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April 27, 2022

Ms. Jan Noriyuki
Commission Secretary
Idaho Public Utilities Commission
11331 West Chinden Blvd, Bldg. 8, Ste 201-A
Boise, ID 83714
Secretary@puc.idaho.gov

RE: Case No. RUL-U-22-01
Rules for the Measurement of Stray Current or Voltage (The Stray Voltage
Rules), DOCKET NO. 31-6101-2201

Dear Ms. Noriyuki:

Idaho Power Company (“Idaho Power” or “Company”), Avista Corporation, and the Idaho Dairymen’s Association, Inc. (together, the “Commenters”) appreciate the opportunity to comment on the proposed changes to the Idaho Public Utilities Commission (“Commission”) IDAPA 31.61.01 - Rules for the Measurement of Stray Current or Voltage (“Stray Voltage Rules”).

The Commenters have reviewed and are supportive of Commission Staff’s (“Staff”) draft revisions to the Stray Voltage Rules. The Commenters also identified additional opportunities to further streamline the Stray Voltage Rules, effectively reducing unnecessary text, and provided minor clarifications to better align the Stray Voltage Rules with practical field application.

To support the Commission, Staff, and other parties’ review of the Commenters’ proposed revisions, two attachments accompany this filing. Attachment 1 contains all redlines (both those proposed by Staff and those proposed by the Commenters) in a single document, and Attachment 2 isolates only the Commenters’ proposed revisions (in this document, Staff’s proposed redlines have been “accepted” and only the Commenters’ additional edits are visible as tracked changes).

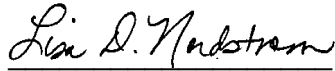
Below is a summary of the Commenters’ proposed revisions which are also explained within the comments in Attachment 2:

Section	Description of change
010.01	Modification: corrected misspelling, added specific code references
010.02	Deleted section – may be omitted without creating confusion
010.05	Modification: Replaced definition with reference to NEC – the source of this definition
010.09	Deleted unnecessary text to simplify statement
010.10	Modification: Revised definition to be consistent with industry practice and other references.
010.11	Modification: Revised definition to be consistent with industry practice and other references.
010.12	Deleted section – definition included in IDAPA 61-802
010.13	Deleted unnecessary text
010.13.a.	Deleted section – definition included in IDAPA 61-802
010.13.b.	Deleted section – definition included in IDAPA 61-802
010.13.c.	Deleted section – definition included in IDAPA 61-802
010.14	Deleted unnecessary text
010.15	Modified to improve clarity and reduce wordiness.
010.16	Deleted unnecessary text to simplify statement
022.01	Deleted portion included in IDAPA 61-804
023.	Deleted portion already included in section 010.09
024.	Deleted section – requirement is included in IDAPA 61-803
051.03	Modified for clarity and accuracy
071.03	Modified to align better with the testing dairy producers sometimes request. Eliminated the requirement for a “written” agreement to suspend or limit testing.
073.03.c.i.	Modified to allow the use of different types of brushes

Finally, the Commenters support Staff’s recommendation to remove the existing figures from the Stray Voltage Rules and instead house them on the Commission’s website. In support of this proposal, the enclosed Attachment 3 contains new images to replace the pixilated and dated figures currently existing within the Stray Voltage Rules. These new images are available as individual electronic image files.

The Commenters appreciate the opportunity to provide additional recommendations for the Commission’s consideration.

Respectfully submitted,



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ATTACHMENT 1

**31.61.01 – RULES FOR THE MEASUREMENT OF
STRAY CURRENT OR VOLTAGE
(THE STRAY VOLTAGE RULES)**

GENERAL PROVISIONS

Rules 0 through 11

000. LEGAL AUTHORITY (RULE 0).

~~These rules are promulgated pursuant to the authority of the~~ Idaho Public Utilities Law, Sections 61-515 and 61-520, Idaho Code, and the Stray Current and Voltage Remediation Act, Section 61-803, Idaho Code. ()

001. TITLE ~~AND SCOPE~~ (RULE 1).

01. Title. The title of these rules is the IDAPA 31.61.01, “Rules for the Measurement of Stray Current or Voltage” (Stray Voltage Rules). ()

~~**02. Scope.** These rules are applicable to dairy producers, public utilities and all persons or entities involved in any way in the measurement or remediation of stray current or voltage within Idaho.~~ ()

~~**002. WRITTEN INTERPRETATIONS – AGENCY GUIDELINES (RULE 2).**
Written interpretations to these rules can be obtained from the Secretary of the Idaho Public Utilities Commission and are available from the office of the Commission Secretary.~~ ()

~~**003. ADMINISTRATIVE APPEALS (RULE 3).**
There are no provisions for administrative appeals within the Commission under these rules.~~ ()

004. INCORPORATION BY REFERENCE – REFERENCE TO SAFETY CODES (RULE 4).

01. Safety Codes. ~~These rules reference two (2) national safety codes.~~ ()

a. The National Electrical Safety Code (NEC) is applicable to public utilities and is adopted by ~~the~~ Commission ~~Order in IDAPA 31.11.01,~~ “Safety and Accident Reporting Rules for Utilities Regulated by the Idaho Public Utilities Commission.” ()

b. The National Electrical Code (NEC) is applicable to the installation of wires and facilities used to convey electric current and to apparatus to be operated by such electric current. Adoption of the National Electrical Code is found at Section 54-1001, Idaho Code, and IDAPA 07.01.06, “Rules Governing the Use of National Electrical Code,” Section 011. ()

005. – 009. (RESERVED)

010. DEFINITIONS (RULE 10).

~~01. These Rules incorporate by references definitions found in Idaho Code 61-802, the NEC, and the NESC.~~

~~**01. Adequate Remediation.** Means corrective action taken by a utility which results in, and is reasonably likely to sustain, a reduction of stray current or voltage attributable to the utility’s distribution system to a measured level that is fifty percent (50%) or less of the preventive action level.~~ ()

~~**02. Ampere.** A unit of measure of current. A milliampere is one one thousandths (1/1,000) of an ampere.~~ ()

~~**03. Commission.** Means the Idaho Public Utilities Commission.~~ ()

Commented [OP1]: Explicitly adding the NEC and NESC as additional sources of definitions.

Commented [SG2]: Certain definitions are in Idaho Code 61-802

Commented [OP3]: Standard terminology – may be omitted without creating confusion. (NEC doesn’t include it, and we don’t include “volt.”)

~~04. **Cow Contact Points.** Means any two (2) points on electrically-conductive materials in a dairy which a dairy cow may (in its normal environment on the dairy) unavoidably and simultaneously contact. Electrically conductive material may include the surface(s) that the cow is standing on as one (1) or both cow contact points.~~ ()

05. **Equipotential Plane (EPP).** See NEC. Means an area where wire mesh or other conductive elements are embedded in or placed under concrete, bonded to all metal structures and fixed nonelectrical equipment that may become energized, and connected to the electrical grounding system to prevent a difference in voltage from developing within the plane. ()

~~06. **Preventive Action Level (PAL).** Stray current or voltage that, when correctly measured, is either:~~ ()

~~a. A steady state, root mean square (rms) alternating current (AC) of two (2) milliamperes (mA) or more through a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter; or~~ ()

~~b. Any steady state, rms AC voltage of one (1.0) volt or more across (in parallel with) a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter.~~ ()

07. **Primary System.** A term that describes the high-High voltage utility electrical system including the generation, transmission and distribution systems. It also refers to the high voltage side of a distribution transformer. ()

08. **Secondary System.** Means the low-voltage utility electrical system on the secondary side of a distribution transformer. The dairy's on-farm system begins on the dairy's side of the metering points, except for dairies metered on the high voltage side of the transformer(s). In the case of dairies metered on the high voltage side, the on-farm system begins at the transformer's low-voltage lugs. ()

09. **Service Provider.** Means any Any person, company or other legal entity providing stray voltage or current testing, consulting, measurements, analysis services, construction, or hardware. ()

10. **Shunt Resistor.** A physical resistor or combination of resistors used to simulate a dairy cow's body resistance, body-to-metal contact resistance, and hoof-to-earth contact resistance between the cow and contact points during the measurement of cow contact voltage. As used in these rules, A shunt resistor shall be five hundred (500) ohms plus or minus two percent (+/- 2%). ()

11. **Source Resistance.** Means that portion of resistance in the circuit, other than the resistance of the cow and its contact resistance, when the cow is completing a circuit between contact points. Body-to-metal contact resistance and hoof-to-earth resistance may represent a portion of the source resistance. ()

12. **Steady State.** The value of a current or voltage after an amount of time has passed where all transients have decayed to a negligible value. ()

13. **Stray Current or Voltage.** Stray voltage or current is: ()

a. Any steady state, sixty (60) hertz (Hz) (including harmonics thereof) root mean square (rms) alternating current (AC) less than twenty (20) milliamperes (mA) through a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter; or ()

b. Any steady state, sixty (60) Hz (including harmonics thereof), rms AC voltage of less than ten (10) volts, across (in parallel with) a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter. ()

Commented [OP4]: Definition was effectively identical to NEC definition. Replacing definition with citation will keep the definition of EPP consistent.

Commented [OP5]: Clarification of original definition. Cows don't make a nearly zero-ohm connection to their environment like metal voltage test-leads can. The 500-ohm shunt resistor is intended as a substitute for both the cow's internal body resistance and any contact resistance between a cow and its environment. (ref. IEEE Std. 1695-2016 section 5.5.1.4, and USDA 696 pages 5-5, 5-10.

Commented [OP6]: See above – contact resistance is included in the shunt resistor for measurement purposes.

Commented [OP7]: Defined in IDAPA 61-802.

~~e. Stray current and voltage is a normal, inherent and unavoidable result of electricity traveling through grounded electrical systems, including a dairy producer's on-farm system and a utility's distribution system. These systems are required by the National Electrical Code (NEC) and the National Electrical Safety Code (NESC) to be grounded to the earth to ensure safety and reliability. ()~~

Commented [OP8]: (a), (b), and (c) are defined and described in IDAPA 61-802. Note – (d) should be kept.

d. Unless the context otherwise requires, the term "stray voltage" shall mean stray current or stray voltage. ()

14. **Tests, Measurements, Procedures and Analysis.** Means a Any or all of the stray voltage testing, measurement, work and work product defined in these rules. ()

15. **Transient or Transient Deviation.** ~~Transient or transient deviation means a~~ A non-steady state increase or spike in voltage or current. For the purpose of identifying and reporting transients in cow contact voltage (Vcc) or current (Icc), a transient occurs when the recorded maximum Vcc or Icc in a recording interval exceeds two hundred percent (200%) of the steady state Vcc or Icc recorded during the same recording interval. ()

16. **Utility.** Means a A public electric utility as defined in Section 61-332A, Idaho Code. ()

~~**011. PURPOSE OF RULES – CONFORMANCE TO ELECTRICAL CODE (RULE 11).** These rules standardize the measurement and testing procedures used to measure stray voltage and current. Standardization of testing will provide a consistent basis for determining the presence and level of stray voltage in a dairy and how to determine the source of that stray voltage or current. These rules do not replace existing safety standards embodied in electrical codes. Any conflict between these rules and the National Electrical Code or the National Electrical Safety Code shall be promptly brought to the attention of the Commission. Under these rules, testing is intended to determine: ()~~

~~01. **Presence of Stray Voltage.** The presence and amount of any stray voltage or current within the dairy. ()~~

~~02. **Sources of Stray Voltage.** The source(s) of any stray voltage or current detected. ()~~

~~03. **Contributions to Stray Voltage.** The percent contribution from the utility side and the dairy side of the dairy service entrance to the total stray voltage or current measured on the dairy. ()~~

Commented [SG9]: The purpose of the rules is the enabling statute in Idaho Code.

012. -- 020. (RESERVED)

APPLICABILITY AND ADMISSIBILITY

Rules 21 through 30

021. UTILITY (RULE 21).

A utility measuring or testing for stray voltage or current at the request of a dairy producer, as directed by the Commission or on its own initiative, shall conduct such measurements in accordance with these rules. ()

022. DAIRY PRODUCER (RULE 22).

01. **Serving Notice on the Utility.** A dairy producer providing written notice to a utility pursuant to Section 61-804, Idaho Code, shall specify why the dairy producer believes its dairy cows are being affected by electrical energy attributable to the utility. A dairy producer may provide such notice with or without first having conducted tests or measurements of stray voltage. ()

Commented [OP10]: The "why" requirement for the notice is included in IDAPA 61-804.

