

SEP 15 2021

PUBLIC SERVICE
COMMISSION

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Lindsey Flora
Deputy Executive Director
Kentucky Public Service Commission
211 Sower Boulevard
Frankfort, KY 40601

Kentucky Utilities Company
Transmission & Distribution
Integrity & Compliance
6900 Enterprise Drive
Louisville, KY 40214
www.lge-ku.com

Peter Clyde
Manager Gas Transmission &
Distribution Integrity &
Compliance
T 502-364-8715
Peter.Clyde@lge-ku.com

September 15, 2021

Locate Gas Lines Notification System

Mr. Flora:

In response to your letter dated August 12, 2021, concerning the amendments to KRS 367.4903 through 367.4917, thank you and your staff and associates for taking the time to have a clarifying phone conversation with Mike Jones. Please find below the text of each question and Kentucky Utility Company's ("KU") responses associated with its natural gas pipeline locate process. Some of these responses vary from the responses which were submitted to you for Louisville Gas and Electric Company's ("LG&E") gas facility locates. The responses differ because LG&E gas facilities are located by contractors and the KU EW Brown gas pipeline is located by company employees.

1. State whether your company currently provides status updates of a locate request to the party making the request. If so, describe how that is currently accomplished.

Yes. A KU employee contacts the requestor by phone to confirm the locate needs and then either clears the request or performs the locate as discussed. The temporary markings indicate KU's response to the locate request.

2. State whether your company currently informs the party making the request when the locate is complete, and if so, state how that communication is currently accomplished.

Yes. Per the current requirements stated in law, the temporary markings are considered to be a response to the locate request.



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3. State whether your company currently informs the party making the request when additional time is needed to locate the facilities, and if so, how that communication is currently accomplished.

KU receives approximately 45-50 requests annually where the physical locate is necessary and is applied. There have not been instances when the locate required additional time.

4. State how your company will provide "Positive Response" as defined in KRS 367.4903(21), as of January 1, 2022, to parties that have submitted locate requests.

KU uses a ticket management system that will be configured to send positive responses as defined in KRS 367.4903(21) to KU's protection notification center which is Kentucky 811. Status updates will include notification of project declarations, untonable facilities, and delays of other kinds as provided for in KRS 367.4909(11), and completion.

5. State how your company will maintain and retrieve the Positive Response communications it sends starting January 1, 2022, so that the fact of those notifications and their content is available to the Public Service Commission for routine inspection and for inclusion in reports of underground facility damage required by KRS 367.4909(4).

Pursuant to KRS 367.4913(i), KU's protection notification center, Kentucky 811, will retain records of our positive responses to them for at least five (5) years.

Additionally, e-mail responses sent to the requesting party from KU's ticket management system will be kept by KU for at least five (5) years.

6. Describe how your company will ensure that Positive Response communications are stored and retrievable for 5 years.

KU will have a shared e-mail box where the e-mail positive responses sent to the requesting party will be copied and stored.

7. Provide an example of your company's current communication with parties making locate requests.

There are no examples of current communications. The communications will be initiated by January 1, 2022 in line with the processes discussed in this



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letter. The positive response e-mails will have the original ticket number as a unique identification number which also provides the date of request. The e-mails will also have the date of the status update or completion.

Thank you once again for the clarifying conversation with Mike Jones. If there are follow-up questions and/or comments regarding the process, please contact Mike Jones at mike.jones@lge-ku.com or 502-364-8281.

Kind Regards,

A handwritten signature in blue ink, appearing to read 'Peter Clyde', is positioned below the text 'Kind Regards,'.

Peter Clyde
Manager Gas Transmission & Distribution Integrity & Compliance