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Wyoming Public Service Commission
2515 Warren Avenue, Suite 300
Cheyenne, WY 82002

Attn: Chris Petrie, Chief Counsel
Blair Bales, Assistant Secretary

RE: Comments on Notice of Intent to Adopt Rules and Regulations Docket No.
90000-105-XO-08 Interruption of Service and Third Party Damage Reporting.

The Wyoming Rural Electric Association (WREA) represents eleven distribution cooperatives across the state of Wyoming and three Generation and Transmission cooperatives based in North Dakota, Colorado and Utah.

We appreciate the opportunity to comment on the proposed rules and for the opportunity to participate over the two years in technical conferences that the PSC has conducted in order to gather information and input from all affected parties. Having said that we still have some concerns on the proposed rules and they are spelled out below.

Proposed Rule 238 – No comment

Proposed Rule 252 – No comment

Proposed Rule 325 – We do have some concerns with regards to the proposed rule:

- 1) Although we believe that coops are all capable of defining our own “Major and Minor” interruptions as specified in Section 325 (a), we do have concerns with the time reporting requirement of “within two (2) hours”. Our concern stems from the fact that most cooperatives do not man their respective headquarters offices 24 hours a day 7 days a week, the responsibility of this requirement will then fall upon our linemen in the field (those working to restore the service) and/or our after hours dispatching service.

We would encourage the commission to delete the minimum reporting requirement. We feel that it is standard practice and

protocol with all of our systems to notify the Commission as soon as we can of a service interruption.

- 2) In Section 325 (e) the proposed rule asks for quarterly reports of all service interruption be filed with the Commission. **We are confident that we can meet this provision and would request the Commission, in turn, prepare and submit to all reporting entities an annual report of their findings as a result of these reports. This report may lend itself to identifying trends (outages and third party damages) around the state and may assist us when dealing with problem contractors etc. We would further request that this report be submitted prior to the first calendar quarter of each year.**
- 3) Finally, under Section 325 (f) the Commission requires that a utility “shall submit to the Commission...a current list of contact name(s) and telephone number(s) to be used when a service interruption occurs...The utility shall ensure that one (1) or more of the named individuals are available to confer with the Commission at all times. **Our concerns with this provision are similar to those stated above in that some cooperatives either have on-call linemen or an after-hours dispatch service and not a designated person to be on-call all the time. We are concerned that if this is the Commission’s intent that this would create an unfunded mandate and impose additional costs upon the cooperatives. It is our hope that those cooperatives that utilize an after-hours dispatching service would be exempt from this section or at the very least have this service count as a “reporting contact.”**

As we have stated in numerous technical conferences and meetings with the Commission, the electric load make-up and staff of our cooperatives vary greatly among our membership and a “one-size-fits-all” approach to outage reporting seems counterproductive. Our first priority when addressing a service interruption is to restore that service, if people committed to that priority have to be pulled away in order to meet these reporting requirements then nobody wins. We have no problem and in-fact agree that there needs to be good communication between us and the Commission during an outage period but would ask for some latitude give our diverse make-up.

Thank you again for allowing us to comment on these proposed rules. If you need to contact me I can be reached at the WREA office in Cheyenne at (307) 634-0727 or via email at staylor@wyomingrea.org.

Sincerely,

Shawn Taylor
Executive Director