COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

KENTUCKY POWER COMPANY	)	
	)	CASE NO.
	)	2010-00317
ALLEGED FAILURE TO COMPLY WITH KRS 278.042	)	
	)	

O R D E R

Kentucky Power Company ("Kentucky Power"), a Kentucky corporation which engages in the distribution of electricity to the public for compensation for lights, heat, power, and other uses, is a utility subject to Commission jurisdiction.[1]

KRS 278.042 requires the Commission to ensure that each electric utility constructs and maintains its plant and facilities in accordance with accepted engineering practices as set forth in the Commission's administrative regulations and Orders and in the most recent edition of the National Electrical Safety Code ("NESC").

KRS 278.030 requires every utility to furnish adequate, efficient, and reasonable service. KRS 278.260 permits the Commission, upon its own motion, to investigate any act or practice of a utility that affects or is related to the service of a utility. KRS 278.280(1) further permits the Commission, after conducting such investigation and finding that a practice is unreasonable, unsafe, improper, or inadequate, to determine

[1] KRS 278.010(3)(a).

the reasonable, safe, proper, or adequate practice or methods to be observed and to correct unreasonable, unsafe, improper, or inadequate practices by Order.

Commission Staff submitted an electric utility Incident Investigation Report ("Report") dated March 22, 2010 to the Commission, which is attached as the Appendix to this Order. The report alleges that, on June 15, 2009 at 68 Snake Valley Road, Hueysville, Floyd County, Kentucky, a member of the public, William Wolf, may have made contact with an energized 120/240-volt triplex service drop on Kentucky Power's system due to the service drop hanging below the height required by the NESC.

Pursuant to 807 KAR 5:006, Section 26(2), Kentucky Power provided a summary written report ("summary report") regarding the June 15, 2009 incident to Commission Staff on June 18, 2009, which is appended to Commission Staff's Report as Attachment A. In the summary report, Kentucky Power states that its Pikeville Customer & Distribution Services Manager ("Pikeville Service Manager") and its Safety & Health Manager interviewed Mr. Wolf on June 16, 2009. During the June 16, 2009 interview, Mr. Wolf reported to Kentucky Power that he had made contact with the service drop when he raised a weed-eater (weed-trimming power tool) he was using into the air.

Kentucky Power further states in its summary report that its personnel visited the site of the incident on three occasions prior to the June 15, 2009 incident (January 2, 2008; January 3, 2008; and April 23, 2008). During each of the prior visits to the site, the utility's employees observed the unsafe height of the service line at the residence. However, no action was taken by Kentucky Power to raise the line to a safe height, pursuant to NESC requirements, prior to the June 15, 2009 incident.

In the summary report, Kentucky Power states that, on June 15, 2009, its Pikeville Service Manager was notified of the contact incident. He visited the site that day, removed the service drop, and "[made] the incident site safe," but he did not take any photographs of the incident site or otherwise document the height of the service drop prior to removing it. However, according to the Report, the Pikeville Service Manager returned to the incident site between June 15, 2009 and June 18, 2009 and re-installed the original service drop in order to take photographs of the service drop on the original distribution pole and service pole and to document the height of the service drop. In its summary report, Kentucky Power states that the height of the electric service drop at its lowest point was 6 feet.

Based on Commission Staff's investigation of the accident and the information provided by Kentucky Power in its summary report, Commission Staff alleges that Kentucky Power has violated KRS 278.042 by violating the following provision of the most recent edition (2007) of the NESC:

NESC Section 23 Clearances:

> 232. Vertical Clearances of Wires, Conductors, Cables, and Equipment Above Ground, Roadway, Rail, or Water Surfaces.
>
> B. Clearance of Wires, Conductors, Cables, Equipment, and Support Arms Mounted on Supporting Structures.
>
> 1. Clearance to Wires, Conductors, and Cables.
>
> The vertical clearance of wires, conductors, and cables above ground in generally accessible places, roadway, rail, or water surfaces, shall be not less than that shown in Table 232-1.

NESC Table 232-1[2] provides that supply conductors of zero to 750 volts crossing over "[s]paces and ways subject to pedestrians or restricted traffic only" shall have a minimum clearance of no less than 12 feet.

Based on its review of the Report and being otherwise sufficiently advised, the Commission finds that prima facie evidence exists that Kentucky Power has failed to comply with KRS 278.042. We further find that a formal investigation into the incident that is the subject matter of the Report should be conducted. This investigation should also examine why Kentucky Power failed to correct the unsafe condition of the service drop at 68 Snake Valley Road, Hueysville, Floyd County, Kentucky, prior to the June 15, 2009 incident and why Kentucky Power failed to document and investigate the conditions at the incident site after it became aware of the June 15, 2009 contact incident and prior to removing the service drop.

The Commission, on its own motion, HEREBY ORDERS that:

1. Kentucky Power shall submit to the Commission, within 20 days of the date of this Order, a written response to the allegations contained in the Report.

2. Kentucky Power shall appear on October 21, 2010, at 10:00 a.m., Eastern Daylight Time, in Hearing Room 1 of the Commission's offices at 211 Sower Boulevard in Frankfort, Kentucky, for the purpose of presenting evidence concerning the alleged violations of KRS 278.042 and 807 KAR 5:006, Section 24, and of showing cause why it should not be subject to the penalties prescribed in KRS 278.990(1) for these alleged violations.

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[2] See Report at 6.

3. At the scheduled hearing in this matter, Kentucky Power shall be prepared to present evidence on the failure of Kentucky Power to correct the unsafe condition of the service drop at 68 Snake Valley Road, Hueysville, Floyd County, Kentucky, prior to the June 15, 2009 incident.

4. At the scheduled hearing in this matter, Kentucky Power shall be prepared to present evidence on the failure of Kentucky Power to document and investigate the conditions at the incident site after it became aware of the June 15, 2009 contact incident and prior to removing the service drop.

5. The October 21, 2010 hearing shall be recorded by videotape only.

6. The Report in the Appendix to this Order is made a part of the record in this case.

7. Any requests for an informal conference with Commission Staff shall be set forth in writing and filed with the Commission within 20 days of the date of this Order.

By the Commission

ENTERED
AUG 20 2010
KENTUCKY PUBLIC
SERVICE COMMISSION

ATTEST:

Executive Director

APPENDIX

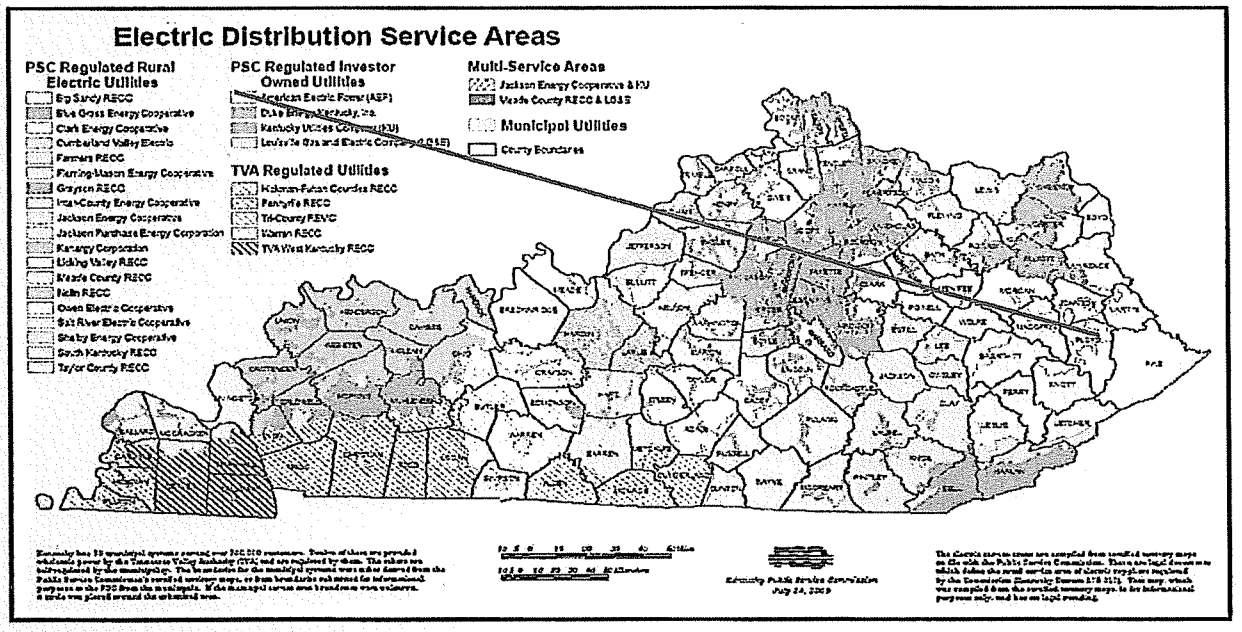
APPENDIX TO AN ORDER OF THE KENTUCKY PUBLIC SERVICE COMMISSION IN CASE NO. 2010-00317 DATED AUG 20 2010

Commonwealth of Kentucky
Public Service Commission
211 Sower Blvd.
P.O. Box 615
Frankfort, Kentucky 40602-0615
Telephone: (502) 564-3940
Fax: (502) 564-3460
psc.ky.gov

INCIDENT INVESTIGATION

STAFF REPORT COMPILED – 10/29/2009

Incident Location: Hueysville, Kentucky (Floyd County)
Incident Date: June 15, 2009
PSC Investigator: Jeff Moore
Utility: AEP/Kentucky Power
Injured: William Wolf



Utility:	AEP/Kentucky Power	
Reported By:	Bob Shurtleff and David Robinson	
Incident Occurred	June 15, 2009	Approximate Time: Unknown
Utility Notified:	June 15, 2009	Approximate Time: 3:00 PM
PSC Notified:	June 15, 2009	Approximate Time: 5:30 PM
PSC Investigated:	October 29, 2009	Approximate Time: 9:00 AM
Report Received:	June 18, 2009	
Incident Location:	68 Snake Valley Rd. Hueysville, Kentucky	

INCIDENT DESCRIPTION: On June 15, 2009 Public Service Commission staff received a call from AEP/Kentucky Power of possible public contact with a 120/240 volt triplex service drop located at 68 Snake Valley Rd. Hueysville, KY. During the phone conversation with AEP/Kentucky Power Safety & Health manager I was informed that the # 4 triplex service drop had been removed without documentation of the incident site. I informed him the company should make a site visit to document the site and include that information in the company's seven day report. I also asked that the service be located and photographed. During a later conversation with the Safety and Health Manager he informed me that the Pikeville Distribution Service Supervisor went back to the site and took some pictures of the phone drop to the customer's service pole. See attachment B; utility photographs (phone drop).

During the incident site visit I was informed by the Manager of the Pikeville District that the Distribution Service Supervisor had returned and re-installed the original service so he could take photographs of the service on the original distribution and service pole. See attachment C; (service drop at incident site).

According to AEP/Kentucky Powers' report William Wolf possibly made contact with an energized service drop when he raised his weed eater into the air. An employee with AEP/Kentucky Power was near the incident site and was informed by a neighbor that an incident had occurred. The AEP/Kentucky Power employee contacted management, and the Pikeville Distribution Service Supervisor went to the incident site, removed the service drop making the site safe.

AEP/Kentucky Power noted in the seven day report that on three different occasions company personnel went to the site, with the first of these visits on January 2, 2008 by a customer accounts specialist to disconnect service for nonpayment. The customer accounts specialist noticed the unsafe condition of the service drop, and reported it to his immediate supervisor. A second visit on January 3, 2008 was made by company servicer to inform the customer that his service pole was leaning, and it was the customer's responsibility to straighten the service pole. A third visit was made by a technician on April 23, 2008, staking the location for a new pole, and soon after this visit the customer contacted AEP/Kentucky Power to inform them that he did not want the pole installed at this location. During these three visits there was no mention in AEP/Kentucky Powers' report that the unsafe condition of the service drop had been corrected. After the customer said he had made contact with the service drop on June 15, 2009, the company visited the site and removed the service drop without documenting the incident site.

