

**Mark David Goss**

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June 14, 2011

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JUN 15 2011

PUBLIC SERVICE  
COMMISSION

Mr. Jeffrey Derouen  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
P. O. Box 615  
Frankfort, Kentucky 40602-0615

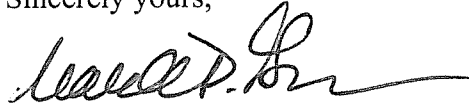
Re: In the Matter of: Meade County Rural Electric Cooperative Corporation  
PSC Case No. 2010-00375

Dear Mr. Derouen:

Enclosed please find an original and ten (10) copies of Meade County Rural Electric Cooperative Corporation's Application for Rehearing to be filed in the above-captioned case pursuant to 807 KAR 5:001, Section 4(10) and KRS 278.400. Please file these documents of record and return a file-stamped copy to me in the enclosed self-addressed stamped envelope.

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

Sincerely yours,



Mark David Goss

Enclosures

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**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

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PUBLIC SERVICE  
COMMISSION

**In the Matter of:**

**MEADE COUNTY RURAL ELECTRIC )  
COOPERATIVE CORPORATION )**

**CASE NO. 2010-00375**

\_\_\_\_\_)  
**ALLEGED FAILURE TO COMPLY WITH )  
KRS 278.042 )**

**APPLICATION FOR REHEARING**

Comes now Meade County Rural Electric Cooperative Corporation (“Meade County”), pursuant to KRS 278.400 and 807 KAR 5:001, Section 4(10), and applies to the Kentucky Public Service Commission (the “Commission”) for an Order sustaining Meade County’s request for rehearing and modifying certain portions of the Commission’s Order dated June 3, 2011.

In support of this Application for Rehearing, Meade County states as follows:

1. The portions of the Commission’s June 3, 2011 Order which are the subject of this Application for Rehearing are ordering paragraphs 8 and 9. Meade County does not object to the filing of the safety audit documents provided for in those ordering paragraphs. However, Meade County does object to the stated deadline for the filing of such documents. Specifically, ordering paragraphs 8 and 9 require that the safety audit documents in question are to be filed “... on or before the 15<sup>th</sup> day of the month following the final month of the quarter for which the documents are being filed.”

2. This deadline only provides Meade County a period of 15 days following quarter’s end within which to file the required safety audit documents at the Commission. While it would certainly try to provide these documents within the 15-day period set forth in the Order,

as a practical matter, Meade County would have a great deal of difficulty in doing so. By the Commission's Order, both Meade County's and the contractor's safety staffs are to perform safety audits for each contractor crew working on Meade County's system. Because these audit documents are to come from both safety staffs, it could well prove problematic to expect the respective safety staffs to finalize all audits, turn them in to Meade County, have Meade County review, file and copy the safety audits and transmit them to the Commission, all within a 15-day time period.

3. In order to allow sufficient time to compile and file such audit documents to the Commission, Meade County would need an additional 30 days beyond the 15 days the Commission granted in the June 3, 2011 Order, or, up to a total of 45 days . As such, Meade County respectfully requests that the Commission's June 3, 2011 Order, specifically ordering paragraphs 8 and 9, be modified to reflect that the safety audit documents requested shall be filed on or before the 15<sup>th</sup> day of the second month following the final month of the quarter for which the documents are being filed.

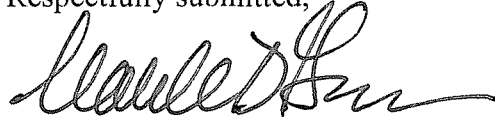
4. Meade County's Application for Rehearing to modify the filing dates for these safety audit documents is not made for purposes of hindrance or delay, but, rather, so that comprehensive safety audits from both Meade County's and the contractor's safety staffs can be obtained, after which Meade County would have a reasonable time to compile, file and transmit such safety audit documents to the Commission for filing and review.

WHEREFORE, Meade County respectfully requests that the Commission sustain this Application for Rehearing and modify ordering paragraphs 8 and 9 of the Commission's June 3, 2011 Order so as to provide that: "Quarterly safety audit documents shall be filed on before the

15<sup>th</sup> day of the second month following the final month of the quarter for which the documents are being filed.”

This 14<sup>th</sup> day of June, 2011.

Respectfully submitted,



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*Counsel for Meade County Rural Electric  
Cooperative Corporation*