

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

In the Matter of:

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

**RESPONSE OF BULLOCK PEN WATER DISTRICT
TO PSC'S ORDER ENTERED NOVEMBER 16, 2022**

Comes now the Bullock Pen Water District, by and through Mr. Paul Harp, Superintendent, and respectfully submits the following Response to the Public Service Commission's Request for Information submitted herein. The undersigned would state that the information provided herein was also provided in Public Service Commission Case No. 2022-00378.

REQUEST NO. 1: Provide an explanation for Bullock Pen Water District's failure to respond to the Commission's Order herein:

RESPONSE: The District's failure to respond to the Commission Order Case No. 2022-00363 was an oversight by the District. The email containing the Order was simply missed and possibly misinterpreted by the District.

REQUEST NO. 2: Each utility shall file within 45 days of the date of service of this Order the following information:

Witness Bullock Pen Water District
Paul Harp, Superintendent

- 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);

Response:

| Request Type | Occurrences |
|--|--------------------|
| A. Normal Excavation Request | 2353 |
| B. Emergency Request | 20 |
| C. Design Request | 11 |
| C. Large Project Request | 0 |
| B. Unmapped Facility Request | 0 |
| F. Fiber to the premises Broadband Deployment Request | 0 |
| Other Not contained in KRS 367.4909(5) (Damage &/or On Site Exposed Facility) | 7 |
| Total | 2391 |

- 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);

Response:

| Request Type | 2nd Request Occurrences |
|--|---|
| A. Normal Excavation Request | 0 |
| B. Emergency Request | 0 |
| C. Design Request | 0 |
| 9. Large Project Request | 0 |
| B. Unmapped Facility Request | 0 |
| F. Fiber to the premises Broadband Deployment Request | 0 |
| Other Not contained in KRS 367.4909(5) (Damage &/or On Site Exposed Facility) | 0 |
| Total | 0 |

- 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;

Response: The below chart indicates approximate response time.

| Request Type | Occurrences | Total Response Time | Average Response Time |
|--|-------------|---------------------|-----------------------|
| A. Normal Excavation Request | 2353 | 2059.5 days | 1.08 days |
| B. Emergency Request | 20 | 20 hours | 1 hour |
| C. Design Request | 11 | 14 days | 1.3 days |
| C. Large Project Request | 0 | 0 | 0 |
| B. Unmapped Facility Request | 0 | 0 | 0 |
| F. Fiber to the premises Broadband Deployment Request | 0 | 0 | 0 |
| Other Not contained in KRS 367.4909(5) (Damage &/or On Site Exposed Facility) | 7 | 7 hours | 1 hour |
| Total | 2391 | 2075.75 days | 1.2 days |

- 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);

Response:

| Request Type | Occurrences Where Agreement reached outside statutory time limit |
|--|--|
| A. Normal Excavation Request | 0 |
| B. Emergency Request | 0 |
| C. Design Request | 0 |
| C. Large Project Request | 0 |
| B. Unmapped Facility Request | 0 |
| F. Fiber to the premises Broadband Deployment Request | 0 |
| Other Not contained in KRS 367.4909(5) (Damage &/or On Site Exposed Facility) | 0 |
| Total | 0 |

- 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;

Response:

The district performs all of its own locate requests.

- 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;**

Response:

The district does not keep record or statistics on the accuracy of underground locates. Accuracy is only verified when damage occurs. During the year 2022 no such damages occurred, nor were any reported.

- g. Explain the method used to determine whether an underground facility has been located accurately versus inaccurately;**

Response:

The district is only made aware of an inaccurate locate if there is damage during excavation and the marking isn't at the location where damage occurred.

- 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:

The district follows an internal procedure in completing locate request to ensure locates are completed accurately and minimize the number of inaccurately located facilities. Basically, these procedures include reviewing the utility maps and records prior to completing the locate to understand the underground assets in the locate request area. Also, using above ground district water line indicators such as valve boxes and fire hydrants to assist in tracing the water line through the locate request area.

CERTIFICATE

Comes now the Bullock Pen Water District, by and through its Superintendent, Paul Harp, and states that the information contained in the attached response is true and accurate to the best of the undersigned's knowledge, information and belief formed after a reasonable inquiry.

Done at Crittenden, Kentucky, this 15TH day of March, 2023.

Respectfully submitted,
BULLOCK PEN WATER DISTRICT

BY: *Paul Harp*
SUPERINTENDENT PAUL HARP

COMMONWEALTH OF KENTUCKY
COUNTY OF GRANT

Subscribed, sworn to and acknowledged before me by Superintendent Paul Harp, Bullock Pen Water District, on this the 15th day of March, 2023.

Amy G. Ruark
NOTARY PUBLIC, State at Large
My Commission Expires: 2-20-24

