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August 20, 2004

**RECEIVED**

**AUG 23 2004**

**PUBLIC SERVICE  
COMMISSION**

**VIA FEDERAL EXPRESS**

Elizabeth O'Donnell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40601

**RE: In the Matter of: Louisville Gas and Electric Company / Alleged Failure to Comply with Commission Regulation 807 KAR 5:041, Section 3(1)**  
**KPSC Case No. 2004-00096**

Dear Ms. O'Donnell:

As was discussed at the conclusion of the informal conference held on July 29, 2004, please find and accept for filing the additional representations and documentation requested by Commission Staff. Please confirm your receipt of this filing by placing the stamp of your Office with the date received on the enclosed additional copies and return them to me in the enclosed self-addressed stamped envelope. In the chronological order of events surrounding the accident the Company submits the following documentation and representations for filing in the record:

1. The Commission Staff requested any documentation regarding the job briefing that occurred before the commencement of the work to be performed by A&T Industrial Services ("A&T). While the briefing itself was verbal, Exhibit A is a copy of the sign-in sheet for the job briefing.
2. The Company submits the following representations for the record with respect to the steps taken following the incident:
  - A. A&T was required to cease all work on the cooling tower project.
  - B. A&T was required to drug test employees working on the cooling tower project.
  - C. A&T was not permitted to perform further work for the Company until evidence of completion of refresher safety training was completed. Exhibit B is a Training Attendance Roster provided by A&T after the incident.

- D. A&T was required to represent that they would provide all personnel working for the Company with fall protection equipment, and require that all work at the Company would begin with a job briefing for personnel, which would include identification of hazards and notification of safety precautions.
3. A&T was replaced on the cooling tower project. An invoice from Nelson Industrial Services, the contractor that completed the work, is included as Exhibit C. The Company represents that the opening involved in the incident was planked prior to Nelson's resumption of work on the project.
4. Immediately following the incident, the Company requisitioned custom fabricated covers for the opening into the riser pipe. Those covers have been received and are stored on the cooling tower in close proximity to the openings used to access the interior of the cooling tower. Exhibit D contains a picture of these covers.
5. The Company has revised the work order to be issued for future cooling tower cleaning work to provide:
- A. For installation of the above-referenced covers prior to commencing work on the pipe.
  - B. For use of fall protection while the covers are being installed.
  - C. That the location of the covers be discussed in the job briefing prior to commencement of work.

A copy of the revised work order is contained at Exhibit E.

Should you have any questions or need any additional information, please contact me at your convenience.

Very truly yours,



J. Gregory Cornett

Enclosure

cc: Anita Mitchell  
Michael S. Beer  
James Dimas  
John Wolfram



Toolbox Safety

Activity: <u>HEADER PIPES / LOWER VESTIBULE</u>	Date: <u>10-31-03</u>
Project: <u>LG&amp;E Mill Creek Generating Station</u>	
Site Supervisor: <u>Jackie Townsend</u>	
Site Safety Officer: <u>Todd Tallon</u>	
Review for latest use: Before the job is performed.	

Description of the work:  
Clean dust from vestibule  
Clean Header pipes / Floors

- + Jackie Townsend James J. Goetke
- + Matt Adams
- + James Gray
- + Christopher Masley
- + Robert D. Dike
- + Grant [Signature]



# Training Attendance Roster Sheet

Course Name CONFINED SPACE WORKER LEVEL TRNG Date 11-5-03  
FALL PROTECTION - REFRESHER  
 Time 12:30 - 4:30 PM Trainer GARY YURT, MS, CFPS, EMT-D Gougeon

