



CALLAWAY ELECTRIC COOPERATIVE

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Missouri Public
Service Commission

December 12, 2003

The Missouri Public Service Commission
Dale Hardy Roberts, Secretary of the Commission
PO Box 360
Jefferson City, MO 65102

RE: Case No EX-2003-0489

Dear Sir:

These comments are in reference to Case No. EX-2003-0489, the proposed amendment to 4 CSR 240-3.190 – Reporting Requirements for Electric Utilities and Rural Electric Cooperatives. Callaway Electric Cooperative is opposed to the proposed amendment, and the following comments list a few of the reasons for our opposition.

First, the Cooperative is currently regulated and audited by our insurer and Workers' Compensation insurer. We also answer to DNR and OSHA, and therefore feel that another level of reporting is not necessary.

In addition, our construction and maintenance work must meet the National Electric Safety Code, and it is inspected by engineers. This is a requirement of the Rural Utilities Services (RUS).

Another issue is possible litigation. Any and all information forwarded to the MO PSC is public information. The information requested in the extremely short time frame may be used against the Cooperative if legal action is taken.

Also, the time requirements for reporting are extremely narrow, and the definition of accidents which are to be reported are negotiable. What happens if the person involved in the accident refuses medical treatment at the time, but seeks it the next day? How about an accident which we believe is less than \$10,000 in damages, only to find out it was \$15,000 when the cost is finalized? Does the "energized electrical supply facilities" include the pole, guy wire, etc or only the energized conductors?

For the reasons listed above, plus others, the Cooperative is opposed to the proposed amendment to 4 CSR 240-3.190.

Thank you for the opportunity to express my opinion and for your consideration.

Sincerely,

Thomas W. Howard
CEO/General Manager

