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VIA HAND DELIVERY

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Executive Director
Public Service Commission of Kentucky
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Frankfort, Kentucky 40602

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RE: Case No. 2016-00202

Dear Dr. Mathews:

At the conclusion of the informal conference in this matter on August 9, 2016, Commission Staff requested three follow-up items: 1) a summary of the remedial actions Louisville Gas and Electric Company (“LG&E or the “Company”) took as a result of the March 31, 2016 incident that is the subject of this case; (2) an update on the Company’s Work Safety Audit procedures; and (3) documentation of any changes to Company policies or procedures.

1) Remedial Actions

The Company took six actions as a result of the incident with Mr. Edds on March 31, 2016. First, the Company issued time off to both Mr. Edds and Tom Malloy, the foreman who was leading the crew at the time of the incident. Second, both Edds and Malloy actively participated in safety tailgate sessions, taking responsibility for their actions with peers. Third, the Company issued a Safety Watch to all operation centers on March 31, which described the event at a high level and asked all employees to stop, refocus and recommit to the Company’s safety excellence. Fourth, the Company conducted a Safety Stand-down in all Louisville operation centers on April 5, in which Management reviewed the Company’s Electric Distribution Operations Safety Plan, reviewed the specific incident, including what was done wrong and what was done right, and reviewed the Safety Reinforcement policy in issuing discipline. Fifth, the Company conducted a Safety Blitz from April 25 – April 29, 2016, in which the management team went into the field and emphasized the following topics: job briefings; vehicle safety; stress hazards associated with the heat; work practices; proper site angles of job observation; identifying hazards; being your brother’s keeper; when working on various conductors, look at the entire span to identify



splices that could break or cause a hazard; and ensuring that work will not negatively impact customers or property. Finally, the Company instituted continuous training on the Safety Handbook, assigning various employees to review certain sections with peers at each weekly tailgate.

2) Work Safety Audit

LG&E conducts regular work safety audits for its Electric Distribution Operations employees working on overhead and underground facilities. Several LG&E employees conduct these audits: the Manager of LG&E's Louisville Electric Distribution, Field Coordinators, Group Leaders, Team Leaders, and representatives from the Safety Team. These audits are unannounced and they cover a wide range of safety topics, such as job planning and briefings, work area protection, personal protective equipment, cover-up protection, and recognizing other specific hazards. The team audits both employees and contractors working in the field. The Company employees conducting the audits complete an audit form, which is submitted electronically and stored in a database. An LG&E employee then reviews the forms and ensures that the Company addresses any deficiencies noted. The Company has set a goal of 65 audits per month. Through the end of July of this year, the Company had conducted 587 safety audits (above the 455 target for this point in the year) in the Louisville Electric Distribution group. The Company does not have set crews that always work together. Depending on the particular job, the crew size varies. Thus, it is not possible to track exactly how often each individual employee is audited; but the Company is confident that, given the frequency of these work safety audits, the audits reach all employees and contractors regularly.

3) Changes to Company Policies

After reviewing current practices across the Company's client groups and surveying other utilities in the industry, the safety team made, and the Company has now adopted, the following recommendations regarding installation of hot line clamps:

- It is acceptable to attach hot line clamps to conductors by hand under the following conditions:
 - No load is being picked up
 - No lighting arrestors are being energized



PPL companies

- Proper cover up is applied when working within the Minimum Approach Distance for any energized conductor or difference in potential
- Should these conditions be met and the hot line clamp is attached to the conductor by hand, the hot line clamp shall be tightened to the conductor with an approved hot stick
 - Screwdrivers, pliers, and other tools are not considered approved tools as stated in LGE/KU safety manual (A.24.4)

The Company issued a Safety Watch to convey this Work Practice to employees, and I have included a copy of that here.

We believe this provides all of the additional information requested. I have also included two additional copies of this letter and the Safety Watch. Please have one of the copies stamped as received and returned to me in the enclosed, self-addressed envelope. Should you have any questions or need anything further, please do not hesitate to contact me.

Sincerely,

A handwritten signature in blue ink that reads "Sara Veeneman".

Sara Veeneman

Encl.

cc: Molly Katen
Nancy Vinsel

August 17, 2016

Item: Work Practice – Hot Line Clamp Installation

From: LGE/KU Safety Department



Current work practices across our company and across our industry allow for the installation of a hot line clamp by hand under certain circumstances. This will continue to be an accepted work practice at LGE/KU, unless the employee is:

- Picking up any load
- Energizing any lightning arrester



Proper cover up shall be applied when working within the Minimum Approach Distance (MAD) for any energized conductor or difference of potential. (*LGE/KU Health and Safety Manual D.1.8*)

Should these conditions be met, and the hot line clamp is attached to the conductor by hand, the hot line clamp shall be tightened to the conductor using an approved hot stick. Screwdrivers, pliers, or any other tools are not considered approved tools for the tightening of a hot line clamp. (*LGE/KU Health and Safety Manual A.24.4 Tools shall be used for only the purposes for which they have been designed, manufactured and approved.*)

For comments or questions regarding this information, call your Safety representative