Trainee Name (Please print)	Company	Trainee Signature
Michael Alibekasidby	ART Ind	<i>[Signature]</i>
CHAD FLAHERTY	AIT Ind	<i>[Signature]</i>
W Lee Castle	AIT Ind	<i>[Signature]</i>
ELROY HARRIS JS	ART Ind	<i>[Signature]</i>
Stacie Townsend	AT Ind	<i>[Signature]</i>
<del>James Koetter</del>		<i>[Signature]</i>
<del>James Smith</del>		<i>[Signature]</i>
Jason Tallon		<i>[Signature]</i>
Bill Sharp		<i>[Signature]</i>
Bill Sackens		<i>[Signature]</i>
DEFF BLASZ		<i>[Signature]</i>
MATT ADKINS		<i>[Signature]</i>
James Gray		<i>[Signature]</i>
George Taiser		<i>[Signature]</i>
Chris Gillbert		<i>[Signature]</i>
Ronald Lee		<i>[Signature]</i>
Steve Schufel		<i>[Signature]</i>
John Crawford		<i>[Signature]</i>





P.O. Box 2128  
 Evansville, Indiana 47728-0128  
 (812) 422-9122 or (502) 826-4843

# INVOICE

INVOICE NUMBER: 7528

INVOICE DATE: Nov 14, 2003

PAGE:

BILL TO:

LOUISVILLE GAS & ELECTRIC CO  
 ACCOUNTS PAYABLE  
 P.O. BOX 32010  
 LOUISVILLE, KY 40232

PLANT NAME:

TERRI COOK  
 MILL CREEK STATION  
 14660 DIXIE HIGHWAY  
 LOUISVILLE, KY 40272

*Power Plant Entry*

**PPÉ**

*N. OPPEL*

JOB START	JOB COMPLETE	VENDOR NUMBER	CONTRACT NUMBER	JOB NUMBER
11/10/03	11/11/03	<u>55927</u> -1422724		Net 30 Days

#4 LINE MOLE HEADERS IN COOLING TOWER.

DESCRIPTION	QUANTITY	UNIT PRICE	EXTENSION
800 H.P. PUMP	22.50	120.00	2700.00
SUPERVISOR	22.50	30.00	675.00
EQUIPMENT OPERATOR	22.50	27.00	607.50
LABORER	22.50	26.00	585.00
EXTRA LABORER	22.50	26.00	585.00
SUBSISTENCE	4.00	60.00	240.00
FUEL SER CHARGE	675.00	0.40	270.00

CPA NUMBER: 55927  
 PROJECT#: MCHFO3SPR TASK#: 1422724  
 EXPENDITURE ORG: 002401  
 EXP TYPE: 0301 2692.50 0670 270.00 0303 270.00  
 LEADER SIGNATURE: *[Signature]*  
 MANAGER SIGNATURE: *[Signature]*

We certify that the Fair Labor Standards Act of 1938 as amended has been complied with in the production of goals and or with respect to services furnished covered by this invoice Executive Order 11640

TERMS: NET  
 Invoices over 30 days will be subject to a SERVICE CHARGE OF 1 1/2% PER MONTH (18% ANNUAL RATE)

