### DARRELL L. SAUNDERS, P.S.C.

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COMMISSION

### FAX TRANSMISSION SHEET

DATE: August 25, 2009

RE: South Kentucky RECC Alleged Failure to Comply with KRS 278-042 (PSC Case No. 2009-00015)

**RECIPIENT:** Executive Director, Public Service Commission

FAX NUMBER: 502-564-3460

FROM: Darrell L. Saunders

TOTAL NUMBER OF PAGES (INCLUDING COVER): 4

**MESSAGE**:

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### COMMONWEALTH OF KENTUCKY

### BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

# SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION

) CASE NO. 2009-00015

)

# ALLEGED FAILURE TO COMPLY WITH KRS 278.042

#### WITNESS AND EXHIBIT LIST

Comes South Kentucky Rural Electric Cooperative Corporation, ("South Kentucky") by

counsel, and states that it may call the following witnesses and introduce the following exhibits

the September 1, 2009 hearing of the above cause:

### WITNESS LIST

- 1. Eddie Black, South Kentucky Safety Team Leader.
- 2. E. Allen Anderson, South Kentucky CEO.
- 3. Richard Randell, South Kentucky Safety Coordinator.
- 4. Eric Minton, Davis H. Elliot Company, Inc. COO.
- 5. Don Adkins, Davis H. Elliot Company, Inc. Safety and Training Manager.

### EXHIBIT LIST

- 1. South Kentucky Safety Manual.
- 2. Davis H. Elliot Company, Inc. Safety Manual.
- 3. Prior final orders of PSC penalty proceedings.
- 4. Federal and state OSHA regulations, policies and directives.
- 5. Documentation from OSHA regarding the accident which is the subject of this

action.

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PUBLIC SERVICE COMMISSION

- 6. South Kentucky's investigation report.
- 7. Davis H. Elliot Company, Inc.'s investigation report.
- 8. South Kentucky/Davis H. Elliot Company, Inc. contract.
- 9. Governor's Safety and Health Award.
- 10. Safety Accreditations from National Rural Electric Cooperative Association.
- 11. South Kentucky Board Policy regarding safety.
- 12. South Kentucky employee safety and corrective action policy.
- 13. Description of South Kentucky's safety team duties and responsibilities.
- 14. South Kentucky's Safety Reports from 2001 through 2009.
- 15. Documentation of South Kentucky's bid process for contractors.
- 16. South Kentucky's rate reductions of Workers Compensation premiums due to

limited number of claims.

17. South Kentucky organizational chart.

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ATTORNEY FOR SOUTH KENTUCKY RURAL ELECTRIC COMMISSION

### CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was this 25<sup>th</sup> day of August, 2009 via facsimile transmission and deposited in the regular United States mail, all postage prepaid and addressed for delivery to Mr. Rick Bertelson, Public Service Commission, 211 Sower Blvd., P.O. Box 615, Frankfort, KY 40602-0615.

Original to: Mr. Jeff Derouen, Executive Director, Public Service Commission, 211 Sower Blvd., P.O. Box 615, Frankfort, KY 40602-0615.

, Del

ATTORNEY FOR SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE CORPORATION