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December 11, 2015

Ms. Patricia Van Gerpen
SD Public Utilities Commission
500 E. Capitol Ave.
Pierre, SD 57501

Re: In the Matter of the Consideration of Rules Regarding
Stray Electrical Current and Voltage Remediation
RM15-001

Dear Ms. Van Gerpen:

Thank you for the opportunity to submit initial comments on the South Dakota Public Utilities Commission's ("Commission") stray voltage rule-making docket, RM15-001. I am submitting these comments on behalf of the South Dakota Rural Electric Association ("SDREA"). SDREA represents twenty-eight distribution cooperatives in South Dakota, as well as East River Electric, Rushmore Electric, and Basin Electric. As you are aware, SDREA was very active in the passage of stray voltage legislation in South Dakota (SDCL ch. 49-47). We are keenly interested in the development and promulgation of the rules required to be adopted by this Commission, pursuant to SDCL §49-47-2. Our member companies have carefully reviewed the draft rules in this docket and appreciate the opportunity to provide input.

SDREA is generally supportive of the processes and framework established in the draft rules. We would suggest a revision in 20:10:39:07(2), based upon the fact that South Dakota does not recognize or license "master electricians." Accordingly, we recommend the following language:

20:10:39:07. Qualified testing professional. Measuring and testing for stray voltage must be performed by a qualified testing professional. The following persons are presumed to be qualified testing professionals:

(2) An ~~master~~ electrician holding an electrical contractor's license, master electrician's license or equivalent, licensed—in any state, who has completed no fewer than 48 hours of commission-approved stray voltage training and who has been involved in no fewer than 5 prior investigations involving the measurement or testing of stray voltage; and

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Our members have also had discussions concerning what constitutes “commissioner-approved” stray voltage training for qualified testing professionals (see 20:10:39:07(1), (2), and (3)), and how it will be determined which training programs would be “approved” by the Commission. For example, some of SDREA’s members participate in stray voltage training developed by the Engineering Department of the University of Wisconsin, the Wisconsin Public Service Commission, and the Wisconsin Department of Agriculture. This three-tiered program (Introduction to Stray Voltage, Stray Voltage Testing, and Advanced Stray Voltage) is offered by the University of Wisconsin-Madison.

SDREA suggests that as part of this rule-making docket, the discussions include a reasonable method to determine training programs that would be acceptable under the rules. One option discussed by our members is the possibility of opening a separate docket to establish a list of Commission approved stray voltage training programs.

SDREA would ask that the Commission consider these comments in the development of the Stray Electrical Current and Voltage Remediation Rules. We also reserve the right to submit responsive comments, per the Commission Order dated November 18, 2015. Thank you for the opportunity to comment. If you have any questions, please feel free to contact me.

Sincerely yours,

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By: 

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