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October 21, 2010

**HAND DELIVERED**

Jeff R. Derouen  
Executive Director  
Public Service Commission  
211 Sower Boulevard  
P.O. Box 615  
Frankfort, KY 40602-0615

RECEIVED

OCT 21 2010

PUBLIC SERVICE  
COMMISSION

Mark R. Overstreet  
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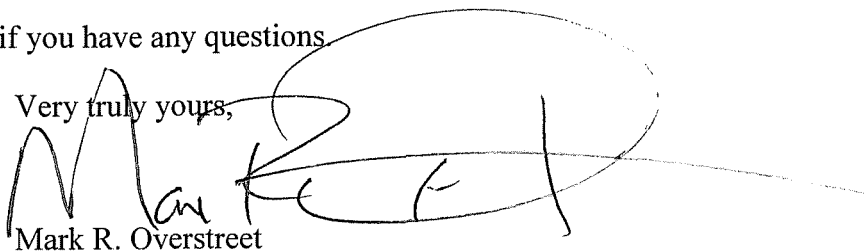
RE: P.S.C. Case No. 2010-00317

Dear Mr. Derouen:

Enclosed please find and accept for hearing the original and ten copies of Kentucky Power Company's Response to the Staff's Data Requests at the October 5, 2010 Informal Conference in this proceeding.

Please do not hesitate to contact me if you have any questions.

Very truly yours,



Mark R. Overstreet

MRO  
Enclosures

COMMONWEALTH OF KENTUCKY  
BEFORE THE  
PUBLIC SERVICE COMMISSION OF KENTUCKY

RECEIVED

OCT 21 2010

PUBLIC SERVICE  
COMMISSION

IN THE MATTER OF:

KENTUCKY POWER COMPANY )  
D/B/A AMERICAN ELECTRIC POWER )  
\_\_\_\_\_ )

ALLEGED FAILURE TO COMPLY WITH )  
KRS 278.042 )

) Case No. 2010-00317

KENTUCKY POWER RESPONSES TO COMMISSION STAFF'S  
OCTOBER 5, 2010 INFORMAL CONFERENCE DATA REQUESTS

October 21, 2010



## KENTUCKY POWER COMPANY

### REQUEST

Please describe the new or modified safety procedures undertaken by Kentucky Power Company in light of the issues presented in this proceeding.

### RESPONSE

Following the incident, Kentucky Power modified its training materials to include specific information on the issues presented. In addition, in its training since the incident the Company has emphasized the appropriate actions to be taken in similar situations. Finally, Kentucky Power has instituted a procedure to monitor on at least a weekly basis all active Unsafe Condition Investigation Orders (IO-02)

#### A. Modified Training Materials.

- Training materials have been developed and delivered to all field personnel (line, meter and engineering personnel) addressing what to look for while performing system inspection, damage assessment and normal execution of their daily work. The material specifically addresses actions to be taken when unsafe conditions are encountered.
  - If a clear and immediate endangerment to human life is found to exist, immediate safe guarding action is necessary until corrective action can be taken.
  - Immediately repair those facilities which present a risk to safety of the public & our employees.
  - If defects should be discovered that pose a safety risk, then timely corrective action by qualified personnel is required.
- Other reference material, such as a single sheet clearance table, has been developed and distributed to field employees. This reference material provides readily accessible information to the employee that aids in determining appropriate clearances.

- KPC periodically revises its training materials to improve clarity and to address specific situations which have been encountered in the field.

B. Focused Training

- Kentucky Power has also re-emphasized to all field personnel that deficiencies which cause an immediate safety concern to the public or our employees must be addressed immediately and completely. Specifically, during regular safety huddles, safety meetings, telephone conference calls and other operational meetings the Company has emphasized that:
  - Personnel are to remain on site to guard against accidental contact until the situation can be made safe.
  - If a permanent remedy cannot be promptly implemented, temporary measures are to be employed to remedy the immediate safety threat until a permanent solution can be implemented.

C. Additional Monitoring And Follow-up of IO-02s.

- As under prior procedures, Company personnel will continue to submit IO-2s whenever unsafe conditions are encountered that cannot be permanently corrected by the employee. To provide for better follow-up and remedy of such conditions, the Company now creates and distributes to distribution operations management personnel a weekly report of all active IO-02s. These reports are reviewed and addressed weekly at the Company's distribution operations staff conference call presently held on Monday morning. During this call temporary actions taken to make the situation safe and the schedule discussed.

**WITNESS: David P. Robinson/Larry J. Pemberton**



## KENTUCKY POWER COMPANY

### REQUEST

Please describe any additional planned first responder training and the steps AEP and Kentucky Power takes to ensure its accident and site investigation practices reflect “best practices.”

### RESPONSE

AEP’s Risk Management department provides first responder site and contact incident investigation and documentation training for KPC personnel who respond to electrical contact cases. Additional training is scheduled to be provided in the first quarter of 2011. The Kentucky Safety Manager will participate in this training.

AEP contact incident training materials address site and incident investigation and documentation procedures to be employed in the event of a contact incident. These materials are periodically reviewed to ensure that they are up-to-date and incorporate the industry best practices for accident investigation. KPC will also consider sending its safety manager to an outside training session sometime in 2011.

WITNESS: David P. Robinson/Larry J Pemberton