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April 4, 2017

Ms. Talina Mathews
Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602

RECEIVED

APR 07 2017

PUBLIC SERVICE
COMMISSION

Re: **Case No. 2017-00121**

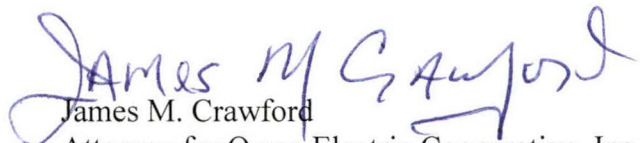
Dear Ms. Mathews:

Please find enclosed for filing with the Commission in the above-referenced case, an original and ten copies of Owen Electric Cooperative, Inc.'s ("Owen Electric") response to the report contained in the Commission's Order dated March 21, 2017, and request for Informal Conference regarding the matter.

Please contact me with any questions.

Respectfully yours,

CRAWFORD & BAXTER, P.S.C.


James M. Crawford
Attorney for Owen Electric Cooperative, Inc.

Enclosures

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

APR 07 2017

PUBLIC SERVICE
COMMISSION

In the Matter of:

OWEN ELECTRIC COOPERATIVE, INC.)

_____)

ALLEGED FAILURE TO COMPLY WITH)
KRS 278.042)

CASE NO. 2017-00121

OWEN ELECTRIC COOPERATIVE, INC.'S RESPONSE TO COMMISSION'S ORDER
DATED MARCH 21, 2017, AND REQUEST FOR INFORMAL CONFERENCE

Comes now Owen Electric Cooperative, Inc. ("Owen Electric"), by and through counsel and for its Response to the Commission's Order dated March 21, 2017, respectfully states as follows:

1. NESC Section 42, Rule 421.A was violated as no written job briefing was conducted.
2. Owen Electric Safety Manual, Section 11, 1105 was violated as no written job briefing was conducted.
3. Owen Electric drafts the rules in its Safety Manual such that these rules meet or exceed federal and state regulations. Accordingly, Owen Electric believes that the violations cited in paragraphs 1 and 2 above are, in essence, one violation.
4. On January 23, 2017, and January 24, 2017, meetings were conducted with field personnel at the Walton Service Center and the Owenton Service Center, respectively, to discuss the incident that occurred on January 20, 2017.
5. On February 1, 2017, the Owen Electric Safety Team met to evaluate the incident and draft revisions to certain components of the Owen Electric Safety Manual ("Safety Manual.") Revisions relating to Safety Manual Section 7, Tree Trimming, were drafted, then presented at the regularly

scheduled safety meeting on February 15, 2017. The comments received from that meeting were incorporated into the final rules in February 2017. The revisions to Safety Manual Section 7, paragraph 701 b) and c), and paragraph 705 b) are provided in Exhibit 1. Additionally, at the safety meeting held on February 15, 2017, details of the January 20, 2017 incident, including pictures, were discussed at length.

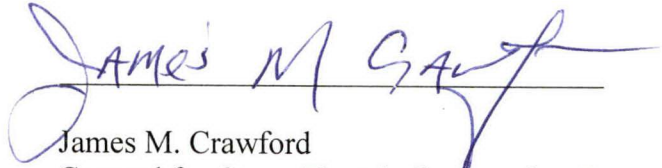
6. At the March 15, 2017 regularly scheduled safety meeting, an enhanced job briefing form was presented, which added the acronym SAFER¹ (Safety, Attitude, Focus, Expectations, Resources.) Two Owen Electric employees created this acronym and shared it with the Safety Team for adoption. Field personnel were instructed on how to complete the form. The enhanced job briefing form is available both in paper copy and in an electronic, fillable version for those field personnel who use iPads or laptop computers. Owen Electric understands both the importance of and regulatory requirements associated with completing a job briefing form. The addition of the SAFER component of the job briefing form will reiterate the importance of assessing the job and its risks prior to beginning work on the job. The job briefing form is provided in Exhibit 2.

WHEREFORE, Owen Electric acknowledges the violations outlined in the Commission's March 21, 2017 Order, respectfully requests the opportunity to discuss this matter at an Informal Conference, or, alternatively, respectfully requests that the Commission consider the steps Owen Electric has taken since the January 20, 2017 incident in rendering its decision in this matter.

¹ Adapted from Lean Manufacturing and Six Sigma concept of SQDC (Safety, Quality, Delivery, Cost)

Dated at Owenton, Kentucky, this 4th of April 2017.

RESPECTFULLY SUBMITTED,

A handwritten signature in blue ink that reads "James M. Crawford". The signature is written in a cursive style and is positioned above a horizontal line.