02. **Cooperation.** When a written notice is filed with the utility, the dairy is obligated to make any contact point(s), service panels, grounding rods or other electrical equipment at the dairy available to the utility for measuring and testing. The utility shall provide reasonable notice and cooperate with the dairy producer to establish an appropriate time to conduct the tests and measurements. The dairy shall cooperate with the utility so that all tests

and measurements necessary to identify the existence and magnitude of stray current or voltage, if any, are completed within fourteen (14) days of the utility's receipt of such notice. ()

023. SERVICE PROVIDERS (RULE 23).

~~Any person performing any stray voltage measurement or test on behalf of a utility or a dairy shall be deemed a service provider and All service providers shall follow these rules. ()~~

~~**024. ADMISSIBILITY (RULE 24).**~~

~~Only tests and measurements made in compliance with these rules shall be admissible before the Commission or in any civil action. ()~~

025. -- 030. (RESERVED)

**QUALIFICATIONS OF PERSONS
PERFORMING AND ANALYZING
RESULTS OF STRAY VOLTAGE TESTS**

Rules 31 through 40

031. PERFORMANCE OF TESTS AND MEASUREMENTS (RULE 31).

Measuring and testing for stray voltage under these rules for consideration by the Commission shall be performed by a qualified testing professional, such as: ~~The following persons are presumed to be qualified testing professionals: ()~~

01. Professional Engineer. A professional engineer, licensed in any state, who has completed no fewer than forty-eight (48) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

02. Master Electrician. A master electrician, licensed in any state, who has completed no fewer than forty-eight (48) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

03. Technician. A technician who, under the supervision of a person presumed qualified under Subsections 031.01 and 031.02, has completed no fewer than eight (8) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

032. DATA ANALYSIS (RULE 32).

Analysis of data under these rules, for consideration by the Commission, shall be performed by a qualified analyst. A professional engineer, licensed in any state, who has completed no fewer than forty-eight (48) hours of stray voltage training and who has been involved in no fewer than five (5) prior investigations involving measurement or testing of stray voltage shall be presumed to be a qualified analyst. ()

033. PERSONS OTHERWISE QUALIFIED (RULE 33).

A person who does not satisfy the qualifications in Sections 031 and 032, may nonetheless be determined by the Commission to be a qualified testing professional or a qualified analyst if, on motion of any party, the Commission finds that person otherwise possesses the knowledge, skill, experience, training, or education that qualifies that person to offer expert testimony before the Commission. ()

034. -- 050. (RESERVED)

CALIBRATION OF AND EQUIPMENT USED FOR MEASURING

Commented [OP11]: Service Providers is already defined in the definitions section. This applicability section didn't change that definition.

Commented [OP12]: This requirement is included in IDAPA 61-803.

**AND RECORDING
VOLTAGE, CURRENT, AND RESISTANCE**

Rules 51 through 60

051. GENERAL REQUIREMENTS FOR STRAY VOLTAGE MEASURING AND RECORDING EQUIPMENT (RULE 51).

Equipment used for the measurement or testing of stray voltage, current, and resistance shall meet the following criteria: ()

01. Resolution and Accuracy. The accuracy and resolution of any instrument used to measure or record cow contact voltage or current, shall limit the error to five percent (5%) or less at one volt (1 V) or two milliamperes (2 mA). ()

02. Voltage Measurement. Instruments used to measure cow contact voltage shall be capable of separating and independently measuring alternating current (AC) and direct current (DC) voltages. These instruments shall have a minimum internal impedance of ten thousand (10,000) ohm and shall be capable of measuring the true-rms voltage. ()

03. Current Measurement. A clamp-on ammeter, a digital multi-meter (DMM) with clamp-on device, or an in-line ammeter shall be used to measure current through a conductor or resistor connected between two (2) points. The meters shall be capable of separating and independently measuring alternating current (AC) and direct current (DC) and shall be capable of measuring the true-rms current. Care must be taken to assure that clamp-on ammeters used have the required resolution and accuracy. ()

Commented [OP13]: Clarification for accuracy. There may be multiple current paths between two points. A clamp-on ammeter only measures the current in the conductor(s) it is clamped around.

04. Resistance Measurement. Resistance shall be measured using either a volt ohmmeter (VOM) or a DMM. Resolution shall be to the level of one (1) ohm or less when measuring a resistance of less than one thousand (1,000) ohm. Accuracy shall be within plus or minus five (+/-5) ohm for a five hundred (500) ohm resistance. ()

05. Resistance-to-Earth Measurement. Grounding electrode resistance-to-earth measurements shall be made with a three- (3) point fall-of-potential instrument or a clamp-on resistance-to-earth tester. ()

052. CALIBRATION REQUIREMENTS (RULE 52).

01. Measuring Equipment Calibration. All measuring equipment shall be calibrated according to the manufacturer's recommended calibration schedule, but no less than annually, to meet the manufacturer's specifications for the accuracy and resolution of the equipment. Measuring equipment shall not be used after its next "calibration due" date for measurements or tests conducted during a stray voltage investigation. Calibration shall be performed by either: ()

a. The manufacturer of the equipment, who shall certify that the equipment meets the manufacturer's specifications for accuracy and resolution; or ()

b. A laboratory currently certified as meeting all applicable Institute of Electrical and Electronic Engineers (IEEE) and International Organization for Standards (ISO) standards. ()

02. Calibration Certificates. The service provider performing the tests and measurements shall maintain certificates from the manufacturer or the calibration laboratory demonstrating compliance with calibration requirements. ()

03. Field Check. Before voltage or current measurement or testing is performed, the instrument shall be field-checked by comparing measurements to those of other instruments or against a known source. ()

053. REQUIREMENTS FOR MONITORING AND RECORDING DEVICES (RULE 53).

Digital recording devices shall be used for the purpose of recording current and voltage for extended periods, such as the forty-eight (48) hour test. The recording devices shall have the same level of resolution and accuracy as the meters being used for the measurements. Monitoring systems, which combine measuring and recording functions in a single instrument, shall have the same level of resolution and accuracy as specified in Section 051. Recording devices and monitoring systems shall be capable of recording transient deviations of one-tenth (0.1) second or less in duration from the steady state. Digital recording devices, which have deviation settings, shall permit the deviation setting to be set "low" enough to meet the resolution and accuracy requirements in Subsection 051.01 of these rules. All recording devices shall be able to log the time and date of all data recorded and shall have their internal clocks synchronized.

()

054. REQUIREMENTS FOR LOAD BOXES (RULE 54).

~~The load box shall meet the following criteria: ()~~

01. Volts. A load box shall be a primarily non-inductive nominal two hundred forty (240) volt, resistance heating type load with a minimum nominal full load of eighteen (18) kilowatts (kW). ()

02. Split-Load. A load box shall be capable of operating at two (2) or more load settings, including approximately fifty percent (50%) and one hundred percent (100%) of the load box's rated total load. ()

055. -- 070. (RESERVED)

**TESTING AND MEASUREMENT PROCEDURES
Rules 71 through 80**

071. STRAY CURRENT OR VOLTAGE TESTS (RULE 71).

Subject to Subsection 071.02, there are six (6) tests used to detect and measure stray current or voltage. ()

01. Scheduling of Stray Voltage Tests. Efforts shall be made to perform the tests under conditions substantially similar to those conditions existing at the time(s) the dairy producer believes stray voltage to be a problem. ()

- a. Test 1 - Cow Contact Test; ()
- b. Test 2 - Forty-Eight (48) Hour Test; ()
- c. Test 3 - Primary Profile Test; ()
- d. Test 4 - Secondary Neutral Voltage Drop Test; ()
- e. Test 5 - Load Box Test; and ()
- f. Test 6 - Signature Test. ()

02. Testing Sequence. Test 1 shall be performed first. Tests 1 and 2 are used to determine the presence and level of stray voltage and shall be performed in all investigations, subject to the provisions of Subsection 071.03. Tests 3, 4, 5, and 6 may be performed in any order and may be performed without first determining that these tests are required under Paragraph 071.02.b. Tests 3, 4, 5, and 6 may be performed prior to starting the recording for Test 2 or while Test 2 is in progress. Test 2 may be interrupted as necessary to conduct Tests 4, 5, and 6, or for review and analysis of the data recorded up to that point. ()

a. If the results from Tests 1 and 2 indicate that stray voltage does not exceed the preventive action level (PAL), the utility has no further testing or remediation obligations under these rules during this test cycle. ()

b. If the PAL is exceeded, the utility shall perform the remaining four (4) tests except as provided in Subsection 071.03. The utility shall also perform analysis to determine whether the portion of the stray current or voltage attributable to an off-farm source exceeds fifty percent (50%) of the PAL. ()

c. If the PAL is exceeded, and the portion of the stray current or voltage attributable to an off-farm source does not exceed fifty percent (50%) of the PAL, the utility has no further testing or remediation obligations. ()

d. If the PAL is exceeded, and the portion of the stray current or voltage attributable to an off-farm source exceeds fifty percent (50%) of the PAL, the utility shall conduct remediation pursuant to Section 091. Under this condition, the forty-eight (48) hour recording of Test 2 may be reduced to no fewer than twenty-four (24) hours. ()

e. For all testing conducted under these rules, the utility shall have a qualified analyst prepare a report pursuant to Section 082. ()

~~03. Suspended or Limited Testing. With the written agreement of both the utility and the dairy producer, a stray voltage investigation may be suspended at any point in the investigation. With the written agreement of both the utility and the dairy producer, the utility may employ a limited set of tests or measurements on a dairy as part of an intentionally limited evaluation. If the utility proposes to suspend a stray voltage investigation or to conduct a limited evaluation, its reasons for doing so shall be set forth in the written agreement between the utility and as agreed between the utility and the dairy producer.~~ ()

072. PREPARATION FOR TESTING (RULE 72).

The person performing the tests shall perform the following: ()

01. Remote Reference Grounding Rod. ()

a. Remote reference grounding rod(s) shall be installed and penetrate moist soil to a depth of thirty (30) inches. When practicable, remote reference rods shall be installed at least twenty-five (25) feet away from the nearest underground conductive electrical equipment of any type or at a distance equal to three (3) to four (4) times the buried depth of any metallic structure connected to the service entrance neutral. The reference ground rod shall be located not closer than twenty-five (25) feet from the centerline of a primary electrical conductor right-of-way. A reference rod shall be located not closer than one hundred (100) feet from the edge of a transmission line right-of-way. ()

b. All remote reference grounding rods shall be checked for "remoteness" prior to their use for tests or measurements and if found to be insufficiently "remote," a new location for that reference ground rod shall be found and retested for remoteness. Remoteness of the reference ground shall be determined by measuring the voltage from the transformer grounding electrode conductor to the remote reference ground. The resistance-to-earth of the transformer grounding electrode shall be measured. The grounding electrode current shall be measured. Remoteness is considered adequate if the measured voltage (transformer grounding conductor to reference ground, V_p) is within twenty percent (20%) of the voltage calculated by multiplying the grounding electrode current by the grounding electrode resistance-to-earth. ()

c. If the transformer grounding electrode is within twenty-five (25) feet of other primary or secondary grounding electrodes, this remoteness test shall be conducted at the first primary system grounding electrode upstream of the transformer that is greater than twenty-five (25) feet from other primary or secondary system grounding electrodes. ()

02. Inspecting the Transformer(s). Prior to testing, the utility transformer shall be inspected, grounding electrode resistance measured, and any repairs necessary for safety be made and recorded. In the case of a customer-owned transformer, qualified personnel shall inspect the installation, measure grounding electrode resistance, and make and record any repairs necessary for safety. Measurements that require contact with utility or customer-owned primary wires or equipment shall be made by the utility or other qualified personnel. ()

Commented [OP14]: Aligns better with the practice of performing "spot checks" requested by dairy producers and electricians.

03. In-Line Ammeters. If in-line or series ammeters are used, they shall be installed under safe conditions in accordance with ~~the National Electrical Safety Code~~ NESC and the ~~National Electrical Code~~ NEC with the entire dairy system or the specific circuit to be tested de-energized. ()

04. Pre-Test Documentation.()

a. All pre-test calibration requirements from Section 052 shall be completed and documented. ()

b. A sketch or drawing of the dairy shall be prepared indicating: ()

i. The location of the buildings; ()

ii. Secondary electrical service panels and secondary feeder systems serving cow contact areas; ()

iii. Transformer(s) and central distribution point; ()

iv. Existing grounding electrodes (if known); ()

v. The location of all cow contact points to be tested; ()

vi. All remote reference grounding rods; and ()

vii. All primary and secondary neutral test points used in conjunction with the remote reference grounding rod(s). ()

c. A listing of planned test points shall be prepared using the applicable form prior to beginning each test. Each test shall be listed separately and specific reference numbers shall be given to each planned test point. ()

05. Safety. ()

a. If the service provider reasonably concludes that a dairy's noncompliance with the ~~National Electrical Code~~ NEC poses a significant and immediate safety hazard which prevents completion of any test or measurement required by these rules, then the service provider's obligations to proceed under these rules shall be suspended until the hazard is eliminated. ()

b. At the discretion of the service provider conducting the test, livestock shall be removed from any area where electrical equipment or wiring is examined or electrical measurements are taken. Testing may be suspended if the presence of cows or other animals creates a potential hazard to testing personnel. The locations of electric fences and other electrified cow control devices shall be noted and de-energized where practical. ()

073. TEST 1 -- COW CONTACT TEST (RULE 73).

01. Purpose. ~~The purpose of~~ this test is to determine the location(s), if any, where stray current or voltage exceeds the ~~preventive action level~~(PAL) and to identify the location(s) at which the cow contact voltage will be recorded in the forty-eight (48) hour test. ()

02. Selection of Cow Contact Points. The selection of cow contact points to be tested shall include a sufficient number of locations reasonably likely to demonstrate the presence of stray voltage or current, if any. ()

03. Conducting the Test. The voltage across the shunt resistor or current through the shunt resistor

shall be measured between cow contact points as shown in Figure 1. The source resistance shall be calculated during analysis for all cow contact points.

