



## Howell-Oregon Electric Cooperative, Inc.

P.O. Box 649, West Plains, Missouri 65775-0649

Phone (417) 256-2131 Fax (417) 256-4571

1-888-HOE-POWER 1-888-463-7693

December 8, 2003

**FILED<sup>4</sup>**  
DEC 10 2003  
Missouri Public  
Service Commission

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

RE: PSC Case No. EX-2003-0368

Dear Mr. Roberts:

I am writing in regards to PSC Case Number EX-2003-0368. On behalf of Howell-Oregon Electric Cooperative I am opposed to the adoption of the modification to the reporting rules.

The notice of rules contains a financial note indicating the rule will not cost state agencies or political subdivisions more than \$500 in the aggregate and will not cost private entities more than \$500 in the aggregate. I truly believe that the cost will more than exceed the \$500 as stated.

When you look at the man hours that it will require to perform the investigation, to compile the information taken from the investigation, to prepare the reports required and to submit the reports, I truly believe that it will cost the entities more than \$500 and when you include the time it will take the PSC to receive, to process and to perform the statistical analysis the true cost will greatly exceed \$500.

The Public Service Commission has advanced no rationale for using the information to be reported that does not duplicate activities already being conducted by either the Public Service Commission, the



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Cooperatives or both. For example, the Public Service Commission suggested if it noted a re-occurrence with a particular type of incident it could issue a public notice to warn of this type of incident. This duplicates activities already performed at the Association of Missouri Electric Cooperative and its member cooperatives.

The information required to be reported will not be used to improve safety. The reason being, the Public Service Commission has already adopted the National Electrical Safety Code as Missouri Law, in addition, cooperatives that are regulated by Rural Utilities Service are required by insurers to meet such requirements. Cooperative Engineers are required to inspect electrical systems for safety issues and all Missouri Electric Cooperatives participate in the Missouri Electric Cooperative insurance plan safety audits. Therefore, the information requested to be reported will not be used to improve any of these safety programs and the information reported could be used in litigation against cooperatives to enhance damage claims. The new requirements would add direct costs to the cooperative as well as previously stated, could be used as a potential tool against cooperatives with no benefits of any kind being given to the cooperative for meeting these new reporting requirements.

I ask that the Public Service Commission carefully review the comments to this proposed reporting rule and understand how this proposed reporting rule would add costs to both the cooperatives, and the Public Service Commission, and not supply any additional benefits to the cooperatives.

Sincerely,

HOWELL-OREGON ELECTRIC COOP., INC.



Dan Singletary  
General Manager

DS/jh