

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

In the Matter of:

ELECTRONIC INVESTIGATION INTO COMPLIANCE)	
WITH EXCAVATOR LOCATE REQUESTS PURSUANT)	CASE NO.
TO KRS 367.4909 AND KRS 367.4917(7))	2022-00363

**RESPONSE OF SOUTH KENTUCKY RURAL ELECTRIC COOPERATIVE
CORPORATION TO COMMISSION’S NOVEMBER 16, 2022 ORDER**

In response to the Commission’s November 16, 2022 Order in the captioned case, South Kentucky Rural Electric Cooperative Corporation (“South Kentucky”) provides the following information pursuant to ordering paragraph 2:

- a. Since January 1, 2022, South Kentucky has received 501 locate requests. All are expected to fall under the KRS 367.4909(5)(a) category of “normal excavation” requests. South Kentucky’s reporting system does not specify requests in greater detail.
- b. Since January 1, 2022, South Kentucky has not received any second or subsequent requests for the same locate request.
- c. Since January 1, 2022, South Kentucky has responded to all locate requests within the statutory window established by KRS 367.4909(5). In an attempt to determine the time-sensitivity and urgency of requests South Kentucky employees make telephone contact with the locate requestor to inquire on this subject if such information is not already contained on the locate service order. The vast majority

- of locates were made the same day unless time or weather did not permit. In such circumstances the locate request was completed the next business day. Responses to urgent requests are completed on average within one business day.
- d. South Kentucky does not track this information. However, on occasion when the locate requestor asks South Kentucky to wait until a certain day in the future to complete the locate, South Kentucky attempts to comply. Otherwise, South Kentucky will complete the locate request no later than the next business day. South Kentucky is unaware of a situation where it has needed to reach an agreement with an excavator to complete a locate request outside of the statutory time limits.
 - e. Since January 1, 2022, South Kentucky has performed all locate requests without assistance from any third-party contractor.
 - f. South Kentucky does not keep records or statistics to differentiate between accurate and inaccurate locates.
 - g. South Kentucky does not employ a specific method to determine whether an underground facility has been located accurately versus inaccurately. However, South Kentucky believes all locates are performed accurately and makes sure to inform excavators they should not dig in close proximity to the located routes.
 - h. South Kentucky uses several methods to prevent inaccurate locates. The Cooperative has purchased and uses high-quality locating devices and makes sure its service territory infrastructure maps are current and accurate. Even with utilization of best of practices inaccuracies can occur. For that reason, South

Kentucky always informs excavators to allow as much space to either side of the line identification markers as possible when digging to allow some tolerance for the occasional inaccurate location of facilities.

Dated: December 6, 2022

Respectfully Submitted,

/s/ Mark David Goss

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