Goss Samford

ATTORNEYS AT LAW | PLLC

L. Allyson Honaker
allyson@gosssamfordlaw.com
(859) 368-7740

RECEIVED
JUL 31 2017
PUBLIC SERVICE COMMISSION

July 31, 2017

Via Hand-Delivery

Mr. John S. Lyons
Acting Executive Director
Kentucky Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, KY 40602

Re: *In the Matter of: East Kentucky Power Cooperative, Inc. Failure to Comply with KRS 278.042* - PSC Case No. 2017-00084

Dear Mr. Lyons:

Enclosed please find for filing with the Commission in the above-referenced case an electronic copy of East Kentucky Power Cooperative, Inc.'s revised safety manual is contained on the attached CD. In addition, a hard copy of the Job Hazard Risk Assessment (Field Hazard Risk Analysis) is attached. These documents were required by ordering paragraph 3 of the Commission's June 30, 2017 Order. A statement that the rigging training is complete, also pursuant to ordering paragraph 3, will be filed upon the completion of the training and prior to the October 31, 2017 date contained in the Stipulation and Settlement Agreement attached to the Commission's June 30, 2017 Order. Please return a file-stamped copy to me.

Do not hesitate to contact me if you have any questions.

Very truly yours,

L. Allyson Honaker

Enclosures

Power Delivery
Field Hazard Analysis Instructions

A full Power Delivery Field Hazard Analysis (sections A.1 – A.3) should be conducted if the job is newly established, non-routine, high-risk, or infrequently performed and a current JHA does not exist or is not accessible. These should be conducted prior or during the job briefing and reviewed with the team or crew prior to work commencing.

A.1 Identification of Job Tasks

Breakdown each job into a sequence of basic steps. Avoid breaking down the job in excessive detail where an unnecessarily large number of steps result and breaking down the job in such general terms that basic steps are not recorded. The purpose is to identify hazards by analyzing the task at hand.

A.2 Identification of Job Hazards Associated with Job Tasks

Check or list all potential hazards of the job by identifying the hazardous conditions that could potentially lead to an accident. A hazard is anything that has the potential for harm. In practical terms, a hazard often is associated with a condition or activity that, if left uncontrolled, can result in an injury or illness. Review past experiences (if any) in performing the job.

A.3 Identification of Hazard Controls

For each Hazard identified, check or list the Hazard Control Measures to be taken to protect the worker from the Hazard. Hazard control measures are systems that can reduce or eliminate the risks associated with a hazard. These may include engineering controls (i.e. elimination of the hazard, enclosure or isolation of the hazard, etc.), administrative controls (i.e. written procedures, exposure time limitations, monitoring, buddy system, training, etc.), and personal protective equipment (PPE). The Job Hazard Analysis shall be used as a guide for determining what actions are necessary to eliminate or minimize the hazards associated with the job.

Note: Every job should have sections A.2. and A.3 completed to account for changes in environments and circumstances. Only jobs that are newly established, non-routine, high-risk, or infrequently performed and a current JHA does not exist or is not accessible should have sections A.1, A.2, and A.3 completed.

EAST KENTUCKY POWER COOPERATIVE
JOB BRIEFING (JB)

Safety is our number one priority.

- Safety is an essential part of everything we do.
- Staying safe and returning home safely is more important than any outage.
- When the demands of the job challenge our focus, safety shall remain our top priority.

Location:	**Department:**	**Date:**
Longitude: **Latitude:**	**Name of nearest major road for emergency evacuation:**	**Nearest 911 Address:**

Work Performed:	
Person in Charge:	