Company management and safety department personnel made a site visit to talk with Mr. Wolf on June 16, 2009. According to the report Mr. Wolf provided a summary of what happened on June

15, 2009. Company management informed me that Mr. Wolf has refused to talk with anyone about the incident after the visit on June16, 2009. The company's seven day report noted that attachments sent to Commission staff on June 18, 2009 reflect the measurements of the phone cable; AEP/Kentucky Power's lowest point was 6 feet. Company personnel during the PSC site investigation stated that the service was too low and unsafe when they arrived at the incident site on the June 15, 2009.

<table>
<tr><td rowspan="5">Victim:</td><td colspan="2">Name</td><td>Address</td><td>Employer</td></tr>
<tr><td colspan="2">William Wolf</td><td rowspan="3">Unknown</td><td rowspan="3">Unknown</td></tr>
<tr><td>Fatality</td><td>Age</td></tr>
<tr><td>No</td><td>Unknown</td></tr>
<tr><td>Injury:</td><td colspan="3">Unknown, Possible electrical contact with weed eating equipment.</td></tr>
<tr><td rowspan="3">Witnesses:</td><td colspan="2">Name</td><td>Address</td><td>Employer</td></tr>
<tr><td colspan="2">N/A</td><td></td><td></td></tr>
<tr><td colspan="2">N/A</td><td></td><td></td></tr>
<tr><td>Information From:</td><td colspan="2">Name</td><td>Position</td><td>Employer</td></tr>
<tr><td rowspan="3">Utility:</td><td colspan="2">David Robinson</td><td>Safety & Health Manager</td><td>AEP/Kentucky Power</td></tr>
<tr><td colspan="2">Bob Surtleff</td><td>Manager, Pikeville District</td><td>AEP/Kentucky Power</td></tr>
<tr><td colspan="2">Tim Hall</td><td>Distribution Service Supervisor</td><td>AEP/Kentucky Power</td></tr>
<tr><td>Contractor</td><td colspan="2">N/A</td><td></td><td></td></tr>
</table>

Line/Equipment Measurements/Clearances					
Line Clearances At Point of Incident:	Measured	Minimum Allowed by NESC	Applicable NESC Edition	Voltage	Construct Date
Service Drop Elevation:	Was not Measured	12 feet	2007	120/240	Unknown
Date of Measurement:	Service was not measured; photos provided by AEP/Kentucky Power show a measurement of the phone drop attached to the service pole on June18, 2009.				
Temp & Weather:	Unknown at the time of the incident.				
Measurements Made By:	Name			Company	
	Tim Hall			AEP/Kentucky Power	

PROBABLE VIOLATIONS:

National Electric Safety Code C2-2007

Section 23: Clearances

1.) 232. Vertical clearances of wires, conductors, cables, and equipment above ground, roadway, rail, or water surfaces.

B. Clearance of Wires, Conductors, Cables, Equipment, and Support Arms Mounted on Supporting Structures

1. Clearance to Wires, Conductors, and Cables
   The vertical clearance of wires, conductors, and cables above ground in generally accessible places, roadway, rail, or water surfaces, shall be not less than that shown in Table 232-1 .

Table 232-1:

Vertical Clearance of Wires, Conductors, and Cables Above Ground, Roadway, Rail, or Water Surfaces[25]

(Voltages are phase to ground for effectively grounded circuits and those other circuits where all ground faults are cleared by promptly de-energizing the faulted section, both initially and following subsequent breaker operations. .See the definitions section for voltages of other systems. See Rules 232B1, 232C1a, and 232D4.)

Nature of surface underneath wires, conductors, or cables	Insulated communication conductors and cable; messengers; overhead shield/surge-protection wires; grounded guys; ungrounded guys exposed to 0 to 300 V[1,15]; neutral conductors meeting Rule 230E1; supply cables meeting Rule 230C1 (ft)	Noninsulated communication conductors; supply cables of 0 to 750 V meeting Rules 230C2 or 230C3 (ft)	Supply cables over 750 V meeting Rules 230C2 or 230C3; open supply conductors, 0 to 750 V; ungrounded guys exposed to over 300 V to 750 V[14] (ft)	Open supply conductors, over 750 V to 22 kV; ungrounded guys exposed to 750 V to 22 kV[14] (ft)	Trolley and electrified railroad contact conductors and associated span or messenger wires	
					0 to 750 V to ground (ft)	Over 750 V to 22 kV to ground (ft)
Where wires, conductors, or cables cross over or overhang						
1. Track rails of railroads (except electrified railroads using overhead trolley conductors)[2,16]	23.5	24.0	24.5	26.5	22.0[4]	22.0[4]
2. Roads, streets, and other areas subject to truck traffic[23]	15.5	16.0	16.5	18.5	18.0[5]	20.0[5]
3. Driveways, parking lots, and alleys[23]	15.5[7, 13]	16.0[7, 13]	16.5[7]	18.5	18.0[5]	20.0[5]
4. Other land traversed by vehicles, such as cultivated, grazing, forest, orchard, etc.[26]	15.5	16.0	16.5	18.5	—	—

5. Spaces and ways subject to pedestrians or restricted traffic only[9]	9.5	12.0[8]	12.5[8]	14.5	16.0	18.0
6. Water areas not suitable for sailboating or where sailboating is prohibited[21]	14.0	14.5	15.0	17.0	—	—
7. Water areas suitable for sailboating including lakes, ponds, reservoirs, tidal waters, rivers, streams, and canals with an unobstructed surface area of...[17,18,19,20,21]						
a. Less than 20 acres	17.5	18.0	18.5	20.5	—	—
b. Over 20 to 200 acres	25.5	26.0	26.5	28.5	—	—
c. Over 200 to 2000 acres	31.5	32.0	32.5	34.5	—	—
d. Over 2000 acres	37.5	38.0	38.5	40.5	—	—
8. Established boat ramps and associated rigging areas; areas posted with sign(s) for rigging or launching sail boats	Clearance above ground shall be 5 ft greater than in 7 above, for the type of water areas served by the launching sites					
Where wires, conductors, or cables run along and within the limits of highways or other road rights-of-way but do not overhang the roadway						
9. Roads, streets, or alleys	15.5[24]	16.0	16.5	18.5	18.0[5]	20.0[5]
10. Roads where it is unlikely that vehicles will be crossing under the line	13.5[10,12]	14.0[10]	14.5[10]	16.5	18.0[5]	20.0[5]

[1] Where subways, tunnels, or bridges require it, less clearance above ground or rails than required by Table 232-1 may be used locally. The trolley and electrified railroad contact

conductor should be graded very gradually from the regular construction down to the reduced elevation.

[2] For wires, conductors, or cables crossing over mine, logging, and similar railways that handle only cars lower than standard freight cars, the clearance may be reduced by an amount equal to the difference in height between the highest loaded car handled and 20 ft, but the clearance shall not be reduced below that required for street crossings.

[3] Does not include neutral conductors meeting Rule 230E1.

[4] In communities where 21 ft has been established, this clearance may be continued if carefully maintained. The elevation of the contact conductor should be the same in the crossing and next adjacent spans. (See Rule 225D2 for conditions that must be met where uniform height above rail is impractical.)

[5] In communities where 16 ft has been established for trolley and electrified railroad contact conductors 0 to 750 V to ground, or 18 ft for trolley and electrified railroad contact conductors exceeding 750 V, or where local conditions make it impractical to obtain the clearance given in the table, these reduced clearances may be used if carefully maintained.

[6] This footnote not used in this edition.

[7] Where the height of a residential building does not permit its service drops(s) to meet these values, the clearances over residential driveways only may be reduced to the following:

	(feet)
(a) Insulated supply service drops limited to 300 V to ground	12.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	12.0
(d) Drip loops only of service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(e) Insulated communication service drops	11.5

[8] Where the height of a residential building does not permit its service drops(s) to meet these values, the clearances may be reduced to the following:

	(feet)
(a) Insulated supply service drops limited to 300 V to ground	10.5
(b) Insulated drip loops of supply service drops limited to 300 V to ground	10.5
(c) Supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(d) Drip loops only of supply service drops limited to 150 V to ground and meeting Rules 230C1 or 230C3	10.0
(e) Insulated communication service drops	11.5

[9] Spaces and ways subject to pedestrians or restricted traffic only are those areas where riders on horses or other large animals, vehicles, or other mobile units exceeding a total height of 8 ft are prohibited by regulation or permanent terrain configurations, or are otherwise not normally encountered nor reasonably anticipated.

[10] Where a supply or communication line along a road is located relative to fences, ditches, embankments, etc., so that the ground under the line would not be expected to be traveled except by pedestrians, the clearances may be reduced to the following values:

	(feet)
(a) Insulated communication conductor and communication cables	9.5
(b) Conductors of other communication circuits	9.5
(c) Supply cables of any voltage meeting Rule 230C1, supply cables limited to 150 V to ground meeting Rules 230C2 or 230C3, and neutral conductors meeting Rule 230E1	9.5
(d) Insulated supply conductors limited to 300 V to ground	12.5
(e) Guys	9.5

[11] No clearance from ground is required for anchor guys not crossing tracks, rails, streets, driveways, roads, or pathways.

[12] This clearance may be reduced to 13 ft for communication conductors and guys.

[13] Where this construction crosses over or runs along alleys, driveways, or parking lots not subject to truck traffic this clearance may be reduced to 15 ft.

[14] Ungrounded guys and ungrounded portions of span guys between guy insulators shall have clearances based on the highest voltage to which they may be exposed due to a slack conductor or guy.

[15] Anchor guys insulated in accordance with Rule 279 may have the same clearance as grounded guys.

[16] Adjacent to tunnels and overhead bridges that restrict the height of loaded rail cars to less than 20 ft, these clearances may be reduced by the difference between the highest loaded rail car handled and 20 ft, if mutually agreed to by the parties at interest.

[17] For controlled impoundments, the surface area and corresponding clearances shall be based upon the design high-water level.

[18] For uncontrolled water flow areas, the surface area shall be that enclosed by its annual high-water mark. Clearances shall be based on the normal flood level; if available, the 10-year flood level may be assumed as the normal flood level.

[19] The clearance over rivers, streams, and canals shall be based upon the largest surface area of any 1-mi-long segment that includes the crossing. The clearance over a canal, river, or stream normally used to provide access for sailboats to a larger body of water shall be the same as that required for the larger body of water.

[20] Where an over water obstruction restricts vessel height to less than the applicable reference height given in Table 232-3, the required clearance may be reduced by the difference between the reference height and the over water obstruction height, except that the reduced clearance shall be not less than that required for the surface area on the line-crossing side of the obstruction.

[21] Where the US Army Corps of Engineers, or the state, or surrogate thereof has issued a crossing permit, clearances of that permit shall govern.

[22] See Rule 234I for the required horizontal and diagonal clearances to rail cars.

[23] For the purpose of this Rule, trucks are defined as any vehicle exceeding 8 ft in height. Areas not subject to truck traffic are areas where truck traffic is not normally encountered nor reasonably anticipated.

[24] Communication cables and conductors may have a clearance of 15 ft where poles are back of curbs or other deterrents to vehicular traffic.

[25] The clearance values shown in this table are computed by adding the applicable Mechanical and Electrical (M &E) value of Table A-1 to the applicable Reference Component of Table A2-a of Appendix A.

[26] When designing a line to accommodate oversized vehicles, these clearance values shall be increased by the difference between the known height of the oversized vehicle and 14 ft.

