

**COMMONWEALTH OF KENTUCKY
BEFORE THE
PUBLIC SERVICE COMMISSION**

RECEIVED

APR 25 2007

PUBLIC SERVICE
COMMISSION

**AN INVESTIGATION OF THE RELIABILITY
MEASURES OF KENTUCKY'S JURISDICTIONAL
ELECTRIC DISTRIBUTION UTILITIES AND
CERTAIN RELIABILITY OF MAINTENANCE
PRACTICES – CASE NO. 2006-0494**

Due on or before April 13th, 2007

**BIG SANDY RURAL ELECTRIC
COOPERATIVE CORPORATION
PAINTSVILLE, KENTUCKY**



**Big Sandy Rural Electric
Cooperative Corporation**

504 11th Street
Paintsville, Kentucky 41240-1422
(606) 789-4095 • Fax (606) 789-5454
Toll Free (888) 789-RECC (7322)

Branch Office:

204 Glyn View Plaza
Prestonsburg, Kentucky 41653
(606) 886-2987

April 10, 2007

**RESPONSE TO DATE REQUEST OF
THE KENTUCKY PUBLIC SERVICE COMMISSION
DUE ON OR BEFORE APRIL 13TH, 2007
CASE NUMBER 2006-00494**

Big Sandy Rural Electric Cooperative, Inc. ("Big Sandy RECC"), pursuant to the Public Service Commission's (PSC) information request due on or before April 13th, 2007, hereby submits the following response dated April 10, 2007 regarding Case No. 2006-00494. Included with the original document are 6 copies.

Dates: April 10, 2007

ATTEST:

A handwritten signature in cursive script that reads "Bobby Sexton".

Bobby Sexton
General Manager/President

Cc: Parties of record

Administrative Case 2006-0494
Informal Conference
Reported by Big Sandy Rural Electric Cooperative

5. 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. Utilities should be permitted to incorporate all the above mentioned methods to manage ROW growth. The use of Tree Growth Retardant should be permitted as well.

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?

Big Sandy RECC's membership application grants permission to maintain our line. Big Sandy RECC also obtains written easements on current construction projects.

Big Sandy RECC

1. Does Big Sandy only analyze reliability numbers on a system wide basis, as Big Sandy's states in its response to Item No 1 of Staff's Second Data Request in this case? If yes, how are these numbers then used to target certain areas?

Big Sandy RECC only analyzes reliability numbers on a system wide basis. Outage reports contain the location information. Circuits or areas are investigated whenever numerous outages have occurred in that area.

7. Staff guidance for testimony

Reliability reporting requirement

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

No. Big Sandy RECC is already required to report reliability numbers to RUS on Form 7. This information is available to the PSC.

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

No. The reliability numbers required by RUS should be sufficient.

3. 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 numbers should be adequate.

4. Are there any concerns about sharing this information within the industry or with the public?

No. The information reported on RUS form 7 is subject to public disclosure.

Reliability performance standard

1. 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 stand would be unreasonable, however a guideline such as RUS 1730-1 can be helpful.

2. 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?

A system-wide performance guideline should be sufficient such as RUS 1730-1.

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

A Co-op that fails to meet the RUS 1730-1 guidelines are provided with recommendations of correcting the situation and must respond with a corrective action plan.

Right-of-way (ROW) management

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

ROW management standards would be inappropriate because each utility system has a different terrain and vegetation management needs.

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

A standard would be inappropriate, therefore, broad standards should be considered.

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

No. ROW maintenance is already governed by RUS.

4. Are there disadvantages?

Yes. It would interfere with the good will of the Co-ops and their members in addressing ROW needs.

Witness to all responses:

Jeff Prater, Operations Superintendent