

Se - Ma - No Electric Cooperative

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MANSFIELD, MISSOURI 65704

December 9, 2003

MISSOURI PUBLIC SERVICE COMMISSION

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

FILED²

DEC 15 2003

Missouri Public
Service Commission

Reference: PSC Case No. EX-2003-0368

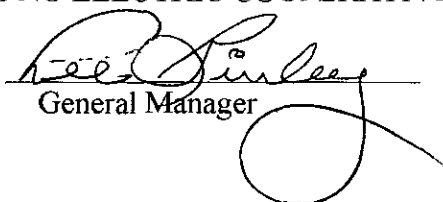
SeMaNo Electric Cooperative opposes the adoption of the above referenced amendment by the Missouri Public Service Commission for the following reasons:

1. SeMaNo Electric Cooperative is already regulated by the Rural Utility Service and must comply with their construction and maintenance standards. SeMaNo Electric Cooperative has adopted the National Electric Safety Code and is regularly inspected by consulting engineers, our insurance carrier, Association of Missouri Electric Cooperatives and others to assure compliance thereto. Additional oversight would be redundant and of no benefit.
2. We fail to see any justification that accident reporting, as proposed, would improve safety or give a true picture of accidents within the electric utility industry in Missouri as a large segment of the industry, municipally owned systems, are exempt.
3. It is stated that adoption of the proposed amendment would not cost state agencies or political subdivisions more than \$500.00 in the aggregate. Nor, would adoption of the amendment cost private entities more than \$500.00. This is unrealistic. Compliance to the proposed amendment could easily exceed \$500.00 for any or all effected entities.
4. There are serious concerns about the privacy of reports and information provided to the PSC in the proposed amendment. Access to accident reports could be used in litigation against the reporting entity.

The SeMaNo Electric Cooperative's Board of Directors, management and employees support safety, in the work place and public. We do however fail to see how adoption of this amendment will enhance safety, or the prevention of accidents in either.

We respectfully request that the Missouri Public Service Commission not adopt this amendment.

Sincerely,
SE-MA-NO ELECTRIC COOPERATIVE


General Manager


Safety Director