

April 9, 2008

Jim Welch Public Service Commission 211 Sower Blvd. Frankfort, Kentucky 40602-0615 APR 1 0 2008 PUBLIC SERVICE COMMISSION

Mr. Welch:

Enclosed with this letter is a corrected chart for Clark Energy's annual reliability report for 2007. Thank you for bringing this to my attention.

Sincerely,

Scott Sidwell

Scott Sidwell VP of Engineering & Operations Clark Energy Cooperative



Our power is our People

Introduction

The following report contains information on outages for Clark Energy Cooperative's system and includes an update on the cooperatives vegetation management plan and any changes to that plan that will be implemented in 2008. Enough outage information was available to assimilate five years of outage data reported in the IEEE reporting format as requested using SAIDI, SAIFI & CAIDI indices reported in minutes. A more detail account of outages for the calendar year 2007 is included with each index calculated for the utility's complete system, then broken down into individual circuits and analyzed to determine the contributing factors for the 10 worst performing circuits.

More than 10 categories of outage causes are tracked in Clark Energy's outage management system so therefore the top ten categories of significance will be analyzed and discussed as requested in the order.

Five years of System Average Interruption Duration Index (SAIDI)

| Year | All | MED | PS | Scheduled | Other |
|------|-------|-------|-----|-----------|-------|
| | | | | | |
| 2003 | 226.3 | 149.1 | 4.2 | 0.0 | 73.0 |
| 2004 | 178.9 | 59.5 | 7.9 | 3.1 | 108.4 |
| 2005 | 109.6 | 25.1 | 9.3 | 0.6 | 74.6 |
| 2006 | 117.8 | 26.9 | 1.1 | 2.0 | 87.8 |
| 2007 | 133.1 | 44.1 | 5.4 | 2.5 | 81.0 |

<u>Customer Average Interruption Duration Index (CAIDI) in minutes and</u> <u>System Average Interruption Frequency Index (SAIFI).</u>

| | CAIDI | SAIFI | | |
|------|-------|-------|--|--|
| Year | All | All | | |
| 2003 | 166.7 | 1.36 | | |
| 2004 | 82.8 | 2.16 | | |
| 2005 | 77.7 | 1.41 | | |
| 2006 | 72.8 | 1.26 | | |
| 2007 | 94.4 | 1.41 | | |

Substation list

Listed below is each substation in Clark Energy's system with the number of customers, the number of outage events for each substation for 2007 and the three indices requested.

| | # | | | | |
|----------------|------|--------|-------|-------|-------|
| Substation | CUST | Events | CAIDI | SAIDI | SAIFI |
| BLEVINS VALLEY | 1007 | 59 | 7.2 | 8.17 | 1.89 |
| BOWEN | 920 | 58 | 1.8 | 2.00 | 0.61 |
| CAVE RUN | 336 | 19 | 4.2 | 4.74 | 2.68 |
| CLAY CITY | 2661 | 62 | 5.4 | 6.16 | 0.88 |
| FRENCHBURG | 2505 | 80 | 7.9 | 8.97 | 1.32 |
| HARDW CREEK | 734 | 35 | 3.8 | 4.26 | 0.96 |
| HIGH ROCK | 236 | 12 | 0.7 | 0.75 | 1.45 |
| HINKSTON | 524 | 22 | 2.1 | 2.33 | 1.15 |
| HOPE | 1534 | 100 | 3.3 | 3.71 | 0.64 |
| HUNT | 2086 | 160 | 24.8 | 28.15 | 2.59 |
| JEFFERSONVILLE | 1557 | 47 | 5.6 | 6.40 | 1.41 |
| MARIBA | 1606 | 68 | 11.8 | 13.32 | 2.16 |
| MILLER HUNT | 723 | 36 | 1.6 | 1.86 | 1.23 |
| MT. STERLING | 1608 | 77 | 5.3 | 6.01 | 1.36 |
| REID VILLAGE | 901 | 38 | 3.7 | 4.16 | 1.78 |
| SIDEVIEW | 1887 | 134 | 14.7 | 16.61 | 2.75 |
| STANTON | 3074 | 61 | 0.9 | 1.05 | 0.13 |
| THREE FORKS | 1032 | 50 | 4.7 | 5.28 | 1.45 |
| TRAPP | 810 | 39 | 3.7 | 4.22 | 0.78 |
| TREEHAVEN | 337 | 1 | 0.1 | 0.16 | 0.19 |
| UNION CITY | 1466 | 52 | 3.3 | 3.79 | 0.73 |
| VAN METER | 732 | 59 | 0.8 | 0.96 | 0.43 |

