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PUBLIC SERVICE
COMMISSION

Mr. Jeff DeRouen
Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

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Electric Company**
State Regulation and Rates
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September 22, 2014

**RE: TRACY MATHIS v. LOUISVILLE GAS AND ELECTRIC
COMPANY
Case No. 2014-00198**

Dear Mr. DeRouen:

An informal conference in the above-referenced docket was held on September 10, 2014. During that conference, LG&E agreed to provide some additional information regarding this matter. Enclosed please find an original and ten (10) copies of the additional information of Louisville Gas and Electric Company in the above-referenced docket.

The installation in question at 163 Crescent Avenue was relocated in 1994. At that time, the 1993 edition of the National Electrical Safety Code ("NESC") code was applicable. Attached is a copy of Table 232-1 from the 1993 edition of the NESC (Attachment No. 1) that addresses vertical clearance requirements. Highlighted is the applicable clearance for the installation located at 159 and 163 Crescent Avenue. In addition, footnote 7 provides reduced clearance requirements for installations where **the height of attachment to a building** or other installation does not permit service drops to meet standard values.

It wasn't until 1997 that the NESC revised footnote 7 to limit reduced clearance requirements to installations where **the height of a building** or other installation does not permit service drops to meet standard values. A copy of Table 232-1 from the 1997 edition of the NESC is also provided (Attachment No. 2). Because the service was changed in 1994, the 1993 edition of the

NESC applies to this installation, requiring the minimum clearance to be twelve feet, dependent on attachment height. At this time, the lowest point of the service wire at issue as it crosses over the driveway between the residential properties located at 159 Crescent Avenue and 163 Crescent Avenue is fourteen feet, one inch.

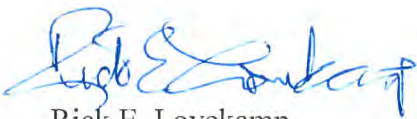
LG&E has also determined the eye bolt in place at 159 Crescent Avenue has a screw-in configuration. See the photo enclosed as Attachment No. 3. Although not legally required to comply with the applicable NESC clearance requirements, in order to raise this service connection point, the customer at this premise would need to take the following steps:

- Install a new eye bolt.
- Add pipe to existing riser in order to acquire additional clearance.
- Replace service wire in customer's modified pipe riser.
- Riser modification and service wire must be inspected by city inspector.
- Possible repair to stucco on side of house may be needed.

All costs associated with these items would be the responsibility of the customer residing at 159 Crescent Avenue.

Please contact me if you have any questions concerning this filing.

Sincerely,



Rick E. Lovekamp

cc: Tracy Mathis

Table 232-1

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Vertical Clearance of Wires, Conductors, and Cables Above Ground, Roadway, Rail or Water Surfaces⁽²⁵⁾

(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations.)

See the definitions section for voltages of other systems. See Rules 232B1, 232C1a, and 232D4.)

Nature of surface underneath wires, conductors, or cables	Insulated ⁽¹⁾ communication conductors and cable; messengers; surge-protection wires; grounded guys; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rules 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rules 230C2 or 230C3; open supply conductors, 0 to 750 V (ft)	Open supply conductors, over 750 V to 22 kV (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires ⁽¹⁾	
	0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)				
Where wires, conductors, or cables cross over or overhang						
1. Track rails of railroads (except electrified railroads using overhead trolley conductors) ⁽²⁾⁽³⁾⁽²⁰⁾	23.5	24.0	24.5	26.5	22.0 ⁽⁴⁾	22.0 ⁽⁴⁾
2. Roads, streets, and other areas subject to truck traffic ⁽²⁾	15.5	16.0	16.5	18.5	18.0 ⁽⁵⁾	20.0 ⁽⁵⁾
3. Driveways, parking lots, and alleys	15.5 ⁽⁷⁾⁽⁸⁾	16.0 ⁽⁷⁾⁽⁸⁾	16.5 ⁽⁷⁾	18.5	18.0 ⁽⁵⁾	20.0 ⁽⁵⁾
4. Other land traversed by vehicles, such as cultivated, grazing, forest, orchard, etc. ⁽²⁾	15.5	16.0	16.5	18.5	—	—
5. Spaces and ways subject to pedestrians or restricted traffic only ⁽²⁾	9.5	12.0 ⁽⁸⁾	12.5 ⁽⁸⁾	14.5	16.0	18.0
6. Water areas not suitable for sailboating or where sailboating is prohibited ⁽²⁾	14.0	14.5	15.0	17.0	—	—
7. Water areas suitable for sailboating including lakes, ponds, reservoirs, tidal waters, rivers, streams, and canals with an unobstructed surface area of ⁽⁷⁾⁽⁸⁾⁽⁹⁾						
a. Less than 20 acres	17.5	18.0	18.5	20.5	—	—
b. Over 20 to 200 acres	25.5	26.0	26.5	28.5	—	—
c. Over 200 to 2000 acres	31.5	32.0	32.5	34.5	—	—
d. Over 2000 acres	37.5	38.0	38.5	40.5	—	—
8. Public or private land and water areas posted for rigging or launching sailboats	Clearance above ground shall be 5 ft greater than in 7 above, for the type of water areas served by the launching site					
Where wires, conductors, or cables run along and within the limits of highways or other road rights-of-way but do not overhang the roadway						
9. Roads, streets, or alleys	15.5 ⁽¹³⁾⁽²⁴⁾	16.0 ⁽¹³⁾	16.5	18.5	18.0 ⁽⁵⁾	20.0 ⁽⁵⁾
10. Roads in rural districts where it is unlikely that vehicles will be crossing under the line	13.5 ⁽¹⁰⁾⁽¹²⁾	14.0 ⁽¹⁰⁾	14.5 ⁽¹⁰⁾	16.5	18.0 ⁽⁵⁾	20.0 ⁽⁵⁾

