

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED

OCT 05 2011

PUBLIC SERVICE
COMMISSION

In the Matter of:

KENTUCKY POWER COMPANY)
D/B/A AMERICAN ELECTRIC POWER)
_____)
ALLEGED FAILURE TO COMPLY WITH)
KRS 278.042)

CASE NO. 2010-000317

**Notice of Compliance With Paragraphs 3 and 4 of
Commission's March 3, 2011 Order**

In conformity with paragraphs 3 and 4 of the Public Service Commission of Kentucky's March 3, 2011 Order, Kentucky Power Company verifies to the Commission that Payton Wilson, Safety and Health Manager, Kentucky Power Company:

1. Attended and successfully completed the Power & Communication Utility Training Center's course entitled "Investigating & Documenting Accidental Public Contacts with Power & Communication Utility Facilities" on September 19-22, 2011. A copy of the agenda is attached to this filing as **EXHIBIT 1**. A copy of Mr. Wilson's Certificate of Continuing Education is attached as **EXHIBIT 2**.
2. Completed American Electric Power Company, Inc.'s 2011 Public Accident Investigator Training on August 18, 2011. A copy of the course description is attached to this filing as **EXHIBIT 3**. An agenda was not available.

A handwritten signature in black ink, appearing to read 'Mark R. Overstreet', with a long horizontal line extending to the right from the end of the signature.

Mark R. Overstreet
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COUNSEL FOR KENTUCKY POWER
COMPANY

EXHIBIT 1

Investigating & Documenting Accidental Public Contacts with Power & Communication Utility Facilities



UPCAT

2.4 CEU's

June 27-30 and Sept. 19-22, 2011
Myrtle Beach, SC

Instructors: Allen L. Clapp, PE,
and John B. Dagenhart, PE

The premier seminar on utility accidents

Revised for
2011

About the seminar

When there is an accident, you need to gather and analyze the appropriate data yesterday—before it goes away. You need to quickly

- determine whether you met the appropriate requirements and
- secure information concerning the actions, qualifications, tools and equipment of other parties.

Regardless of whether you are on the team gathering data and analyzing the accident or you are developing the appropriate litigation strategy, it is vital that you understand what data is required, how to use it, and how to make it be the most effective in litigation. Discussions by engineers who have investigated well over 1000 utility accidents will help you understand effective ways to investigate and document accidents in a manner that will aid and promote effective litigation decisions.

At the end of the seminar, attendees are divided into teams to review a real accident scenario and prepare (a) lists of measurements and other data to be gathered and (b) present arguments to be made for each side, based on information provided in class.

Who should attend

- ◆ investigators
- ◆ attorneys
- ◆ paralegals
- ◆ engineers
- ◆ risk managers
- ◆ claims managers
- ◆ claims agents

Important topics

- ◆ Responsibilities of utilities
- ◆ Responsibilities of others
- ◆ How to investigate the scene
- ◆ How to make measurements in the field with hand tools
- ◆ How to document and control evidence
- ◆ How to reconstruct accidents
- ◆ How to apply codes and standards
- ◆ How to determine whether you met the appropriate requirements
- ◆ How to consider the effects of electricity on the body
- ◆ OSHA regulations applicable to members of the public

In addition, you receive

- ◆ Current National Electrical Safety Code
- ◆ Current NESC Handbook
- ◆ Bound Student Workbook
- ◆ Excerpts from Practical Utility Safety
- ◆ Exercise/Answer sets
- ◆ CEUs and NC or FL PDHs awarded upon successful completion of workshop
- ◆ Plus continental breakfasts, complete lunches, & refreshments

NESC® and National Electrical Safety Code® are registered trademarks of the Institute of Electrical & Electronics Engineers, Inc. Product availability and prices, and seminar schedules, instructors and prices are subject to change without notice.

Note: Adjourn @ 11:00am; plan flights for 1:30pm or later.