Attachments: A. Utility Incident Report
B. Utility Photographs (phone drop)

Utility Investigator	Jeff Moore	PSC Engineering Staff Electric Branch
Signed:	Jeffrey C Moore	Date: 3/12/2010
Manager	John Shupp	PSC Engineering Staff Electric Branch
Signed:	John V. Shupp	Date: 3/22/10

C. Utility Photographs (service drop at incident site)
D. PSC Photographs

Attachment A

Utility Incident Report

Moore, Jeffrey C (PSC)

From: jrchaney@aep.com
Sent: Thursday, June 18, 2009 3:09 PM
To: Moore, Jeffrey C (PSC); Kingsolver, Steve (PSC); ekwagner@aep.com
Cc: dprobinson2@aep.com
Subject: Follow-up Summary to PSC - 06/15/2009 Public Contact

MVC-011S.JPG (103 KB) MVC-004S.JPG (24 KB)

Dave Robinson is submitting the following report for your review.

Mr. Jeff Moore
Commonwealth of Kentucky
Public Service Commission
P. O. Box 615
Frankfort, KY. 40602

June 18, 2009

RE: 06/15/2009 Public Electrical Contact
Hueysville (Floyd County), KY
KYPCo Pikeville District

Dear Jeff:

This is a follow-up summary of Kentucky Power Company's initial report of the above styled electrical contact incident that occurred in Kentucky Power Company's Pikeville District on June 15, 2009. Kentucky Power Company received information around 3:00 p.m., June 15, 2009, that a customer located at Hueysville (Floyd County), KY, had possibly made electrical contact when his weed eater was raised into the air, thus making contact with an energized secondary service drop.

A Kentucky Power Company employee was in the vicinity of the incident site, and was informed by the victim's neighbor that this incident had occurred. The KYPCo employee immediately contacted management, and the Pikeville Distribution Services Supervisor made a site visit, removing the service drop, and making the incident site safe. KYPCo's Pikeville Customer & Distribution Services Manager and KYPCo's Safety & Health Manager visited the site the following day, June 16, 2009. At which time, William Wolf, the victim, provided a summary of what occurred on June 15, 2009.

Leading up to this event, Kentucky Power made three (3) different site visits to the incident scene, in an effort to correct an unsafe condition. The first visit was made January 2, 2008, by Kentucky Power Company's Customer Accounts Specialist to the residence of Vanessa Goble (property owner where the unsafe condition existed), at 117 Reed Branch, Hueysville, KY, to disconnect the service for non-payment, At this time the Customer Accounts Specialist identified an unsafe condition, reporting the same to his immediate supervisor. An unsafe condition order was issued for investigation. The second visit was made on January 3, 2008, when a Kentucky Power Company Servicer contacted the customer, advising him that his service pole was leaning, and that it was his responsibility to straighten and anchor the pole. The third visit occurred when a Kentucky Power Company technician visited the site on April 23, 2008, staking the location for a new pole installation to raise the low service drop. Soon after the April 23, 2008 technician

visit, the customer contacted Kentucky Power Company, stating that they did not want a pole installed at this location.

Documentation of measurements taken at the incident site:

Attachment #1 reflects measurement of the phone cable, KYPCo's lowest point was 6'
Attachment #2 is the same, from a different angle

(See attached file: MVC-011S.JPG)(See attached file: MVC-004S.JPG)

Should you have any questions or need additional information, please feel free to contact me at (606) 929-1483.

Sincerely yours,

David P. Robinson
Safety & Health Manager

cc: Steve Kingsolver
Errol Wagner

Jackawayne Chaney
Administrative Associate
Office Phone: 8-620-3824
Outside Office: (606) 437-3824

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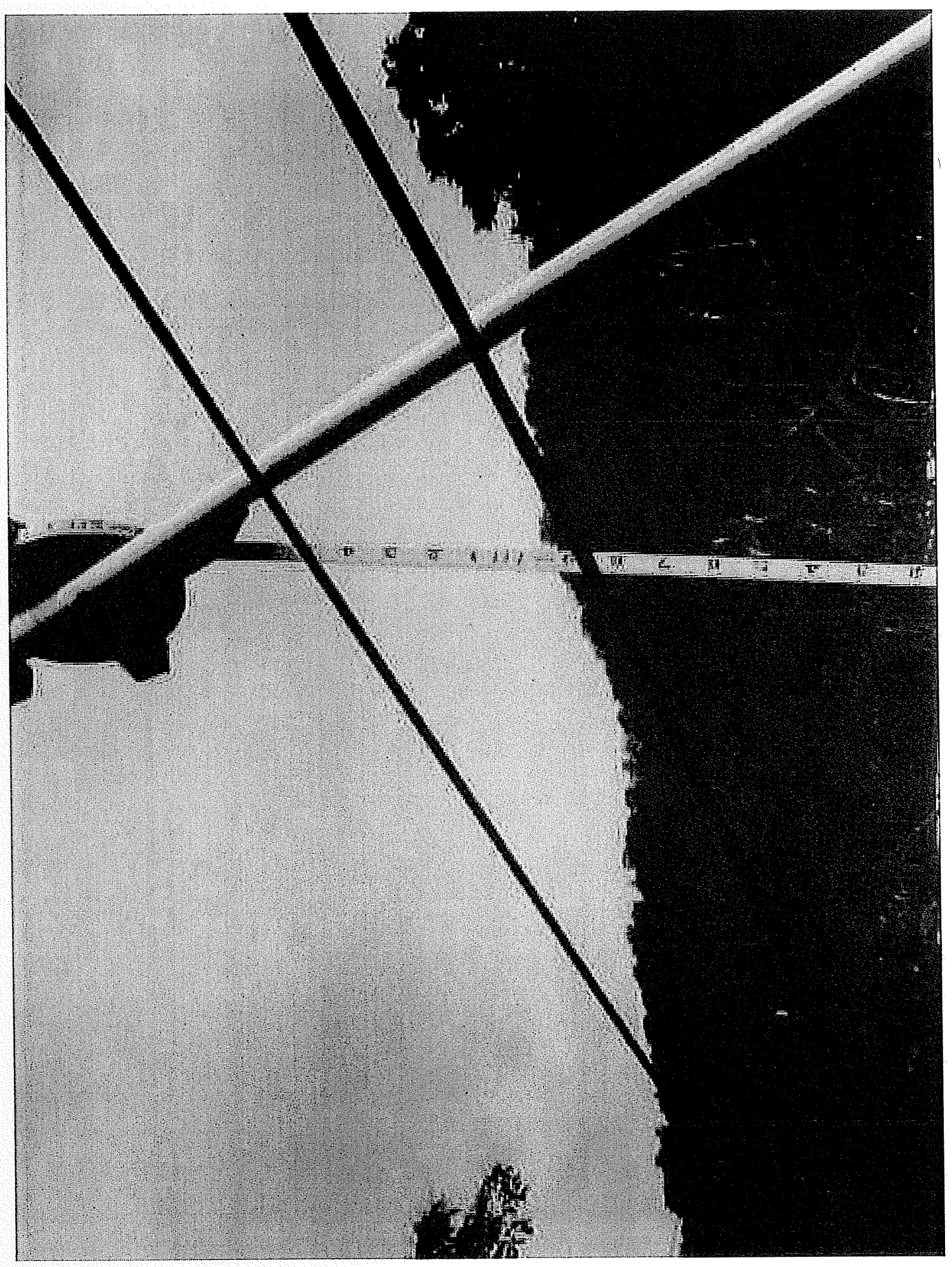
Attachment B

Utility Photographs (phone drop)



