



Co-Mo Electric Cooperative, Inc.

29868 Highway 5, P.O. Box 220
Tipton, Missouri 65081-0220
Telephone: (800) 781-0157
(660) 433-5521
Fax: (660) 433-5631

December 4, 2003

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

LAKE DISTRICT OFFICE
Highway 5, P.O. Box 1279
Laurie, Missouri 65038-1279
Telephone: (573) 374-5407
Fax: (573) 374-5499

FILED

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**Missouri Public
Service Commission**

RE: Case No. EX-2003-0368

Dear Mr. Roberts:

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 proposed reporting requirements.

Sincerely,

Don Ernst, General Manager/CEO