| Circuit | CAIDI | SAIDI | SAIFI | Circuit | CAIDI | SAIDI | SAIFI |
|----------|-------|-------|-------|------------|-------|-------|-------|
| BLEVAL1 | 4.2 | 4.77 | 1.57 | MARIBA3 | 0.7 | 0.83 | 0.81 |
| BLEVAL2 | 0.9 | 1.06 | 0.40 | MARIBA4 | 0.7 | 0.84 | 2.28 |
| BLEVAL3 | 0.3 | 0.29 | 1.15 | MILL HUNT1 | 1.4 | 1.57 | 2.28 |
| BOWEN1 | 0.1 | 0.08 | 0.20 | MILL HUNT2 | 0.1 | 0.12 | 0.12 |
| BOWEN2 | 0.1 | 0.16 | 0.73 | MILL HUNT3 | 0.1 | 0.17 | 1.02 |
| BOWEN3 | 1.6 | 1.76 | 0.91 | MTSTRLG1 | 0.6 | 0.73 | 0.37 |
| CAVERUN1 | 3.6 | 4.09 | 3.12 | MTSTRLG2 | 0.7 | 0.81 | 0.35 |
| CAVERUN2 | 0.2 | 0.27 | 0.49 | MTSTRLG3 | 0.6 | 0.66 | 0.58 |
| CLAYCTY1 | 5.0 | 5.67 | 2.55 | RDVILLAGE1 | 1.5 | 1.75 | 1.40 |
| CLAYCTY2 | 0.1 | 0.15 | 0.13 | RDVILLAGE2 | 0.2 | 0.23 | 0.17 |
| CLAYCTY4 | 0.3 | 0.34 | 0.22 | SIDEVIEW1 | 2.2 | 2.53 | 1.71 |
| FRNBURG1 | 2.7 | 3.00 | 1.85 | SIDEVIEW2 | 0.3 | 0.35 | 0.17 |
| FRNBURG2 | 0.0 | 0.03 | 0.06 | SIDEVIEW3 | 0.2 | 0.24 | 0.23 |
| FRNBURG3 | 0.5 | 0.59 | 0.42 | SIDEVIEW4 | 3.7 | 4.24 | 1.33 |
| FRNBURG4 | 4.7 | 5.35 | 1.86 | STANTON1 | 0.1 | 0.08 | 0.08 |
| HARDWIC1 | 3.7 | 4.14 | 1.29 | STANTON2 | 0.1 | 0.15 | 0.12 |
| HARDWIC2 | 0.1 | 0.06 | 0.24 | STANTON3 | 0.4 | 0.49 | 0.18 |
| HARDWIC3 | 0.1 | 0.06 | 0.22 | STANTON4 | 0.3 | 0.34 | 0.37 |
| HIGHROC1 | 0.5 | 0.57 | 0.57 | THRFRKS1 | 0.5 | 0.61 | 0.53 |
| HINKSTO2 | 1.0 | 1.12 | 0.98 | THRFRKS2 | 4.0 | 4.53 | 2.13 |
| HINKSTO3 | 1.1 | 1.21 | 1.70 | THRFRKS3 | 0.1 | 0.14 | 1.74 |
| HOPE1 | 0.1 | 0.13 | 0.49 | TRAPP1 | 0.2 | 0.22 | 0.62 |
| HOPE2 | 0.6 | 0.65 | 0.28 | TRAPP2 | 3.4 | 3.88 | 1.08 |
| HOPE3 | 2.6 | 2.93 | 0.81 | TRAPP3 | 0.1 | 0.12 | 0.23 |
| HUNT1 | 8.2 | 9.30 | 2.29 | TREEHAVEN2 | 0.1 | 0.16 | 0.98 |
| HUNT2 | 0.1 | 0.15 | 0.26 | UNIONCITY1 | 0.6 | 0.72 | 0.46 |
| HUNT3 | 5.6 | 6.36 | 3.55 | UNIONCITY2 | 2.5 | 2.82 | 1.29 |
| HUNT4 | 10.9 | 12.33 | 2.29 | UNIONCITY3 | 0.2 | 0.17 | 0.71 |
| JVILLE1 | 3.2 | 3.63 | 1.87 | UNIONCITY4 | 0.1 | 0.08 | 0.05 |
| JVILLE2 | 2.4 | 2.77 | 0.68 | VANMTR1 | 0.2 | 0.23 | 1.13 |
| MARIBA1 | 0.0 | 0.04 | 0.11 | VANMTR2 | 0.0 | 0.05 | 0.22 |
| MARIBA2 | 10.2 | 11.62 | 2.77 | VANMTR3 | 0.6 | 0.69 | 0.37 |

