

**Alan Keck**  
MAYOR

**Bruce Neely**  
Gas Department  
Manager

**Ashley Blevins**  
Gas Accounting



**City of Somerset Gas  
Department**  
P.O. Box 989 Somerset, KY 42502  
**Office 606-425-5317**  
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February 22<sup>nd</sup>, 2023

TO: PUBLIC SERVICE COMMISSION  
211 SOWER BLVD  
FRANKFORT, KY 42501

RE: Electronic Investigation into Compliance with Excavator Locate requests  
CASE NO.  
2022-00363

Somerset Gas Service would like to provide the response below to the Public Service Commission regarding the above subject, following the notice received February 8<sup>th</sup>, 2023. These responses are based on the best available information at this time:

a: Number of locate requests by type:

Total	3125
Normal	3037
Emergency	78
Design	10
Fiber to the premises	0

b: Second requests:

Total	23
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*The Spirit of Southern Kentucky*

Equal Opportunity Employer M/F/H/V (606) 678-5176 (TDD)

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c: Documentation of response times:

Prior to implementation of One Call Concepts, SGS began using USDI's platform built on Arc GIS to log 811 locates. However, all locates were not successfully logged correctly. Since October of 2022, SGS has utilized One Call Concepts and it appears that this information collected in One Call Concepts is also incorrect due to employee data entry perhaps not occurring by midnight of statutory date. Employees have recently been instructed to clear the ticket when locate is performed. It also appears that whenever agreements for dates outside of statutory limits are made, that One Call concepts is still recording those locates as late. Below is the information as reported at this time.

Since October 2022:

On time locates – 533

Late locates – 151 (We do not believe we have any actual late locates)

Avg locate response time – estimated to be 24 to 36 hrs by our staff.

d: Number of agreements outside statutory time limits:

Estimated total - 25

This number is estimated as it was not tracked in Survey 123 prior to One Call Concepts or also prior to that time period. It was not being tracked in One Call Concepts accurately until just recently. During our annual OQ and O&M meeting we discussed the need to document in One Call Concepts and will begin doing so. But appears One Call Concepts will still show these locates as being late.

e: Locates are performed by SGS staff.

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f: Records of accurate locates:

No records have been kept previously, however if we are made aware of inaccurate locates by the excavator or our own staff then mapping is updated and we use Arc GIS to document correct location of the facility.

g and h: Reducing underground damage:

SGS previously followed guidance concerning damage prevention by dissemination of information and posting on City website the revision to the dig law including fines. We also use direct electronic connections to run lines whenever possible. We utilize technology such as the Jamison locate reel to insert through mains or services when feasible. If we are in the area, we also assist by uncovering our facilities or staying on site with the excavator if the line is not locatable by other means.

Sincerely,

*Bruce Neely*

Bruce Neely P.E.  
Gas Dept. Director  
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