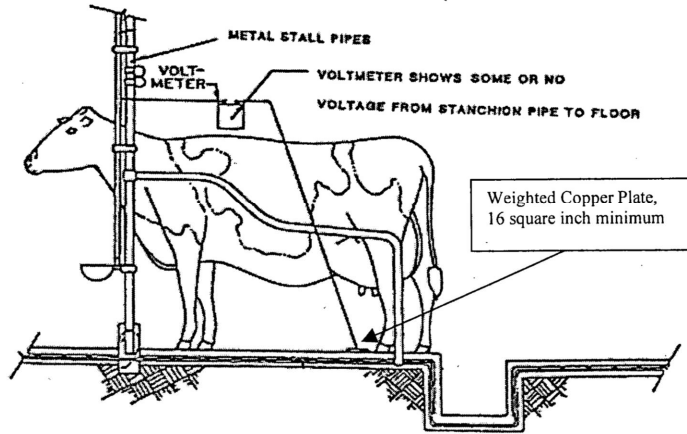


Figure 1, Cow Contact Test.

Commented [SG15]: All figures and Appendices will be posted to the Commission website at www.puc.idaho.gov

a. When using a voltmeter to measure voltage between contact points where one (1) of those points is the floor surface, the equipment shall be arranged as shown in Figures 1 and 2, using a metal plate, which shall make a high quality conductive contact with the ground or floor. If the service provider is unsure of having a high quality conductive contact with the floor or ground, then the procedure described in Paragraph 073.03.c. shall be followed. If necessary, corrosion shall be removed from the point(s) where test lead(s) make contact with metal equipment.

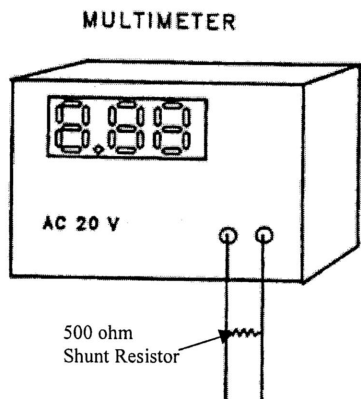


Figure 2, Cow Contact Voltage Measurement.

(—)

b. When using an in-line milliammeter or a clamp-around milliammeter to measure current between contact points and one (1) of those points is the floor surface or earth, the equipment shall be arranged as shown in Figure 3, using a metal plate which shall make high quality conductive contact with the ground or floor. If the service provider is unsure of having a high quality conductive contact with the floor or ground, then the procedures described in Paragraph 073.03.c. shall be followed. If necessary, corrosion shall be removed from the point(s) where test lead(s) make contact with metal equipment.

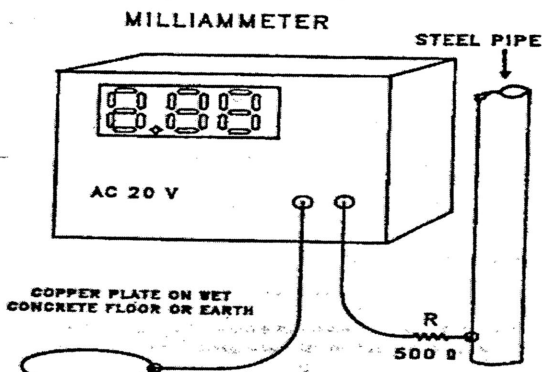


Figure 3, Set Up for Measuring Current Cow Contact Point to Ground (—)

c. A metal plate used to make an electrical contact with the earth or floor shall be of regular shape (square, rectangular or round), and shall have a surface area equal to or greater than sixteen (16) square inches (4 inches x 4 inches or equivalent). Place a weight not less than twenty (20) pounds on the metal plate. This weight shall be applied evenly across the metal plate and not to the adjacent concrete or earth. Place the metal plate a minimum distance of twelve (12) inches from any metal equipment making contact with the floor or earth. ()

i. Where the metal plate is to be placed on a concrete floor, the surface shall be flat. Clean the floor surface with a ~~wire~~ stiff brush to remove debris that may add excess resistance. Use water to clean the floor surface at the point where the metal plate will be placed. Place a paper towel or similar material soaked in saltwater between the metal plate and the concrete floor. ()

ii. Where the metal plate is to be placed on the ground or earth surface, the surface shall be flat. Remove any debris and add water to the area, if necessary, to dampen the soil. The surface of the metal plate that will make contact with the earth shall be clean and free of corrosion before use. Remove any corrosion, if necessary. ()

04. **Recording the Data.** The person conducting this test shall record the location of, and measured values at, each test point. At each cow contact location, an open circuit voltage reading (V_{oc}) and a voltage with five hundred (500) ohm nominal shunt resistor placed across the input to the meter (V_{shunt}) shall be taken. These readings shall be taken with ten (10) seconds or less time between each reading. Alternatively, a current measurement (I_{shunt}) may be taken in place of the voltage reading (V_{shunt}). Data for these test points shall be recorded on the form in Appendix 1. ()

05. **Source Resistance Calculation.** The source resistance (R_{source}) shall be calculated for each cow

Commented [OP16]: A stiff plastic brush is equally effective and doesn't rust or shed short fine metal wires.

contact location measured and the value recorded in Appendix 1. The following formulas shall be used to calculate source resistance.

$$R_{\text{source}} = \frac{V_{\text{oc}} - V_{\text{shunt}}}{V_{\text{shunt}}} \times R_{\text{shunt}}$$

$$R_{\text{source}} = \frac{V_{\text{oc}}}{I_{\text{shunt}} - R_{\text{shunt}}} \quad ()$$

074. TEST 2 -- FORTY-EIGHT HOUR TEST (RULE 74).

01. Purpose. ~~The purpose of~~ this test is to determine whether stray current or voltage exceeds the ~~preventive action level (PAL)~~ at selected location(s) over a forty-eight (48) hour period, subject to Subsection 074.06 and Paragraph 071.02.d. The test also demonstrates whether the primary or secondary sides of the system have a specific impact on the recorded current or voltage at specific times of day. ()

02. Setup. A digitizing data recorder with averaging capability and capable of detecting and recording transient deviations of one-tenth (0.1) second or less in duration shall be used to record the following: ()

- a. Voltage from primary neutral at the transformer to remote reference ground, Vp. ()
- b. Voltage from secondary neutral in the service panel serving the area of the cow contact to remote reference ground, Vs. ()
- c. Voltage drops (Vps) from primary neutral at the location of connection for Vp to secondary neutral at the location of the connection for Vs. ()
- d. Cow contact current through (Icc) or voltage across a five hundred (500) ohm resistor at the high voltage point(s) found in Test 1, Vcc. ()

03. Measurement Interval. The results of the forty-eight (48) hour test may be highly indicative of the presence of stray voltage. A recording interval as high as ten (10) seconds may be used provided that transient deviations of voltage or current of one-tenth (0.1) second or less in duration of voltage or current are recorded to the maximum ability of the instrument. ()

04. Measurement at the Cow Contact Point(s). Measurements to the earth or concrete surface shall be to a metal plate as described in Paragraph 073.03.c. When making measurements to metal objects, corrosion shall be removed to obtain a low resistance connection. ()

05. Recording the Data. ~~All of the~~ data gathered by the recording equipment during the forty-eight (48) hour test including transients shall be downloaded and retained with the records of the investigation. In addition, the steady-state data shall be summarized in the investigation report. The recorded data shall be made available to the dairy producer or utility upon request. The person conducting this test shall record the location of, and measured values at, each test point. The identification of the cow contact point shall be recorded on the form in Appendix 2. Transient deviations shall be recorded on the supplemental data form, page 3 of 3 in Appendix 2. A plot of the voltage versus time may be substituted for the recording of measured values in Appendix 2. ()

06. Reduced Recording Period. If a qualified analyst concludes that remediation by the utility is

required under Paragraph 071.02.d. prior to the completion of a forty-eight (48) hour recording period, the recording period may be reduced to no fewer than twenty-four (24) hours. ()

075. TEST 3 -- PRIMARY PROFILE TEST (RULE 75).

01. Purpose. The purpose of this test is to measure or calculate neutral-to-earth voltage (NEV) for a multi-grounded distribution system. ()

02. Conducting the Test. The primary profile test requires concurrent measurement of the ground electrode resistance and current at all primary system ground points within three quarters (3/4) of a mile on either side of all primary service points serving the dairy, or to the end of the line if less than three quarters (3/4) of a mile. Alternatively, the voltage between a remote grounding rod and the primary ground point being tested may be measured. ()

a. This test shall be conducted starting at one (1) end of the distribution system and working toward the other end along the main primary distribution system. Figure 4 below illustrates the procedure. ()

i. Where the dairy is served by a dedicated tap of less than one-half (1/2) mile in length from a distribution line, the neutral-to-earth voltage shall be measured at each primary ground along the tap and along the distribution line to a distance of three-quarters (3/4) of a mile in each direction from the point of the tap; or ()

ii. Where a dairy is served by a dedicated tap that extends more than one-half (1/2) mile from the distribution line, the neutral-to-earth voltage shall be measured at each primary grounding electrode along the tap and along the distribution line to a distance of one-half (1/2) mile in each direction from the point of the tap. ()

03. Recording the Data. The person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 3.

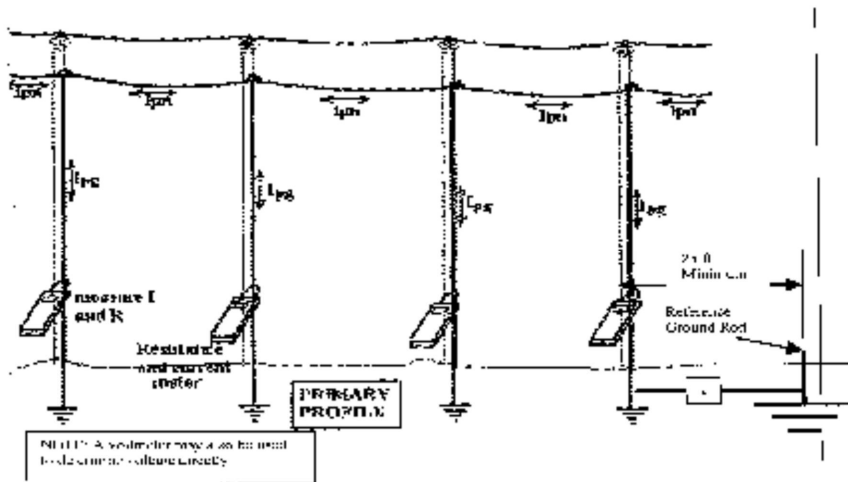


Figure 4, Primary Profile Test ()

076. TEST 4 -- SECONDARY NEUTRAL VOLTAGE DROP TEST (RULE 76).

01. **Purpose.** This test is used to determine the impact of each secondary service on the neutral-to-earth (NEV) and cow contact voltages on the dairy under controlled conditions. ()

02. **Conducting the Test.** This test shall be performed for all service entrances. A proxy load of known characteristics (such as a resistive load like a one hundred twenty (120) volt, fifteen hundred (1,500) watt hairdryer) is required for this test. The proxy load must create a known and stable current and subsequent voltage drop for each neutral serving a main panel, sub-panel or end-of-service area. All service entrances other than that being tested shall be turned "off" to perform this test. A diagram showing the connections and measurement points for this test is shown in Figure 5.

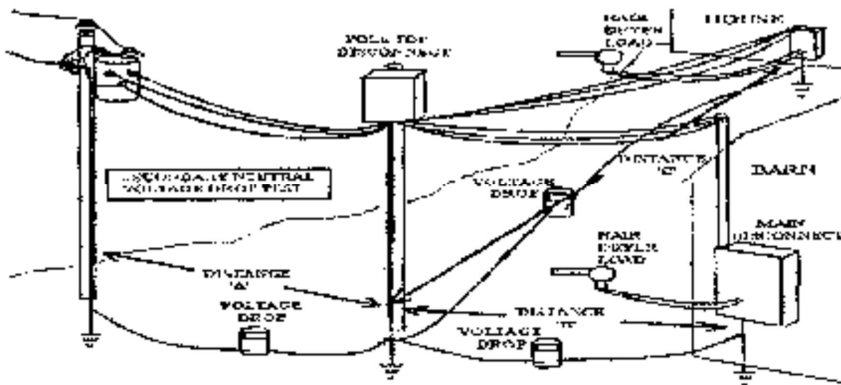


Figure 5, Secondary Neutral Voltage Drop Test Arrangement. ()

03. **Data Collection.** The following data shall be collected for each secondary neutral tested: ()
- a. Gauge and type of neutral wire. ()
 - b. Length of neutral wire. ()
 - c. Neutral current, I_{sn} . ()
 - d. Voltage drop (V_{DropM}) between both ends of the secondary neutral being tested. ()
 - e. Cow contact voltage (V_{cc}) or current (I_{cc}) at the same points used in the forty-eight (48) hour test. ()
 - f. Primary neutral at the transformer to reference ground voltage, V_p . ()
 - g. Secondary neutral to reference ground voltage, V_s . ()

04. **Measurements.** The three (3) voltages (V_{cc} , V_p and V_s) shall be measured with the proxy load "off" and "on." Calculated expected voltage drops (V_{DropC}) (see Appendix 4) shall be compared with measured voltage drops (V_{DropM}). If the measured and calculated voltage drops differ significantly, further investigation shall be undertaken to determine the source of additional voltage drop within the circuit. Neutral current shall be measured

and recorded with the proxy load on (Isn). ()

05. **Recording the Data.** Any person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 4. ()

077. **TEST 5 -- THE LOAD BOX TEST (RULE 77).**

01. **Purpose.** This test is used to determine the extent to which the primary system contributes to stray current or voltage at cow contact points. For dairies with three (3) phase balanced primary service, the service provider shall perform Steps One and Two in Paragraph 077.02.b. below. ()

02. **Conducting the Load Box Test.** This test shall be performed at the same time of day as the time(s) of highest cow contact voltage found in the forty-eight (48) hour test. During this test, voltage and current shall be measured and recorded at the points indicated in Figure 6.