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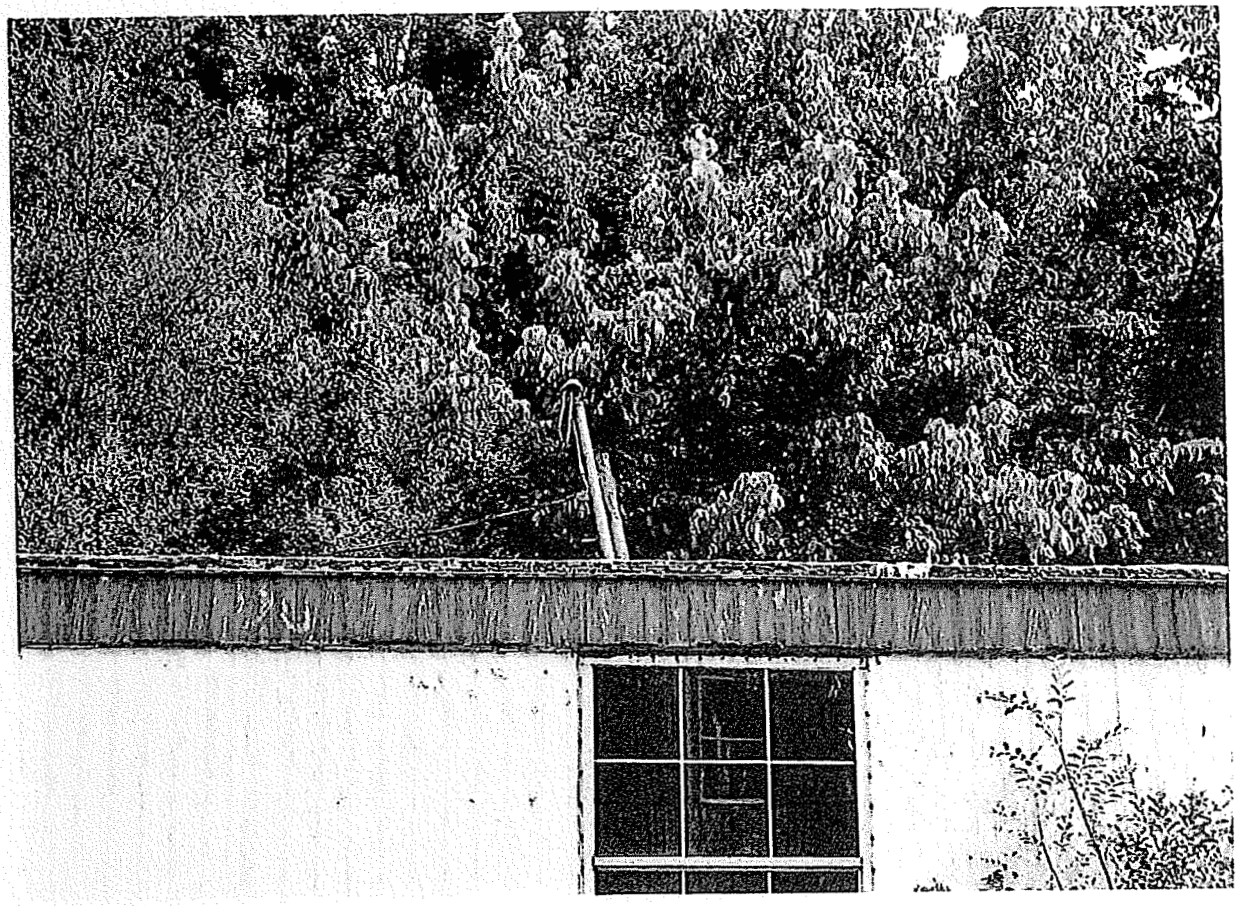
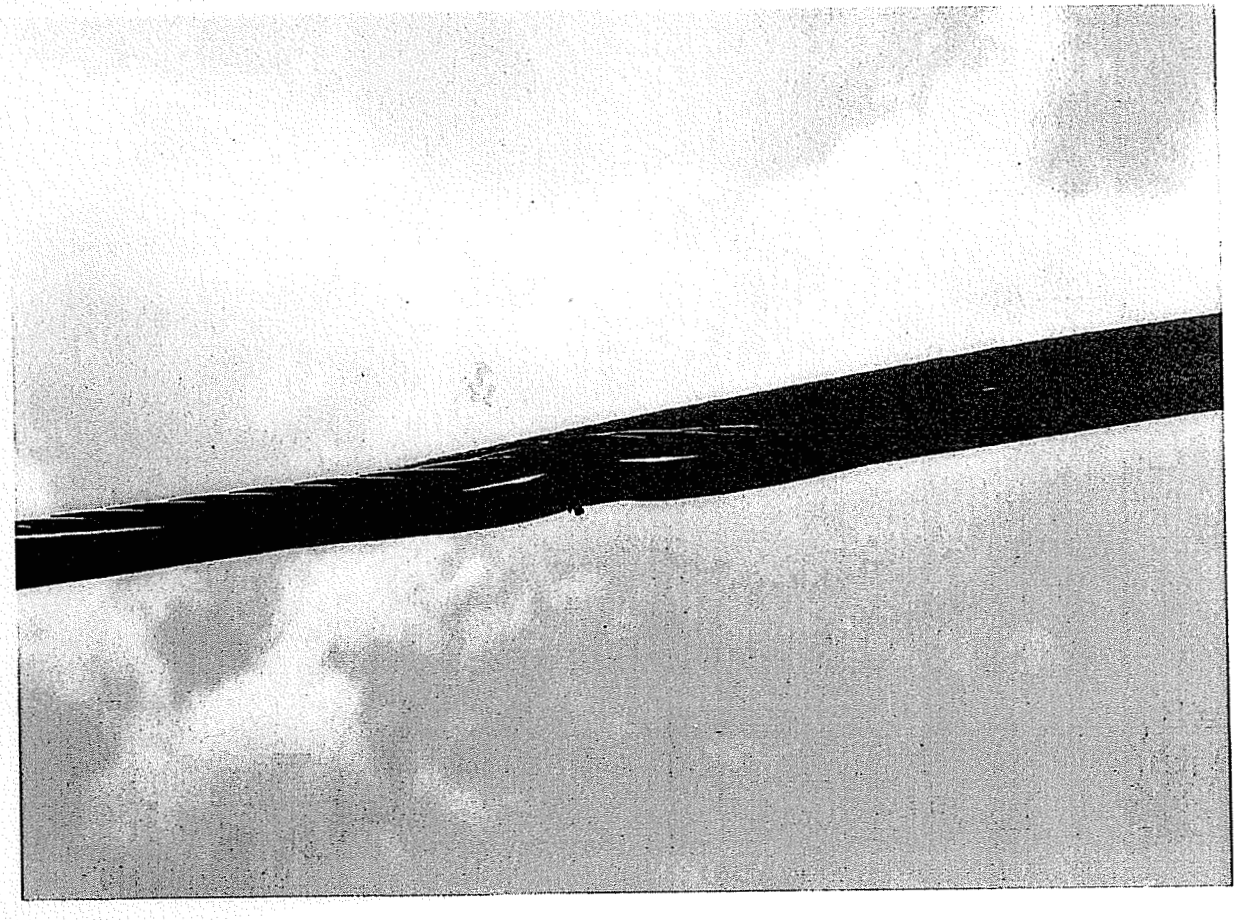
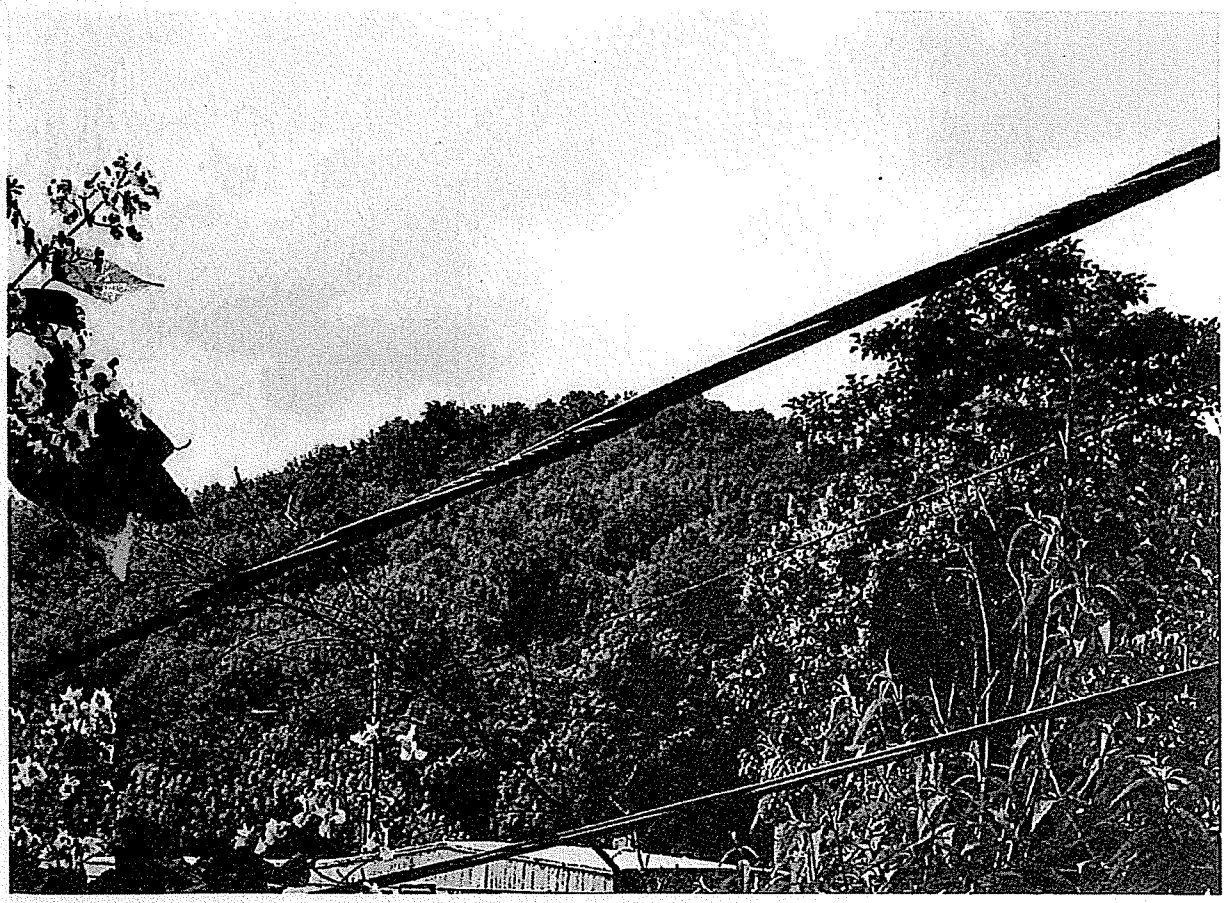
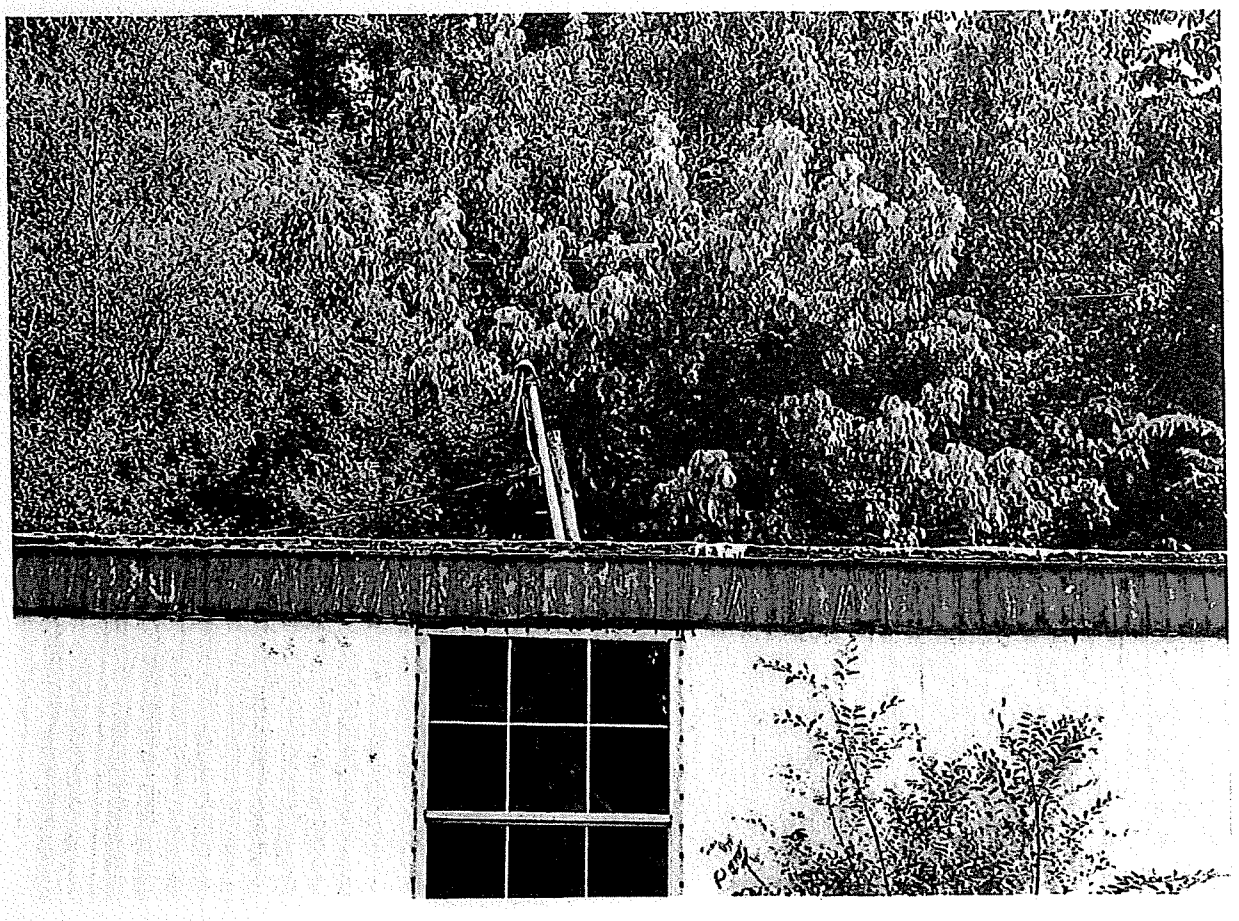
Attachment C