This chart lists each substation by circuit.

Analysis of outage categories

Clark Energy currently uses 33 cause descriptions in our outage management software to aid in determining trends in outages so steps may be taken to proactively reduce or eliminate future outages. Listed below are the top 10 categories with numbers of outages, consumers actually affected and the total number of customer hours out.

| Top ten | | # of | |
|---------------|--------------|-----------|------------|
| Causes | # of Outages | Consumers | # of hours |
| Woodcutter | 21 | 308 | 359 |
| Vehicles | 22 | 325 | 368 |
| Squirrel | 43 | 384 | 420 |
| Trees In R/W | 44 | 503 | 454 |
| Deterioration | 53 | 1009 | 939 |
| Other | 57 | 1113 | 997 |
| Animal / Bird | 62 | 2244 | 2568 |
| Overload | 64 | 3349 | 2608 |
| Unknown | 166 | 3350 | 6236 |
| Trees Out R/W | 186 | 5152 | 7033 |
| Lightning | 440 | 9650 | 17272 |

These 10 categories represent 30% of the descriptions but were 91% of all actual recorded outages last year affecting 75% of our customer's outages and 80% of our customer hours out.

Weather continues to be the top cause of outages with the top two categories being lightning and trees being blown in from outside the ROW corridor taking down lines, poles and equipment. These two causes are 48% of all outages, 40% of our customer total and 49% of total customer hours. It can be argued that the unknown category, affecting 11% of outages, is largely a result of lighting damage to fuses and equipment in case where the cutout fuse has melted out. Overloading is responsible for 5% of all outages and approximately 5% of customer's hours out, largely due to extreme weather either hot or cold. Deterioration contributed 4% to last year's outages but only about 2% of the number of customers affected. There are several causes attributed to deterioration including damage to conductor from falling trees, lighting damage to transformers and equipment and the effect of small, aging conductor that breaks due to metal fatigue.

Outages due to unmanaged trees and brush cause 3% of outages last year but affected less than 1% of the consumer hours.

Animals including birds, squirrels, varmints and large birds getting into the lines and equipment are responsible for about 6% of outages but less than 1% of total outage hours.

Vehicle accidents and human error cause approximately 2 % of outages but less than 1% of consumers out or consumer hours last year.

6

List of ten worse performing substations circuits

Clark Energy currently has 22 substations with 71 circuits feeding out of those distribution substations. An average circuit on Clark Energy's service area is 42 miles in length and has an average of 463 members served from these feeders. A determination of the 10 worst circuits performing circuits has been made and is listed below for your review.