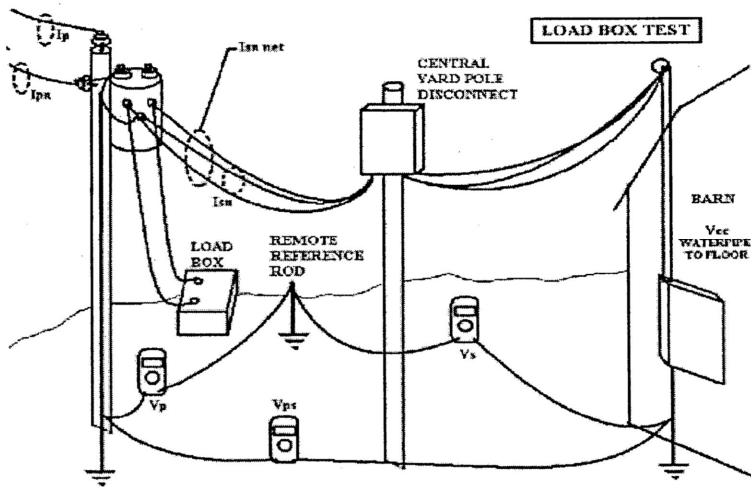


Figure 6, Load Box Test. ()

a. The load box test requires the recording of eight (8) data points during each of the five (5) test steps. The eight (8) data points that shall be measured or calculated and recorded for each step are: ()

- i. Primary line to neutral voltage, V_{pri} . ()
- ii. Load Box Current, I_{lb} . ()
- iii. Voltage at load box connection to secondary system, V_{lb} . ()
- iv. Calculate transformer current I_p using $I_p = \frac{I_{lb} \times V_{lb}}{V_{pri}}$. ()

- v. Voltage from primary neutral at the transformer to remote reference ground rod, V_p . ()
- vi. Voltage from secondary neutral in the service panel serving the area of the cow contact to remote reference ground rod, V_s . ()
- vii. Voltage from primary neutral at the transformer to secondary neutral at the service panel serving the area of cow contact, V_{ps} . ()
- viii. Cow contact voltage (V_{cc}) or current (I_{cc}) at the same point(s) used in the forty-eight (48) hour test. ()

b. Except for dairies with three (3) phase balanced primary service, the following five (5) test steps shall each be conducted for at least two (2) minutes, ~~and the data shall be recorded for each step:~~ ()

- i. Step One: The load box shall be de-energized, the dairy shall remain “on,” ~~and the data shall be recorded.~~ ()
- ii. Step Two: The load box shall be de-energized, the dairy shut “off,” ~~and the data shall be recorded.~~ ()
- iii. Step Three: The load box shall be set to half load, the dairy shut “off,” ~~and the data shall be recorded.~~ ()
- iv. Step Four: The load box shall be set to full load, the dairy shut “off,” ~~and the data shall be recorded.~~ ()
- v. Step Five: The load box shall be set to full load, the dairy shall be turned “on,” ~~and the data shall be recorded.~~ ()

03. Calculating the K Factor. The K factor is a calculated ratio (V_{cc}/V_s). The K factor should be less than one (1) because V_{cc} (cow contact voltage) should be less than V_s (the dairy ground to reference ground voltage). If the K factor is greater than one (1), then there is contribution to V_{cc} from sources other than V_s . ()

04. Recording the Data. The person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 5. ()

078. TEST 6 -- SIGNATURE TEST (RULE 78).

01. Purpose. This test is used to determine the contribution to stray current or voltage of individual pieces of equipment operating on the dairy. The test is best performed when there is minimal farm electrical activity. ()

02. Conducting the Signature Test. During this test, individual pieces of major current drawing equipment shall be started and stopped. The effects of starting, operating, and stopping each piece of equipment shall be measured and recorded for a period of operation of at least fifteen (15) seconds. The person conducting the test shall identify and record the equipment being tested and record the specific times that the equipment was started and stopped. A digitizing data recorder with averaging capability shall be used to measure and record the required electrical data. These measurements shall be taken at the same locations at the dairy where measurements were taken for the purpose of the load box test and forty-eight (48) hour test. ()

- a.** Voltage from primary neutral at the transformer to remote reference ground rod, V_p . ()
- b.** Secondary neutral at the service panel serving the area of cow contact to remote reference ground voltage, V_s . ()

Commented [SG17]: Streamlining the wording

c. Primary neutral voltage drop (Vps) from the location of connection for Vp to secondary neutral voltage at the location of the connection for Vs. ()

d. Cow contact voltage (Vcc) or current (Icc) at the preselected point. ()

03. Recording the Data. All of the data gathered by the recording equipment during the signature test, including transients shall be downloaded and retained with the records of the investigation. In addition, the steady state data shall be summarized in the investigation report. The recorded data shall be made available to the dairy producer or utility upon request. The location of all test point(s) shall be recorded on the form in Appendix 6. A plot of the voltage versus time may be substituted for the recording of measured values on Appendix 6. ()

079. -- 080. (RESERVED)

ANALYSIS AND REPORTING THE DATA

Rules 81 through 90

081. ANALYZING THE COLLECTED DATA (RULE 81).

01. Cow Contact Points. Examine the data recorded for the forty-eight (48) hour test in Appendix 2 and determine the highest steady state value of cow contact voltage (Vcc) or current (Icc). Determine the value of primary neutral to reference voltage (Vp) that was present for the highest cow contact value. Record these values on the data sheet of Appendix 7. These values shall be identified as "test cow contact voltage or current" ($V_{cc\ 48hr}$ or $I_{cc\ 48hr}$) and "primary neutral to reference voltage at time of maximum cow contact voltage or current" ($V_{p\ 48hr}$). The three (3) data sets created from the values are: ()

a. The primary to reference ground voltage and the cow contact voltage or current measured during the load box test (Appendix 5) with the farm power "off" and the load box "off" shall be recorded on the data sheet of Appendix 7 as $V_{p\ OFF}$ and either $V_{cc\ OFF}$ or $I_{cc\ OFF}$. ()

b. The primary to reference ground voltage and the cow contact voltage or current measured with the load box set at one-half (1/2) load shall be recorded on the data sheet of Appendix 7 as $V_{p\ HALFLOAD}$ and either $V_{cc\ HALF\ LOAD}$ or $I_{cc\ HALF\ LOAD}$. ()

c. The primary to reference ground voltage and the cow contact voltage or current measured with the load box at maximum shall be recorded on the data sheet of Appendix 7 as $V_{p\ FULL\ LOAD}$ and either $V_{cc\ FULL\ LOAD}$ or $I_{cc\ FULL\ LOAD}$. ()

02. Contributions to Stray Voltage or Current for Single Phase Dairies. The utility contribution to cow contact voltage or current shall be determined using the following formula. Compare the values determined to the preventive action level (PAL).

Utility contribution to

$$\text{cow contact voltage} = \frac{V_{p48} - V_{pHALF}}{V_{pFULL} - V_{pHALF}} \times (V_{cc\ FULL} - V_{cc\ HALF}) + V_{cc\ HALF}$$

or

Utility contribution to

$$\text{cow contact current} = \frac{V_{p48} - V_{pHALF}}{V_{pFULL} - V_{pHALF} \times (I_{ccFULL} - I_{ccHALF}) + I_{ccHALF}} \quad (\quad)$$

03. Contributions to Stray Voltage or Current for Three Phase Dairies. The utility contribution to cow contact voltage or current for dairies with three (3) phase balanced load service, shall be determined by directly using the results of the load box test results for Step 1 and Step 2 as specified in Paragraph 077.02.b. ()

a. The Vcc measured during Step 1 of the load box with the load box “off” and the dairy “on” will be the total Vcc. ()

b. The Vcc measured during Step 2 of the load box test with the load box “off” and the dairy “off” is the contribution to Vcc from the utility, Vccutility. ()

c. The contribution to Vcc by the dairy is the difference between Vcc and Vccutility, Vccdairy = Vcc - Vccutility. ()

082. REPORTING (RULE 82).

Within a reasonable period of time after completion of any tests required to be performed by the utility under these rules, a qualified analyst shall prepare a written report. The report shall include a summary of the tests performed, a copy of the sketch or drawing of the dairy prepared pursuant to Section 072, all of the data or results obtained from the tests, and an analysis of the data or results obtained from the tests. If remediation was required under these rules, the report shall specify the actions taken or to be taken. The utility shall provide a copy of the written report to the dairy producer. ()

083. – 090. (RESERVED)

**REMEDIAL ACTIONS AND COMMISSION PROCEEDINGS
Rules 91 through 92**

091. REMEDIATION (RULE 91).

01. Utility System. If the utility is required to conduct remediation, it shall commence such remediation within five (5) business days. The utility shall diligently pursue to completion remedial procedures which shall reduce, and are reasonably likely to sustain, that portion of the stray current or voltage attributable to the utility’s distribution system to a level equal to or less than fifty percent (50%) of the ~~preventive action level (PAL)~~. This may include addressing other off-dairy sources. ()

02. Other Dairies, Farms and Industrial Sites. If a utility’s contribution to stray voltage exceeds fifty percent (50%) of the ~~preventive action level (PAL)~~ and the utility determines that another customer is a significant contributing source of stray voltage, the utility shall notify both the dairy and the other customer in writing. ()

092. COMMISSION PROCEEDINGS (RULE 92).

01. Filing with the Commission. All petitions seeking relief under Section 61-805, Idaho Code, shall be filed with the Commission Secretary pursuant to Section 005. Petitions shall conform to IDAPA 31.01.01, ~~“Rules of Procedure of the Idaho Public Utilities Commission,”~~ Section 053. The petitioner shall file an original and five (5) copies of the petition. ()

~~**02. Contents of Petition.** The petition shall conform to IDAPA 31.01.01, “Rules of Procedure of the~~

Idaho Public Utilities Commission," Section 053. The petition shall contain background information, the date the notice was filed with the serving utility, a description of the alleged incident(s) of non-compliance with the Stray Current and Voltage Remediation Act, and the remediation actions (if any) undertaken by either the utility or the dairy. A copy of the utility's entire stray voltage report shall accompany the petition.

Commented [SG18]: This is in IDAPA 31.01.01

0XX. FIGURES AND APPENDICES (RULE XX)

01. All figures and appendices can be found on the Commissions website at www.puc.idaho.gov

Commented [SG19]: All figures and Appendices will be posted to the Commission website at www.puc.idaho.gov

093. -- 999. (RESERVED)

**APPENDIX 1
TEST 1—
COW CONTACT POINT DATA FORM**

Dairy Name: _____ Date: _____
 Dairy Location: _____
 Shunt Resistor: _____ ohm(**Rshunt**)

Item #	Contact Point Identifier	Contact Point Description	Voltage Measured w/o Shunt Resistor Vcc	Voltage Current Measured w/Shunt Resistor Vcc	Source Resistance Calculated Rsource	Comments
1						
2						

**TEST 1—
COW CONTACT POINT DATA FORM INSTRUCTIONS**

1. The total information provided by the contact point identification, the contact point description, and the dairy sketch(es) shall be sufficient to allow a third party to accurately repeat the test locating the correct cow contact points for a specific contact voltage.
2. The voltages measured in this test shall be determined using the same instrument(s) for both data points. One reading shall be taken immediately following the other using the same meter.
3. The actual source resistance is calculated from the known shunt resistance and the measured voltage.
4. Record comments as appropriate or necessary.

$$R_{source} = \frac{V_{oc} - V_{shunt}}{V_{shunt}} \times R_{shunt}$$

_____ or _____

$$R_{source} = \frac{V_{oc}}{I_{shunt}} - R_{shunt}$$

APPENDIX 2

**TEST 2—
“48 HOUR” TEST REPORT FORM 1**

Customer Name: _____ Date: _____
 Start Time: _____ Stop Time: _____
 Contact Point Identifier Number: _____

Hour	Time of Occurrence (Hr, Min) of Highest Steady State V _{cc} or I _{cc}	Voltage Across (Current Thru) R _{shunt} -V _{cc} or I _{cc}	Primary Neutral to Referenced Ground V _p	Secondary Neutral to Reference Ground V _s	Primary to Secondary Voltage Drop V _{ps}	Duration Steady State V _{cc} or I _{cc} Exceeded PAL in One Hour Period
1						
2						

**TEST 2—“48 HOUR” TEST REPORT FORM 1
INSTRUCTIONS**

Record the following data with a long term digitizing data recorder or its equivalent for a minimum of 48 hours as specified in Rule 074:

- a. Voltage from primary neutral to remote reference ground, V_p, at transformer.
- b. Secondary neutral to remote reference ground voltage, V_s, at the electrical panel serving the area for the V_{cc} or I_{cc} selected.
- c. Primary neutral to secondary neutral voltage, V_{ps}, between points of connection for V_p and V_s.
- d. Steady state cow contact voltage or current at the preselected point(s) with the highest cow contact voltage or current recorded in Test 1, V_{cc} or I_{cc}.

