

-----Original Message-----

From: Kelly, Kevin
Sent: Friday, December 12, 2003 11:00 AM
To: Roberts, Dale
Subject: FW: Case No. EX-2003-0489

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From: Melissa Evans [mailto:mevans@ueci.coop]
Sent: Friday, December 12, 2003 10:02 AM
To: pscinfo@psc.mo.gov
Subject: Case No. EX-2003-0489

United Electric Cooperative is opposed to the Public Service Commissions proposed incident reporting requirement. Listed below are a few reasons why we are opposed to such a requirement:

* The notice of rule contains a financial note indicating the rule will not cost state agencies, political subdivisions or 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. Further, the rule contains no explanation of how these increased PSC costs will be funded.

* The PSC has advanced no rationale for using the information to be reported that does not duplicate activities already being conducted by either the PSC, cooperatives or both. For example, the PSC suggested if it noted a recurrence of a particular type of incident it could issue a public notice to warn of the type of incident. This duplicates activities already performed by AMEC and its member cooperatives.

* 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 which are regulated by RUS are required by insurers to meet safety requirements and cooperative engineers are required to inspect the electric systems for safety issues.

* The information reported could be used in litigation against cooperatives to enhance damage claims. Contrarily, the PSC has advanced no explanation on how the reporting requirements will be used to improve safety. The new requirements are a cost and potential tool to be used against cooperatives with no benefits of any kind.

* The time requirements of the rule are unrealistic and will cause limited cooperative resources to be drawn away from repair and remedy and instead be devoted to meaningless reporting. For example, an automobile accident on a Saturday night will require investigation immediately and delay restoration of service.

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United Electric Cooperative is opposed to the PSC proposed incident reporting requirement and we feel that there is absolutely no benefit in it. If you have questions or comments, please email me at mevans@ueci.coop. Thank you.

Gene Dorrel
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