

Taylor County
Rural Electric Cooperative
Corporation

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April 12, 2007

Hon. Beth O'Donnell, Executive Director
Public Service Commission
211 Sower Boulevard
P. O. Box 615
Frankfort, KY 40602

RE: Administrative Case No. 2006-00494
An Investigation of the Reliability Measures
Of Kentucky's Jurisdictional Electric
Distribution Utilities and Certain Reliability
Maintenance Practices

RECEIVED

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PUBLIC SERVICE
COMMISSION

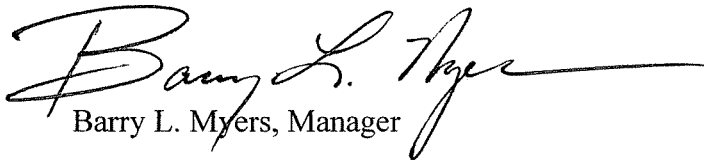
Dear Hon. O'Donnell:

Please find enclosed the original and six copies of the information requested in Administrative Case No. 2006-00494, Third Data Request of Commission to Jurisdictional Electric Distribution Utilities.

If additional information is needed, please contact my office..

Sincerely,

TAYLOR COUNTY RURAL ELECTRIC
COOPERATIVE CORPORATION


Barry L. Myers, Manager

BLM:pwr

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TAYLOR COUNTY RECC
RESPONSE
TO MARCH 8, 2007 INFORMAL CONFERENCE
DATA REQUEST OF COMMISSION STAFF
CASE NO. 2006-00494

April 12, 2007

Administrative Case 2006-00494
Responses to Questions Posed during Informal Conference
Held at PSC Building on March 8, 2007

STAFF QUESTIONS – ALL UTILITIES

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, implementation of any or all of the techniques should be permitted.

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?

Cooperatives obtain such rights through provisions in memberships along with easements obtained from the property owner.

STAFF GUIDANCE FOR TESTIMONY

1. Reliability Reporting Requirement

- A. Is it appropriate for the Public Service Commission to require regular reporting of reliability information from all distribution utilities?

Reliability statistics are reported to RUS on the Form 7. This information is also submitted to the Public Service Commission.

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

Electric cooperative utilities are required to regularly report reliability information on the RUS Form 7. This data is also filed with the Public Service Commission.

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

No

2. Reliability Performance Standard

- A. 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 for electric cooperatives is unreasonable. RUS provides performance guidelines in Bulletin No. 1730-1, but has not issued mandatory performance requirements.

- B. 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?

RUS provides electric cooperatives with performance guidelines in Bulletin 1730-1. These guidelines are on a system wide basis. The guidelines are found to be sufficient.

- C. 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.

Guidelines such as those issued by RUS are helpful. Electric cooperatives that do not meet the performance guidelines specified in RUS Bulletin 1730-1 are provided with recommendations for correction and improvement by RUS.

3. Right-of-way (ROW) Management

- A. Please provide comments regarding the appropriateness of a PSC-defined ROW management minimum standard.

A PSC-defined ROW management would not be appropriate for distribution facilities. Each system is different and the best ROW management practice would need to be decided on a case by case basis.

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

A minimum standard should not be created.

- C. Does a PSC requirement give the utility any advantage when performing ROW maintenance?

No.

- D. Are there disadvantages?

Yes, even though Taylor County RECC has ROW rights through its member applications and also through its easements, the Cooperative tries to get member approval before clearing ROW. In every situation the Cooperative might have difficulty meeting the PSC standards.