



Black River Electric Cooperative

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December 3, 2003

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

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

Dear Mr. Roberts:


PLEASE NOTE: Comments pertaining to HCSR240-3.190 were erroneously filed in Case No. EX-2003-0368 by letter date December 3, 2003. Please disregard those previously filed comments. The comments below pertain to Case No. EX-2003-0489.

Black River Electric Cooperative respectfully, but unequivocally opposes the PSC's Proposed "FILING AND REPORTING AMENDMENT". Our opposition is based upon the following reasons:

1. Electric Cooperatives have a long history of rigid compliance to NESC standards and the system has been certified and annually inspected for non-compliance. In essence, the system is now of the highest recognized integrity, and the services of Commission would better suited in quest of out other sectors of the electrical industry to focus improvements upon.
2. The cooperative further believes that additional reporting, without a self-evident benefit to the electrical industry, and a defined "end result", is obvious clerical redundancy, and that the Commissions important resources would have better application, elsewhere.
3. The notice of the rule contains a financial note indicating the rule will not cost state agencies, political subdivisions, or private entities more that \$500 on the aggregate. The proposed amount is greatly in error and should be further researched by the commission with a clearly defined cost indicated in an amended document.
4. It is evident that information gathered and filed by the Commission may at some point be made public and thus utilized in litigation against the cooperative. It is not in the cooperative's interest to provide information that could reasonably incite and challenge the general public or aggressive attorneys to pursue frivolous lawsuits.
5. The reporting time requirement set forth in the proposed document is unrealistic. Investigation and the production of accurate reports will be not only time consuming, but costly for our members/customers. Cooperatives are not-for-profit organizations, which challenges us to be fiscally responsible in all ways. This additional redundancy of further reporting puts the burden of expense back to the customer without any viable value to them in return.

Please accept these comments as genuine concerns from our company, expressed for your consideration.

Very truly yours,


Thomas J. Steska
General Manager/CEO

Ellington
663-2226

Your Touchstone Energy* Partner 

Marble Hill
238-2621

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Missouri Public
Service Commission