

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of: )  
)  
JACKSON PURCHASE ENERGY )  
CORPORATION )  
\_\_\_\_\_)  
)  
ALLEGED FAILURE TO COMPLY )  
WITH KRS 278.042 )

CASE NO. 2012-00240

RECEIVED

OCT 01 2012

PUBLIC SERVICE  
COMMISSION

**JACKSON PURCHASE ENERGY CORPORATION'S  
NOTICE OF FILING RESPONSE TO INFORMAL CONFERENCE**

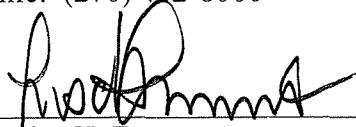
COMES Jackson Purchase Energy Corporation (hereinafter "JPEC"), through the undersigned counsel, and pursuant to the direction of the Staff at the Informal Conference of September 11, 2012, files herewith the following:

1. September 28, 2012 Response of JPEC, signed by Kelly Nuckols, President and CEO;
2. Statement of Clarification of Murray Riley; and
3. Photographs of subject property.

Respectfully submitted,

DENTON & KEULER  
P. O. BOX 929  
PADUCAH KY 42002-0929  
Telephone: (270) 443-8253  
Facsimile: (270) 442-6000

By: \_\_\_\_\_

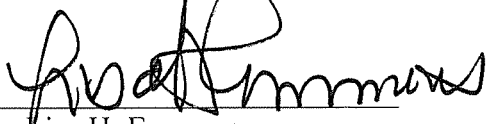
  
Lisa H. Emmons  
Melissa D. Yates

ATTORNEYS FOR JACKSON PURCHASE  
ENERGY CORPORATION

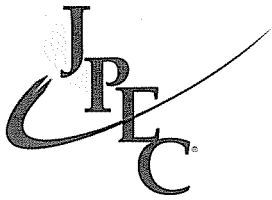
I hereby certify that the foregoing has  
been served via facsimile at 502-564-3460  
and Federal Express:

MR JEFF DEROUEN  
KENTUCKY PUBLIC SERVICE COMMISSION  
211 SOWER BLVD.  
FRANKFORT KY 40602

on this 28<sup>th</sup> day of September, 2012

By:   
\_\_\_\_\_  
Lisa H. Emmons  
Melissa D. Yates

152719



Jackson Purchase Energy  
P.O. Box 4030 • 2900 Irvin Cobb Drive  
Paducah, KY 42002-4030  
270.442.7321 • 800.633.4044

*Your Cooperative Partner by Choice  
Online at JPEnergy.com*

September 28, 2012

Mr. Jeff Derouen, Executive Director  
Commonwealth of Kentucky  
Public Service Commission  
211 Sower Blvd.  
PO Box 615  
Frankfort, KY 40602-0615

**Re: Jackson Purchase Energy Corporation's response to informal conference  
Case No. 2012-00240**

Dear Mr. Derouen:

Per our recent informal conference on September 11, 2012 Commission Staff asked for documentation identifying the training that our inspector(s) attend that deals with inspecting the coop's facilities. Commission Staff also asked for documentation regarding current and future practices in identifying possible NESC violations.

Our current inspector has attended the following training that deals with inspection of JPEC facilities and system safety:

NESC (2007)	11/8/2006
Hazard ID	12/9/2008
Hazard Recognition	12/10/2009
Hazard ID	11/9/2010
Hazard ID	6/7/2011
2012 NESC Update	1/6/2012
Hazard Recognition	5/3/2012

The Hazard ID/Recognition course is part of JPEC's monthly safety program and all employees attend this course.

Jackson Purchase Energy Corporation takes inspecting of its facilities very serious and has the personal in place to look for these hazards on a daily bases. Per the Commission's 807 KAR 5-006 General Rules JPEC completes a system inspection every two years.

Presently, line inspections are collected as paper records and turned into the dispatch office for processing. A dispatcher removes the inspections that affect the phone or



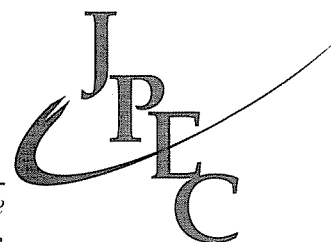
cable company, records the inspection information into a spreadsheet and then separates the remaining tickets as either engineering or maintenance. A work order clerk takes the engineering line patrol tickets and turns them over to staking personal for a field visit and correction by work order if needed. In general, this system works well in the normal course of business when dealing with general maintenance or engineering inspections.

However, JPEC feels that line inspections involving possible NESC code violations should be handled directly by engineering and operations staff to insure prompt attention. For these cases, the inspector will give the line patrol ticket to an engineer for review. JPEC has also instructed all employees to report any questions or concerns regarding potential clearance, construction, or other issues dealing with JPEC facilities that might pose a safety hazard to dispatch. Dispatch will create a job order of the location and give the order to an engineer for review. After review, engineering can either close the case with the appropriate documentation showing no hazard is present or forward to staking for a work order and correction by a construction crew.

Sincerely,



G. Kelly Nuckols  
President & CEO



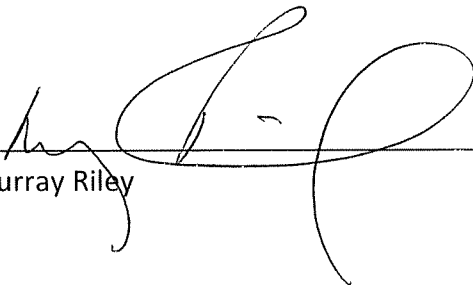


**STATEMENT OF CLARIFICATION**

Upon re-inspection of the NESC clearance measurements taken on 2/8/2012 at 4946 Reidland Road (Lees Pools & Specialties, Inc.) in Reidland, KY it was discovered that the point of measurement to JPEC's primary line was incorrectly chosen. When JPEC first arrived on site there were no employees present from the roofing company actively working so the assumption was made that the job had been completed. At this point JPEC personnel measured the code clearance from the JPEC primary line to the closest point of the building, which was chosen to be a piece of roof flashing that extended beyond the roof line. It was determined that this measurement presented a clearance violation per the 1961 NESC. At the time, no clearance measurements were taken back to the physical building. Upon hearing that the contractor was not completed and returning to the job site, JPEC moved the line the following day to increase the clearance. After the contractor finished and JPEC's review it was discovered the roofline extension had been removed. Pictures were taken and included with this statement that show the roof flashing overhang missing and an additional trim piece installed.

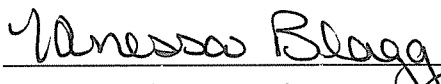
**VERIFICATION**

I, Murray Riley, verify, state and affirm that I prepared the statement filed with this Verification, and that this statement is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

  
Murray Riley

COMMONWEATH OF KENTUCKY    )  
COUNTY OF MCCRACKEN        )

SUBSCRIBED AND SWORN TO before me by Murray Riley on this the 27<sup>th</sup> day of  
September, 2012

  
Notary Public, Kentucky. State at Large  
Notary ID: 457050  
My Commission Expires: 12-22-15





