Weather Conditions:	Indoor	Clear	Overcast	Rain	Snow

	Discussion Items	**Comments**
☐	Notification of proper personnel to log into location where work will be performed (i.e., substation/plant)	
☐	Hazards associated with the job (including the content of any existing JHA's) and how they can be eliminated or addressed should be annotated in columns A.2 and A.3 of the attached FHA.	Hazard Identification and Controls should be marked in columns A.2 and A.3 of the attached FHA for all Jobs. A full FHA (with job steps annotated) will need to be completed if the job is newly established, non-routine, high-risk, or infrequently performed and a current JHA does not exist or is not accessible.
☐	Work procedures to be used to perform the job	
☐	Special precautions	
☐	Control of energy sources	
☐	Personal Protective Equipment (PPE) required	
☐	Emergency Considerations Discussed	☐ Primary Communication (cell or radio) ☐ Evacuation Route and Location of Possible LZ ☐ Location of Fire Extinguisher and Medical Equipment

The discussion items listed above were covered prior to the start of the work to be performed today. By signing this form, I am confirming that I understand the steps and procedures that are required to ensure this job is completed in a safe manner.

Signed	**Date**	**Signed**	**Date**

All completed and signed forms should be forwarded to the appropriate Safety Coordinator upon completion of the work assignment, no later than one month after the date of the Job Briefing. Safety Coordinators shall retain all completed and signed Job Briefing forms for a period of one year to meet the requirements set forth by the Kentucky Public Service Commission (PSC). Note: Reference OSHA Standard 1910.269(c) on job briefing requirements.

Field Hazard Analysis (FHA)

Analysis By:	Date:	Location:	All Jobs : Complete Sections A.2 Potential Hazards and A.3 Hazard Controls ☐ JHA Does Not Exist and Job is newly established, non-routine, high-risk, or infrequently performed : Complete Entire FHA
Tools and Equipment:		Previous Lessons Learned:	

[A.1] Job Tasks	[A.2] Potential Hazards	[A.3] Hazard Controls
	☐ Electrical Contact ☐ Electric Arc Flash ☐ Energized Lines or Equipment ☐ Stored Energy (Tension, Pressure, etc.) ☐ Confined / Enclosed Space Entry ☐ Vehicular Operations ☐ Heavy Equipment Operations ☐ Civilian Vehicular or Pedestrian Traffic ☐ Potential for Vehicle Roll-over ☐ Other Crews Working in Area ☐ Height or Work Elevations (i.e. climbing) ☐ Chemical Exposure ☐ Poor Lighting / Visibility ☐ Poor Ventilation (fumes) ☐ Fire / Flammable / Combustibles ☐ Hot Surfaces ☐ Overhead Hazard / Falling Debris ☐ Crush or Pinch Points ☐ Impact / Penetration ☐ Light (Optical) Radiation ☐ Rotating Equipment / Moving Parts ☐ Height or Work Elevations ☐ Difficult Environment or Terrain ☐ Difficult Egress ☐ Extreme Hot / Cold Climate ☐ High Winds/Storm/Lightening/Ice ☐ Pressure System (Steam, Air, Water) ☐ Telephone Not Working In Area ☐ Slip/Trip/Fall Hazards ☐ Body Position/Lifting ☐ Bending/Twisting ☐ Kneeling/Squatting ☐ Repetitive Motion ☐ Straining ☐ Sight or Hearing Injury ☐ Back Injury ☐ Other_____ ☐ Other_____ ☐ Other_____	☐ De-Energized Equipment / Proper Grounding Procedures ☐ Fall Protection Plan ☐ Proper Rigging ☐ Lock Out / Tag Out Procedures ☐ Vehicle Traffic Controls ☐ Barricades/Signs Installed ☐ Advance Review or Job-site Entrance and Exit Routes ☐ Confined Space Rescue Equipment ☐ Safe Lifting Procedures ☐ De-pressurized, vented, drained ☐ Inspected Prior to Use (Guards, switches, tc) ☐ Stretching ☐ Other_____ ☐ Other_____ ☐ Other_____ ********** PPE Preventive Measures Required For Task ☐ Hard Hat/Safety Glasses ☐ Hearing Protection ☐ Glove Type ☐ Foot Protection ☐ Face Shield ☐ Respirator ☐ Goggles ☐ Welding Jacket/Sleeves ☐ Flash Jacket/Hood/Gloves ☐ Fire Retardant Clothing ☐ Fall Protection Equipment ☐ Other_____ ☐ Other_____ ☐ Other_____ **********