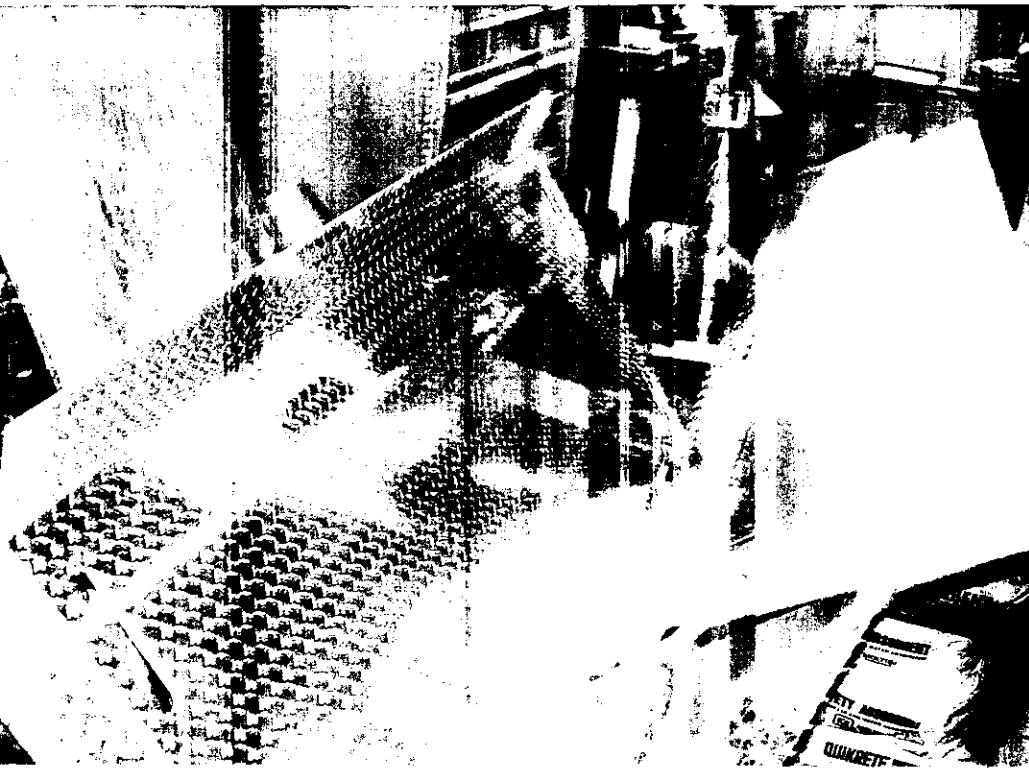
SUBTOTAL	\$5,662.50
TAX	
PAYMENT	
TOTAL	<u>\$5,662.50</u>

*VB*

ORIGINAL









## PM GEN Work Order Report

PM # 02120-01 PM-UNIT 4 COOLING TOWER INSPECT AND REPAIR AS PER ATTACHED Master PM N

1) GREASE FRONT STANDARD BASE PLATES & GUIDES 2) GREASE MIDDLE BEARING STANDARD  
 BASE PLATES & GUIDES 3) GREASE LOW PRESSURE TURBINE SECTION FOOT PLATES NOTE:  
 CHEVRON ULTRA DUTY GREASE NO. 2

PM-UNIT 4 COOLING TOWER INSPECT AND REPAIR AS PER ATTACHED MEMO. TREAT GASKETS,  
 PACKING, INSULATION AS ASBESTOS (IF NOT TAGGED NON ASBESTOS).

IMPORTANT: BEFORE ANY WORK IS BEGUN ON COOLING TOWER THE COVER PLATES NEED TO BE  
 INSTALLED OVER THE RISER HOLE OPENING INTO THE FLUME PRIOR TO START OF WORK. FALL  
 PROTECTION WILL BE USED WHILE THE COVER PLATES ARE BEING INSTALLED. JOB BRIEFING SHALL  
 INCLUDE THAT THE COVER PLATES ARE LOCATED ON TOP OF UNIT 4 COOLING TOWER .UNTIL THE  
 COVERS ARE IN PLACE, THE COOLING TOWER IS TREATED AS A PERMITTED CONFINED SPACE.

WHEN WE USE INDUSTRIAL CLEANERS TO CLEAN THE FLUMES, MONITOR THE AIR IN THE CONCRETE  
 FLUMES PRIOR TO ENTERING. THE LOCATION OF THE FLUMES IS CONSIDERED PERMITTED CONFINED  
 SPACE AND ALL PROCEDURES AND REQUIRED PPE WILL BE USED.

Location MC004CW-CT- COOLING TOWER

Equipment

Route

### Details

Next Job Plan

Crew	MCM1	Work Order Status	WAPPR	Crew Size	4.00	Storeroom	MCS
Supervisor	E003118	WO Priority	OUTAGE	Outage Class	CW	Lead Time Active ?	
RespCenter	002401	Work Type	PREVENTIVE	Est Hrs.	86.50	Lead Time (Days)	0.00
Labor Type	MECH	Interruptable	Y	Last Wo Number	1422730		