(continued on next page)

Footnotes for Table 232-1

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① Where subways, tunnels, or bridges require it, less clearance above ground or rails than required by Table 232-1 may be used locally. The trolley and electrified railroad contact conductor should be graded very gradually from the regular construction down to the reduced elevation.

② For wires, conductors, or cables crossing over mine, logging, and similar railways that handle only cars lower than standard freight cars, the clearance may be reduced by an amount equal to the difference in height between the highest loaded car handled and 20 ft, but the clearance shall not be reduced below that required for street crossings.

③ This footnote not used in this edition.

④ In communities where 21 ft has been established, this clearance may be continued if carefully maintained. The elevation of the contact conductor should be the same in the crossing and next adjacent spans. (See Rule 225D2 for conditions that must be met where uniform height above rail is impractical.)

⑤ In communities where 16 ft has been established for trolley and electrified railroad contact conductors 0 to 750 V to ground, or 18 ft for trolley and electrified railroad contact conductors exceeding 750 V, or where local conditions make it impractical to obtain the clearance given in the table, these reduced clearances may be used if carefully maintained.

⑥ This footnote not used in this edition.

⑦ Where the height of attachment to a building or other installation does not permit service drops to meet these values, the clearances over residential driveways only may be reduced to the following: (feet)

(a) Insulated supply service drops limited to 300 V to ground	12.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	12.0
(d) Drip loops only of service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(e) Insulated communication service drops	11.5

⑧ Where the height of attachment to a building or other installation does not permit service drops to meet these values, the clearances may be reduced to the following: (feet)

(a) Insulated supply service drops limited to 300 V to ground	10.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(d) Drip loops only of supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0

⑨ Spaces and ways subject to pedestrians or restricted traffic only are those areas where riders on horseback, vehicles, or other mobile units exceeding 8 ft in height, are prohibited by regulation or permanent terrain configurations or are otherwise not normally encountered nor reasonably anticipated.

⑩ Where a supply or communication line along a road is located relative to fences, ditches, embankments, etc., so that the ground under the line would not be expected to be traveled except by pedestrians, the clearances may be reduced to the following values: (feet)

(a) Insulated communication conductor and communication cables	9.5
(b) Conductors of other communication circuits	9.5
(c) Supply cables of any voltage meeting Rule 230C1 and supply cables limited to 150 V to ground meeting Rules 230C2 or 230C3	9.5
(d) Insulated supply conductors limited to 300 V to ground	12.5
(e) Guys	9.5

⑪ No clearance from ground is required for anchor guys not crossing tracks, rails, streets, driveways, roads, or pathways.

⑫ This clearance may be reduced to 13 ft for communication conductors and guys.

⑬ Where this construction crosses over or runs along alleys, driveways, or parking lots, this clearance may be reduced to 15 ft.

⑭ This footnote not used in this edition.

⑮ This footnote not used in this edition.

⑯ Adjacent to tunnels and overhead bridges that restrict the height of loaded rail cars to less than 20 ft, these clearances may be reduced by the difference between the highest loaded rail car handled and 20 ft, if mutually agreed to by the parties at interest.

⑰ For controlled impoundments, the surface area and corresponding clearances shall be based upon the design high-water level. For other waters, the surface area shall be that enclosed by its annual high-water mark, and clearances shall be based on the normal flood level. The clearance over rivers, streams, and canals shall be based upon the largest surface area of any 1-mi-long segment that includes the crossing. The clearance over a canal, river, or stream normally used to provide access for sailboats to a larger body of water shall be the same as that required for the larger body of water.

⑱ Where an overwater obstruction restricts vessel height to less than the applicable reference height given in Table 232-3, the required clearance may be reduced by the difference between the reference height and the overwater obstruction height, except that the reduced clearance shall be not less than that required for the surface area on the line-crossing side of the obstruction.

