

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of the Proposed)	
Amendments to 4 CSR 240-3.190,)	Case No. EX-2003-0489
Reporting Requirements.)	

COMMENTS OF THE EMPIRE DISTRICT ELECTRIC COMPANY

COMES NOW The Empire District Electric Company (hereinafter, "Empire") and offers the following comments with regard to the Commission's proposed amendments to its rule 4 CSR 240-3.190 (Reporting Requirements), as proposed by the Commission in the November 17, 2003, edition of the Missouri Register:

1. Empire has two general comments to make with respect to the Commission's proposed amendments to this rule. Empire opposes the additional reporting requirements imposed by the proposed section (4). Empire believes the addition of the section is unnecessary and that the current reporting system, coupled with the other suggested changes to this rule, adequately ensures the safety of the public and utility employees.

2. Further, Empire opposes the \$10,000 threshold with regard to the reporting of incidents involving property damage. Empire believes this threshold is too low and may impose unnecessary reporting requirements on the utilities.

3. In Empire's view, the additional reporting requirements imposed by section (4) are not the best use of the resources of all parties involved. Consequently, Empire suggests that section (4) be stricken from the proposed amendments. In the alternative, and if section (4) is added to the rule, Empire would suggest that the property damage threshold be \$100,000, so as to be consistent with proposed section (3)(A).

WHEREFORE, Empire submits the foregoing comments with respect to the Commission's proposed rulemaking in the captioned case.

Respectfully submitted,

BRYDON, SWEARENGEN & ENGLAND P.C.


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Certificate of Service

I hereby certify that a true and correct copy of the above and foregoing document was sent by e-mail, on this 17th day of December, 2003, to:

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