




Laclede Electric Cooperative

A Touchstone Energy* Cooperative 

December 16, 2003

FILED

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

**Missouri Public
Service Commission**

RE: 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 4, 2003. Please disregard those previously filed comments. The comments below pertain only to Case No. Ex-2003-0489.

Dear Commissioner:

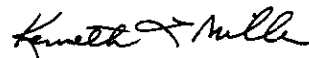
I am writing to make comment opposing the reporting rules proposed in the above referenced case. The PSC has presented no rationale for using the information to be reported that does not duplicate activities already being conducted by either the PSC, cooperatives or both.

The information required to be reported will not be used to improve safety. The PSC has already adopted the National Electric Safety Code as Missouri law. In addition, cooperatives are regulated by RUS, they are required by insurers to meet safety requirements, and cooperative engineers are required to inspect the electric system for safety issues and RUS standards of construction.

The time requirements of the rule are unrealistic and will cause limited cooperative resources to be drawn away from maintenance and construction and will instead be devoted to meaningless reporting. The notice of the rule contains a financial note indicating the rule will not cost state agencies or political subdivisions more than \$500 in the aggregate and will not cost private entities more than \$500 in the aggregate. This is incorrect in that the private entity reporting requirements and PSC handling and investigation costs will greatly exceed \$500.

As a cooperative, we do now comply with all PSC safety rules. However, we believe this proposed rule duplicates activities already performed by AMEC and its member cooperatives. Thank you for taking time to consider my comments.

Sincerely,



Kenneth L. Miller
General Manager

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