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Elizabeth O'Donnell
Executive Director
Public Service Commission of Kentucky
211 Sower Boulevard
Frankfort, Kentucky 40602

JUL 14 2006

PUBLIC SERVICE
COMMISSION

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July 14, 2006

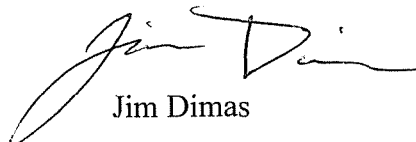
Re: In the Matter of: Louisville Gas and Electric Company – Alleged
Failure to Comply with KRS 278.042, Case No. 2006-00084

Dear Ms. O'Donnell:

Pursuant to the Commission's Order of June 16, 2006 in the above-referenced docket, enclosed please find ten (10) copies of the written guidelines that have been developed for Louisville Gas and Electric Company's ("LG&E") employees and contractors regarding the potential hazards from working on street light poles near energized lines and of the written response from United Electric Company.

Should you have any questions concerning the enclosed, please do not hesitate to contact

Sincerely,



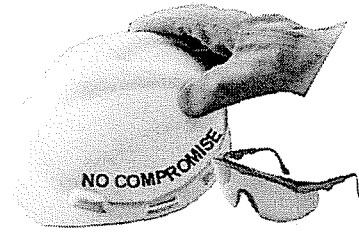
Jim Dimas

June 14, 2006

SAFETY WATCH

Item: Procedures for handling street light poles and fixtures near energized lines

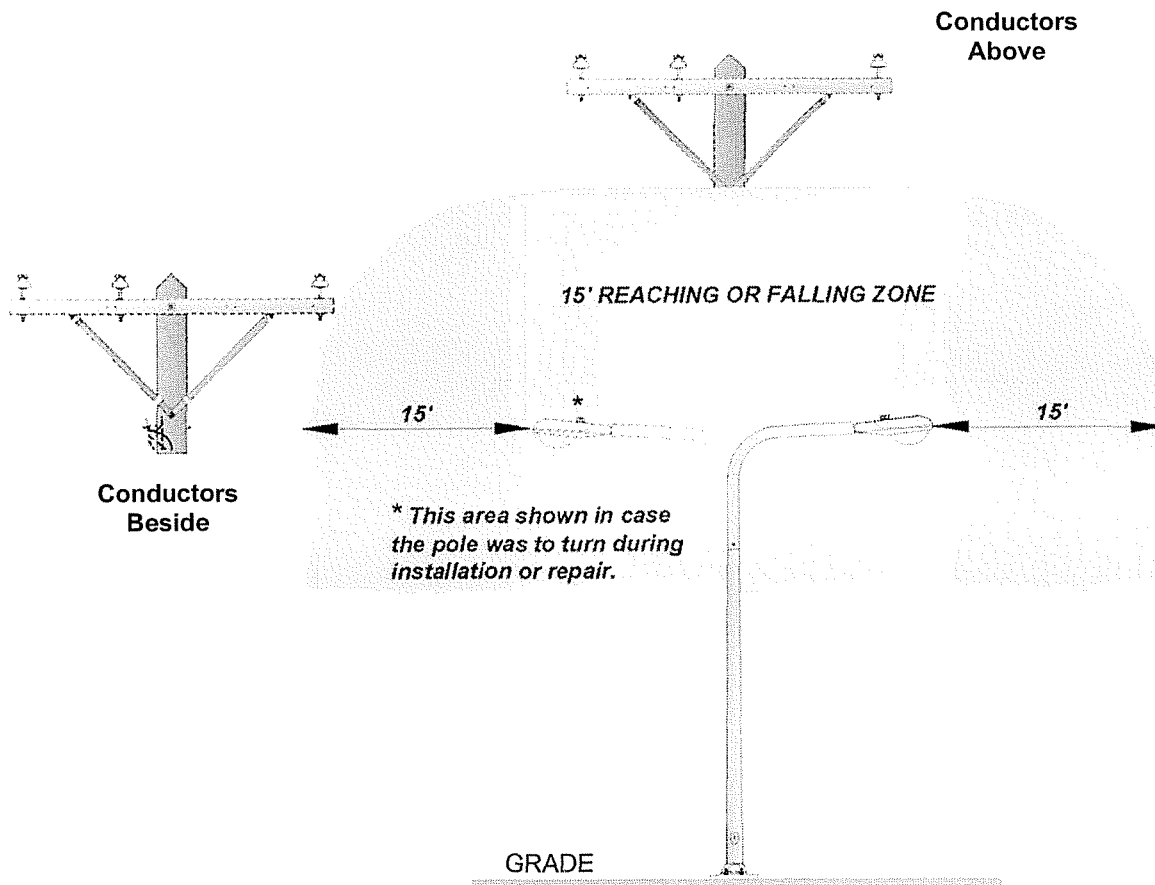
From: Doug Mullins



All LG&E/KU/ODP employees and contractors shall take all necessary precautions to avoid contact with energized lines while removing, installing, or repairing street light poles and fixtures.

Street light poles and or fixtures that are within 15' of reaching or falling distance from energized primary/secondary conductors shall be secured so that no inadvertent movement may cause them to come in contact with the primary/secondary conductors. If there are inadequate means to secure the pole or fixtures then the primary/secondary lines must be covered with rubber goods and insulating materials.

Removal of the mast arm and fixtures prior to moving the pole may be required to maintain adequate control while lowering the street light pole. When LG&E/KU/ODP employees or contractors are removing, installing or repairing street light poles that are within 15' of reaching distance or falling distance of energized primary conductors or equipment Class 2 rubber gloves and sleeves shall be worn by workers handling the pole and/or fixtures.





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Doug,

Here are the preventive measures that we developed where such an incident will not happen again.

Preventive Measures:

As a result of this incident United Electric Company has taken the following steps to insure this will not happen again:

1. On June 15, 2005 at 7:00am. United Electric had a safety toolbox talk on what happened and how we can prevent this from happening again. Any employees that were not present due to vacation or school will be advised on the new policies before they return to work.
2. United Electric's new policy is that we will remove all fixtures and arms from the standard before any pole is to be removed or when any base is to be changed out. This will limit the weight and the possibilities of the standard moving or getting away from the workers.
3. If there is **any** potential that we might get into a high voltage line then our journeyman lineman will use their line hoses and blankets to cover up any potential areas that might be affected. Once determined that we need to use our rubber goods to cover the line up then the lineman will contact dispatch and make them aware of the situation.
4. Also, if the potential is there for us to get into a high voltage line all journeyman lineman working on the ground or in the bucket will have gloves and sleeves on. No apprentice will work on the standard until it is out of harms way.
5. We will also continue to have a job briefing before every job to emphasize all the hazards that are associated with it. By conducting a job briefing it will allow the employees to look for any hazards and let them determine the safest way to perform the task.



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United Electric Company stressed to all their employees again the importance of safety and how we need to prevent accidents and serious injuries from occurring. Safety is the 1st priority with United Electric and we want to stress to LG&E that this is a serious matter to us.

On June 15, 2005 we spent 6 hours re-training our employees on what to look for when performing tasks that involved hazards working around high voltage. We discussed the new policy on removing any standard that has a fixture on it and the proper way to bring the standard to the ground.

United Electric will retrain all employees' on a quarterly basis on such hazards to keep them aware of the importance of doing a job in the safest way possible.

Sincerely,



Mark Hatcher
Safety Director