

KENTUCKY-AMERICAN WATER COMPANY
CASE NO. 2022-00363
RESPONSE TO COMMISSION'S NOVEMBER 16, 2022 ORDER

Witness: Andy Lewis / Justin Sensabaugh

Provide the following information:

- a. Since January 1, 2022, the number of locate requests received in total and broken out into the types of locate requests contained in KRS 367.4909(5);
- b. Since January 1, 2022, the number of second or subsequent requests for the same locate request received in total and broken out into the types of locate requests contained in KRS 367.4909(5);
- c. Since January 1, 2022, the length of time required to respond to each requestor/excavator in total and broken out into the types of locate requests contained in KRS 367.4909(5). Also, provide information showing whether underground facilities are marked within the statutory window, and the average time it takes to respond to a locate request;
- d. Since January 1, 2022, the number of times an agreement has been reached with an excavator outside of the statutory time limits required by KRS 367.4909, with the aggregate numbers and broken out into the types of locate requests contained in KRS 367.4909(5);
- e. Since January 1, 2022, state whether locate requests have been performed by Utility personnel or by a third-party contractor. If the answer is both, provide the number of locate requests performed by Utility personnel and third-party contractors, respectively;
- f. State whether records and statistics are kept of the number of underground facilities located accurately versus inaccurately. Provide all records and statistics compiled since January 1, 2022;
- g. Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and
- h. State what policies and procedures have been implemented to reduce the number of inaccurately located facilities. Provide information detailing the efficacy of those procedures on reducing the number of inaccurately located underground facilities.

Response:

- a. From January 1, 2022, until November 30, 2022, Kentucky American Water has received 52,435 locate requests. The following table represents the types of requests contained in KRS 367.4909(5):

Normal Excavation	Emergency Locate Request	Design Information Request
50,309	1,887	239

The three other categories, not broken down in the tables above, are large project requests, unmapped or untonable facilities, and fiber-to-the-premises broadband. Those three categories are included in the normal excavation total in the above table.

- b. The following table represents the number of second or subsequent requests for the same locate request contained in KRS 367.4909(5):

Normal Excavation	Emergency Locate Request	Design Information Request
2,053	7	0

- c. Kentucky American has responded to approximately 5,840 unique excavators in 2022. The following table represents required time to respond to each request broken down by category:

Normal Excavation (2 working days)	Emergency Locate Request (Quickly as possible not to exceed 48 hours)	Design Information Request (10 working days)
2.2 calendar days Average Response	23 hours Average Response	7.9 calendar days Average Response

The averages represented in the above referenced table account for calendar days, not just working days. The 6 locate categories have required times to locate as follows: Normal excavation (2 working days); Emergency (as quickly as possible not to exceed 48 hours); Design information (10 working days); Large project (2 working days to notify excavator then 5 days or prior to project start); Unmapped or untonable (2 working days to notify the excavator then 5 or 8 days); and Fiber-to-the-premises broadband (4 working days). Kentucky American Water works locates 5 days a week for normal excavation and design information requests and works emergency requests with standby personnel on a 24/7 basis.

Between the years of 2017 and 2021, Kentucky American Water has experienced an increase in utility locate requests of approximately 37%. These increases reflect many variables including organic residential and commercial growth in the local community, area wide utility infrastructure projects performed by others, increased focus on gas line damage prevention on residential property, maturity of the state-wide Kentucky Underground Protection program, and other situations that add to the overall total number of locates a utility must perform.

In terms of the recent focus on residentially requested locates as a result of local gas utility communication campaigns to prevent damage to buried gas lines on customer owned property, Kentucky American Water has experienced an increase in the number of locates requested on customer owned property. Due to the fact that the vast majority of Kentucky American Water owned buried assets are not located on customer property and our water

and wastewater utility line point of demarcation is generally within the road or utility easement, there are very few locates that Kentucky American Water must physically locate on a customer's property. By contrast, communication, gas and electric utilities generally own the buried asset up to the customer's structure. While Kentucky American Water does notify the requestor and/or Kentucky Underground Protection that no buried assets exist, by responding "No Locate Required," we are finding that customers are submitting unnecessary subsequent locate requests simply because their water or sewer line was not physically located on their property. While Kentucky American Water attempts to educate our customers to this point, a more global Call Before You Dig program message or communication program could help reduce the number of subsequent locate requests in these situations.