For complete information on our seminars and products visit our website www.PCUtraining.com or call Toll free 1 877 502 8900

3.5 Days (June) — \$1545

3.5 Days (Sept.) — \$1595

Day 1

- ◆ Case studies: Using codes, regulations and standards
 - Accidents: #1 - Dump truck, #1A - Crane, #1B - Backhoe, #2 - Sailboat
- ◆ How to determine compliance with codes and standards
 - NESC vs. NEC and OSHA
 - Which NESC edition applies
 - Old vs. new NESC clearance system
 - Standard vs. nonstandard clearances
 - Effect of temperature, wind and ice loading on clearances
- ◆ Electric shock effects
- ◆ Responsibilities of contractor
 - OSHA & state regulations

Day 2

- ◆ Case studies cont: Accident #3 - Antenna mounting failure
- ◆ Electrical work accidents
 - Electricians
 - Power line workers
 - Communication line workers
 - Using the Employee Misconduct defense
- ◆ Electrical installations
 - Operation of fuses, breakers, reclosers
- ◆ Accident reference information
 - Scaffold accidents
 - Ladder accidents
 - Over-height vehicle accidents
 - Farm accidents
 - Off-road vehicle accidents
 - Tree-trimming & decorating accidents
 - Boating accidents
 - Aircraft accidents
 - Substation accidents
- ◆ Accident site investigation & analysis tools
 - Vertical clearances above ground
 - Using hand tools for estimations of wire clearances
 - Outdoor exercise in making measurements with hand tools
 - Vertical & horizontal clearances to buildings & other installations
 - Exercise in determining if wire clearances are met

Day 3

- ◆ Documenting and preserving evidence
 - Matching evidence marks
 - Photographs vs videos; film vs digital
 - Accident check list
- ◆ Case studies cont: Accidents
 - #4 - Roof Replacement, #5 - Antenna Removal, #5A - Gutter installation, #5B - Billboard, and #5C - Painting a metal gas station canopy
- ◆ Pole hits
- ◆ Improperly guyed structures
- ◆ Making effective exhibits for depositions & trials
- ◆ Making effective videos
- ◆ Maintenance & control of evidence
- ◆ Additional useful information
 - Analysis of construction fatalities
 - Relevant OSHA regulations
 - Relevant ANSI standards
 - Relevant industry association standards
 - National Safety Council Industrial Data Sheets

Day 4

- ◆ Putting it all together
- ◆ Investigation
 - Split into groups to investigate for plaintiff and defendants for selected accident scenarios
 - Develop information to get at site
 - Present to class for feedback
- ◆ Summary jury trial
 - Use data found at site (provided to groups after investigation presentations)
 - Develop trial strategy
 - Plaintiff group presents significant points
 - Defense groups present significant counterpoints
 - Plaintiff group rebuts defense
 - Feedback from class

EXHIBIT 2

Investigating & Documenting Accidental Public Contacts with Power & Communication Utility Facilities

Day 1

- ◆ Case studies: Using codes, regulations and standards
- ◆ Accidents: #1 - Dump truck, #1A - Crane, #1B - Backhoe, #2 - Sailboat
- ◆ How to determine compliance with codes and standards
- ◆ NEC vs. NEC and OSHA
- ◆ Which NEC edition applies
- ◆ Old vs. new NEC clearance system
- ◆ Standard vs. nonstandard clearances
- ◆ Effect of temperature, wind, and ice loading on clearances
- ◆ Electric shock effects
- ◆ Responsibilities of contractor
- ◆ OSHA and state regulations

Day 2

- ◆ Case studies continued: Accident #3 - Antenna mounting failure
- ◆ Electrical work accidents
 - ◆ Electricians
 - ◆ Power line workers
 - ◆ Communication line workers
 - ◆ Using the Employee Misconduct Defense
- ◆ Electrical installations
 - ◆ Operation of fuses, breakers and reclosers
 - ◆ Accident reference information
 - ◆ Scaffold accidents
 - ◆ Ladder accidents
 - ◆ Over-height vehicles
 - ◆ Farm accidents
 - ◆ Off-road vehicle accidents
 - ◆ Tree-trimming and decorating accidents
 - ◆ Boating accidents
 - ◆ Aircraft accidents
 - ◆ Substation accidents
- ◆ Accident site investigation and analysis tools
 - ◆ Vertical clearances above ground
 - ◆ Using hand tools for estimation of wire clearances
 - ◆ Outdoor exercise in making measurements with hand tools
 - ◆ Vertical & horizontal clearances to buildings & other installations
 - ◆ Exercise in determining if wire clearances are met