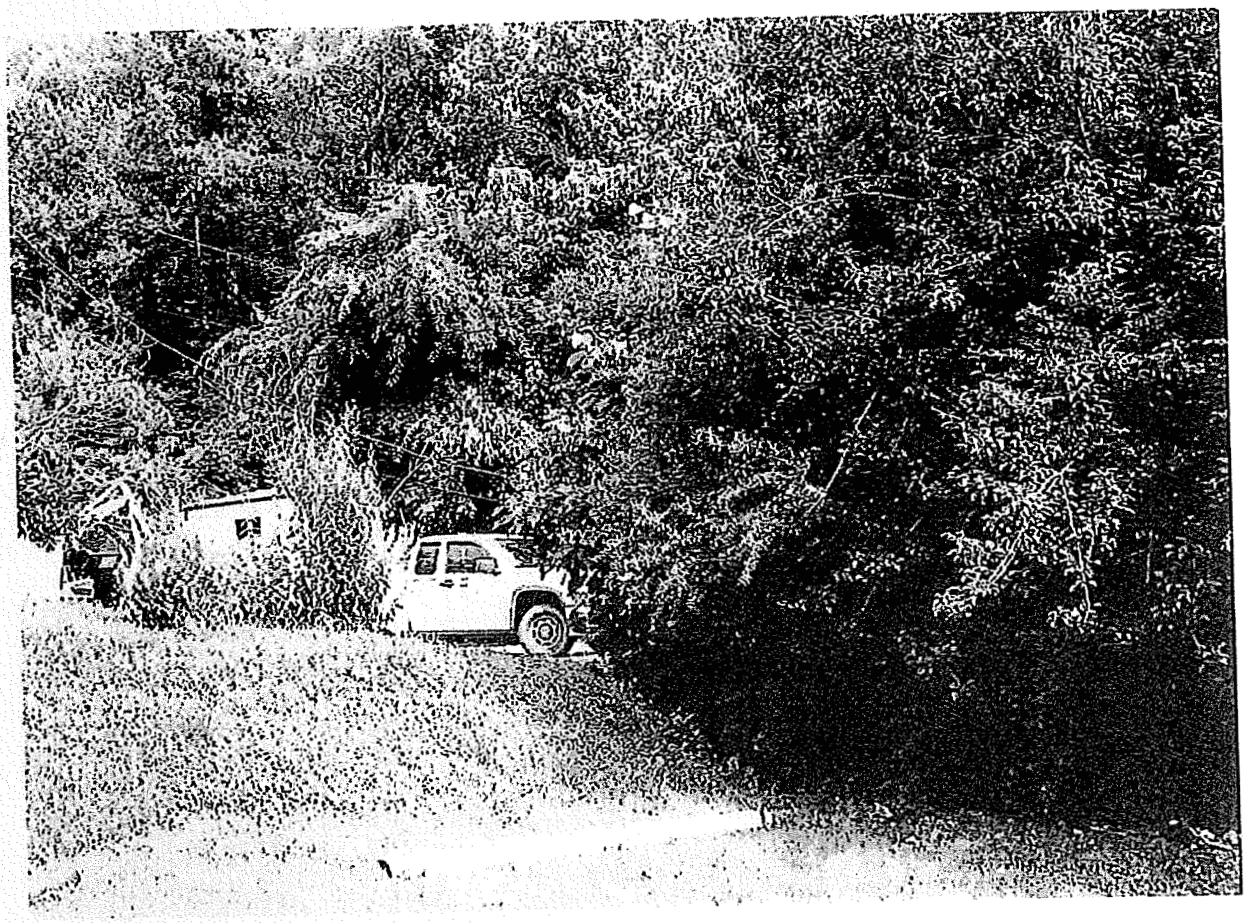
Utility Photographs (service drop at incident site)