Steady State Data:

Steady state data recorded during the 48 hour test shall be presented in tabular format on Form 1 as described below, or it shall be presented graphically. Graphical presentation shall include a time scale for the entire recording period and a clear indication of the steady state readings of V_{cc} or I_{cc}, V_p, V_s and V_{ps} for the recording intervals.

The scale(s) shall be such that steady state cow contact voltages or currents at or above the PAL are easily identifiable.

—— If using tabular format, the analyst shall enter data in the table for each hour of the 48 hours of the test in chronological order. The data recorded in the table shall include: the specific time that the highest steady state value of V_{cc} or I_{cc} was recorded in that hour; all four corresponding data points recorded at that time (V_p, V_s, V_{ps} and V_{ec} or I_{ec}), and the total time during the hour that the steady state V_{cc} or I_{cc} exceeded the PAL.

**TEST 2—REPORT FORM 2
SUPPLEMENTAL DATA FOR FARM OWNER
TRANSIENT DEVIATIONS FOUND DURING “48-HOUR” TEST**

Customer Name: _____ Date: _____
Start Time: _____ Stop Time: _____
Contact Point Identifier Number: _____

Hour	Time of Highest Peak V _{cc} (I _{cc})	Highest Voltage Recorded	Total Number Transient Deviations	No. Transient Deviations Exceeding 1.0 Volts with Peak Magnitude Greater than 1.0 Volts (2.0 milliamps)
4				
2				

Transient deviations occur due to electrical events such as motor starts. The PAL level is 1.0 volt for steady state voltages but PAL does not apply to transient voltage deviations.

**TEST 2—“48 HOUR” TEST REPORT FORM 2
INSTRUCTIONS**

Recording Transient Data:

—— For the purpose of identifying and reporting transient deviations, a transient deviation occurs when the recorded maximum V_{cc} or I_{cc} in a recording interval exceeds two hundred percent (200%) of the steady state V_{cc} or I_{cc} recording during the same recording interval.

—— Transient data recorded during the 48 hour test shall be presented in tabular format on the “48 hour Test—Transient Deviation Data” form as described below, or it shall be presented graphically. Graphical presentation shall include a time scale for the entire recording period and a clear indication of the maximum V_{cc} or I_{cc} recorded for the recording intervals. The scale(s) shall be such that V_{cc} transient deviations at or above two (2.0) volts, or I_{cc} transient deviations at or above four (4) milliamps, are easily identifiable.

—— If using a tabular format, the analyst shall enter data in the table for each hour of the 48 hours of the test in chronological order. The data recorded in the table shall include; the specific time during the hour that the transient deviation in V_{cc} or I_{cc} with the largest peak magnitude occurred, the corresponding peak V_{cc} or I_{cc}, the total number of transient deviations recorded in that hour, and the total number of transient deviations recorded in that hour with a

peak magnitude of two (2) or more volts for V_{cc} or four (4) or more milliamps for I_{cc}.

APPENDIX 3

**TEST 3—
PRIMARY PROFILE DATA FORM**

Dairy Name:

Dairy Location:

Date:

Item	Pole Location & Identification	Time	Current Primary Ground I _{pg}	Resistance Primary Ground R _{pg}	Calculated Voltage (primary neutral-to-earth) V _{pne}	Measured Voltage (primary neutral-to-earth) V _{pne}	
#			(mA)	(Ohm)	(V)	(V)	Notes
1							
2							

Note: If V_{pne} is measured it is not required to measure I_{pg} and R_{pg} for determination of the calculated V_{pne}. In cases where V_{pne} is calculated the following formula is used:

$$\text{Calculated } V_{pne} = (I_{pg} \times R_{pg}) / 1000$$

APPENDIX 4

**TEST 4—
SECONDARY NEUTRAL VOLTAGE DROP TEST**

Test Performed by:

Date:

Customer Name:

(All other farm loads must be off. Use only one load per circuit.)

=

	SITE:	1	2	3	4	5	
A	Site Location						Units
B	Circuit Neutral Wire Gauge						AWG

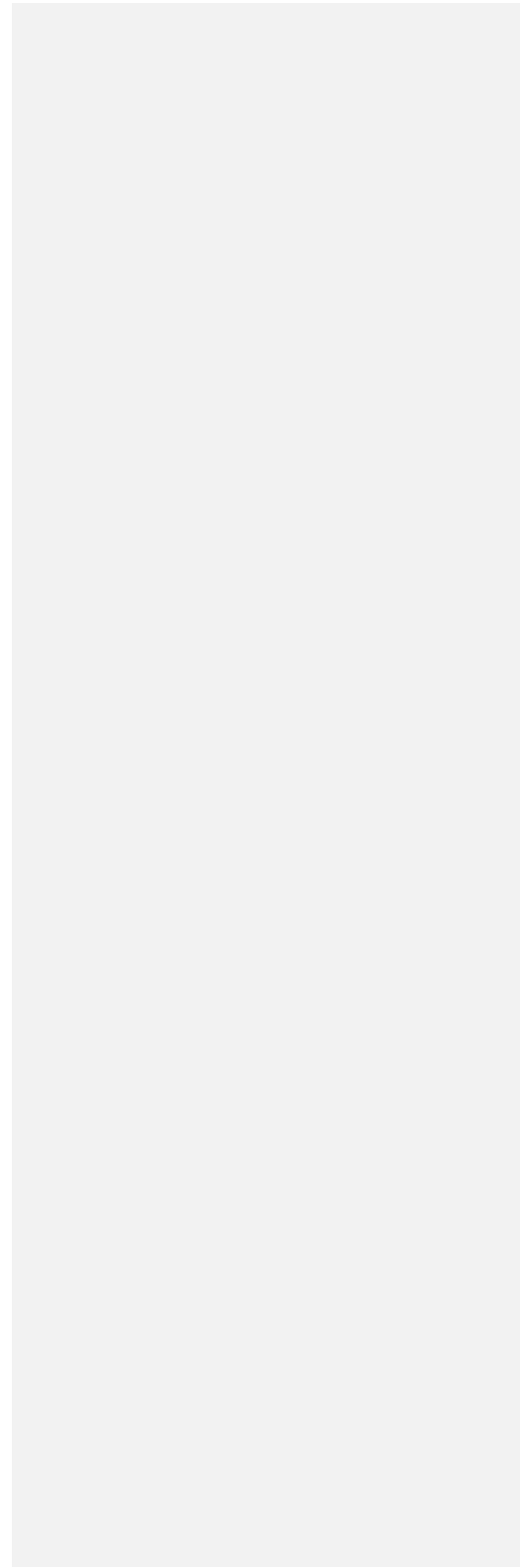
C	Circuit-Neutral AL or CU						
D	Wire length (in 100's ft.)						100 ft.
E	$\frac{\Omega}{100 \text{ ft.}}$						$\frac{\Omega}{\text{ft.}}$
F	Total Resistance (D times E)						Ω
G	Measured Neutral Current, I _{sn}						A
H	Calculated Voltage Drop, V_{DropC} (F times G)						V
I	Measured Voltage Drop, V_{DropM}						V
J	Percent difference $\frac{ (H-I) }{H} \times 100$						%
	V _p load "off"						V
	V _s load "off"						V
	V _{cc} load "off"						V
	I _{cc} load "off," if measured						
	V _p load "on"						V
	V _s load "on"						V
	V _{cc} load "on"						V
	I _{cc} load "on," if measured						

**TEST 4—
SECONDARY NEUTRAL VOLTAGE
DROP TEST
INSTRUCTIONS**

ITEM — EXPLANATION

A-J — Describe load site location, neutral wire gauge, neutral wire length (in 100s of feet), resistance per 100 feet

(see table below), measured neutral current, measured voltage drop, V_p , V_s and V_{ce} or I_{ce} for load "off" and load "on."



ATTACHMENT 2

**31.61.01 – RULES FOR THE MEASUREMENT OF
STRAY CURRENT OR VOLTAGE
(THE STRAY VOLTAGE RULES)**

GENERAL PROVISIONS

Rules 0 through 11

000. LEGAL AUTHORITY (RULE 0).

Idaho Public Utilities Law, Sections 61-515 and 61-520, Idaho Code, and the Stray Current and Voltage Remediation Act, Section 61-803, Idaho Code. ()

001. TITLE (RULE 1).

01. Title. The title of these rules is the IDAPA 31.61.01, “Rules for the Measurement of Stray Current or Voltage” (Stray Voltage Rules). ()

004. INCORPORATION BY REFERENCE – REFERENCE TO SAFETY CODES (RULE 4).

01. Safety Codes.

a. The National Electrical Safety Code (NESC) is applicable to public utilities and is adopted by Commission Order, “Safety and Accident Reporting Rules for Utilities Regulated by the Idaho Public Utilities Commission.” ()

b. The National Electrical Code (NEC) is applicable to the installation of wires and facilities used to convey electric current and to apparatus to be operated by such electric current. Adoption of the National Electrical Code is found at Section 54-1001, Idaho Code, and IDAPA 07.01.06, “Rules Governing the Use of National Electrical Code,” Section 011. ()

005. – 009. (RESERVED)

010. DEFINITIONS (RULE 10).

01. These Rules incorporate by reference definitions found in Idaho Code 61-802, the NEC, and the NESC.

~~**02.** **Ampere.** A unit of measure of current. A milliamper is one one thousandths (1/1,000) of an ampere.~~ ()

~~**05. Equipotential Plane (EPP).** See NEC 547.2. Means an area where wire mesh or other conductive elements are embedded in or placed under concrete, bonded to all metal structures and fixed nonelectrical equipment that may become energized, and connected to the electrical grounding system to prevent a difference in voltage from developing within the plane.~~ ()

07. Primary System. High voltage utility electrical system including the generation, transmission and distribution systems. It also refers to the high voltage side of a distribution transformer. ()

08. Secondary System. The low-voltage utility electrical system on the secondary side of a distribution transformer. The dairy’s on-farm system begins on the dairy’s side of the metering points, except for dairies metered

Commented [OP1]: Explicitly adding NEC and NESC as additional sources of definitions.

Commented [OP2]: Standard terminology – may be omitted without creating confusion. (NEC doesn’t include it, and we don’t include “volt”.)

Commented [OP3]: Definition was effectively identical to NEC definition. Replacing definition with a citation will keep the definition of EPP consistent.

on the high voltage side of the transformer(s). In the case of dairies metered on the high voltage side, the on-farm system begins at the transformer's low-voltage lugs. ()

09. **Service Provider.** ~~Means a~~Any person, company or other legal entity providing stray voltage or current testing, consulting, measurements, analysis services, construction, or hardware. ()

10. **Shunt Resistor.** A physical resistor or combination of resistors used to simulate a dairy cow's ~~body resistance, body-to-metal contact resistance, and hoof-to-earth contact resistance between the cow and contact points~~ during the measurement of cow contact voltage. ~~A~~a shunt resistor shall be five hundred (500) ohm plus or minus two percent (+/- 2%). ()

Commented [OP4]: Clarification of original definition. Cows don't make a nearly zero-ohm connection to their environment like metal voltage test-leads can. The 500-ohm shunt resistor is intended as a substitute for both the cow's internal body resistance and any contact resistance between a cow and its environment. (ref. IEEE Std. 1695-2016 section 5.5.1.4, and USDA 696 pg 5-5, 5-10.

11. **Source Resistance.** ~~Means t~~That portion of resistance in the circuit, other than the resistance of the cow ~~and its contact resistance~~, when the cow is completing a circuit between contact points. ~~Body-to-metal contact resistance and hoof-to-earth resistance may represent a portion of the source resistance.~~ ()

Commented [OP5]: See above – contact resistance is included in the shunt resistor for measurement purposes.

