

April 3, 2020

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**ELECTRONICALLY FILED**

Kent A. Chandler  
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RE: Case No. 2020-00085

On March 6, 2020, Governor Beshear issued Executive Order 2020-215 declaring a State of Emergency in the Commonwealth of Kentucky in response to the novel coronavirus COVID-19. Shortly following that declaration, the Commission on March 16, 2020 initiated Case No. 2020-00085 to address pressing issues related to utility service across the Commonwealth as a result of COVID-19. The Order, in part, granted a temporary deviation from several provisions of 807 KAR 5:006, including certain inspection requirements “[i]n order to limit in-person contact, and also to allow the utility focus on essential functions of the utility.”

Kentucky Power Company places first the safety of its customers, its employees, and its facilities. The Company investigated carefully whether it could continue the periodic inspection of its transmission line facilities notwithstanding the deviation from the inspection requirements imposed by 807 KAR 5:006, Section 26(4)(b)(4) granted by the Commission’s March 16, 2020 Order in Case No 2020-00085. 807 KAR 5:006, Section 26(4)(b)(4) requires the Company to conduct semi-annual inspections of its approximately 1,290 miles of transmission lines.

The terrain of the Company’s service territory and the length of its transmission lines necessitates that the inspections be performed by flying the transmission lines using helicopters. To safely perform the inspections a pilot and an inspector must be present in the cabin of the helicopter. A separate inspector is required because the pilot cannot safely fly the helicopter and inspect the lines even if the pilot were otherwise qualified to perform the inspections.

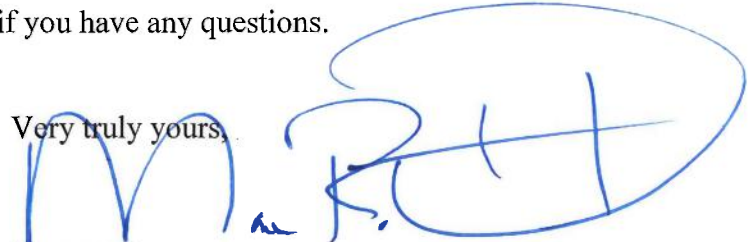
Because of the close confines of helicopters, it is not possible for two people to inhabit a helicopter cabin and maintain the minimum six-foot separation required by Governor Beshear’s March 22, 2020 Executive Order 2020-246, as well the social distancing and hygiene guidance provided by the Centers for Disease Control and the Kentucky Department for Public Health. Accordingly, Kentucky Power has concluded it must temporarily suspend its semi-annual

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transmission line inspections in accordance with the deviation granted by the Commission's March 16, 2020 Order.

Please do not hesitate to contact me if you have any questions.

Very truly yours,

  
Mark R. Overstreet

MRO