



## Co-Mo Electric Cooperative, Inc.

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December 12, 2003

The Missouri Public Service Commission  
Mr. Dale Hardy Roberts, Sec. of Commission  
P.O. Box 360  
Jefferson City, Missouri 65102

**FILED**

**DEC 17 2003**

**Missouri Public  
Service Commission**

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

Dear Mr. Roberts:

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.

I recently became informed about the PSC's proposed rule on incident reporting requirements. As a Manager of a rural electric distribution cooperative, I would like to express my opposition to this reporting requirement for the following reasons:

1. It will cost much more than the stated \$500 to investigate and report these incidents. For, example, if the accident occurs on a Saturday night resulting in a power outage, we would need to pay overtime to investigate which in turn would delay the restoration of service increasing restoration costs.
2. This reporting would be a duplication of what is already being done by the PSC, the cooperative or both.
3. 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, required by insurers to meet safety requirements, and cooperative engineers are required to inspect the electric systems for safety issues. In addition many cooperatives participated in NRECA's safety accreditation program and all participate in the Missouri Electric Cooperative Insurance Plan safety audits.
4. Finally, the new requirements are a cost and potential tool to be used against cooperatives in litigation for damages with no benefits of any kind.

Thank you for listening and your consideration in dealing with the proposal.

Sincerely,

Don Ernst, General Manager/CEO