12. ~~Steady State. The value of a current or voltage after an amount of time has passed where all transients have decayed to a negligible value.~~ ()

Commented [OP6]: Defined in IDAPA 61-802

13. **Stray Current or Voltage.** ~~Stray voltage or current is:~~ ()

~~a. Any steady state, sixty (60) hertz (Hz) (including harmonics thereof) root mean square (rms) alternating current (AC) less than twenty (20) milliamperes (mA) through a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter; or~~ ()

~~b. Any steady state, sixty (60) Hz (including harmonics thereof), rms AC voltage of less than ten (10) volts, across (in parallel with) a five hundred (500) ohm resistor (i.e., shunt resistor) connected between cow contact points, as measured by a true rms meter.~~ ()

~~c. Stray current and voltage is a normal, inherent and unavoidable result of electricity traveling through grounded electrical systems, including a dairy producer's on-farm system and a utility's distribution system. These systems are required by the (NEC) and the (NESC) to be grounded to the earth to ensure safety and reliability.~~ ()

Commented [OP7]: Defined and described in IDAPA 61-802. Note – (d) should be kept.

d. Unless the context otherwise requires, the term "stray voltage" shall mean stray current or stray voltage. ()

14. **Tests, Measurements, Procedures and Analysis.** ~~Means a~~Any or all of the stray voltage testing, measurement, work and work product defined in these rules. ()

15. **Transient or Transient Deviation.** ~~Transient or transient deviation means a~~ A non-steady state increase or spike in voltage or current. For the purpose of identifying and reporting transients in cow contact voltage (Vcc) or current (Icc), a transient occurs when the recorded maximum Vcc or Icc in a recording interval exceeds two hundred percent (200%) of the steady state Vcc or Icc recorded during the same recording interval. ()

16. **Utility.** ~~Means a~~A public electric utility as defined in Section 61-332A, Idaho Code. ()

012. -- 020. (RESERVED)

APPLICABILITY AND ADMISSIBILITY

Rules 21 through 30

021. UTILITY (RULE 21).

A utility measuring or testing for stray voltage or current at the request of a dairy producer, as directed by the Commission or on its own initiative, shall conduct such measurements in accordance with these rules. ()

022. DAIRY PRODUCER (RULE 22).

01. Serving Notice on the Utility. A dairy producer providing written notice to a utility pursuant to Section 61-804, Idaho Code, ~~shall specify why the dairy producer believes its dairy cows are being affected by electrical energy attributable to the utility. A dairy producer may~~ provide such notice with or without first having conducted tests or measurements of stray voltage. ()

Commented [OP8]: The “why” requirement for the notice is included in IDAPA 61-804.

02. Cooperation. When a written notice is filed with the utility, the dairy is obligated to make any contact point(s), service panels, grounding rods or other electrical equipment at the dairy available to the utility for measuring and testing. The utility shall provide reasonable notice and cooperate with the dairy producer to establish an appropriate time to conduct the tests and measurements. The dairy shall cooperate with the utility so that all tests and measurements necessary to identify the existence and magnitude of stray current or voltage, if any, are completed within fourteen (14) days of the utility’s receipt of such notice. ()

023. SERVICE PROVIDERS (RULE 23).

~~Any person performing any stray voltage measurement or test on behalf of a utility or a dairy shall be deemed a service provider and All service providers~~ shall follow these rules. ()

Commented [OP9]: Service Providers is already defined in the definitions section. This applicability section didn’t change that definition.

~~**024. ADMISSIBILITY (RULE 24).**~~

~~Only tests and measurements made in compliance with these rules shall be admissible before the Commission or in any civil action.~~ ()

Commented [OP10]: This requirement is included in IDAPA 61-803.

025. – 030. (RESERVED)

**QUALIFICATIONS OF PERSONS
PERFORMING AND ANALYZING
RESULTS OF STRAY VOLTAGE TESTS**

Rules 31 through 40

031. PERFORMANCE OF TESTS AND MEASUREMENTS (RULE 31).

Measuring and testing for stray voltage under these rules for consideration by the Commission shall be performed by a qualified testing professional, such as:

01. Professional Engineer. A professional engineer, licensed in any state, who has completed no fewer than forty-eight (48) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

02. Master Electrician. A master electrician, licensed in any state, who has completed no fewer than forty-eight (48) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

03. Technician. A technician who, under the supervision of a person presumed qualified under Subsections 031.01 and 031.02, has completed no fewer than eight (8) hours of Commission-approved stray voltage training and who has been involved in no fewer than five (5) prior investigations involving the measurement or testing of stray voltage. ()

032. DATA ANALYSIS (RULE 32).

Analysis of data under these rules, for consideration by the Commission, shall be performed by a qualified analyst. A professional engineer, licensed in any state, who has completed no fewer than forty-eight (48) hours of stray voltage training and who has been involved in no fewer than five (5) prior investigations involving measurement or testing of stray voltage shall be presumed to be a qualified analyst. ()

033. PERSONS OTHERWISE QUALIFIED (RULE 33).

A person who does not satisfy the qualifications in Sections 031 and 032, may nonetheless be determined by the

Commission to be a qualified testing professional or a qualified analyst if, on motion of any party, the Commission finds that person otherwise possesses the knowledge, skill, experience, training, or education that qualifies that person to offer expert testimony before the Commission. ()

034. -- 050. (RESERVED)

**CALIBRATION OF AND EQUIPMENT USED FOR MEASURING
AND RECORDING
VOLTAGE, CURRENT, AND RESISTANCE**

Rules 51 through 60

051. GENERAL REQUIREMENTS FOR STRAY VOLTAGE MEASURING AND RECORDING EQUIPMENT (RULE 51).

Equipment used for the measurement or testing of stray voltage, current, and resistance shall meet the following criteria: ()

01. Resolution and Accuracy. The accuracy and resolution of any instrument used to measure or record cow contact voltage or current, shall limit the error to five percent (5%) or less at one volt (1 V) or two milliamperes (2 mA). ()

02. Voltage Measurement. Instruments used to measure cow contact voltage shall be capable of separating and independently measuring alternating current (AC) and direct current (DC) voltages. These instruments shall have a minimum internal impedance of ten thousand (10,000) ohms and shall be capable of measuring the true-rms voltage. ()

03. Current Measurement. A clamp-on ammeter, a digital multi-meter (DMM) with clamp-on device, or an in-line ammeter shall be used to measure current through a conductor or resistor connected between two (2) points. The meters shall be capable of separating and independently measuring alternating current (AC) and direct current (DC) and shall be capable of measuring the true-rms current. Care must be taken to assure that clamp-on ammeters used have the required resolution and accuracy. ()

Commented [OP11]: Clarification for accuracy. There may be multiple current paths between two points. A clamp-on ammeter only measures the current in the conductor(s) it is clamped around.

04. Resistance Measurement. Resistance shall be measured using either a volt ohmmeter (VOM) or a DMM. Resolution shall be to the level of one (1) ohm or less when measuring a resistance of less than one thousand (1,000) ohms. Accuracy shall be within plus or minus five (+/-5) ohms for a five hundred (500) ohm resistance. ()

05. Resistance-to-Earth Measurement. Grounding electrode resistance-to-earth measurements shall be made with a three- (3) point fall-of-potential instrument or a clamp-on resistance-to-earth tester. ()

052. CALIBRATION REQUIREMENTS (RULE 52).

01. Measuring Equipment Calibration. All measuring equipment shall be calibrated according to the manufacturer's recommended calibration schedule, but no less than annually, to meet the manufacturer's specifications for the accuracy and resolution of the equipment. Measuring equipment shall not be used after its next "calibration due" date for measurements or tests conducted during a stray voltage investigation. Calibration shall be performed by either: ()

a. The manufacturer of the equipment, who shall certify that the equipment meets the manufacturer's specifications for accuracy and resolution; or ()

b. A laboratory currently certified as meeting all applicable Institute of Electrical and Electronic Engineers (IEEE) and International Organization for Standards (ISO) standards. ()

02. Calibration Certificates. The service provider performing the tests and measurements shall maintain certificates from the manufacturer or the calibration laboratory demonstrating compliance with calibration requirements. ()

03. Field Check. Before voltage or current measurement or testing is performed, the instrument shall be field checked by comparing measurements to those of other instruments or against a known source. ()

053. REQUIREMENTS FOR MONITORING AND RECORDING DEVICES (RULE 53).

Digital recording devices shall be used for the purpose of recording current and voltage for extended periods, such as the forty-eight (48) hour test. The recording devices shall have the same level of resolution and accuracy as the meters being used for the measurements. Monitoring systems, which combine measuring and recording functions in a single instrument, shall have the same level of resolution and accuracy as specified in Section 051. Recording devices and monitoring systems shall be capable of recording transient deviations of one-tenth (0.1) second or less in duration from the steady state. Digital recording devices, which have deviation settings, shall permit the deviation setting to be set "low" enough to meet the resolution and accuracy requirements in Subsection 051.01 of these rules. All recording devices shall be able to log the time and date of all data recorded and shall have their internal clocks synchronized. ()

054. REQUIREMENTS FOR LOAD BOXES (RULE 54).

01. Volts. A load box shall be a primarily non-inductive nominal two hundred forty (240) volt, resistance heating type load with a minimum nominal full load of eighteen (18) kilowatts (kW). ()

02. Split-Load. A load box shall be capable of operating at two (2) or more load settings, including approximately fifty percent (50%) and one hundred percent (100%) of the load box's rated total load. ()

055. – 070. (RESERVED)

**TESTING AND MEASUREMENT PROCEDURES
Rules 71 through 80**

071. STRAY CURRENT OR VOLTAGE TESTS (RULE 71).

Subject to Subsection 071.02, there are six (6) tests used to detect and measure stray current or voltage. ()

01. Scheduling of Stray Voltage Tests. Efforts shall be made to perform the tests under conditions substantially similar to those conditions existing at the time(s) the dairy producer believes stray voltage to be a problem. ()

- a. Test 1 - Cow Contact Test; ()
- b. Test 2 - Forty-Eight (48) Hour Test; ()
- c. Test 3 - Primary Profile Test; ()
- d. Test 4 - Secondary Neutral Voltage Drop Test; ()
- e. Test 5 - Load Box Test; and ()
- f. Test 6 - Signature Test. ()

02. Testing Sequence. Test 1 shall be performed first. Tests 1 and 2 are used to determine the presence and level of stray voltage and shall be performed in all investigations, subject to the provisions of Subsection 071.03. Tests 3, 4, 5, and 6 may be performed in any order and may be performed without first determining that these tests are required under Paragraph 071.02.b. Tests 3, 4, 5, and 6 may be performed prior to starting the recording for Test 2 or while Test 2 is in progress. Test 2 may be interrupted as necessary to conduct Tests 4, 5, and 6, or for review and

analysis of the data recorded up to that point. ()

a. If the results from Tests 1 and 2 indicate that stray voltage does not exceed the preventive action level (PAL), the utility has no further testing or remediation obligations under these rules during this test cycle. ()

b. If the PAL is exceeded, the utility shall perform the remaining four (4) tests except as provided in Subsection 071.03. The utility shall also perform analysis to determine whether the portion of the stray current or voltage attributable to an off-farm source exceeds fifty percent (50%) of the PAL. ()

c. If the PAL is exceeded, and the portion of the stray current or voltage attributable to an off-farm source does not exceed fifty percent (50%) of the PAL, the utility has no further testing or remediation obligations. ()

d. If the PAL is exceeded, and the portion of the stray current or voltage attributable to an off-farm source exceeds fifty percent (50%) of the PAL, the utility shall conduct remediation pursuant to Section 091. Under this condition, the forty-eight (48) hour recording of Test 2 may be reduced to no fewer than twenty-four (24) hours. ()

e. For all testing conducted under these rules, the utility shall have a qualified analyst prepare a report pursuant to Section 082. ()

~~03. **Suspended or Limited Testing.** With the written agreement of both the utility and the dairy producer, a stray voltage investigation may be suspended at any point in the investigation. With the written agreement of both the utility and the dairy producer, the utility may employ a limited set of tests or measurements on a dairy as part of an intentionally limited evaluation. If the utility proposes to suspend a stray voltage investigation or to conduct a limited evaluation, its reasons for doing so shall be set forth in the written agreement between the utility and as agreed between the utility and the dairy producer.~~ ()

072. PREPARATION FOR TESTING (RULE 72).

The person performing the tests shall perform the following: ()

01. Remote Reference Grounding Rod. ()

a. Remote reference grounding rod(s) shall be installed and penetrate moist soil to a depth of thirty (30) inches. When practicable, remote reference rods shall be installed at least twenty-five (25) feet away from the nearest underground conductive electrical equipment of any type or at a distance equal to three (3) to four (4) times the buried depth of any metallic structure connected to the service entrance neutral. The reference ground rod shall be located not closer than twenty-five (25) feet from the centerline of a primary electrical conductor right-of-way. A reference rod shall be located not closer than one hundred (100) feet from the edge of a transmission line right-of-way. ()

b. All remote reference grounding rods shall be checked for "remoteness" prior to their use for tests or measurements and if found to be insufficiently "remote," a new location for that reference ground rod shall be found and retested for remoteness. Remoteness of the reference ground shall be determined by measuring the voltage from the transformer grounding electrode conductor to the remote reference ground. The resistance-to-earth of the transformer grounding electrode shall be measured. The grounding electrode current shall be measured. Remoteness is considered adequate if the measured voltage (transformer grounding conductor to reference ground, Vp) is within twenty percent (20%) of the voltage calculated by multiplying the grounding electrode current by the grounding electrode resistance-to-earth. ()

c. If the transformer grounding electrode is within twenty-five (25) feet of other primary or secondary grounding electrodes, this remoteness test shall be conducted at the first primary system grounding electrode upstream of the transformer that is greater than twenty-five (25) feet from other primary or secondary system grounding electrodes. ()

Commented [OP12]: Aligns better with the practice of performing "spot checks" requested by dairy producers and electricians.

