

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

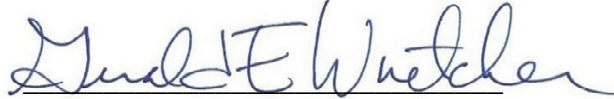
<b>LOGAN TELEPHONE COOPERATIVE, INC.</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 2021-00248</b>
	)	
<b>EAST LOGAN WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	

**RESPONSE OF EAST LOGAN WATER DISTRICT  
TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

East Logan Water District submits its Response to the Commission Staff's First Request for Information.

Dated: March 4, 2022

Respectfully submitted,

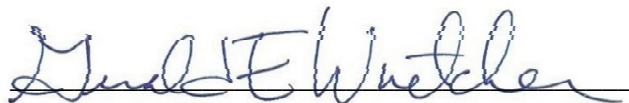


Gerald E. Wuetcher  
Stoll Keenon Ogden PLLC  
300 West Vine Street, Suite 2100  
Lexington, Kentucky 40507-1801  
Telephone: (859) 231-3017  
Fax: (859) 259-3517  
gerald.wuetcher@skofirm.com

*Counsel for East Logan Water District*

**CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on March 4, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**In the Matter of:**

<b>LOGAN TELEPHONE COOPERATIVE, INC.</b>	)	
	)	
<b>COMPLAINANT</b>	)	
	)	
<b>v.</b>	)	<b>CASE NO. 2021-00248</b>
	)	
<b>EAST LOGAN WATER DISTRICT</b>	)	
	)	
<b>DEFENDANT</b>	)	


**RESPONSE OF EAST LOGAN WATER DISTRICT**  
**TO COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION**

**FILED: March 4, 2022**

VERIFICATION

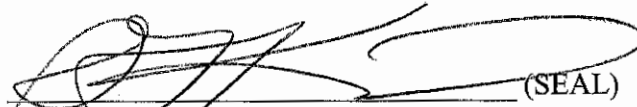
COMMONWEALTH OF KENTUCKY    )  
   ) SS:  
COUNTY OF LOGAN                                     )

The undersigned, Stephen Taylor, being duly sworn, deposes and states that he has been employed as the distribution system operator for East Logan Water District since on or before January 1, 2020, has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

  
\_\_\_\_\_  
Stephen Taylor

Subscribed and sworn to before me, a Notary Public in and before said County and State,  
this 3rd day of March 2022.



  
\_\_\_\_\_  
(SEAL)  
Notary Public

My Commission Expires: KYNP 7078  
Notary ID: 6/2/2024

**EAST LOGAN WATER DISTRICT**

**Response to Commission Staff's First Request for Information  
Case No. 2021-00248**

Question No. 1

Responding Witness: Stephen Taylor

**Q-1. How many requests from excavators to locate underground water lines did East Logan District receive from January 1, 2020, to present?**

A-1. During the period from January 1, 2020 to March 2, 2022, East Logan Water District received for 2,694 requests to locate underground water lines.

## **EAST LOGAN WATER DISTRICT**

### **Response to Commission Staff's First Request for Information Case No. 2021-00248**

Question No. 2

Responding Witness: Stephen Taylor

**Q-2. How many of the requests received from January 2, 2020, to present were requests to locate unmapped or untonable facilities?**

A-2. All of the requests were considered unmapped or untonable facilities. Approximately 95 percent of East Logan Water District's facilities were constructed prior to 2012 and are presumed to lack tracer wire. East Logan County Water District was established in 1972 and its last major construction occurred in 2008. Even in instances in which its facilities may contained tracer wire, the wire's poor condition has significantly limited location efforts. In previous efforts to use the wire to accurately locate its underground facilities, the District has found that, where tracer wire was present, it had been compromised and was of very limited use in detecting facility locations.

East Logan Water District's ability to locate facilities is further limited by the poor quality of its records. While the District has the design blueprints of most of its facilities, it lacks as-built construction plans for all of these facilities. Moreover, while as-built plans should provide a more exact location of a District facility, the District has found significant variances between the actual location of those facilities and the location shown on the as-built drawings.