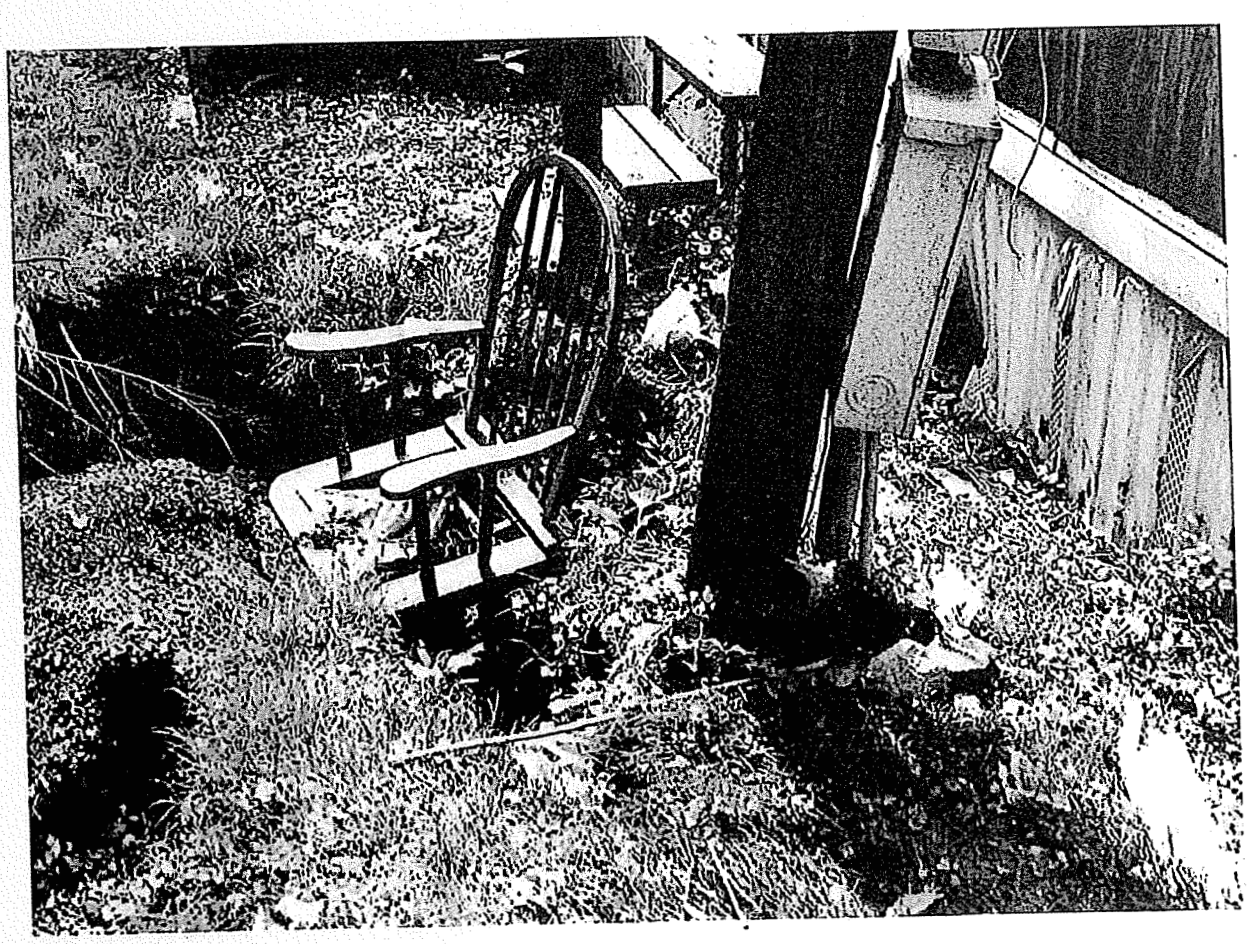


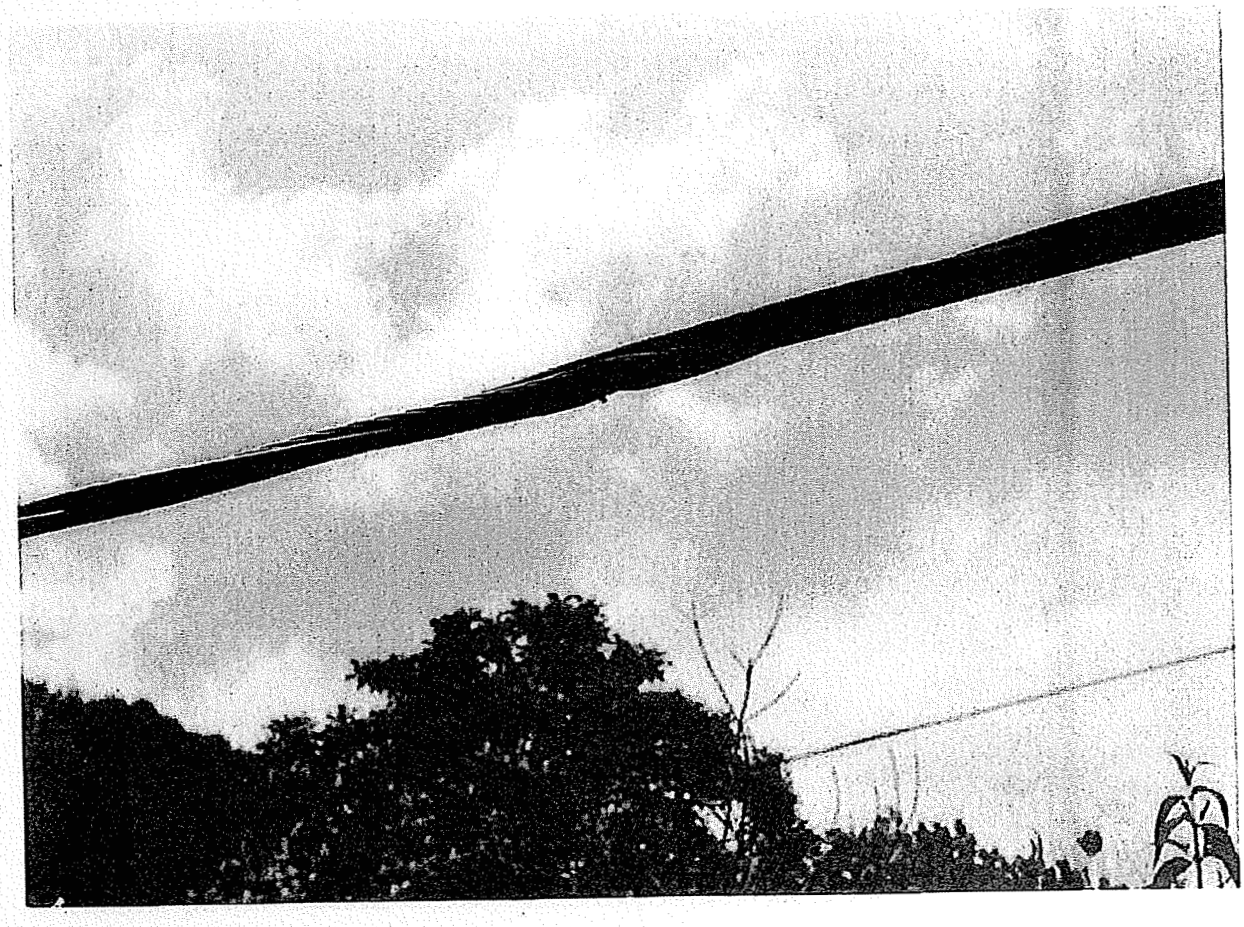


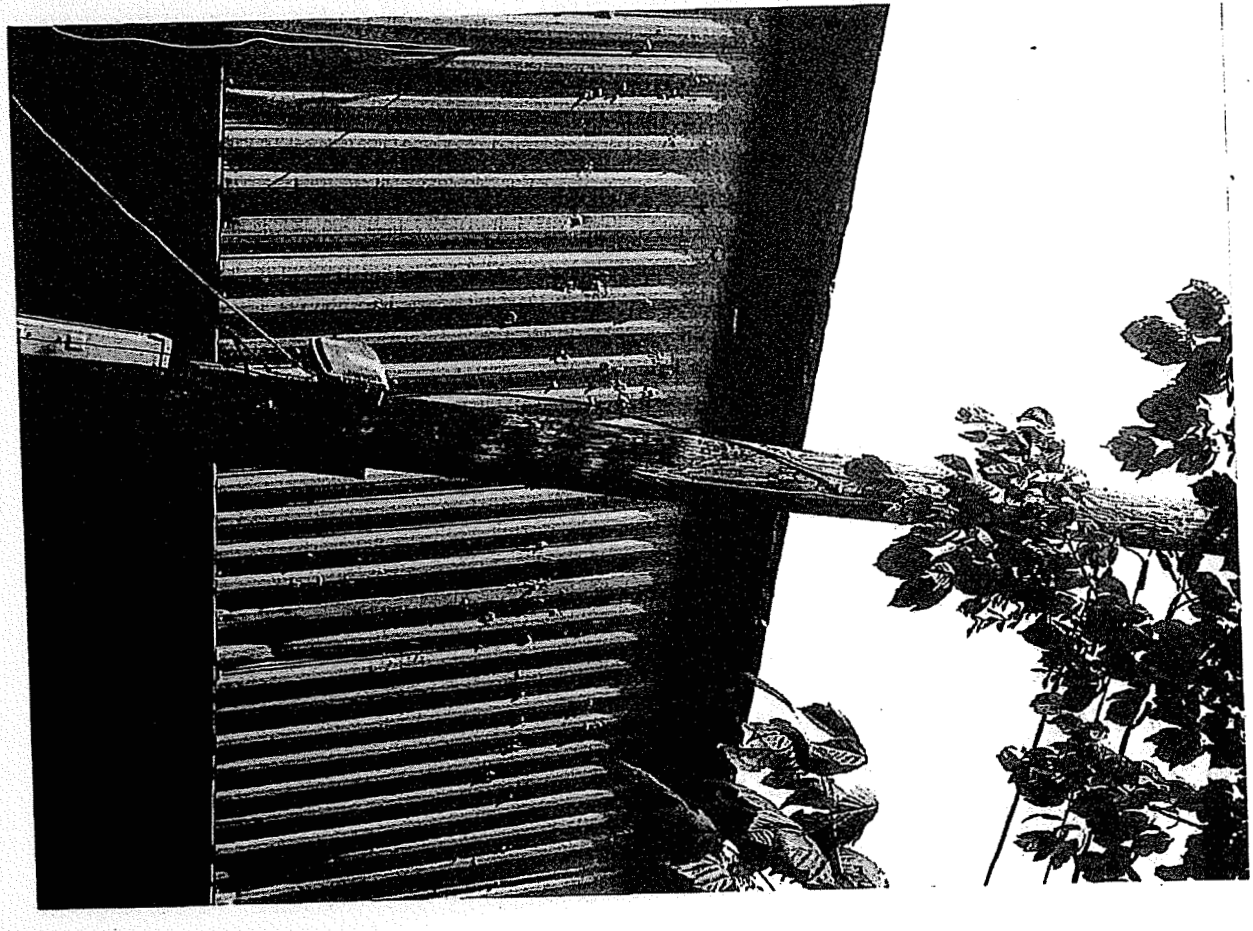


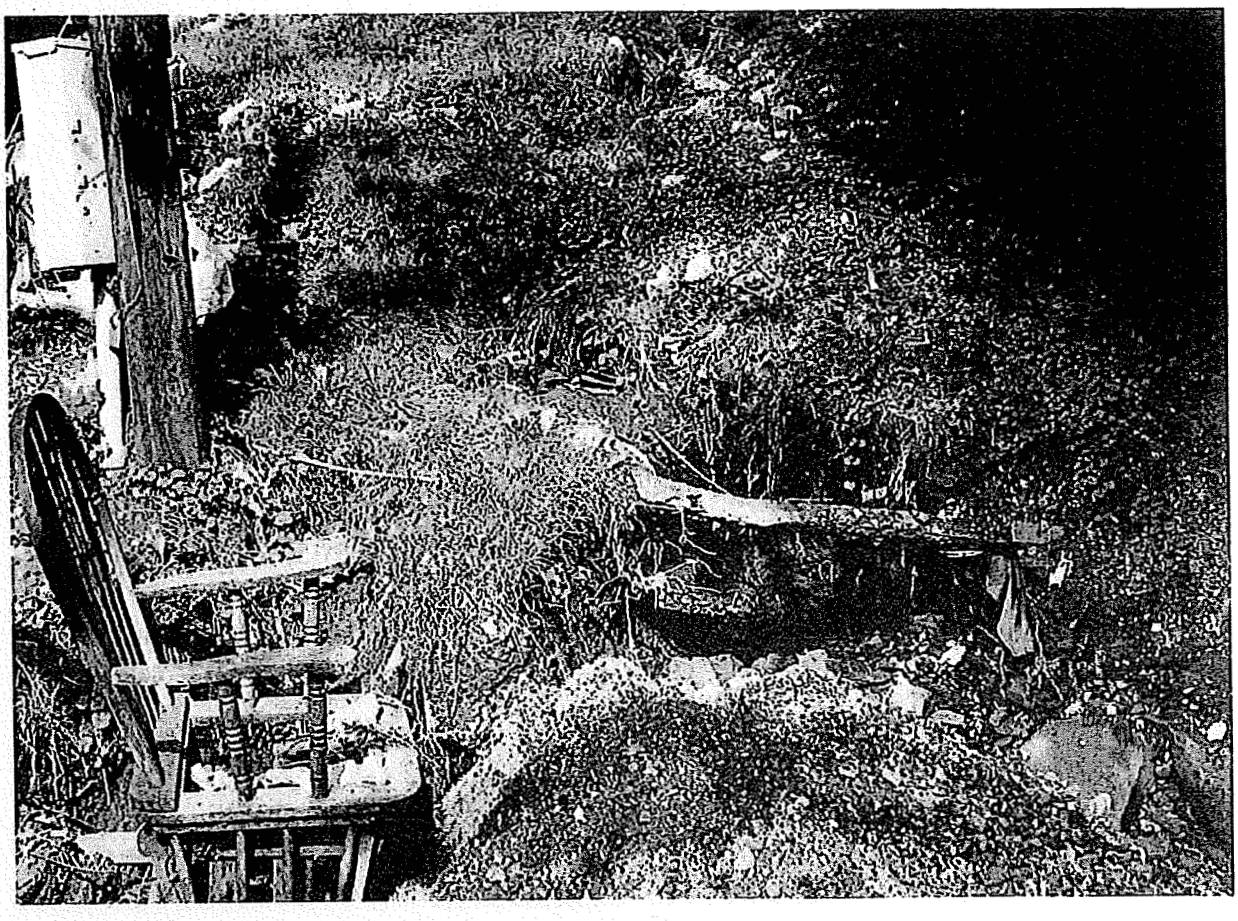


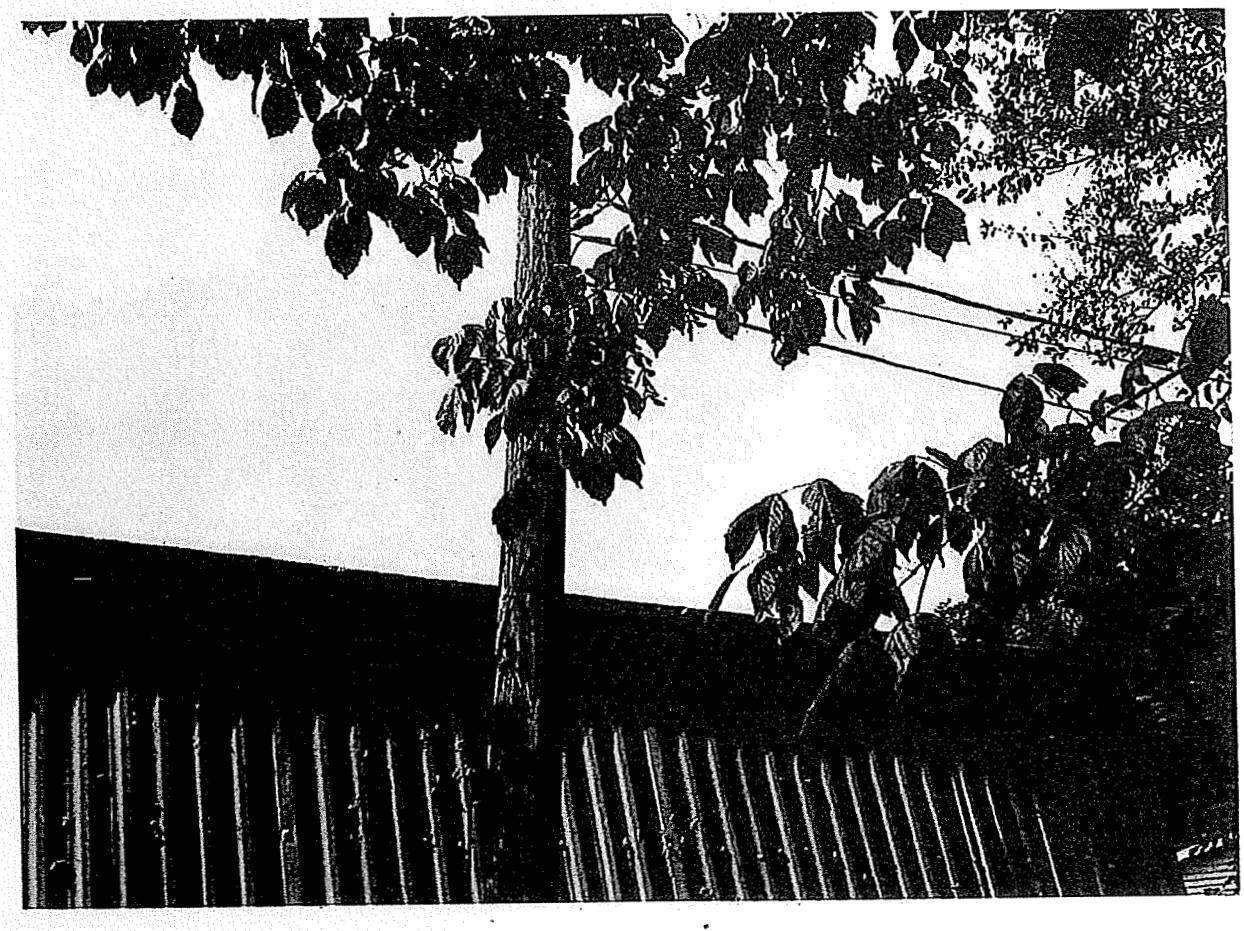


