

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

NOV 09 2011

PUBLIC SERVICE  
COMMISSION

In the Matter of:

SOUTH KENTUCKY R.E.C.C. )

)

)

)

CASE NO. 2011-00404

)

ALLEGED FAILURE TO COMPLY WITH )  
KRS 278.042 )

)

)

RESPONSE

Comes South Kentucky Rural Electric Cooperative Corporation, (“South Kentucky”) by counsel, and for its response to the allegations as contained in the Commission’s Order of October 18, 2011 states as follows:

FIRST DEFENSE

South Kentucky denies any alleged violations of the National Electric Safety Code (NESC).

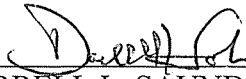
SECOND DEFENSE

South Kentucky’s practices related to the construction, installation and repair of electric facilities are adequate, safe and reasonable.

THIRD DEFENSE

No actions or inactions of South Kentucky relevant to the incident which is the subject of the Commission’s Order were willful.

WHEREFORE, South Kentucky requests that the Commission determine that it did not willfully violate KRS 278.042 or any provision of KRS Chapter 278; that no fine be imposed against South Kentucky for any claimed violations; and any further relief to which it may appear entitled.

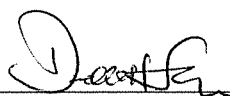
  
\_\_\_\_\_  
DARRELL L. SAUNDERS, P.S.C.  
ATTORNEY AT LAW  
700 MASTER STREET  
P.O. BOX 1324  
CORBIN, KENTUCKY 40702  
TELEPHONE: (606) 523-1370  
FAX NUMBER: (606) 523-1372

ATTORNEY FOR SOUTH KENTUCKY RURAL  
ELECTRIC COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was this 8<sup>th</sup>  
day of November, 2011 deposited in the regular United States mail, all postage prepaid and  
addressed for delivery to Mr. Jeff Derouen, Executive Director, Public Service Commission, 211  
Sower Blvd., P.O. Box 615, Frankfort, KY 40602-0615.

Original to: Public Service Commission, 211 Sower Blvd., P.O. Box 615, Frankfort, KY  
40602-0615.

  
\_\_\_\_\_  
ATTORNEY FOR SOUTH KENTUCKY RURAL  
ELECTRIC COOPERATIVE CORPORATION