

Gascosage Electric Cooperative

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"People Helping People Since 1945"

December 12, 2003

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Dale Hardy Roberts, Secretary of the Commission
The Missouri Public Service Commission
P O Box 360
Jefferson City, Missouri 65102

**Missouri Public
Service Commission**

RE: PSC Case Nos. EX-2003-0489 and EX-2003-0368

PLEASE NOTE: Comments pertaining to HCSR240-3.190 were erroneously filed in Case No. EX-2003-0368 by letter dated December 5, 2003. Please disregard those previously filed comments. The comments below pertain only to Case No. EX-2003-0489.

Dear Mr. Roberts,

This letter is in response to the Proposed Amendment '4 CSR 240-3.190 Reporting Requirements for Electric Utilities and Rural Electric Cooperatives'. Gascosage Electric Cooperative strongly opposes the amendment for the following reasons:

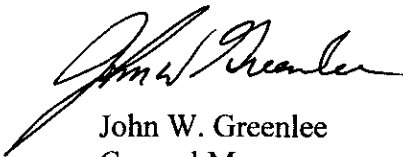
- The information required to be reported duplicates mandates already established by OSHA, the USDA Rural Utilities Service, our worker's compensation provider, MECIP, our insurance carrier, Federated Rural Electric Insurance Exchange, our state association, the Association of Missouri Electric Cooperatives, Inc., and state and local agencies.
- The training of members of our workforce to properly investigate, report and document each incident is a responsibility that we have accepted to meet the above-mentioned mandates. We are not a large system – we have less than 10,000 active meters, with approximately 1,500 miles of line. Additional training and reporting requirements to another agency would be an inordinate strain on our already limited resources.
- Due to the immediate nature of the reporting requirements, personnel typically devoted to restoring the system would be pressed to conduct an instantaneous investigation and file the resulting paperwork. This is contradictory to our policy of limiting the duration and frequency of outages. Our membership has learned to expect swift response times as we endeavor to anticipate their needs. Hiring additional personnel to record another layer of documentation would place an

unfair burden on our membership, as they benefit from profits, or margins, that the cooperative generates.

- Being regulated by the Rural Utilities Service and other agencies requires our cooperative to comply with strict safety codes, and to ensure our construction work meets all established standards. Employees, engineers, insurers, and safety auditors methodically inspect our system for safety issues.
- Our system and many other rural electric cooperatives participate in peer reviews that are done every three years. The peer review looks at activities for the primary purpose of saving lives and preventing injuries. Observers inspect facilities, lines, structures, practices and procedures.
- Since the reported information would be available to the public, our small system may not withstand the effectiveness of shrewd litigation.
- We firmly believe in applying preventive safety measures to every aspect of our operating procedures. This practice is not only fiscally responsible; it maintains a strong morale for our employees and for the public that we serve.

In summary, with strict standards and established practices already effectively in place, the proposed amendment would add an excessive burden and financial expense on this cooperative. We do not believe this amendment is necessary or warranted, and is without merit. Your proposal does not do one thing to strengthen our safety or loss control programs.

Regards,



John W. Greenlee
General Manager

Cc: Rob Land, AMEC