⑲ Where the US Army Corps of Engineers, or the state, or surrogate thereof has issued a crossing permit, clearances of that permit shall govern.

⑳ See Rule 234I for the required horizontal and diagonal clearances to rail cars.

㉑ For the purpose of this rule, trucks are defined as any vehicle exceeding 8 ft in height. Areas not subject to truck traffic are areas where truck traffic is not normally encountered nor reasonably anticipated.

㉒ This footnote not used in this edition.

㉓ This footnote not used in this edition.

㉔ Communication cables and conductors may have a clearance of 15 ft where poles are back of curbs or other deterrents to vehicular traffic.

㉕ The clearance values shown in this table are computed by adding the applicable Mechanical and Electrical (M&E) value of Table A-1 to the applicable Reference Component of Table A-2a of Appendix A.

ft

Table 232-1

Vertical Clearance of Wires, Conductors, and Cables Above Ground, Roadway, Rail or Water Surfaces²⁵

(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations. See the definitions section for voltages of other systems. See Rules 232B1, 232C1a, and 232D4.)

Nature of surface underneath wires, conductors, or cables	Insulated communication conductors and cable; messengers; surge-protection wires; grounded guys and ungrounded guys exposed to 0 to 300 V ^{11, 15} ; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rules 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rules 230C2 or 230C3; open supply conductors, 0 to 750 V; ungrounded guys exposed to over 300 V to 750 V ¹⁴ (ft)	Open supply conductors, over 750 V to 22 kV; ungrounded guys exposed to 750 V to 22 kV ¹⁴ (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires	
					0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)
Where wires, conductors, or cables cross over or overhang						
1. Track rails of railroads (except electrified railroads using overhead trolley conductors) ^{2, 16, 20}	23.5	24.0	24.5	26.5	22.0 ⁴	22.0 ⁴
2. Roads, streets, and other areas subject to truck traffic ²¹	15.5	16.0	16.5	18.5	18.0 ⁵	20.0 ⁵
3. Driveways, parking lots, and alleys	15.5 ^{7, 13}	16.0 ^{7, 13}	16.5 ⁷	18.5	18.0 ⁵	20.0 ⁵
4. Other land traversed by vehicles, such as cultivated, grazing, forest, orchards, etc. ²⁵	15.5	16.0	16.5	18.5	—	—
5. Spaces and ways subject to pedestrians or restricted traffic only ⁹	9.5	12.08	12.5 ⁸	14.5	16.0	18.0
6. Water areas not suitable for sailboating or where sailboating is prohibited ¹⁹	14.0	14.5	15.0	17.0	—	—
7. Water areas suitable for sailboating including lakes, ponds, reservoirs, tidal waters, rivers, streams, and canals with an unobstructed surface area of ^{17, 18, 19}						
a. Less than 20 acres	17.5	18.0	18.5	20.5	—	—
b. Over 20 to 200 acres	25.5	26.0	26.5	28.5	—	—
c. Over 200 to 2000 acres	31.5	32.0	32.5	34.5	—	—
d. Over 2000 acres	37.5	38.0	38.5	40.5	—	—

Table 232-1 (Continued)

Vertical Clearance of Wires, Conductors, and Cables Above Ground, Roadway, Rail or Water Surfaces²⁵

(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations. See the definitions section for voltages of other systems. See Rules 232B1, 232C1a, and 232D4.)

Nature of surface underneath wires, conductors, or cables	Insulated communication conductors and cable; messengers; surge-protection wires; grounded guys and ungrounded guys exposed to 0 to 300 V ^{11, 15} ; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rules 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rules 230C2 or 230C3; open supply conductors, 0 to 750 V; ungrounded guys exposed to over 300 V to 750 V ¹⁴ (ft)	Open supply conductors, over 750 V to 22 kV; ungrounded guys exposed to 750 V to 22 kV ¹⁴ (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires	
					0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)
8. Public or private land and water areas posted for rigging or launching sailboats	Clearance above ground shall be 5 ft greater than in 7 above, for the type of water areas served by the launching site					
Where wires, conductors, or cables run along and within the limits of highways or other road rights-of-way but do not overhang the roadway						
9. Roads, streets, or alleys	15.5 ^{13, 24}	16.0 ¹³	16.5	18.5	18.0 ⁵	20.0 ⁵
10. Roads in rural districts where it is unlikely that vehicles will be crossing under the line	13.5 ^{10, 12}	14.0 ¹⁰	14.5 ¹⁰	16.5	18.0 ⁵	20.0 ⁵

¹ Where subways, tunnels, or bridges require it, less clearance above ground or rails than required by Table 232-1 may be used locally. The trolley and electrified railroad contact conductor should be graded very gradually from the regular construction down to the reduced elevation.

