

**MT. CARMEL PUBLIC UTILITY CO.**

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March 9, 2012

VIA EMAIL

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Eric Lounsberry  
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Illinois Commerce Commission  
527 East Capitol Ave.  
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INITIAL COMMENTS TO FIRST DRAFT OF PROPOSED PART 500 REWRITE

Dear Eric:

Following herein are the Initial Comments which Mt. Carmel Public Utility Co. is making to the January 31, 2012, First Draft of the Part 500 Rewrite. Mt. Carmel Public Utility Co. reserves its right to make further comments on these or subsequent drafts. Thank you for your work in preparing this new draft as we know it took considerable effort on your part.

1. Section 500.50(a) - The Rule as drafted may be problematic for Mt. Carmel Public Utility Co. Our phone system currently is not able to distinguish between gas and electric calls. The phone system simply records calls to some extent, but not whether they are gas or electric. Some form of system specific exception should be allowed.

2. Section 500.150, on Fixed Factor Delivery, is problematic being set at 15 psig. This should be raised to 35 pounds as opposed to 15. Otherwise, the +/- one percent will require Mt. Carmel Public Utility Co. to make investment in acquiring new regulators for several customer installations to be compliant.

3. Section 500.400 dealing with meter tests has reduced the average error from 4% down to 2%. Even a 3% factor would be okay, but 2% is too tight of a margin. If the Commission were to require a 2% error, then this should be phased in, as meters which are currently in the system were installed under the old standard of 4%. The phase in should be for meters as they come out of service over the ten year testing period. Therefore, the phase-in should be over ten years from the date of enactment.

Respectfully submitted

MT. CARMEL PUBLIC UTILITY CO.

Eric Bramlet  
Eric Bramlet, COO

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