

Senate Utilities Committee

Testimony of Dave Holthaus Manager, Governmental Affairs Kansas Electric Cooperatives, Inc.

January 22, 2004

Good morning, Chairman Clark and members of the Committee. My name is Dave Holthaus, Manager of Governmental Affairs for Kansas Electric Cooperatives, Inc. (KEC), the statewide association of electric cooperatives in Kansas. KEC has 29 distribution cooperative members that serve end-use customers at retail in Kansas. It also has two generation and transmission cooperative members, those being Kansas Electric Power Cooperative (KEPCo) and Sunflower Electric Power Corporation (Sunflower).

I quickly surveyed our membership to get responses to the four questions we were instructed to answer. Each of the cooperatives maintains their own records on PCB equipment and although not all cooperatives have responded to date, a very good cross section (size/location) of cooperatives did respond. In the essence of time, I took the liberty of condensing those responses down into four short answers.

Questions for electric utilities to answer during the January 22 hearing on transformers containing PCBs

- 1. Tell the Committee the extent to which you can identify transformers which contain PCBs and their location throughout your distribution system.**

Of the 14 cooperatives answering the survey, two replied they had no PCBs in their systems. Both had tested all transformers. The remaining 12 stated they had no known PCB transformers in the system but they are testing each transformer when it is pulled down from the pole. If it is found to contain PCBs,

it is taken out of service and disposed of. Many cooperatives continuing to test have already tested transformers installed at public use buildings, such as schools, churches, community buildings, and retail stores and feed lots. No PCB contaminated transformers are returned to service.

2. Tell the Committee the number of transformers which contain PCBs in your distribution system.

As I mentioned, two of the cooperatives replied that they were PCB-free on their systems. The remaining cooperatives are testing each transformer as it is taken out of service. All cooperatives commented although they did not know the exact number of PCB contaminated transformers in their system, they felt sure the number was small (1-5%). One cooperative tested 1787 transformers over the past 10 years and three contaminated units were found; another found only 115 since 1980.

3. Tell the Committee what problems you have disposing of transformers containing PCBs when they are replaced.

All cooperatives reported that they have no problem associated with disposal of PCB transformers/oil. Nearly every cooperative commented on the high price of disposal, roughly \$250 per transformer. If the oil in the units is considered contaminated, which is PCB content of greater than 50 ppm, the units are drained and disposed of by shipping them to a reclamation facility. The oil is shipped to a PCB disposal facility. If the device has PCB content above 500 ppm, both the oil and device are shipped to a PCB disposal facility.

4. Describe for the Committee your actions to replace those transformers containing PCBs over the past ten years, the net result of those actions, and your plans for the future regarding transformers containing PCBs.

The goal of all the cooperatives is to eventually have all transformers tested and recorded assuring the entire system is PCB free. The cooperatives that have not completed testing will continue to test each transformer as it is taken down. Most cooperatives believe they have very few PCB transformers on their system at this time. One cooperative plans to test all transformers-5,500 in the next five years at a cost of \$60,000.

All the electric cooperatives are committed to maintaining the good will of their member/owners, being in compliance with applicable regulations, and being good stewards of the environment.

Thank you for your time.