

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

In the Matter of:

	LOGAN TELEPHONE COOPERATIVE, INC.)	
)	
	COMPLAINANT)	
V.)	CASE NO. 2021-00248
)	
	EAST LOGAN WATER DISTRICT, INC.)	
)	
	DEFENDANT)	

**LOGAN TELEPHONE COOPERATIVE, INC.’S RESPONSES TO THE COMMISSION
STAFF’S FIRST REQUESTS FOR INFORMATION**

Logan Telephone Cooperative, Inc. (“LTC”), by counsel, files its responses to the Commission Staff’s First Requests for Information, issued in the above-captioned case on January 12, 2022.

FILED: February 18, 2022

**IN THE MATTER OF LOGAN TELEPHONE COOPERATIVE,
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**LOGAN TELEPHONE COOPERATIVE, INC.’S RESPONSES TO THE COMMISSION
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REQUEST NO. 1: How many requests to East Logan Water District, Inc. to locate underground water lines did Logan Telephone submit from January 1, 2020 to present?

WITNESS: Greg Hale, General Manager, and Thadd Kistler, Outside Plant Manager.

RESPONSE: From January 1, 2020 through present, LTC has submitted 187 tickets for locate requests to East Logan Water District, Inc. (“East Logan”). For detailed information on each of these ticket submissions, LTC refers the Commission Staff to the attached spreadsheet bates labeled LTC_000001.

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REQUEST NO. 2: How many of the requests received from January 2, 2020 to present were requests to locate unmapped or untonable facilities?

WITNESS: Greg Hale, General Manager, and Thadd Kistler, Outside Plant Manager, based on information and representations from its contractor, North Central Service, Inc. (“North Central”), and the inspector of LTC’s fiber-optic deployment, Finley Engineering Company, Inc. (“Finley Engineering”).

RESPONSE: LTC does not have sufficient information to determine whether its locate requests to East Logan were for facilities that were unmapped or untonable. However, LTC knows that East Logan has placed some of its facilities after 2012, thus these facilities should have been metallic or nonmetallic with a metallic tracer wire as required by law. Further, LTC’s contractor, North Central, has observed metallic tracer wire in some of the facilities that were ultimately damaged due to East Logan’s refusal to locate them, including two separate occasions on August 17, 2020. For additional information on these occasions, LTC refers the Commission Staff to a detailed spreadsheet, bates labeled LTC_000002, based on information provided by North Central, that documents each report of damage to East Logan’s facilities during North Central’s excavation.

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REQUEST NO. 3: What is Logan Telephone'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?

WITNESS: Greg Hale, General Manager.

RESPONSE: LTC does not currently have any unmapped or untonable facilities.

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REQUEST NO. 4: Identify each instance of excavation damage to one of Logan Telephone's underground fiber optic and related telecommunications/data facilities from January 1, 2020, to present. Your answer should include the following information.

- (a) Date of the damage.
- (b) Location of the Damage.
- (c) Whether temporary underground facility markers had been provided to show the approximate location of the underground facilities.
- (d) The identity of the excavator that caused the damage.
- (e) Description of all efforts by Logan Telephone to recover from the responsible excavator costs associated with the damage to its underground facilities.

WITNESS: Greg Hale, General Manager.

RESPONSE: To answer this Request, LTC created and refers the Commission Staff to the attached spreadsheet bates labeled LTC_000003.

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REQUEST NO. 5: Identify each incidence of excavation damage cause by Logan Telephone or one its contractors from January 1, 2020 to present. Your answer should include the following information.

- (a) Date of Damage.
- (b) Location of Damage.
- (c) The type of underground facility damaged.
- (d) The identity of the operator of the ground facility damaged by Logan Telephone or its contractor.
- (e) Description of all efforts by the operator of the damaged facility to recover from Logan Telephone costs associated with the excavation damage.

WITNESS: Greg Hale, General Manager, and Thadd Kistler, Outside Plant Manager, based on information and representations from its contractors, North Central and Floyd's Equipment, Inc., and the inspector of LTC's fiber-optic deployment, Finley Engineering.

RESPONSE: LTC has not personally caused any damage to the facilities of other operators from January 1, 2020 until the present. Damage to other operators' facilities has been reported during excavations by LTC's contractors, North Central and Floyd's Equipment. North Central provided the majority of the excavation for LTC's fiber-optic deployment in 2020, and Floyd's Equipment has provided the majority of it from 2021 through present. To answer this Request, LTC has requested and received information from these contractors as well as the inspector of its fiber-optic deployment, Finley Engineering. Based on the information from these

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third-party entities, LTC has created and refers the Commission Staff to the attached spreadsheet bates labeled as LTC_000002.

In addition to the information contained in this spreadsheet, LTC has learned that East Logan has sent North Central at least 31 invoices for alleged excavation damage in 2020. East Logan has also sent LTC copies of these invoices. North Central has represented to LTC that it is disputing these invoices as East Logan ignored locate requests or refused to provide markings for the approximate location of its lines, including some lines that were placed after 2012 and had a metallic tracer wire. *See* LTC_000002.

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REQUEST NO. 6: Is Logan Telephone a member of Kentucky Underground Protection, Inc. (Kentucky 811 Contact Center)?

WITNESS: Greg Hale, General Manager.

RESPONSE: Yes.

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REQUEST NO. 7: Identify any excavation damage to an underground facility owned or operated by Logan Telephone from January 1, 2019, to present.

WITNESS: Greg Hale, General Manager, and Thadd Kistler, Outside Plant Manager.

RESPONSE: To answer this Request, LTC created and refers the Commission Staff to the attached spreadsheet bates labeled LTC_000003.