Kentucky American Water believes further analysis of contractor practices related to when and under what circumstances requesting refreshed locates may be warranted. Through the refresh process, multiple iterations of the original locate can be generated adding to the overall total number of locates a utility must complete. While the need to perform refresh locates is valid, it is unclear whether there is proper oversight and accountability of contractors to ensure these requests are warranted based on the age of the original locate request. It is possible that refresh locates are being requested regardless of the contractor's ability to perform its scheduled work within the initial locate work window. This practice, if it is occurring, has the potential to add significant unnecessary burden to utilities by larger, high production construction firms that have broad geographical impact such as paving contractors, communication utility contractors, or large firms performing significant levels of work in a local area.

- d. Kentucky American Water has not utilized the official form from the PSC website to reach an agreement between owner and excavator. The Company's operational personnel respond to requests and uses "verbal" or "handshake agreements" for extending response times and/or deciding whether facilities are untenable, or whether requests are part of a large project. These agreements are not recorded.
- e. Kentucky American Water employees complete all requests for locates received through the Kentucky Underground Protection call center. However, the Company plans to evaluate the possibility of using third-party contractors to perform some or all of the locate requests in the future.
- f. Records are kept of all underground facilities that have been damaged by excavation. These records show both damage with accurate and inaccurate facility locates. The following table represents the statistics of inaccurate/accurate when a facility is damaged for 2022. Thus, see the following for damage occurrences out of the 52,435 locates requested from January 1, 2022 to November 30, 2022:

Accurately Marked After Damage to Facility	Inaccurately Marked After Damage
35	78

Out of the 78 inaccurate locates after damage, 20 were found to be nonconductive material and 12 reflected damage to property abandoned in place and not currently utilized.

- g. The method used for determining accurate versus inaccurate marks is responding to each damage incident and completing documentation that has relevant information about locate marks and written statements from the responding crew. Exhibit 1 is the referenced form used for all damaged facilities. Kentucky American Water relies upon reported instances of a utility strike or contractor witness to a utility asset that has been located incorrectly.

Kentucky American Water conducts personnel training and utilizes available technology to make locates as accurate as possible. Utility locators use hands on and on-the-job training to build skills and knowledge to locate underground facilities. Kentucky American Water uses a work management system, linked with the Kentucky Underground Protection system, to manage locate requests. The Company's mapping system allows real time requests for changes to underground facility locations along with timely additions to new construction projects for the most current mapping information. The equipment utilized by utility locators is well maintained and various types of equipment are available to utilize depending on each locate scenario.

- h. Please see the response to part g above. When a facility is damaged, Kentucky American Water documents as much information as possible from all parties involved. The documentation compares locate marks to hit facilities to determine accuracy. These documents are also used to determine when an at-fault excavator needs to be sent a request for damage repair payment.

KENTUCKY AMERICAN WATER
DATA SHEET FOR DAMAGES TO COMPANY FACILITIES

Exhibit 1

Date Damaged: _____

MapCall Order No: _____

Date Repaired: _____

Location of damage: _____

Name, phone no. and address (include city and state) of the company and/or person responsible for damages.

Name: _____ Cell Phone: (____) _____

Company: _____ Office Phone: (____) _____

Co. Address: _____ City: _____ State: _____ Zip: _____

Date facility damaged: _____ Time: _____ AM / PM Pictures Taken? Yes No

Was a locate requested? Yes No What is KY 811 confirmation number? _____

Was facility damaged conductive (DI, CI, Copper) or non conductive (PVC, PEP, AC)?

If (conductive) facilities were marked, was mark within 18" of either side of facilities? Yes No

Is damaged to be billed for? (Supervisor only) Yes No Approved by: _____

Type of facility damaged: Main Service Valve Hydrant Other _____

Details of damage and repairs: _____

_____ Signed: _____

Materials Used: _____

Water Loss: _____ GPM x _____ Minutes = _____ gallons
Flushing: _____ GPM x _____ Minutes = _____ gallons

Was entered into SAP