| Ten worst circuits based on SAIDI | | |
|-----------------------------------|-------|--------------|
| SAIDI | CATDI | |
| | SAIDI | Causes |
| BLEVAL1 | 4.77 | Tree Out R/W |
| CLAYCTY1 | 5.67 | Tree Out R/W |
| FRNBURG4 | 5.35 | Tree Out R/W |
| HARDWICKS1 | 4.14 | Other |
| HUNT1 | 9.30 | Tree Out R/W |
| HUNT3 | 6.36 | Lightning |
| HUNT4 | 12.33 | Tree Out R/W |
| MARIBA2 | 11.62 | Lightning |
| SIDEVIEW4 | 4.24 | Tree Out R/W |
| THRFRKS2 | 4.53 | Other |

| Ten worst circuits based on SAIFI | | |
|-----------------------------------|-------|---------------|
| | SAIFI | Causes |
| CAVERUN1 | 3.12 | Deterioration |
| CLAYCTY1 | 2.55 | Tree Out R/W |
| HUNT1 | 2.29 | Squirrel |
| HUNT3 | 3.55 | Lightning |
| HUNT4 | 2.29 | Tree Out R/W |
| JVILLE1 | 1.87 | Tree Out R/W |
| MARIBA2 | 2.77 | Lightning |
| MILLER HUNT1 | 2.28 | Squirrel |
| MARIBA4 | 2.28 | Tree Out R/W |
| THRFRKS2 | 2.13 | Other |

There were 13 substation circuits identified, with 6 of those circuits being the same ones. Of those circuits, 61% were greater in length than the average circuit and 69% of the circuits were larger than the average circuit in terms of members served. One circuit was very short in length with few members in a heavily wooded area and one was the longest circuit served with considerable exposure. A single cause was selected for each circuit if the outage or outages were significant enough to influence the outcome of the indices. Of the 13 circuits, there were 4 events that had causes that were significant enough to cause the indices to point toward poor performance.

- 1. Tree out of ROW
- 2. Lightning
- 3. Other
- 4. Squirrel

Two of the causes were weather related with trees being blown on to lines from outside the ROW corridor the major culprit and lighting being the other cause. The "other" cause is almost always related to material or equipment failure. Poor access to these sites during inclement weather is a contributing factor to the length of the outages. One circuit performed poorly because of a squirrel problem and conductor deterioration was another factor on one circuit.

Plans for improvement

During all outage restoration, personnel are instructed to note any deficiencies that need to be taken care after service restoration so repairs can be made as soon as practical to prevent repeat outages. Our outage management system report software tracks repeat outages and reports are reviewed quarterly to look for trends and repeat outages.

Listed below are steps taken to reduce outage causes and improve system reliability.

- Animal protection New construction units include animal guards as a standard part of construction including transformer bushing covers and covered jumper wires. An increase in conductor separation on overhead structures also aids in reducing bird related incidents where large bird roosts are a problem.
- 2. Work plan issues.
 - a. During the upgrading of overhead primary lines due to load growth, lines are moved closer to the road corridor, where practical, to allow better access during wet weather and allow lines to be inspected more easily thus potentially reducing outage restoration times.

9

- b. A concerted effort is underway to replace aging conductor in areas where load growth does not warrant the upgrading of lines. Plans are to upgrade 40 miles of line in our current 4 year work plan.
- 3. When problems cannot be located during the initial outage and must be listed as "unknown", field personnel patrol the lines as soon as possible to look for the cause and prevent repeat outages.
- 4. Our right-of-way personnel investigate outages where trees have blown in for the corridor walls to see if there are any additional danger trees in need of removal.
- 5. Ten percent of Clark Energy's overhead system is inspected for bad poles each year during which all ground wires attached to driven ground at the base of the pole are repaired and an ohm reading is taken. This is followed up by a contract crew that drives new ground rods to improve the grounding grid of the system in an effort to reduce lighting damage to fuses, poles and equipment.

Right-of-Way program update

Clark Energy's board and staff remain dedicated to implementing a strong ROW program and showed that by increasing Clark Energy's ROW budget by 16% in budget year 2008.

To insure good planning and oversight of the program, a ROW contractor management specialist was brought on board on January 2008 and is currently working on the system.

Outages related to ROW in the lines has steadily declined since 2004 due to an aggressive clearing program. The use of herbicide has been very beneficial in reducing stem counts on woody brush within the ROW corridor and spraying will continued in 2008.

Conclusion

At Clark Energy reliability is of the highest priority for each and every employee whether it is the office personnel or dispatcher recording the outage or the field personnel responding to outage calls at all hours of the day or night to restore service. Continual improvement is desired and pursued with the backing of the Clark Energy board and staff. We believe this report will reflect well on those efforts.

11