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August 10, 2017

RECEIVED

AUG 10 2017

PUBLIC SERVICE
COMMISSION

VIA HAND DELIVERY

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

Re: IN THE MATTER OF: JACKSON PURCHASE ENERGY CORPORATION
ALLEGED FAILURE TO COMPLY WITH KRS 278.042
Case No. 2017-00202

Mr. Lyons:

On behalf of Jackson Purchase Energy Corporation (“JPEC”), please find enclosed and accept for filing in the above-styled matter an original and ten (10) copies of the Response of JPEC to the Commission’s Order entered August 7, 2017. Please return a file-stamped copy of this filing to me.

I appreciate your assistance with this matter, and please do not hesitate to contact me with any questions or concerns.

Respectfully,



Mark David Goss

Enclosures

COMMONWEALTH OF KENTUCKY

RECEIVED

BEFORE THE PUBLIC SERVICE COMMISSION

AUG 10 2017

IN THE MATTER OF:

PUBLIC SERVICE
COMMISSION

JACKSON PURCHASE
ENERGY CORPORATION

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CASE NO. 2017-00202

ALLEGED FAILURE TO COMPLY
WITH KRS 278.042

RESPONSE OF JACKSON PURCHASE ENERGY CORPORATION TO THE
COMMISSION'S ORDER ENTERED AUGUST 7, 2017

Comes now Jackson Purchase Energy Corporation ("JPEC"), by counsel, and in compliance with the Order entered *sua sponte* by the Commission on August 7, 2017, directing JPEC to file certain information and documentation in advance of the hearing scheduled in this matter for August 15, 2017, respectfully states as follows:

1. JPEC intends to call the following individuals as witnesses at the hearing scheduled in this matter: Dennis Cannon, JPEC President and Chief Executive Officer; Scott Ribble, JPEC Vice President of Engineering and Operations; and Murray Riley, JPEC Safety Coordinator. JPEC expects Mr. Cannon will provide testimony addressing introductory and background information about the cooperative, JPEC's safety policies and procedures in place on the day of the subject accident, his experience the day of the accident, and post-accident measures taken by JPEC to reinforce the cooperative's safety practices and principles. JPEC expects Mr. Ribble will provide testimony addressing JPEC's safety policies and procedures in place on the day of the subject accident, his experience the day of the accident, the results of JPEC's investigation of the accident

that culminated in the Utility Summary Report¹ and JPEC's Response filed herein on June 13, 2017, and post-accident measures taken by JPEC to reinforce the cooperative's safety practices and principles. JPEC expects Mr. Riley will provide testimony addressing JPEC's safety policies and procedures in place on the day of the subject accident, his experience the day of the accident, and post-accident measures taken by JPEC to reinforce the cooperative's safety practices and principles. JPEC further expects each of its witnesses to provide testimony addressing such other information as may be relevant to the hearing or may become relevant in the course of the hearing.

2. JPEC intends to refer during the hearing of this matter to the documents of record, particularly the Order entered herein on May 24, 2017 (including its Appendix) and JPEC's Response to said Order filed herein on June 13, 2017 (including its Exhibits). JPEC further intends to present as a hearing exhibit the document included herewith as Attachment 1, which is a record demonstrating Mr. Doublin's and Mr. Franklin's receipt of tested rubber gloves on or about November 30, 2016.²

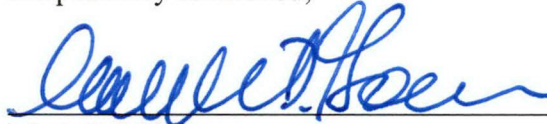
3. JPEC's internal investigation of the accident culminated in and is memorialized by the Utility Summary Report provided to Commission Staff on or about January 13, 2017. JPEC did not conduct a separate investigation and has prepared no other report or memorialization besides the Utility Summary Report, which itself contains the cooperative's observations and conclusions.

¹ A copy of the Utility Summary Report, commonly referred to as the "7-Day Report," is included as part of the Accident Investigation Staff Report attached to the Commission's Order establishing this matter on May 24, 2017.

² As Exhibit #6 to JPEC's Response filed herein on June 13, 2017, JPEC provided a record demonstrating Mr. Doublin's and Mr. Franklin's receipt of tested rubber gloves on September 22, 2016. Upon further review, JPEC identified the more-recent record that is attached hereto and that it intends to introduce at the hearing to ensure a complete and accurate record.

