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ROY E. TOOMS

(1917-1986)

RECEIVED

APR 11 2007

PUBLIC SERVICE  
COMMISSION

April 10, 2007

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission  
Post Office Box 615  
Frankfort, Kentucky 40602

**RE: Administrative Case No. 2006-00494  
Testimony of Ron Fuller, VP of Engineering and Operations  
for Jackson Energy Cooperative**

Dear Ms. O'Donnell:

Please find enclosed herewith the original and ten copies of the testimony of Ron Fuller in Administrative Case No. 2006-00494 to be considered by the Commission pursuant to its order.

Please feel free to call if you have any questions or concerns.

With kindest regards.

Sincerely,



Clayton O. Oswald

Enclosure: as stated

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

IN THE MATTER OF:

AN INVESTIGATION OF THE RELIABILITY )  
MEASURES OF KENTUCKY'S ) ADMINISTRATIVE  
JURISDICTIONAL ELECTRIC ) CASE NO. 2006-00494  
DISTRIBUTION UTILITIES AND CERTAIN )  
RELIABILITY MAINTENANCE PRACTICES )

TESTIMONY OF RON FULLER

Q1 State your name and business address.

A1 Ron Fuller; Jackson Energy Cooperative Corporation, 115 Jackson Energy Lane,  
McKee, Kentucky 40447.

Q2 In what capacity are you employed by Jackson Energy Cooperative?

A2 Vice President of Engineering and Operations.

Q3 Regarding the questions of the PSC as to Administrative Case No. 2006-00494,  
have you had occasion to consider those questions, such that you may answer  
them knowledgeably in this testimony?

A3 Yes.

Q4 With regard to "Handout No. 1" distributed by the PSC, 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?

A4 Of the five methods of pruning and trimming mentioned in the question, topping  
is the worst alternative. Topping should not be done under any circumstances,  
because it causes injury to the tree, and causes unsafe conditions to occur and

persist. When a tree is topped, the result is that sprouts begin to grow, and they grow at a rate that is faster than the normal growth of the tree, to replace the canopy that was removed. The sprouts are formed on a base stub that often rots and is unable to physically bear the increasing load of the growing sprouts, which results in failure of the branch support. This weakness results in a shortened life span of the tree. Furthermore, topping is described by the International Society of Arboriculture (ISA) as an improper pruning practice.

The other pruning methods referenced in the question are better alternatives with regard to concerns of the health of the tree, but it is worth noting that the illustrations in the handout demonstrate trees that have either under grown or over-topped the line structure. Over-topping trees can lead to power outages if the over-topping branch structure were to break off the tree in a storm. Under grown branches (“V” cut trees) can be an impediment to the maintenance of lines if the lines should be down. Furthermore, notched or “V” cut trees usually grow to fill the space provided by the pruning, and will eventually grow up to the line.

The best way to prune trees in the right-of-way of a power line is to first eliminate any trees which are of a species that grow large enough to impede the lines and which stand within the right-of-way. Second, any trees that are located outside of the right-of-way (as measured by the location of their stump) should be side trimmed to the parent limbs from ground to sky. This method does a good job of eliminating the growth close to the power lines. ANSI A300 pruning and Integrated Vegetation Management (IVM) guidelines should be used in all cases.

- Q5 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?
- A6 A utility normally has certain rights to maintain its existing right-of-ways by a specific grant contained in an easement. Utilities may also obtain such rights by agreement with the customer/member, as often contained in the membership application and bylaws, at least in the case of electric cooperatives.
- Q7 Is it appropriate for the Public Service Commission to require regular reporting of reliability information from all distribution utilities?
- A7 Electric cooperatives, such as Jackson Energy, already report outage information via the Rural Utilities Service Form 7, which is also filed with the RUS and the Public Service Commission. No other reporting of outage information is needed.
- Q8 Should the PSC develop standardized criteria for recording and reporting reliability information?
- A8 As stated in response to the previous question, electric cooperatives already report outage information to the Rural Utilities Service and the PSC by use of Form 7. No other reporting information is needed.
- Q9 Is it appropriate for the Commission to require reporting at a level smaller than the entire system (i.e. by substation or circuit)?
- A9 Jackson Energy believes that the reporting by Form 7, which is system wide, is sufficient for reliability reporting purposes.
- Q10 Are there concerns about sharing this information within the industry or with the public?

A10 Jackson Energy has no concerns about the disclosure of this information, because it is already reported using Form 7, which becomes public information upon filing.

Q11 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.

A11 Jackson Energy does not believe that such a performance standard set by the PSC would be appropriate. The five hours referred to in the question is a RUS guideline rather than a requirement. This guideline is found in RUS Bulletin 1730-1.

Q12 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?

A12 Jackson Energy believes the system wide performance guidelines published by RUS are sufficient.

Q13 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.

A13 Jackson Energy has found the guidelines issued by RUS to be helpful, but Jackson Energy does not believe that requirements by the PSC are needed or helpful. Furthermore, electric cooperatives that receive RUS funding and have outages in excess of the guidelines must provide RUS with a corrective action plan.

Q14 Please provide comments regarding the appropriateness of a PSC defined ROW management minimum standard.

A14 Jackson Energy believes the RUS guidelines for right-of-way clearing and maintenance are sufficient. Furthermore, Jackson Energy already has executed easements with many of its customer/members which specifically define the extent to which Jackson Energy may utilize and clear the right-of-way. Furthermore, it is important for all utilities to be able to maintain a sense of autonomy and the ability to compromise with customer/members who may have varying concerns regarding maintenance of right-of-ways. A PSC standard would remove such autonomy and decision making from the utilities.

Q15 If such a standard were created, to what level of detail should it be defined.

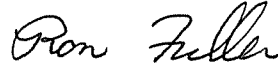
A15 As stated in response to the previous question, Jackson Energy does not believe that a PSC standard in this area is needed nor would it be helpful.

Q16 Does a PSC requirement give the utility any advantage when performing ROW maintenance?

A16 As stated above, Jackson Energy does not believe a PSC standard for right-of-way maintenance is warranted. Furthermore, Jackson Energy does not believe such a standard would give it any advantage when performing right-of-way maintenance, because it is more important for a utility to be able to make its own decisions and compromises with customers/members and/or landowners.

Q17 Are there disadvantages?

A17 Yes, because as stated before, it is important for all utilities to be free to deal with customer/members and landowners on terms that may be negotiated. Setting a standard would no longer allow such negotiation.




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RON FULLER  
VP for Engineering & Operations  
Jackson Energy Cooperative Corp.

STATE OF KENTUCKY

COUNTY OF JACKSON

Subscribed and sworn to before me by Ron Fuller on the 9<sup>th</sup> day of April, 2007.



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Notary Public  
My. Comm. Expires: 1/19/2010

Respectfully submitted by,




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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served by mailing an original and ten copies to:

Ms. Elizabeth O'Donnell  
Executive Director  
Public Service Commission  
Post Office Box 615  
Frankfort, Kentucky 40602

On this the 10th day of April, 2007.

  
Attorney for Jackson Energy