02. Inspecting the Transformer(s). Prior to testing, the utility transformer shall be inspected, grounding electrode resistance measured, and any repairs necessary for safety be made and recorded. In the case of a customer-owned transformer, qualified personnel shall inspect the installation, measure grounding electrode resistance, and make and record any repairs necessary for safety. Measurements that require contact with utility or customer-owned primary wires or equipment shall be made by the utility or other qualified personnel. ()

03. In-Line Ammeters. If in-line or series ammeters are used, they shall be installed under safe conditions in accordance with NESC and the NEC with the entire dairy system or the specific circuit to be tested de-energized. ()

04. Pre-Test Documentation.()

a. All pre-test calibration requirements from Section 052 shall be completed and documented. ()

b. A sketch or drawing of the dairy shall be prepared indicating: ()

i. The location of the buildings; ()

ii. Secondary electrical service panels and secondary feeder systems serving cow contact areas; ()

iii. Transformer(s) and central distribution point; ()

iv. Existing grounding electrodes (if known); ()

v. The location of all cow contact points to be tested; ()

vi. All remote reference grounding rods; and ()

vii. All primary and secondary neutral test points used in conjunction with the remote reference grounding rod(s). ()

c. A listing of planned test points shall be prepared using the applicable form prior to beginning each test. Each test shall be listed separately, and specific reference numbers shall be given to each planned test point. ()

05. Safety. ()

a. If the service provider reasonably concludes that a dairy's noncompliance with the NEC poses a significant and immediate safety hazard which prevents completion of any test or measurement required by these rules, then the service provider's obligations to proceed under these rules shall be suspended until the hazard is eliminated. ()

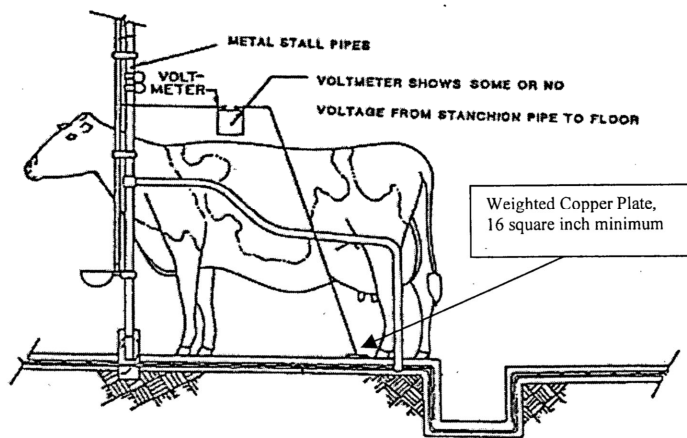
b. At the discretion of the service provider conducting the test, livestock shall be removed from any area where electrical equipment or wiring is examined, or electrical measurements are taken. Testing may be suspended if the presence of cows or other animals creates a potential hazard to testing personnel. The locations of electric fences and other electrified cow control devices shall be noted and de-energized where practical. ()

073. TEST 1 -- COW CONTACT TEST (RULE 73).

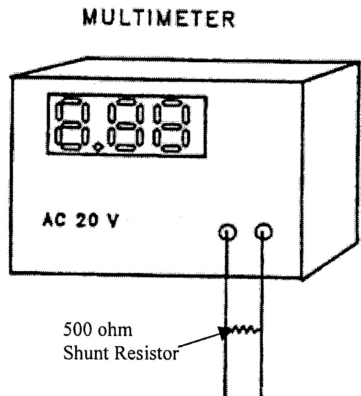
01. Purpose. This test is to determine the location(s), if any, where stray current or voltage exceeds the PAL and to identify the location(s) at which the cow contact voltage will be recorded in the forty-eight (48) hour test. ()

02. **Selection of Cow Contact Points.** The selection of cow contact points to be tested shall include a sufficient number of locations reasonably likely to demonstrate the presence of stray voltage or current, if any. ()

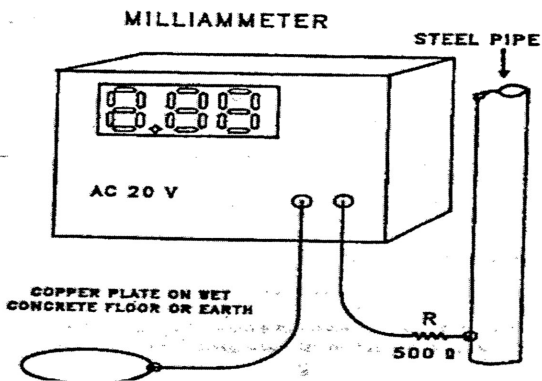
03. **Conducting the Test.** The voltage across the shunt resistor or current through the shunt resistor shall be measured between cow contact points as shown in Figure 1. The source resistance shall be calculated during analysis for all cow contact points.



a. When using a voltmeter to measure voltage between contact points where one (1) of those points is the floor surface, the equipment shall be arranged as shown in Figures 1 and 2, using a metal plate, which shall make a high quality conductive contact with the ground or floor. If the service provider is unsure of having a high-quality conductive contact with the floor or ground, then the procedure described in Paragraph 073.03.c. shall be followed. If necessary, corrosion shall be removed from the point(s) where test lead(s) make contact with metal equipment.



b. When using an in-line milliammeter or a clamp-around milliammeter to measure current between contact points and one (1) of those points is the floor surface or earth, the equipment shall be arranged as shown in Figure 3, using a metal plate which shall make high quality conductive contact with the ground or floor. If the service provider is unsure of having a high-quality conductive contact with the floor or ground, then the procedures described in Paragraph 073.03.c. shall be followed. If necessary, corrosion shall be removed from the point(s) where test lead(s) make contact with metal equipment.



c. A metal plate used to make an electrical contact with the earth or floor shall be of regular shape (square, rectangular or round), and shall have a surface area equal to or greater than sixteen (16) square inches (4 inches x 4 inches or equivalent). Place a weight not less than twenty (20) pounds on the metal plate. This weight shall be applied evenly across the metal plate and not to the adjacent concrete or earth. Place the metal plate a minimum distance of twelve (12) inches from any metal equipment making contact with the floor or earth. ()

i. Where the metal plate is to be placed on a concrete floor, the surface shall be flat. Clean the floor surface with a ~~wire stiff~~ brush to remove debris that may add excess resistance. Use water to clean the floor surface at the point where the metal plate will be placed. Place a paper towel or similar material soaked in saltwater between the metal plate and the concrete floor. ()

ii. Where the metal plate is to be placed on the ground or earth surface, the surface shall be flat. Remove any debris and add water to the area, if necessary, to dampen the soil. The surface of the metal plate that will make contact with the earth shall be clean and free of corrosion before use. Remove any corrosion, if necessary. ()

04. Recording the Data. The person conducting this test shall record the location of, and measured values at, each test point. At each cow contact location, an open circuit voltage reading (V_{oc}) and a voltage with five hundred (500) ohm nominal shunt resistor placed across the input to the meter (V_{shunt}) shall be taken. These readings shall be taken with ten (10) seconds or less time between each reading. Alternatively, a current measurement (I_{shunt}) may be taken in place of the voltage reading (V_{shunt}). Data for these test points shall be recorded on the form in Appendix 1. ()

05. Source Resistance Calculation. The source resistance (R_{source}) shall be calculated for each cow contact location measured and the value recorded in Appendix 1. The following formulas shall be used to calculate source resistance.

$$R_{source} = \frac{V_{oc} - V_{shunt}}{V_{shunt}} \times R_{shunt}$$

$$R_{source} = \frac{V_{oc}}{I_{shunt}} - R_{shunt} \quad ()$$

074. TEST 2 -- FORTY-EIGHT HOUR TEST (RULE 74).

01. Purpose. This test is to determine whether stray current or voltage exceeds the (PAL) at selected location(s) over a forty-eight (48) hour period, subject to Subsection 074.06 and Paragraph 071.02.d. The test also demonstrates whether the primary or secondary sides of the system have a specific impact on the recorded current or voltage at specific times of day. ()

02. Setup. A digitizing data recorder with averaging capability and capable of detecting and recording transient deviations of one-tenth (0.1) second or less in duration shall be used to record the following: ()

- a. Voltage from primary neutral at the transformer to remote reference ground, V_p . ()
- b. Voltage from secondary neutral in the service panel serving the area of the cow contact to remote reference ground, V_s . ()
- c. Voltage drops (V_{ps}) from primary neutral at the location of connection for V_p to secondary neutral at the location of the connection for V_s . ()
- d. Cow contact current through (I_{cc}) or voltage across a five hundred (500) ohm resistor at the high

Commented [OP13]: A stiff plastic brush is equally effective and doesn't rust or shed short fine metal wires.

voltage point(s) found in Test 1, Vcc. ()

03. Measurement Interval. The results of the forty-eight (48) hour test may be highly indicative of the presence of stray voltage. A recording interval as high as ten (10) seconds may be used provided that transient deviations of voltage or current of one-tenth (0.1) second or less in duration of voltage or current are recorded to the maximum ability of the instrument. ()

04. Measurement at the Cow Contact Point(s). Measurements to the earth or concrete surface shall be to a metal plate as described in Paragraph 073.03.c. When making measurements to metal objects, corrosion shall be removed to obtain a low resistance connection. ()

05. Recording the Data. Data gathered by the recording equipment during the forty-eight (48) hour test including transients shall be downloaded and retained with the records of the investigation. In addition, the steady-state data shall be summarized in the investigation report. The recorded data shall be made available to the dairy producer or utility upon request. The person conducting this test shall record the location of, and measured values at, each test point. The identification of the cow contact point shall be recorded on the form in Appendix 2. Transient deviations shall be recorded on the supplemental data form, page 3 of 3 in Appendix 2. A plot of the voltage versus time may be substituted for the recording of measured values in Appendix 2. ()

06. Reduced Recording Period. If a qualified analyst concludes that remediation by the utility is required under Paragraph 071.02.d. prior to the completion of a forty-eight (48) hour recording period, the recording period may be reduced to no fewer than twenty-four (24) hours. ()

075. TEST 3 -- PRIMARY PROFILE TEST (RULE 75).

01. Purpose. This test is to measure or calculate neutral-to-earth voltage (NEV) for a multi-grounded distribution system.()

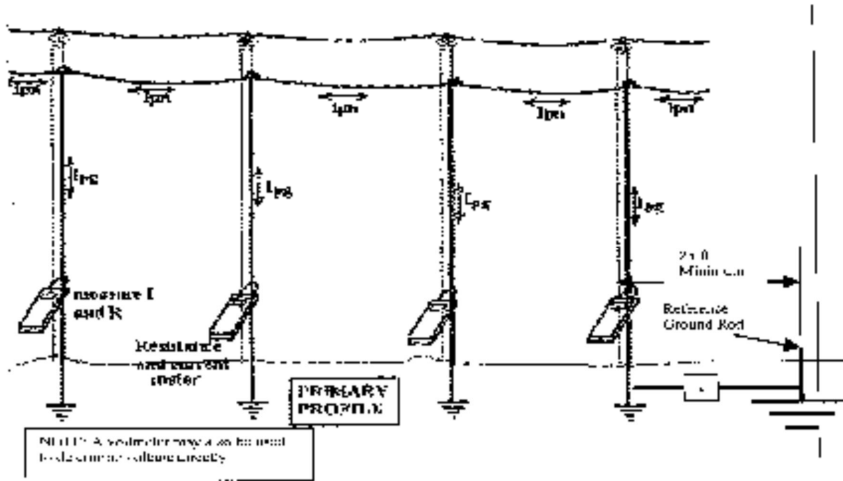
02. Conducting the Test. The primary profile test requires concurrent measurement of the ground electrode resistance and current at all primary system ground points within three quarters (3/4) of a mile on either side of all primary service points serving the dairy, or to the end of the line if less than three quarters (3/4) of a mile. Alternatively, the voltage between a remote grounding rod and the primary ground point being tested may be measured. ()

a. This test shall be conducted starting at one (1) end of the distribution system and working toward the other end along the main primary distribution system. Figure 4 below illustrates the procedure. ()

i. Where the dairy is served by a dedicated tap of less than one-half (1/2) mile in length from a distribution line, the neutral-to-earth voltage shall be measured at each primary ground along the tap and along the distribution line to a distance of three-quarters (3/4) of a mile in each direction from the point of the tap; or ()

ii. Where a dairy is served by a dedicated tap that extends more than one-half (1/2) mile from the distribution line, the neutral-to-earth voltage shall be measured at each primary grounding electrode along the tap and along the distribution line to a distance of one-half (1/2) mile in each direction from the point of the tap. ()

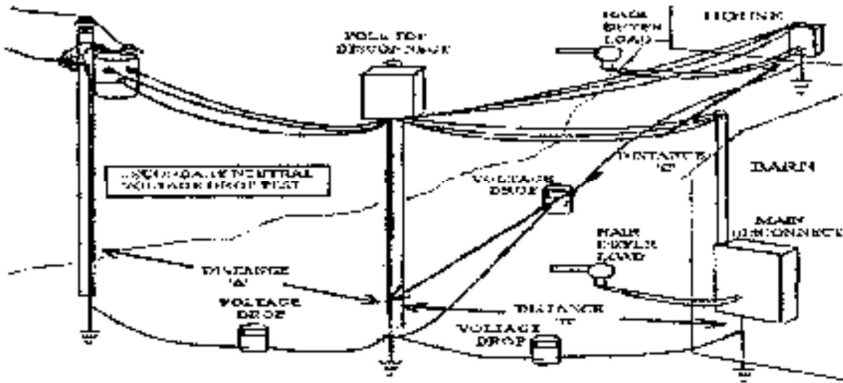
03. Recording the Data. The person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 3.