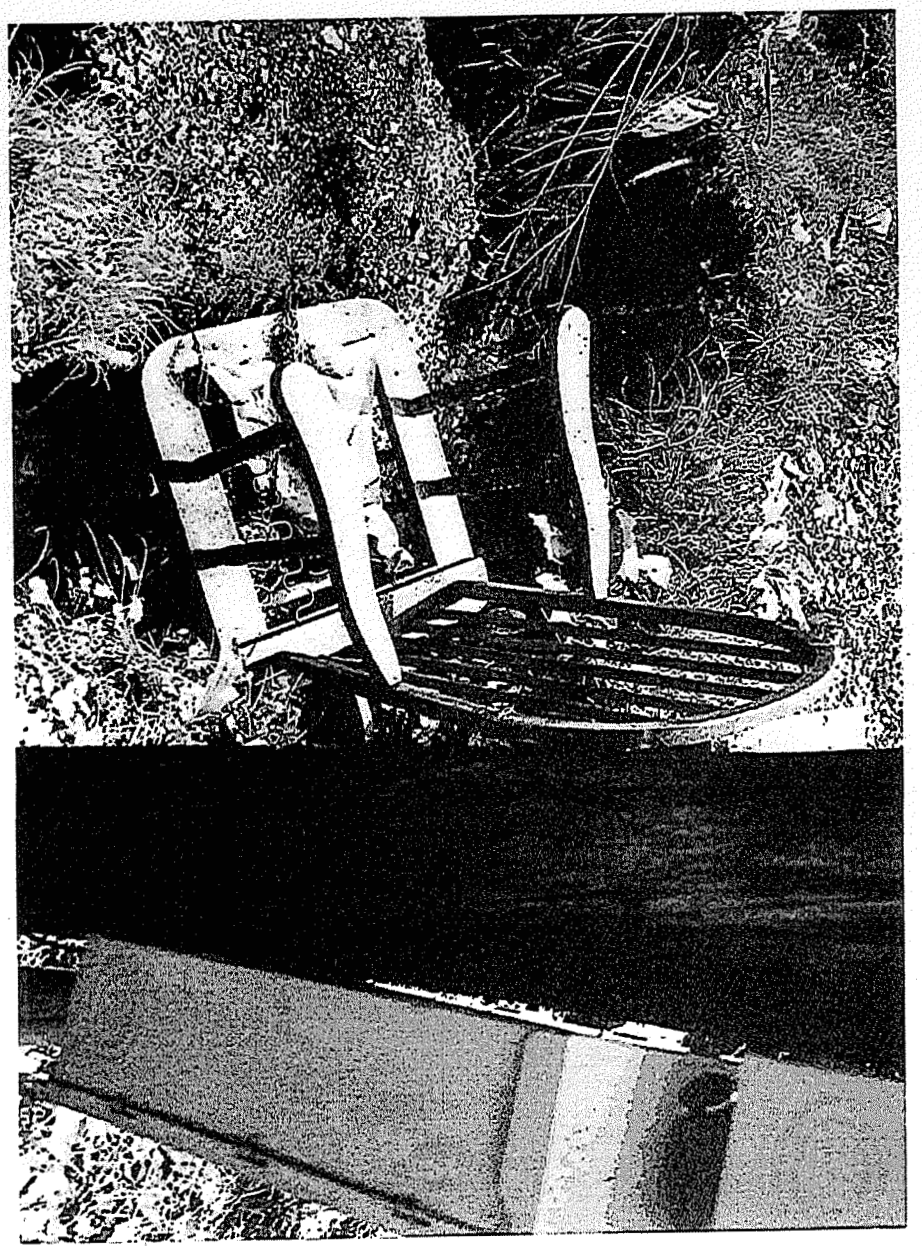












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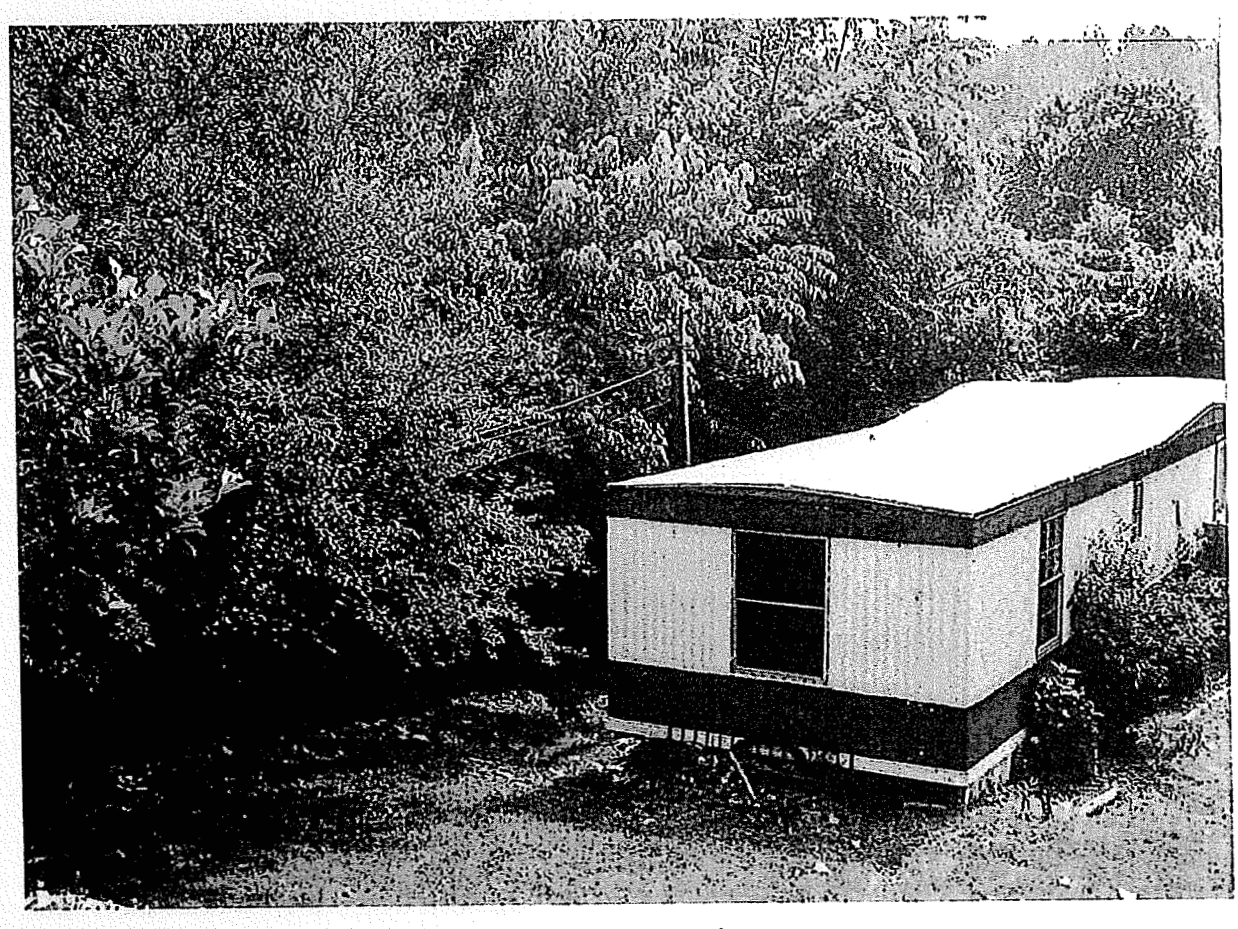
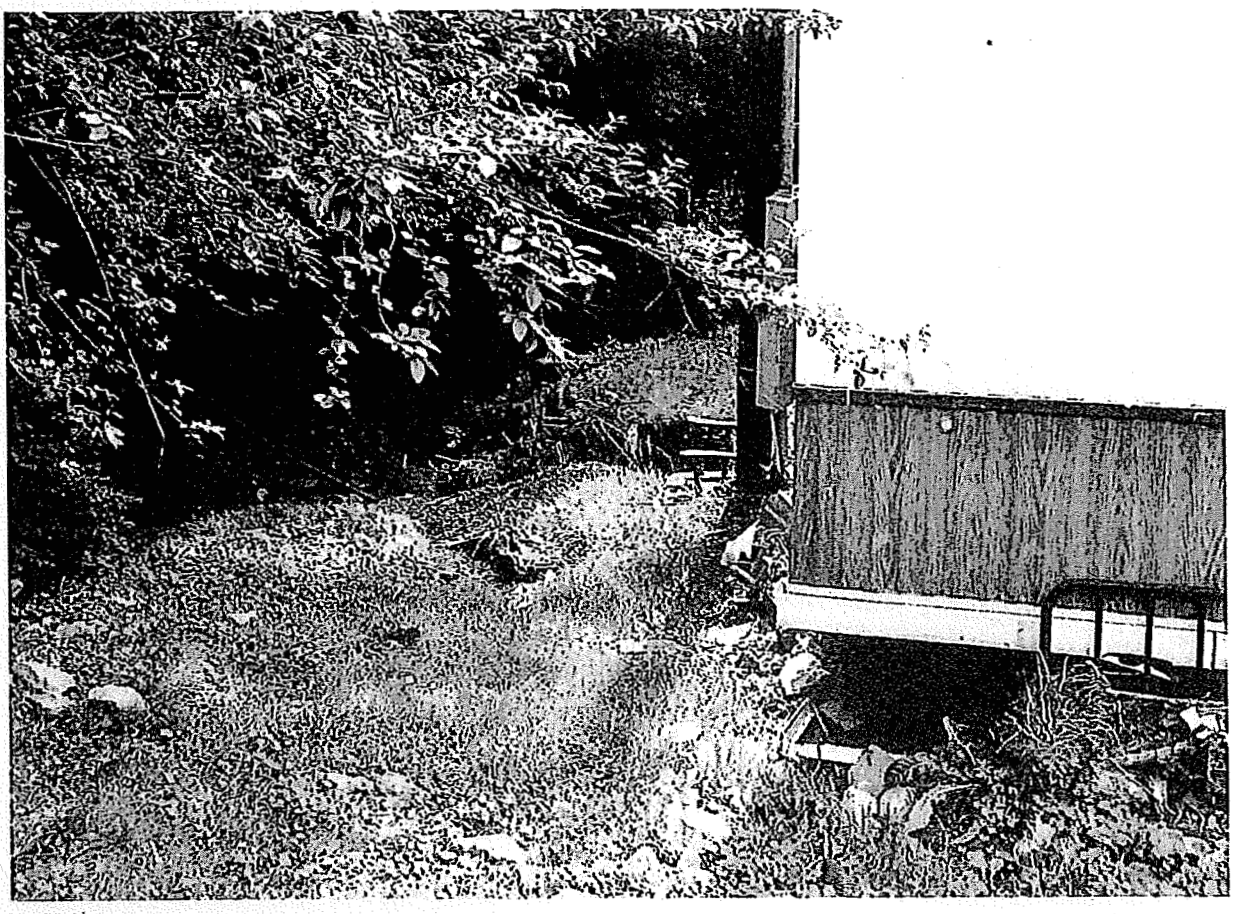




