

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

**In the Matter of:**

**ELECTRONIC INVESTIGATION INTO  
COMPLIANCE WITH EXCAVATOR LOCATE  
REQUESTS PURSUANT TO KRS 367.4909  
AND KRS 367.4917(7)**

**CASE NO. 2022-00363**

**RESPONSE OF KIRKSVILLE WATER ASSOCIATION  
TO ORDER OF NOVEMBER 16, 2022.**

In response to the Commission's Order of November 16, 2022, Kirksville Water Association provides the following response:

- a. Since January 1, 2022, Kirksville Water Association has received 774 locate requests. 758 were normal requests and 16 were emergency locate requests.
- b. Since January 1, 2022, Kirksville Water Association has received 6 second requests, all of which were for normal excavator locate requests.
- c. Since January 1, 2022, Kirksville Water Association has responded to all requests within the statutory window as allowed by KRS 367.4909(5). All normal locate requests are completed within two working days after notification is received. All emergency locate requests are completed within two hours of notification.
- d. Since January 1, 2022, we have not needed any agreement with an excavator to complete a locate outside of the statutory time limit.
- e. Since January 1, 2022, all locate requests are performed by utility personnel. Kirksville Water Association does not use a third-party contractor.

- f. Kirksville Water Association maintains a record only when underground facilities are located inaccurately resulting in damage of water lines. Since January 1, 2022, there have been 3 instances of damaged water lines because of inaccurately located lines.
- g. Kirksville Water Association uses many methods to ensure underground facilities are marked accurately, including but not limited to the use of as-built plans, and a GIS mapping system. If work orders are completed in the field with no damages resulting from excavation, Kirksville Water Association would determine the underground facilities have been located accurately. Kirksville Water Association determines underground facilities have been located inaccurately if damage occurs after excavation.
- h. The policies and procedures Kirksville Water Association has implemented to reduce the number of inaccurately located facilities are upgrading GIS mapping system to accurately represent the underground water lines on the distribution system, installing tracer wire on all new water mains, spot digging, and probing the ground. These methods have proven to be effective at significantly reducing inaccuracies when locating underground facilities.

Dated: December 14, 2022

Kirksville Water Association

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