² For wires, conductors, or cables crossing over mine, logging, and similar railways that handle only cars lower than standard freight cars, the clearance may be reduced by an amount equal to the difference in height between the highest loaded car handled and 20 ft, but the clearance shall not be reduced below that required for street crossings.

³ This footnote not used in this edition.

⁴ In communities where 21 ft has been established, this clearance may be continued if carefully maintained. The elevation of the contact conductor should be the same in the crossing and next adjacent spans. (See Rule 225D2 for conditions that must be met where uniform height above rail is impractical.)

⁵ In communities where 16 ft has been established for trolley and electrified railroad contact conductors 0 to 750 V to ground, or 18 ft for trolley and electrified railroad contact conductors exceeding 750 V, or where local conditions make it impractical to obtain the clearance given in the table, these reduced clearances may be used if carefully maintained.

⁶ This footnote not used in this edition.

⁷ Where the height of a building or other installation does not permit service drops to meet these values, the clearances over residential driveways only may be reduced to the following:

	(feet)
(a) Insulated supply service drops limited to 300 V to ground	12.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	12.0
(d) Drip loops only of service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(e) Insulated communication service drops	11.5

⁸ Where the height of a building or other installation does not permit service drops to meet these values, the clearances may be reduced to the following:

	(feet)
(a) Insulated supply service drops limited to 300 V to ground	10.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0

Footnotes for Table 232-1 (ft)

- (d) Drip loops only of supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3 10.0

⁹ Spaces and ways subject to pedestrians or restricted traffic only are those areas where riders on horseback, vehicles, or other mobile units exceeding 8 ft in height, are prohibited by regulation or permanent terrain configurations or are otherwise not normally encountered nor reasonably anticipated.

¹⁰ Where a supply or communication line along a road is located relative to fences, ditches, embankments, etc., so that the ground under the line would not be expected to be traveled except by pedestrians, the clearances may be reduced to the following values: (feet)

- | | |
|---|------|
| (a) Insulated communication conductor and communication cables. | 9.5 |
| (b) Conductors of other communication circuits | 9.5 |
| (c) Supply cables of any voltage meeting Rule 230C1, supply cables limited to 150 V to ground meeting Rules 230C2 or 230C3, and neutral conductors meeting Rule 230E1 | 9.5 |
| (d) Insulated supply conductors limited to 300 V to ground | 12.5 |
| (e) Guys | 9.5 |

¹¹ No clearance from ground is required for anchor guys not crossing tracks, rails, streets, driveways, roads, or pathways.

¹² This clearance may be reduced to 13 ft for communication conductors and guys.

¹³ Where this construction crosses over or runs along alleys, driveways, or parking lots, this clearance may be reduced to 15 ft.

¹⁴ Ungrounded guys and ungrounded portions of span guys between guy insulators shall have clearances based on the highest voltage to which they may be exposed due to a slack conductor or guy.

¹⁵ Anchor guys insulated in accordance with Rule 279 may have the same clearance as grounded guys.

¹⁶ Adjacent to tunnels and overhead bridges that restrict the height of loaded rail cars to less than 20 ft, these clearances may be reduced by the difference between the highest loaded rail car

handled and 20 ft, if mutually agreed to by the parties at interest.

¹⁷ For controlled impoundments, the surface area and corresponding clearances shall be based upon the design high-water level. For other waters, the surface area shall be that enclosed by its annual high-water mark, and clearances shall be based on the normal flood level. The clearance over rivers, streams, and canals shall be based upon the largest surface area of any 1-mi-long segment that includes the crossing. The clearance over a canal, river, or stream normally used to provide access for sailboats to a larger body of water shall be the same as that required for the larger body of water.

¹⁸ Where an overwater obstruction restricts vessel height to less than the applicable reference height given in Table 232-3, the required clearance may be reduced by the difference between the reference height and the overwater obstruction height, except that the reduced clearance shall be not less than that required for the surface area on the line-crossing side of the obstruction.

¹⁹ Where the US Army Corps of Engineers, or the state, or surrogate thereof has issued a crossing permit, clearances of that permit shall govern.

²⁰ See Rule 234I for the required horizontal and diagonal clearances to rail cars.

²¹ For the purpose of this rule, trucks are defined as any vehicle exceeding 8 ft in height. Areas not subject to truck traffic are areas where truck traffic is not normally encountered nor reasonably anticipated.

²² This footnote not used in this edition.

²³ This footnote not used in this edition.

²⁴ Communication cables and conductors may have a clearance of 15 ft where poles are back of curbs or other deterrents to vehicular traffic.

²⁵ The clearance values shown in this table are computed by adding the applicable Mechanical and Electrical (M & E) value of Table A-1 to the applicable Reference Component of Table A-2a of Appendix A.



Attachment No. 3