The District cannot rely on its employees' experience and familiarity with the District's system to better locate facilities. The longest serving employee has only been employed with the District since 2015. Its distribution system operator has been with the District for less than three years. Its other field employees have been employed by the District for shorter periods. They have not sufficient time to accrued a thorough knowledge of facility locations through their work on the District's distribution facilities.

## **EAST LOGAN WATER DISTRICT**

### **Response to Commission Staff's First Request for Information Case No. 2021-00248**

Question No. 3

Responding Witness: Stephen Taylor

**Q-3. What is East Logan District's current procedure when it receives a request to locate its facilities in an area of intended excavation if the facilities are unmapped or untonable?**

A-3. East Logan Water District will provide a positive response if none of its facilities are clearly in the area of the intended excavation. For example, if the intended area of excavation along a road is opposite the side on which the District's facilities are located.

If the area of intended excavation is a precise and limited area, for example a hole for the setting of a utility or lighting pole, and the District's facilities are generally known to be in the general area, the District will conduct probes in the area of intended excavation, to ascertain whether its facilities are near the point of excavation. These efforts are not designed to locate the District's facilities as much as to ascertain where those facilities are not located.

In all other cases, the District will provide the location of its facilities to the extent its records and its employees knowledge and experience permit and will make available to the excavator a copy of its existing field records in digital format but will inform the requesting party that it is unable to accurately locate its facilities. The District does not have the resources or personnel to conduct extensive location operations. To impose that responsibility upon East Logan Water District would severely strain its finances and likely require significant increases in the District's rates.

**EAST LOGAN WATER DISTRICT**

**Response to Commission Staff's First Request for Information  
Case No. 2021-00248**

Question No. 4

Responding Witness: Stephen Taylor

- Q-4. Identify each instance of excavation damage to one of East Logan District's underground water lines from January 1, 2020, to present. Your answer should include the following information:**
- a. Date of the damage.**
  - b. Location of the damage.**
  - c. Amount of water loss as a result of the damage.**
  - d. Whether temporary underground facility markers had been provided to show the approximate location of the water line.**
  - e. The identity of the excavator that caused the damage.**
  - f. Description of all efforts by East Logan District to recover from the responsible excavator costs associated with the damage to the water line.**
- A-4. See the Excel workbook "2021-00248\_Response to First PSC Staff First Request for Information" embedded in this Response and also filed separately with this Response.**

Please note that in those instances where no location markings were provided, the District did not refuse to locate the facility but advised the requesting excavator that it could not accurately locate its facilities in the area of intended excavation.

**EAST LOGAN WATER DISTRICT**

**Response to Commission Staff's First Request for Information  
Case No. 2021-00248**

Question No. 5

Responding Witness: Stephen Taylor

- Q-5. Identify each incidence of excavation damage caused by East Logan District or one of its contractors from January 1, 2020, to present. Your answer should include the following information:**
- a. Date of the damage.**
  - b. Location of the damage.**
  - c. The type of underground facility damaged.**
  - d. The identity of the operator of the underground facility damaged by East Logan District or its contractor.**
- A-5. See the Excel workbook "2021-00248\_Response to First PSC Staff First Request for Information" embedded in this Response and also filed separately with this Response.**



**EAST LOGAN WATER DISTRICT**

**Response to Commission Staff's First Request for Information  
Case No. 2021-00248**

Question No. 6

Responding Witness: Stephen Taylor

**Q-6. Is East Logan District a member of Kentucky Underground Protection, Inc. (Kentucky 811 Contact Center)?**

A-6. Yes.

**EAST LOGAN WATER DISTRICT**

**Response to Commission Staff's First Request for Information  
Case No. 2021-00248**

Question No. 7

Responding Witness: Stephen Taylor

- Q-7. In 2021, the Kentucky General Assembly enacted amendments to the Kentucky Underground Facility Damage Prevention Act. The amendments, effective January 1, 2022, specify the duties of operators and excavators when underground facilities in an area of intended excavation are unmapped or untonable. How does East Logan District intend to comply with the new requirement under KRS 367.4909(5) for an underground facilities operator to respond and provide a positive response to facility locate requests, including requests to locate and mark unmapped or untonable facilities?**
- A-7. See response to Question 3.