Commercial Pesticide Applicator's license are permitted to supervise herbicide applications to DEMCO's rights-of-way. The licensee must always be present on the job site.

²⁸ Exhibit 26 DEMCO Member Service E-mail Web Link

²⁹ Exhibit 27 DEMCO Herbicide Application Contract – Special Specifications Herbicide Application

³⁰ Exhibit 28 Louisiana Pesticide Law and Title 7 Part XXIII Pesticides Rules and Regulations

Notification regarding the application of herbicides is made to DEMCO's members through, door hangers, personal contact, or on DEMCO's web site at www.demco.org. DEMCO reviews the Louisiana Registry of Pesticide Hypersensitive Individuals and Louisiana Certified Organic Farm and Business Database³¹ annually to determine if changes have been made thereto. DEMCO does not currently serve any Louisiana Registered Pesticide Hypersensitive Members or Certified Organic Farms or Businesses.

A DEMCO Daily Chemical Report³² is also completed each time herbicide applications are made by a DEMCO employee. DEMCO maintains its herbicide records for a period of three (3) years. Records include the circuit name, various addresses or pole numbers throughout the circuit, and general location where herbicides were applied, the name of the herbicide(s), the application rate, and the name of the certified applicator. Contract crews also complete their own application reports and retain this information for three years after completing herbicide application work on the DEMCO System.

Copies of the current herbicide and adjuvant labels that are used on DEMCO's system are attached hereto³³.

XI. MANAGEMENT ORGANIZATION

DEMCO's Right-of-way Department is structured as follows:

- The Board of Directors, General Manager/CEO and Director of Operations promulgate all policies relating to the program and establishes program goals.
- The Manager of Lands and Right-of-Way and Supervisor, Right-of-Way implement the program, supervise the operations of the DEMCO Right-of-Way Department, establish specifications and practices for the conduct of the contract crews and the work that they perform, coordinate work plans, establish mechanical re-trim and herbicide application cycles, and measure the performance of the Right-of-way Coordinators within the DEMCO Right-of-Way Department. Additionally, they also conduct safety orientation meetings with all contract crews prior to them working on DEMCO.
- The DEMCO Right-of-way Coordinators (6): supervise the right of way clearing on select new construction jobs, supervise and inspect all Right-of-Way contract work (of both mechanical clearing and herbicide application crews), and manage the work and progress of the vegetation management crew within their area of responsibility. They also measure contract crew performance and provide training in safe work practices to all crews they supervise.

The quality of work and the professionalism of the DEMCO Right-of-way Department directly affect the number of member complaints and ultimately the total cost of electric service. The quality of mechanical trimming or removal activity and the

³¹ Exhibit 29 Louisiana Registry of Pesticide Hypersensitive Individuals and Certified Organic Nursery List

³² Exhibit 30 DEMCO Daily Chemical Report

³³ Exhibit 31 Herbicide and Adjuvant Labels

application of herbicides can determine the future cost and timing of these activities. Accordingly, to ensure quality control, the Right-of-Way Coordinators inspect all mechanical and herbicide application work within their area of responsibility to ensure the contract crews are performing quality work. A DEMCO Circuit Completion Report³⁴ is executed for each circuit maintained.

Finally, a list of Right-of-way Department employees and their qualifications is attached hereto³⁵.

XII. TRAINING

Employees and contractors are required to be trained in utility right-of-way management on a regular basis and must attend weekly safety meetings. Employees and contractors are also required to be trained on an annual basis in utility line and tree hazards, proper pruning and felling techniques, herbicide applications, legislation, equipment safety, and tree identification.

Employees and contractors with utility arborist licenses are required to attend approved continuing education training courses annually. These courses must meet the requirements set forth by the Horticulture Commission of the Louisiana Department of Agriculture and Forestry.

Employees and contractors with commercial pesticide applicators licenses are required to attend approved continuing education training courses once every three years. These courses must meet the requirements of the Louisiana Department of Agriculture and Forestry.

XIII. CONTINUED DEVELOPMENT

DEMCO's overriding goal as an electric utility cooperative is to provide safe, reliable, low cost electric service to its members. This requires an unwavering, professional commitment to right-of-way management and a desire not only to strictly adhere to the specific provisions of its plan, but to initiate change as the need may arise.

The basis of American forestry practices can only be understood by having first observed the native species growing and developing naturally. Bernard Eduard Fernow said, "if anyone should ask me what he or she should do to acquire the first practical knowledge of silviculture, I would answer: go into the woods and observe the behavior of trees with regard to the light conditions under which they grow".³⁶ Credit is hereby given to God for trees, his creation. The understanding of tree growth, forest development, and right-of-way maintenance should begin at this point.

³⁴ Exhibit 32 DEMCO Circuit Completion Report

³⁵ Exhibit 33 DEMCO ROW Department Employee List

³⁶ Bernhard Eduard Fernow (1851-1923), the father of North American Forestry

This manual will be updated as additional information pertinent thereto becomes available. Notwithstanding, DEMCO intends to formally review this manual periodically and resubmit a revised manual when changes take place in the DEMCO Right-of-way Department's Line Clearance Procedures Manual.