

The Missouri Public Service Commission
Dale Hardy Roberts, Secretary of the Commission
P.O. Box 360, Jefferson City, MO. 65102
Case # EX-2003-0489

FILED⁵

DEC 17 2003

Missouri Public
Service Commission

Dear Mr. Roberts,

Recently, I was made aware of the Missouri Public Service Commission's proposed modification to the reporting rules that would require electric Cooperatives to report any incident resulting in an electrical contact involving a fatality, injury or property damage in excess of \$10,000.

First, I want to express my complete and total opposition to the proposed modification of the reporting rules.

Second, I feel it is warranted to provide you reason and clarification of the concerns that justify my position.

Intent. What is the intent of this rule? It seems to provide a parallel path of reporting that duplicates existing methods. While I practice and promote the duplication and repetition of any activities that lead to reduction of occurrences and or minimize the impact of incidents, I cannot see the value of repeating the reporting procedures in place today.

Another point of concern is the time requirements proposed within the rule. I believe all available resources should be focused on the remedy and repair during an incident. Because of the rule's time requirements it would be necessary for us to draw away resources from repair and remedy and assign them to the lesser priority of reporting. Again, I cannot see the value of this rule, for the Cooperative or the public.

I ask that you consider our position, and reconsider the position that the modification to the reporting rules would put us in.

Sincerely, Jerry Hartman
Director of Communications and Safety
Sho-Me Power Electric Cooperative

