

2106 Jefferson Street, P.O. Box 269 Jefferson City, Missouri 65102 Telephone: (573) 634-2454 Fax: (573) 634-3892 December 11, 2003 FILED²
DEC 1 2 2003

Missouri Public Service Commission

Missouri Public Service Commission ATTN: Dale Hardy Roberts P.O. Box 360 Jefferson City, MO 65102

Dear Mr. Roberts:

I have included Central Electric Power Cooperatives comments regarding the Public Service Commission's Case No. EX-2003-0489 for your review. I hope that you will find these comments helpful regarding the cooperative's position on this issue.

Should you have any questions regarding these comments, please feel free to contact me.

Sincerely,

CENTRAL ELECTRIC POWER COOPERATIVE

Mark J. Newbold

Manager of Administrative Services

MJN:lb Enclosure

U:\Bartlett\Word\letters\MNewbold\mpsc.doc

- 1. This information is currently not being collected by the PSC. The addition of a formal collection process for the Public Service Commission would only increase costs for both the cooperative and the PSC. Labor to complete the process and file the information would likely exceed \$1,000 per incident.
- 2. This process would duplicate activities currently completed by the Association of Missouri Electric Cooperatives. The Association, along with the member cooperatives, already provides incident notice for the public combined with educational activities and media information to help prevent future accidents.
- 3. Cooperative systems are regulated by RUS and are already required by insurers to meet safety requirements. Additionally, cooperative engineers are required to inspect electrical systems to ensure they are safe.
- 4. This would potentially place information in the hands of overly litigious individuals that could be misinterpreted and used against a cooperative.
- 5. These new requirements would in no way assist in promoting safety.