


A Touchstone Energy<sup>®</sup> Cooperative 

**RECEIVED**

APR 13 2007

**PUBLIC SERVICE  
COMMISSION**

April 12, 2007

Beth O'Donnell  
Executive Director  
Public Service Commission  
P O Box 615  
Frankfort, Kentucky 40602

**RE: Administrative Case No. 2006-00494**

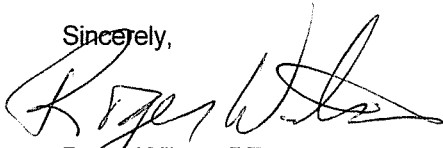
Response to the March 8, 2007 informal conference's questions  
presented to jurisdictional electric distribution utilities

Dear Ms. O'Donnell:

Please find enclosed the original and six (6) copies of the responses to the informal conference of March 8, 2007 to the jurisdictional electric distribution utilities.

If you have any questions on the content of the responses please contact Vince Heuser, Vice President of System Operations at the Nolin Rural Electric Cooperative Corporation office in Elizabethtown, KY [270-765-6153].

Sincerely,

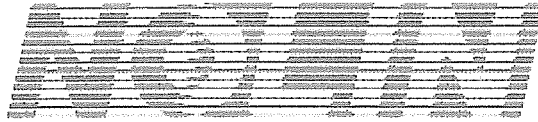



Roger Wilson, PE

Received confirmation

---

411 Ring Road  
Elizabethtown, KY 42701-6767



A Touchstone Energy Cooperative 

**RECEIVED**

APR 13 2007

**PUBLIC SERVICE  
COMMISSION**

**Public Service Commission**  
**Administrative Case No. 2006-00494**  
**Response to the Informal Conference**  
**on**  
**March 8, 2007 of Commission Staff**

Prepared by  
**NOLIN RURAL ELECTRIC COOPERATIVE CORPORATION**  
&  
**ENVISION ENERGY SERVICES**  
Roger Wilson, PE

April 5, 2007

RECEIVED

APR 13 2007

PUBLIC SERVICE  
COMMISSION

## TABLE OF CONTENTS

Informal Conference (3/08/07) Response on Case No. 2006-00494

---Page #-----	----- Content-----
3.	Response to Question No. 5 --Part 1.& Part 2 from staff to all utilities
4.	Response to Question No. 7 --Reliability reporting requirement
5.	Response to Question No. 7 --Reliability performance standard
6.	Response to Question No. 7 --Right-of-Way (ROW) management

Vince Heuser will answer related questions to these responses.

[Phone (270)765-6153]

➤ **Question #5. Staff question**

- 1. See Handout No. 1 which reflects several types of tree pruning. Regardless of whether or not the Commission sets any tree trimming standards, should Through or V pruning, Side pruning, Under pruning, or Topping be Allowed?**

Yes. A company should be permitted to implement any of the four methods of vegetation management illustrated in Handout No.1, or other methods not addressed by the handout when economic and environmentally safe processes are available, such as tree growth retardants. It should be left to management's discretion as to what method is economical, environmentally safe, and compliant to the National Electric Safety Code.

- 2. If the utility does not own the property over which its distribution lines are located, what are the utility's legal rights as far as access to the property, and ability to trim trees?**

A utility normally obtains such legal rights via easements. However, electric cooperative companies also obtain such rights through provisions in their membership applications in addition to easements.

## Question 7. Staff guidance for testimony

### ➤ **Reliability reporting requirement**

- **Is it appropriate for the PSC to require regular reporting of reliability information from all distribution utilities?**

Electric cooperative companies regularly report reliability information, as required, to the United States Department of Agriculture's Rural Utilities Service via the RUS Form 7. This data is also filed with the PSC.

- **Should the PSC develop standardized criteria for recording and reporting reliability information?**

Electric cooperative companies regularly report reliability information, as required, to the United States Department of Agriculture's Rural Utilities Service via the RUS Form 7. This data is also filed with the PSC. To date, the adequacy of this information has not been challenged.

- **Is it appropriate for the Commission to require reporting at a level smaller than the entire system (i.e. by substation or circuit)?**

NO. The system-wide reliability information reported via the RUS form 7 has proven to be sufficient. It would be burdensome, additional calculations, and expensive to compile, serving no purpose for the majority of the system.

- **Are there concerns about sharing this information within the industry or with the public?**

NO. The present reliability information reported via the RUS Form 7, filed with RUS and the PSC, has been public information and subject to public disclosure for many years.

(Continued)

➤ **Reliability performance standard**

- **Please comment on the appropriateness of a reliability performance standard. An example of a performance standard is found in the RUS requirement of no more than five hours outage for the average customer for any reason, and no more than one hour caused by power supply.**

A performance standard is unreasonable. However, a guideline or benchmark can be helpful. Although RUS has not mandated performance requirement for electric cooperative companies, RUS has provided electric cooperative companies with performance guidelines via RUS Bulletin 1730-1.

- **Is it more appropriate to develop performance standards on a utility by utility basis or a circuit by circuit basis? What is the most appropriate level for applying performance standard requirements?**

As previously stated, guidelines via RUS Bulletin 1730-1 are on system-wide basis. Both RUS and electric cooperative companies have found the system-wide guidelines to be sufficient.

- **Comment on an appropriate requirement to respond to non-attainment of performance standard, or in the alternative explain why a response to non-attainment is not necessary.**

As previously stated, requirements are unreasonable, but guidelines such as those issued by RUS are helpful. RUS provides electric cooperative companies that do not meet the performance guidelines specified by RUS Bulletin 1730-1, with recommendations for correction and improvement. They must respond to RUS regarding same via a “detailed corrective action plan.”

(continued)

Question 7. Staff guidance for testimony (continued)

➤ **Right-of-Way (ROW) management**

- **Please provide comments regarding the appropriateness of PSC defined ROW management minimum standards.**

Legal rights and obligations with respect to rights of way and easements have been long established between electric cooperatives companies or utilities and landowners. The commission has no standing to interfere with same. The intervention of the PSC would only add extra manpower and expense to the commission with little results. The commission's concern should be addressed to management activities relating to the maintenance or said rights of way.

- **If such a standard were created, to what level of detail should it be defined?**

See previous statement.

- **Are there disadvantages?**

YES. See statement under the first question dealing with ROW management.