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January 31, 2019

Secretary Retz
Kansas Corporation Commission
1500 SW Arrowhead Road
Topeka, KS 66604-4027

Re: The Empire District Electric Company
Docket 19-EPDE-180-SHO

Dear Ms. Retz:

I am writing in follow up to the Commission's January 3, 2019 order in the above captioned docket in which it required The Empire District Electric Company to inspect the clamps and insulators on the transmission structures adjacent to the one at issue in this docket if it has not already done so, as well as to file a plan with the Commission to address the issue raised in this matter with respect to its lines and equipment within thirty days of the issuance of the order. The purpose of this letter is to update the Commission and parties with regard to both matters.

On January 15, 2019, Cross Discipline Engineering, on behalf of Empire, visually inspected the clamps and insulators on the transmission structures adjacent to the one at issue in this docket. On January 29, 2019, Cross Discipline Engineering issued its Inspection Report, which is being forwarded to the Commission via overnight mail. The Company is currently reviewing the Inspection Report to determine the most prudent course of action.

With regard to Empire's plans to address the issues raised in this docket regarding its lines and equipment, Empire has adopted the attached Immediate Hazard Policy which should prevent any future recurrence of this issue. The unpublished phone number included in the Hazard Policy has been redacted and is designated as confidential.

Thank you for your assistance with this matter. If you have any questions, please do not hesitate to contact me.

Sincerely,

Sheri Richard
Director, Rates & Regulatory Affairs

Enclosure

cc: Service List in Docket 19-EPDE-180-SHO



Immediate Hazard Policy

If an immediate hazard to life, property, or service is identified during the course of infrastructure inspection, the inspector is to remain on site and provide immediate notification to the company while attempting to maintain the public's safety. The on-site inspector shall communicate the hazard and attempt to prevent all bystanders from placing themselves in harm's way until the hazard is remedied. The inspector is to remain on site until relieved by a representative of the company.

Potential immediate hazards include, but are not limited to,

- Broken or severely rotted poles
- Severely corroded or structurally deficient steel structures
- Floating phase conductor
- Line on ground
- Broken guy wire passing through phases
- Or any other immediate hazard to life, property, or service

When an immediate hazard is identified, the following notification procedure shall be followed.

1. The inspector shall call their supervisor and report the immediate hazard identified.
2. If the inspection supervisor does not answer, the inspector shall call the appropriate area line operations manager and report the hazard. If the area line operations manager does not answer, a message shall be left describing the hazard.
3. If area line operations manager does not answer, the inspector shall call the appropriate area's second contact on the list provided (assistant manager of line operations or storekeeper) and report the hazard. If the area's second contact does not answer, a message shall be left describing the hazard.
4. If the area's second contact does not answer, the inspector shall call the area's third contact (operations administrative assistant - if applicable) and report the hazard. If the area's third contact does not answer, a message shall be left describing the hazard.
5. If the area's third contact does not answer, the inspector shall call the Empire Contact Center at [REDACTED] **(not for public distribution)** to report the hazard.
6. The inspector is to remain on-site until relieved by a representative of the company's Operations workgroup.
7. The inspection supervisor shall provide an email at the completion of each workday describing any immediate hazards which were identified that day.