Attachment D

PSC Photographs

Photo 1

Photo 2

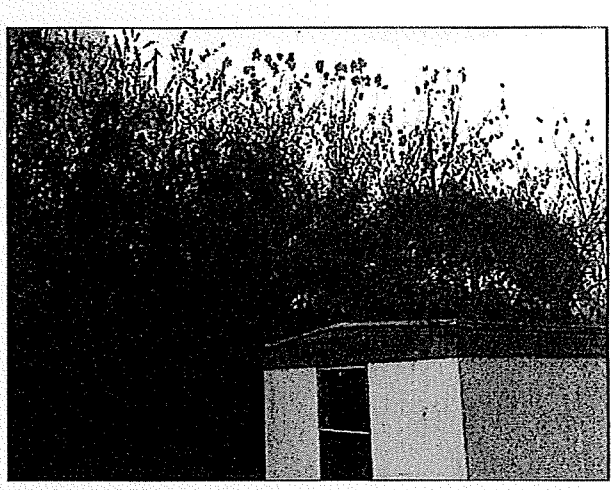


Photo 3

Photo 4

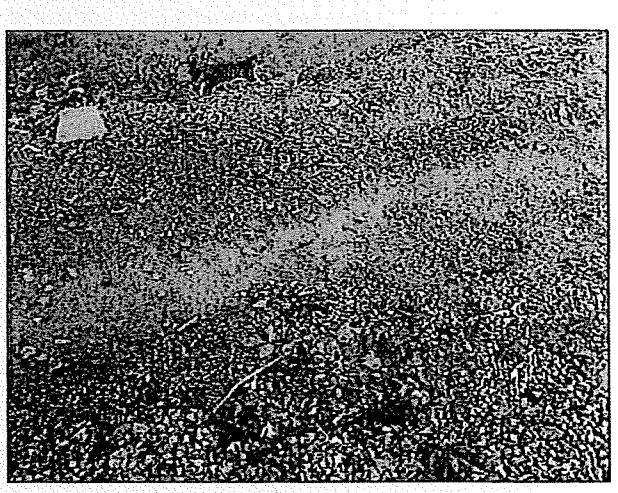


Photo 5

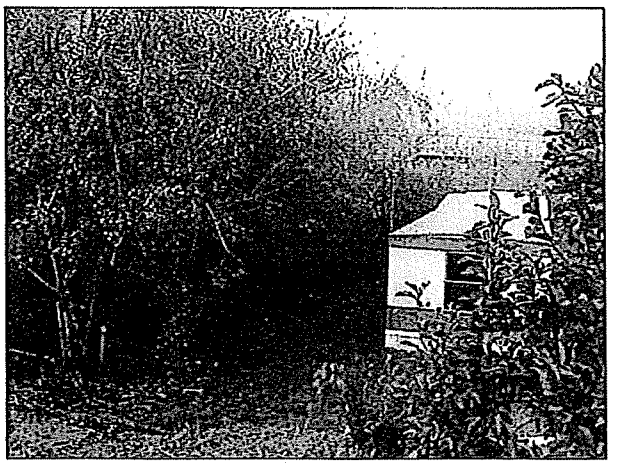


Photo 6

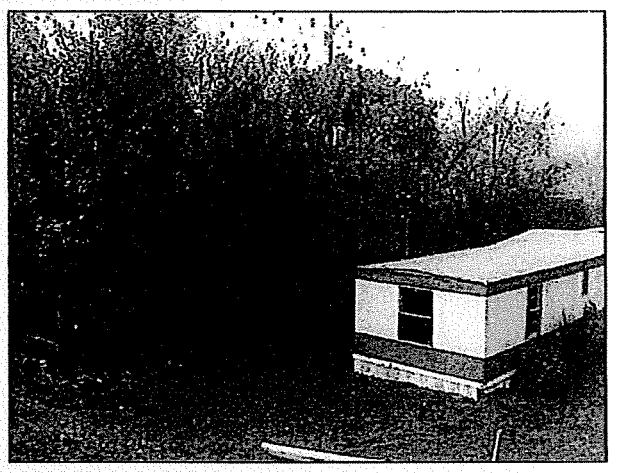
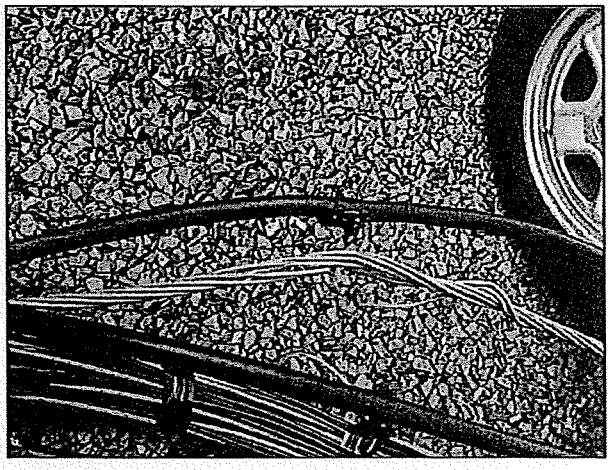


Photo 7

Photo 8



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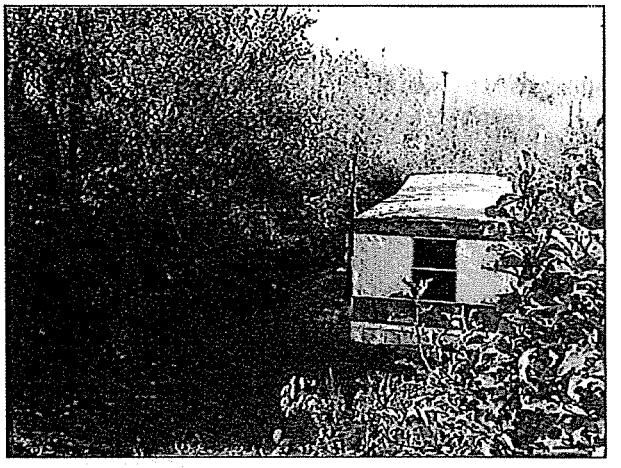

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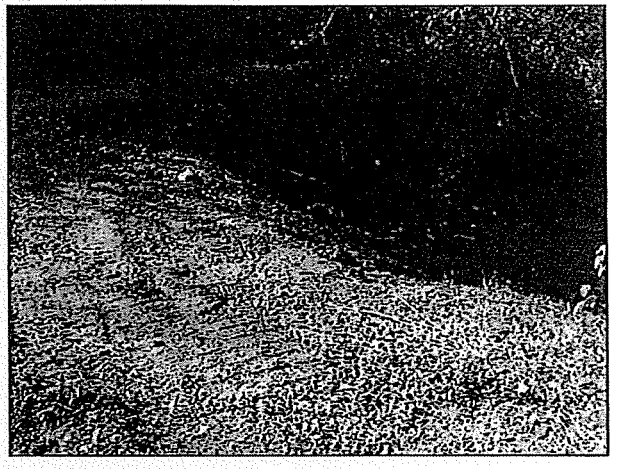
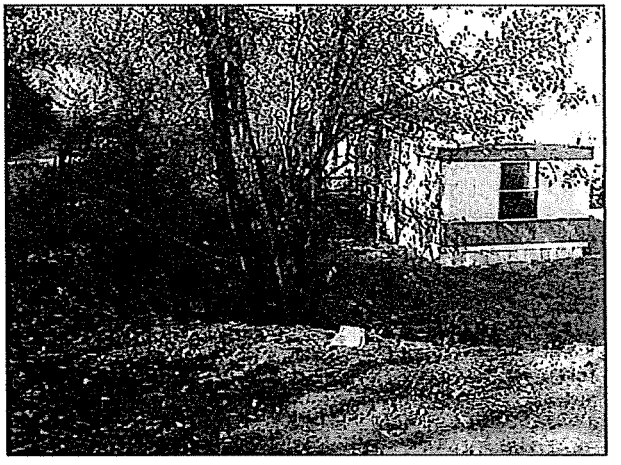


Photo 11



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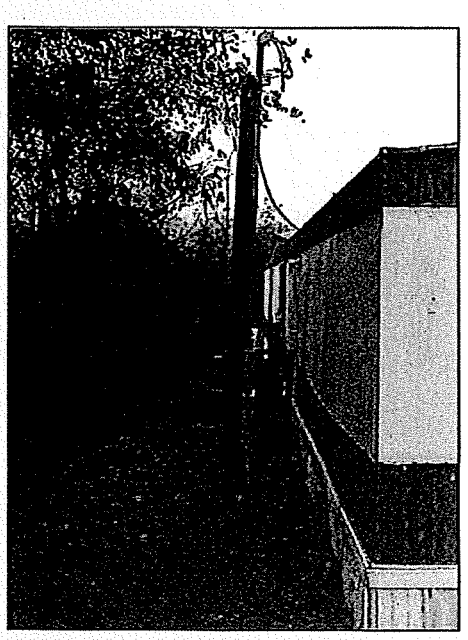

Photo 13

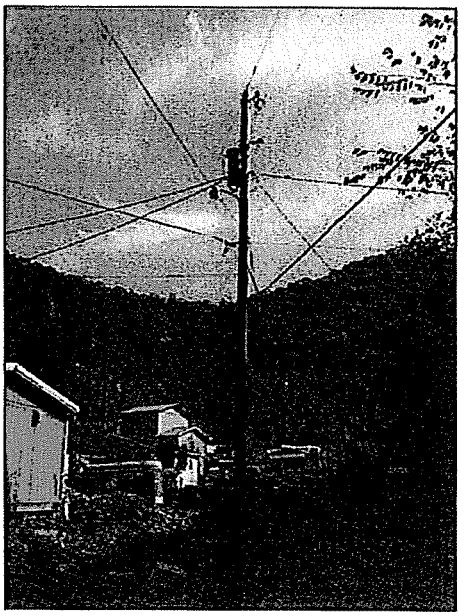

Photo 14

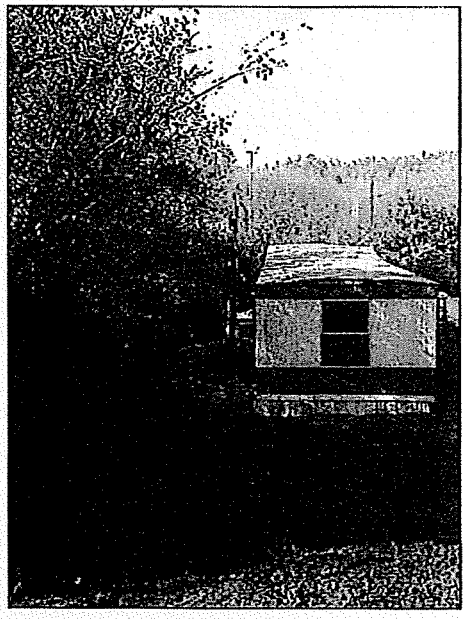

Photo 15

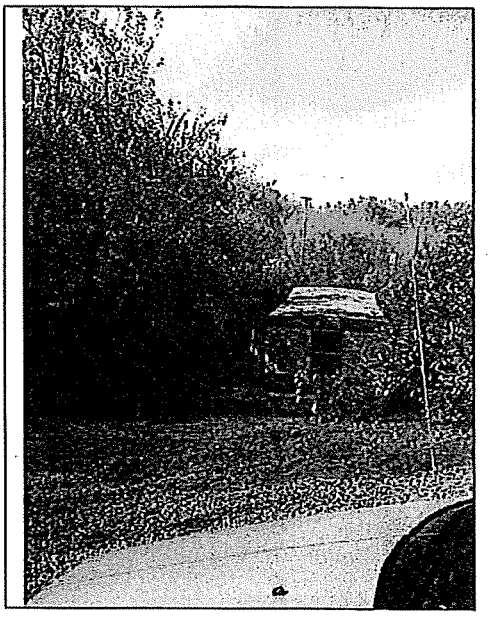

Photo 16

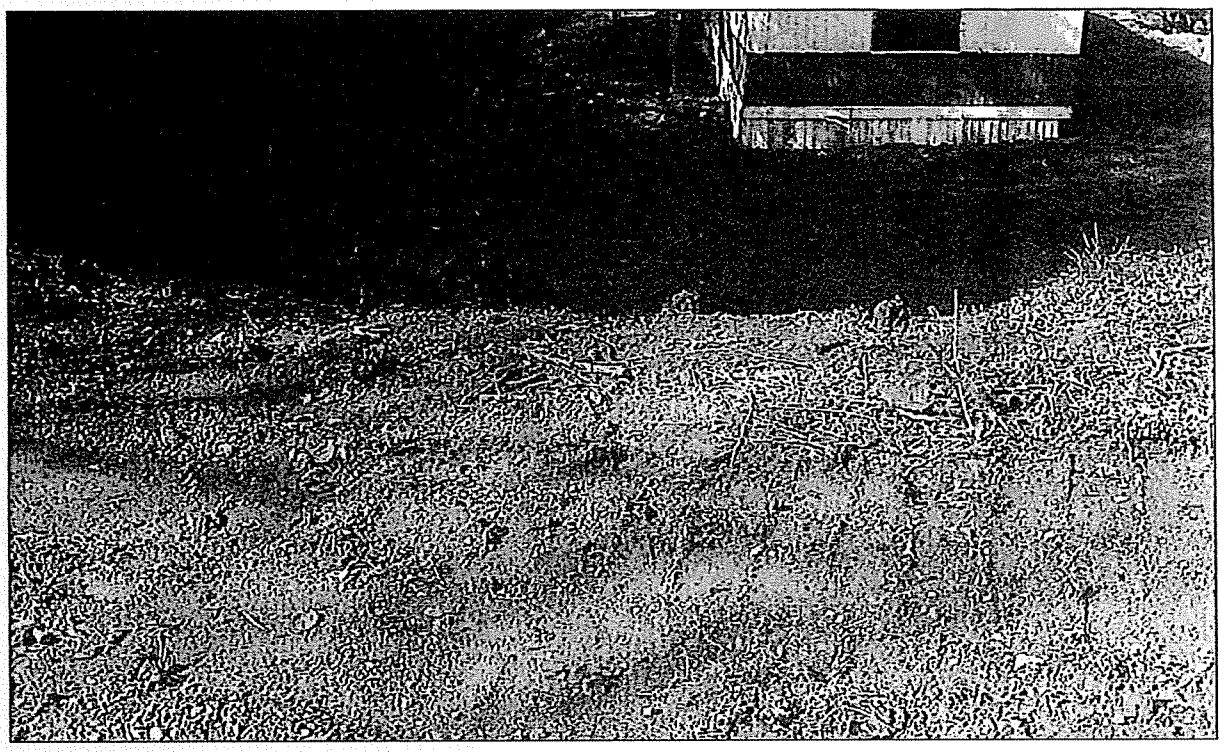

Photo 17

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