Day 3

- ◆ Documenting and preserving evidence
 - ◆ Matching evidence marks
 - ◆ Photographs vs videos, film vs digital
 - ◆ Accident check list
- ◆ Case studies continued: Accidents #4 - Roof replacement, #5 - Antenna removal, #5A - Gutter installation, #5B - Billboard, and #5C - Painting a metal gas station canopy
- ◆ Pole hits
 - ◆ Improperly guyed structures
 - ◆ Making effective exhibits for depositions and trial
- ◆ Making effective videos
- ◆ Maintenance and control of evidence
 - ◆ Additional useful information
 - ◆ Analysis of construction facilities
 - ◆ Relevant OSHA regulations
 - ◆ Relevant ANSI standards
 - ◆ Relevant industry association standards
 - ◆ National Safety Council Industrial Data Sheets

Day 4

- ◆ Putting it all together
- ◆ Investigation
 - ◆ Spill into groups to investigate for plaintiff and defendants for selected accident scenarios
 - ◆ Develop information to get at site
 - ◆ Present to class for feedback
- ◆ Summary jury trial
 - ◆ Use data found at site (provided to groups after investigation presentation)
 - ◆ Develop trial strategy
 - ◆ Plaintiff group presents significant points
 - ◆ Defense group presents significant counterpoints
 - ◆ Plaintiff group rebuts defense
 - ◆ Feedback from class

The Continuing Education Unit is a nationally recognized unit of measure for continuing education programs. One CEU = 10 class contact hours (excluding breaks) = 10 PDH/CLE units.

Certificate of Continuing Education

The Continuing Education Program at
Power & Communication Utility Training Center
hereby awards

Payton Wilson

2.4 Continuing Education Units
for successfully completing the workshop

**Investigating & Documenting Accidental
Public Contacts with Power & Communication
Utility Facilities**

on September 19-22, 2011

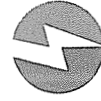
This, the 22nd day of September, 2011

Allen L. Clapp

Allen L. Clapp, Lead Instructor
6112 Saint Giles Street, Suite 200
Raleigh, North Carolina 27612
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FL CEU Provider #4074

(excluding breaks) = 10 PDH/CLE units.



**Power & Communication Utility
Training Center**

EXHIBIT 3

Item Details

Help

← Back

▶	Item Summary
▼	Item Summary
<p>COURSE SAF-ACCINVREV Revision: 1 - 2/28/2009 12:00 AM America/New York Description: New and/or Refresher Course - Review the procedures for investigating accidents involving injury to non-AEP employees and serious property damage involving non-AEP property. Provides materials and instructions on how to investigate a third party injury or serious property damage claim in cooperation with Risk Management and Legal in anticipation of litigation, including interface with Risk Mgmt. & Legal, Communication with media, proprietary nature of results of investigation and related confidentiality.</p>	<p>Request Schedule Add to Learning Plan</p>
<p>Length: 2.00</p>	<p>Audience: Manager, Contact: Supervisor, Designated First Responder/Accident Investigators</p>
<p>CPEs: 0.00</p>	<p>Source: Contact Hours: 2.00</p>
<p>Goals: To (1) secure the scene of the accident from public disturbance; (2) gather evidence as to the cause of the incident to assist Risk Mgmt. and Legal in the handling of an anticipated claim or lawsuit; (3) help provide information for corporate communications if media response is involved; (4) identify ways to prevent similar accidents. Investigator takes measurements, takes photos, diagrams the scene, identifies potential witnesses, tries to determine the cause of the accident, etc. To teach the First Responder/Accident Investigators to accomplish the objectives thoroughly, quickly and accurately to assist Risk Mgmt. And Legal in the resolution of claims or lawsuits against the company.</p>	<p>Credit Hours: 0.00 Delivery Method: Instructor Led Training</p>