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EXHIBIT 1

Section 7 TREE TRIMMING

701 General

- a) When tree trimming, tree felling, brush loading or brush disposal operations are under way on street, highway, or any other area accessible to the public, all work zone associated rules will apply. Refer to OEC Safety Manual sec. 4.
- b) { When the complexity of the line clearance potentially exceeds the employee's abilities or equipment abilities, the Owen Electric line clearance/right of way contractor shall be called in to conduct the line clearance.
- c) { When attempting to pull a limb 4" in diameter or larger from lines or equipment, that can be reached by hand from ground level, there shall be a length of rope attached to use for the pulling and the removal, so the employee can maintain a safe distance.
- d) Climbers with pole gaffs shall not be used in trees.
- e) Dead or rotted limbs, regardless of size, shall not be used by employees for support.
- f) No work shall be done in a tree until employee is securely tied in or belted to the tree.
- g) The climbing rope shall be crotched in such a manner as to prevent its "working out" on a lateral limb.
- h) When working in a multiple trunk tree, the climbing rope shall preferably be crotched around a main trunk other than the one on which the employee is working.
- i) Employee shall crotch their climbing rope in two places if a single crotch does not adequately protect them from falling into energized limbs or falling back into trunk of tree.
- j) The climbing rope shall not be used as a pull rope or as a hand line to lower limbs or branches.
- k) The ground end of a climbing rope shall not be allowed to dangle over roadways and shall be kept free from obstructions, passing vehicles, etc.
- l) The taut-line hitch shall not be released until the climber is on the ground.
- m) Branches or other material shall not be dropped unless the immediate area has been cleared so that there is no possibility of injury to persons or damage to property. If such a possibility exists, a rope shall be used to lower branches or other materials.

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- j) Climbing ropes shall be removed from the base of the tree when not in use.
- k) Ropes shall be coiled and piled, or suspended so that air can circulate through the coils.
- l) Rope ends shall be secured to prevent unraveling.
- m) Climbing rope may not be spliced.
- n) A rope that has compromised insulation (for instance, wet or contaminated) may not be used near exposed energized lines or equipment.

705 Powered Trimming Equipment

- a) Employees operating powered trimming equipment shall wear suitable head protection, hand protection, hearing protection, eye protection, approved leg chaps (except when in aerial basket) and foot protection (approved steel or composite toed work boots).

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2/17

- b) { When operating chainsaws during line clearance operations, another employee trained in first aid and CPR shall be present.
- c) For hearing protection requirements, refer to OEC Safety Manual sec. 204.
- d) Chainsaw operators shall inspect the saw before each use to assure that all handles and guards are in place and tight, that all controls function properly, and that the muffler is operational.
- e) Chainsaw operators shall follow manufacturer's instructions on operation and maintenance.
- f) Power saws weighing more than 15 pounds that are used in trees shall be supported by a separate line, unless the work is performed from an aerial lift or no supporting limbs are available.
- g) When starting a chainsaw, it shall be placed on or against a solid support and the area cleared of all co-workers.
- h) The operator shall grip the chain saw with both hands during the entire cutting operation.
- i) Saw bumper shall be against tree or limb before starting a cut.
- j) Chainsaw operators shall, when necessary, clear the immediate area around their work to make certain the brush will not interfere with either the chain saw or operator.

EXHIBIT 2

**OWEN ELECTRIC COOPERATIVE
JOB BRIEFING COMPLIANCE CHECKLIST**

JO # / WO #:		Location #:	
Substation:		Address:	
Feeder:		Truck(s) #:	
ARE YOU IN COMPLIANCE?			
	YES	NO	N/A
			COMMENT
1. Job briefing occurs at beginning of each new job.			
2. Job briefing occurs if significant changes in work occur.			
3. More extensive briefing is conducted if work is complicated, particularly hazardous, or employees cannot be expected to recognize and avoid the hazards of the job.			
4. Job briefing contains at least:			
A. The hazards associated with the job.			
B. Work procedures involved.			
C. Special precautions.			
D. Energy source controls.			
E. PPE requirements.			
5. Voltage <input type="checkbox"/> 7,200 <input type="checkbox"/> 14,400 <input type="checkbox"/> Other (<i>specify</i>)			

REMINERS

- | | |
|---|--|
| <input type="checkbox"/> Direction of Feed
<input type="checkbox"/> Non-Reclose Operation (Lockout/Tagout)
<input type="checkbox"/> De-energize Location
<input type="checkbox"/> De-energize Lines: Tested and Grounded
<input type="checkbox"/> U/G Facilities Located
<input type="checkbox"/> Safety Check on Vehicle(s) | <input type="checkbox"/> Body Belt, Safety Strap and Climbers
<input type="checkbox"/> Traffic Warning Devices
<input type="checkbox"/> Rubber Gloves/Sleeves
<input type="checkbox"/> Rubber Cover-up Goods
<input type="checkbox"/> Check Poles/Structures
<input type="checkbox"/> Guarding of Work Area |
|---|--|

"A NO IS A NO GO"	YES	NO	COMMENT
Safety - Can we do this job safely?			
Attitude - Do we have a good attitude about work today?			
Focus - Is everyone focused on Safety?			
Expectations - Do we know what is expected of us?			
Resources - Do we have the equipment and personnel needed?			

Safety Concerns and Suggestions:

SIGNATURE OF PERSON IN CHARGE

Date

Time

am
pm

ALL PERSONS ATTENDING JOB BRIEFING PRINT AND SIGN NAME. INITIALS NOT ACCEPTED.