076. TEST 4 -- SECONDARY NEUTRAL VOLTAGE DROP TEST (RULE 76).

01. Purpose. This test is used to determine the impact of each secondary service on the neutral-to-earth (NEV) and cow contact voltages on the dairy under controlled conditions. ()

02. Conducting the Test. This test shall be performed for all service entrances. A proxy load of known characteristics (such as a resistive load like a one hundred twenty (120) volt, fifteen hundred (1,500) watt hairdryer) is required for this test. The proxy load must create a known and stable current and subsequent voltage drop for each neutral serving a main panel, sub-panel or end-of-service area. All service entrances other than that being tested shall be turned "off" to perform this test. A diagram showing the connections and measurement points for this test is shown in Figure 5.



03. Data Collection. The following data shall be collected for each secondary neutral tested: ()

a. Gauge and type of neutral wire. ()

b. Length of neutral wire. ()

c. Neutral current, I_{sn} . ()

d. Voltage drop (V_{DropM}) between both ends of the secondary neutral being tested. ()

e. Cow contact voltage (V_{cc}) or current (I_{cc}) at the same points used in the forty-eight (48) hour test. ()

f. Primary neutral at the transformer to reference ground voltage, V_p . ()

g. Secondary neutral to reference ground voltage, V_s . ()

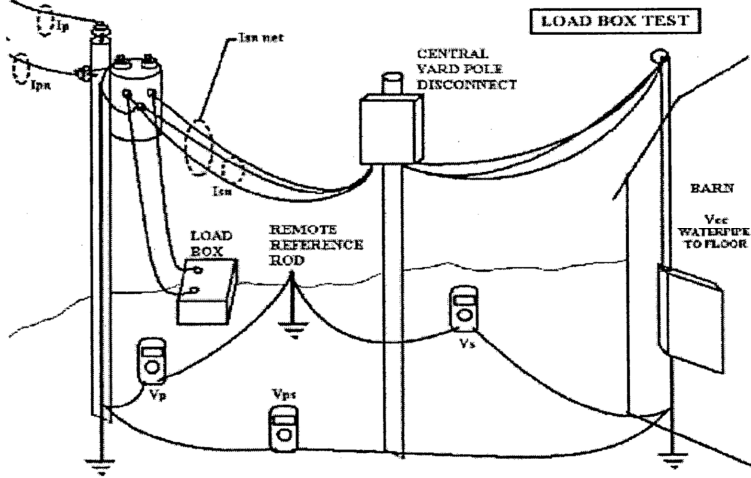
04. Measurements. The three (3) voltages (V_{cc} , V_p and V_s) shall be measured with the proxy load “off” and “on.” Calculated expected voltage drops (V_{DropC}) (see Appendix 4) shall be compared with measured voltage drops (V_{DropM}). If the measured and calculated voltage drops differ significantly, further investigation shall be undertaken to determine the source of additional voltage drop within the circuit. Neutral current shall be measured and recorded with the proxy load on (I_{sn}). ()

05. Recording the Data. Any person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 4. ()

077. TEST 5 -- THE LOAD BOX TEST (RULE 77).

01. Purpose. To determine the extent to which the primary system contributes to stray current or voltage at cow contact points. For dairies with three (3) phase balanced primary service, the service provider shall perform Steps One and Two in Paragraph 077.02.b. below. ()

02. Conducting the Load Box Test. This test shall be performed at the same time of day as the time(s) of highest cow contact voltage found in the forty-eight (48) hour test. During this test, voltage and current shall be measured and recorded at the points indicated in Figure 6.



a. The load box test requires the recording of eight (8) data points during each of the five (5) test steps. The eight (8) data points that shall be measured or calculated and recorded for each step are: ()

i. Primary line to neutral voltage, V_{pri} . ()

ii. Load Box Current, I_{lb} . ()

iii. Voltage at load box connection to secondary system, V_{lb} . ()

iv. Calculate transformer current I_p using $I_p = \frac{I_{lb} \times V_{lb}}{V_{pri}}$. ()

v. Voltage from primary neutral at the transformer to remote reference ground rod, V_p . ()

vi. Voltage from secondary neutral in the service panel serving the area of the cow contact to remote reference ground rod, V_s . ()

vii. Voltage from primary neutral at the transformer to secondary neutral at the service panel serving the area of cow contact, V_{ps} . ()

viii. Cow contact voltage (V_{cc}) or current (I_{cc}) at the same point(s) used in the forty-eight (48) hour test. ()

b. Except for dairies with three (3) phase balanced primary service, the following five (5) test steps shall each be conducted for at least two (2) minutes, and the data shall be recorded for each step: ()

i. Step One: The load box shall be de-energized, the dairy shall remain "on," ()

ii. Step Two: The load box shall be de-energized, the dairy shut "off," ()

- iii. Step Three: The load box shall be set to half load, the dairy shut “off,” ()
- iv. Step Four: The load box shall be set to full load, the dairy shut “off,” ()
- v. Step Five: The load box shall be set to full load, the dairy shall be turned “on,” ()

03. Calculating the K Factor. The K factor is a calculated ratio (V_{cc}/V_s). The K factor should be less than one (1) because V_{cc} (cow contact voltage) should be less than V_s (the dairy ground to reference ground voltage). If the K factor is greater than one (1), then there is contribution to V_{cc} from sources other than V_s . ()

04. Recording the Data. The person conducting this test shall record the location of, and measured values at, each test point. Data and calculation results for these test points shall be recorded on the form in Appendix 5. ()

078. TEST 6 -- SIGNATURE TEST (RULE 78).

01. Purpose. This test is used to determine the contribution to stray current or voltage of individual pieces of equipment operating on the dairy. The test is best performed when there is minimal farm electrical activity. ()

02. Conducting the Signature Test. During this test, individual pieces of major current drawing equipment shall be started and stopped. The effects of starting, operating, and stopping each piece of equipment shall be measured and recorded for a period of operation of at least fifteen (15) seconds. The person conducting the test shall identify and record the equipment being tested and record the specific times that the equipment was started and stopped. A digitizing data recorder with averaging capability shall be used to measure and record the required electrical data. These measurements shall be taken at the same locations at the dairy where measurements were taken for the purpose of the load box test and forty-eight (48) hour test. ()

- a. Voltage from primary neutral at the transformer to remote reference ground rod, V_p . ()
- b. Secondary neutral at the service panel serving the area of cow contact to remote reference ground voltage, V_s . ()
- c. Primary neutral voltage drop (V_{ps}) from the location of connection for V_p to secondary neutral voltage at the location of the connection for V_s . ()
- d. Cow contact voltage (V_{cc}) or current (I_{cc}) at the preselected point. ()

03. Recording the Data. All of the data gathered by the recording equipment during the signature test, including transients shall be downloaded and retained with the records of the investigation. In addition, the steady state data shall be summarized in the investigation report. The recorded data shall be made available to the dairy producer or utility upon request. The location of all test point(s) shall be recorded on the form in Appendix 6. A plot of the voltage versus time may be substituted for the recording of measured values on Appendix 6. ()

079. -- 080. (RESERVED)

ANALYSIS AND REPORTING THE DATA

Rules 81 through 90

081. ANALYZING THE COLLECTED DATA (RULE 81).

01. Cow Contact Points. Examine the data recorded for the forty-eight (48) hour test in Appendix 2 and determine the highest steady state value of cow contact voltage (V_{cc}) or current (I_{cc}). Determine the value of

primary neutral to reference voltage (Vp) that was present for the highest cow contact value. Record these values on the data sheet of Appendix 7. These values shall be identified as “test cow contact voltage or current” ($V_{cc\ 48hr}$ or $I_{cc\ 48hr}$) and “primary neutral to reference voltage at time of maximum cow contact voltage or current” (V_{p48hr}). The three (3) data sets created from the values are: ()

a. The primary to reference ground voltage and the cow contact voltage or current measured during the load box test (Appendix 5) with the farm power “off” and the load box “off” shall be recorded on the data sheet of Appendix 7 as $V_{p\ OFF}$ and either $V_{cc\ OFF}$ or $I_{cc\ OFF}$. ()

b. The primary to reference ground voltage and the cow contact voltage or current measured with the load box set at one-half (1/2) load shall be recorded on the data sheet of Appendix 7 as $V_{p\ HALFLOAD}$ and either $V_{cc\ HALF\ LOAD}$ or $I_{cc\ HALF\ LOAD}$. ()

c. The primary to reference ground voltage and the cow contact voltage or current measured with the load box at maximum shall be recorded on the data sheet of Appendix 7 as $V_{p\ FULL\ LOAD}$ and either $V_{cc\ FULL\ LOAD}$ or $I_{cc\ FULL\ LOAD}$. ()

02. Contributions to Stray Voltage or Current for Single Phase Dairies. The utility contribution to cow contact voltage or current shall be determined using the following formula. Compare the values determined to the preventive action level (PAL).

Utility contribution to

$$\text{cow contact voltage} = \frac{V_{p48} - V_{pHALF}}{V_{pFULL} - V_{pHALF}} \times (V_{cc\ FULL} - V_{cc\ HALF}) + V_{cc\ HALF}$$

or

Utility contribution to

$$\text{cow contact current} = \frac{V_{p48} - V_{pHALF}}{V_{pFULL} - V_{pHALF}} \times (I_{cc\ FULL} - I_{cc\ HALF}) + I_{cc\ HALF}$$

()

03. Contributions to Stray Voltage or Current for Three Phase Dairies. The utility contribution to cow contact voltage or current for dairies with three (3) phase balanced load service, shall be determined by directly using the results of the load box test results for Step 1 and Step 2 as specified in Paragraph 077.02.b. ()

a. The Vcc measured during Step 1 of the load box with the load box “off” and the dairy “on” will be the total Vcc. ()

b. The Vcc measured during Step 2 of the load box test with the load box “off” and the dairy “off” is the contribution to Vcc from the utility, Vccutility. ()

c. The contribution to Vcc by the dairy is the difference between Vcc and Vccutility, Vccdairy = Vcc - Vccutility. ()

082. REPORTING (RULE 82).

Within a reasonable period of time after completion of any tests required to be performed by the utility under these rules, a qualified analyst shall prepare a written report. The report shall include a summary of the tests performed, a copy of the sketch or drawing of the dairy prepared pursuant to Section 072, all of the data or results obtained from the tests, and an analysis of the data or results obtained from the tests. If remediation was required under these rules, the report shall specify the actions taken or to be taken. The utility shall provide a copy of the written report to the dairy producer. ()

083. – 090. (RESERVED)

**REMEDIAL ACTIONS AND COMMISSION PROCEEDINGS
Rules 91 through 92**

091. REMEDIATION (RULE 91).

01. Utility System. If the utility is required to conduct remediation, it shall commence such remediation within five (5) business days. The utility shall diligently pursue to completion remedial procedures which shall reduce, and are reasonably likely to sustain, that portion of the stray current or voltage attributable to the utility's distribution system to a level equal to or less than fifty percent (50%) of the PAL. This may include addressing other off-dairy sources. ()

02. Other Dairies, Farms and Industrial Sites. If a utility's contribution to stray voltage exceeds fifty percent (50%) of the PAL and the utility determines that another customer is a significant contributing source of stray voltage, the utility shall notify both the dairy and the other customer in writing. ()

092. COMMISSION PROCEEDINGS (RULE 92).

01. Filing with the Commission. All petitions seeking relief under Section 61-805, Idaho Code, shall be filed with the Commission Secretary pursuant to Section 005. Petitions shall conform to IDAPA 31.01.01 Section 053. The petitioner shall file an original and five (5) copies of the petition. ()

0XX. FIGURES AND APPENDICES (RULE XX)

01. All figures and appendices can be found on the Commissions website at www.puc.idaho.gov

093. – 999. (RESERVED)

ATTACHMENT 3

Voltage from stanchion to floor

