

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

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AUG 26 2009
PUBLIC SERVICE
COMMISSION

In the Matter of:

SOUTH KENTUCKY RURAL ELECTRIC
COOPERATIVE CORPORATION

ALLEGED FAILURE TO COMPLY WITH
KRS 278.042

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)
) CASE NO. 2009-00015
)
)
)

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.

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.



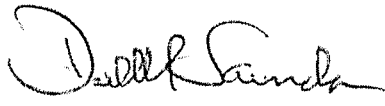
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ATTORNEY FOR SOUTH KENTUCKY RURAL
ELECTRIC COMMISSION

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing was this 25th 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.

A handwritten signature in black ink, appearing to read "David R. Smith", is written over a horizontal line.

ATTORNEY FOR SOUTH KENTUCKY RURAL
ELECTRIC COOPERATIVE CORPORATION