Dated this 10th day of August, 2017.

Respectfully submitted,



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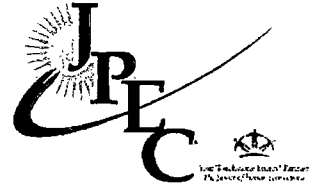
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Co-Counsel for Jackson Purchase
Energy Corporation

ATTACHMENT 1

JACKSON PURCHASE ENERGY CORP.
RUBBER GLOVES



Date: 11-30-16

| Last | First | ID# | Size | 20kV | 5kV | Month | Initial |
|-------------------|------------------|----------------|------------------|------|-----|----------|---------------|
| Burrow | Keith | 320 | 9 1/2 | ✓ | ✓ | 12-6-16 | KB |
| Byassee | Cody | 364 | 9 1/2 | | | 12-12-16 | C.B. |
| Coffer | Steve | 153 | 9 1/2 | | | | |
| Colley | Taylor | 362 | 9 1/2 | ✓ | | 11-30-16 | TC |
| Cope | Dustin | 363 | 9 1/2 | ✓ | | 12-12-16 | DC |
| Corn | Darryl | 229 | 10 | ✓ | | 12-12-16 | DC |
| Cornwell | Joseph | 304 | 9 1/2 | | | | |
| Denfip | David | 225 | 9 1/2 | ✓ | | 11-30-16 | DD |
| Dillworth | Tom | 285 | 10 | ✓ | | 12-12-16 | TD |
| Doublin | Terry | 201 | 10 | ✓ | | 12-6-16 | TD |
| Downing | Mike | 160 | 9 1/2 | | | | |
| Evrard | Jim | 233 | 9 1/2 | ✓ | | 11-30-16 | JE |
| Franklin | Josh | 338 | 8 | | | 11-30-16 | JF |
| Gipson | Jason | 344 | 9 1/2 | ✓ | | 12-16-16 | JG |
| Goodman | Jeremy | 314 | 10 1/2 | ✓ | | 11/30/16 | JG |
| Hardie | Shane | 267 | 9 1/2 | | | | |
| Hardin | Jamie | 190 | 8 | | ✓ | 12-6-16 | JH |
| Harper | Kenny | 268 | 9 1/2 | ✓ | ✓ | 11/30/16 | K.H. |
| Humphrey | Shane | 308 | 10 | ✓ | | 11-30-16 | SH |
| Hurley | Brian | 337 | 9 1/2 | ✓ | ✓ | 11-30-16 | BH |
| Johnson | Jimmy | 258 | 9 1/2 | ✓ | ✓ | 11-30-16 | JH |
| Joiner | Micah | 350 | 9 1/2 | ✓ | | 12-6-16 | MJ |
| Keith | Stephen | 365 | 9 1/2 | | | | |
| Kelso | Mike | 329 | 9 1/2 | ✓ | | 11-30-16 | mK |
| Kendall | Phillip | 186 | 10 | ✓ | | 12-6-15 | |
| Martin | Tony | 152 | 9 1/2 | | | | |
| Pearson | Michelle | 246 | 8 | ✓ | | 12-12-16 | MP |
| Riley | Murray | 302 | 10 1/2 | | | | |
| Russell | Kelly | 203 | 10 | | | | |
| Sanderson | Greg | 322 | 10 | ✓ | | 12-12-16 | GWS |
| Smith | Robby | 292 | 10 | ✓ | ✓ | 12-13-16 | R.S. |
| Story | Jason | 245 | 9 1/2 | ✓ | | 12-6-16 | JS |
| Sutton | John | 293 | 8 1/2 | ✓ | | 12-6-16 | JS |
| Thweatt | Zach | 361 | 9 1/2 | ✓ | | 11-30-16 | ZT |
| Todd | Eric | 253 | 9 | ✓ | | 11-30-16 | E.T. |
| Vied | Greg | 224 | 9 1/2 | | | 11-3-16 | G.V. |
| Washam | Mike | 219 | 9 1/2 | | | | |
| Womble | Billy | 281 | 9 | ✓ | | 11-30-16 | BW |

Williams Matt 343 9 1/2 ✓ 12-12-16 maw