

July 15, 2013
VIA the Commission's ERF System
Mr. Mohammed Monawer
Docket Coordinator
Public Service Commission of Wisconsin
610 North Whitney Way
Madison, WI 53707

Re: Comment on Proposed revisions to Wisconsin Administrative Code Chapter
PSC 114
Docket: 1-AC-238
PSC Ref#: 181745
Table PSC 114.232-1, FN18

Dear Mr. Monawer:

After reviewing the proposed revision to Wisconsin Administrative Code § PSC 114., Table PSC 114.232-1, Footnote 18 the Wisconsin Utilities Association (WUA) suggests changing the wording "normal high water level" to read "annual high-water mark".

The current draft for Footnote 18 reads as follows:

¹⁸ For uncontrolled water flow areas, the surface area and clearances shall be based on the normal high water level.

WUA PROPOSED WORDING

WUA offers the following revision of this rule for consideration.

¹⁸ For uncontrolled water flow areas, the surface area and clearances shall be based on the ~~normal high water level~~ annual high-water mark, (level).

WUA proposed wording clarifies the intent that the water levels used to determine surface area and clearances over uncontrolled water flow areas must be based upon annual high-water marks for that body of water.

Changing the wording to annual high-water mark will provide consistency with terminology used in the 2012 NESC. In order to determine the clearance for a wire or cable crossing over a water flow area you need a base level to measure clearance from. In Wisconsin that level is determined by the annual high-water mark.