

CAMPBELLSVILLE, KENTUCKY 42719

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February 23, 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 FEB 2 6 2007

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, Second 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

Enc

ITEM 1 Page 1 of 1 Witness: Mike Skaggs

1. Describe in detail how the company utilizes all of the reliability measures it monitors

The reliability measures required RUS Form 7 outage data. They also provide confirmation of known problem areas through serviceman/consumer feedback.

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2. Has the company determined an appropriate operating range of performance threshold based on these measures? If yes, identify.

RUS quideline is five (5) hours per consumer per year.

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3. Describe in detail how the company develops formal plans to address its worst performing circuits. If the company does not develop such plans, indicate so in the response.

Given servicemen/consumer feedback, processes are set in motion to make line repairs/adjustments to fix problem areas.

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4. Why are momentary outages excluded?

No way to easily track. Generally no one is dispatched to the location because equipment is designed to clear temporary faults.

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5. Why are major event days or major storms excluded?

Not excluded.

ITEM 6 Page 1 of 3 Witness: Mike Skaggs

6. Provide a hard copy citing of the Rural Utilities Service ("RUS") reliability monitoring or reporting requirements or, in the alternative, provide an accessible Internet site.

See attached.

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Bulletin 1717B-2
Exhibit A
Page 20

Column g the total of the balances in Accounts 155, 156, 157, 158.1, and 158.2 on December 31 (Note: Columns a plus b and c, less d and e, plus or minus f, as appropriate, equal Column g).

PART G, SERVICE INTERRUPTIONS

The importance and manner of measuring and reporting continuity of service is described in RUS Bulletin 161-1. This bulletin provides for coding of causes that fit the four classifications shown in this part.

Average hours interruptions per consumer are obtained by multiplying the time of each interruption by the number of consumers affected and dividing by the average number of consumers receiving service.

Column

a Power Supplier

Enter in this column the average interruption hours per consumer resulting from failure of the power supplier's facilities.

b Extreme Storm

It is intended that this column exclude common or expected weather conditions and include extreme weather conditions resulting in extraordinary interruption time and equipment damage. Usually there is a series of concurrent interruptions resulting from conditions that exceed design assumptions.

c Prearranged

This column includes service interruptions caused by a decision to de-energize all or part of the system.

d All Other

Include in this column all service interruptions not included in Columns a, b, and c.

e Total

This column represents the sum of all causes, and represents either the average interruption hours per consumer for the current year (Item 1), or the average for 5 years (Item 2).

Item No.

1 Present Year

Enter data for the current year in the appropriate column.

2 Five Year Average

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Enter data for the most recent 5 years including the current year. In the event that statistics are not available for a full previous 5 years, use the best estimate possible until actual figures become available

PART H, EMPLOYEE - HOUR AND PAYROLL STATISTICS

The object of this part is to obtain statistics on all work performed for the borrower by the cooperative's employees based on payroll records.

Item No.

1 Number of Full-Time Employees

The number reported should be the number of employees hired full-time for normal operations of the system. It should not include employees added to do emergency work, employees added for seasonal employment, or for special assignments. If an employee works for the first 6 months of the year, quits in July, and is replaced immediately or later by another employee, these two employees should be reported as one full-time employee.

2 Employee-Hours Worked - Regular Time

Report the total number of employee-hours worked for which the employees received a regular rate of pay. Include all employees both salaried and those paid by the hour. All leave with pay is to be counted as hours worked. All leave without pay is not to be counted.

3 Employee-Hours Worked - Overtime

Report the total number of employee-hours worked for which a premium rate of pay was received by the employee.

4 Payroll - Expensed

Enter the amount of payroll that was charged to the operation and maintenance expense accounts (Accounts 500 through 598 and 901 through 931 and 935) during the year.

5 Payroll - Capitalized

Enter the amount of payroll that was used in construction and retirement work (all payroll charged to Accounts 107.1 through 107.3, 108.8, plus all payroll directly charged to the plant Accounts 301 through 399).

6 Payroll - Other

Enter the amount of payroll that was not included in Items 4 and 5.

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7. Provide and describe in detail any service restoration or outage response procedure utilized.

Substations are restored first, then three-phase lines, then single phase lines, then individuals.

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- 8. Refer to the RUS drawing M1.30G "RIGHT-OF-WAY CLEARING GUIDE" ("ROW Guide"), a copy has been provided in Appendix A.
 - a. Is this type of clearance requirement appropriate for all areas of a distribution system? If not, what types of exclusions or exceptions should be made?

Yes, clearance requirement is appropriate. An occasional consumer yard tree clearance would be our exception.

b. If the distribution utility is not already following this guide, provide an estimate of the cost and timeline to implement.

N/A

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- 9. Refer to North American Electric Reliability Corporation ("NREC") standard FAC-003-1 "Transmission Vegetation Management Program ("NERC Standard"), a copy is attached in Appendix B.
 - a. Does the company prefer the type of standard described in the NERC Standard over the type of standard described in the ROW Guide? Explain why you prefer one over the other.

No, the ROW standard is simple and to the point.

b. Refer to section R3 of the NERC Standard and substitute "distribution" for "transmission". Is the distribution utility capable of meeting the reporting requirements described in the section? IF not, why not?

Yes, were capable, but much more work would be required to report these items quarterly.

c. Again referring to section R3 as applied to distribution, how many sustained outages would be reportable for the calendar year 2006?

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10. Provide and discuss any right-of-way maintenance standard which is preferable to those identified in questions 1 and 2 above.

No preferable standard over and above the ones already discussed.

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51. Can Taylor County monitor SAIDI and CAIDI in addition to SAIDI?

Yes, only SAIDI currently but with more work could supply CAIDI and SAIDI.

ITEM 12 Page 1 of 1 Witness: Mike Skaggs

52. Why doesn't Taylor County exclude any outages from its reliability measures other than those where equipment automatically restores service?

RUS Form 7 requires that all outages are tracked.