

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

AT&T’s RESPONSE TO 11/16/22 COMMISSION ORDER

AT&T¹ respectfully submits this response to information requested regarding each non-municipal utility’s positive response communication system, pursuant to the Kentucky Public Service Commission’s (“Commission’s”) November 16, 2022 Order in this matter. AT&T submits this response to assist the Commission in its investigation of jurisdictional utilities’ compliance with excavator locate requests made pursuant to the Underground Facility Damage Prevention Act of 1994, without waiving any objection regarding limitations of the Commission’s existing jurisdiction, and without acquiesce to any extension thereof.²

RESPONSES

- a. Since January 1, 2022, through November 30, 2022, the number of locate requests received in total and broken out into the types of locate requests contained in KRS 367.4909(5).**

Ticket Type	Number Received
DESIGN	731
EMERGENCY	15145
NORMAL	305742

¹ BellSouth Telecommunications, LLC d/b/a AT&T Kentucky (AT&T)

² KRS 367.4901-KRS-KRS 367.4917

- b. Since January 1, 2022, through November 30, 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).

Ticket Type	Number Received
DESIGN	3
EMERGENCY	190
NORMAL	3999

- c. Since January 1, 2022, through November 30, 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.

Ticket Type	Average Response Time/Days
DESIGN	6
EMERGENCY	0
NORMAL	2

- 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 requested contained.

This is not tracked.

- 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.

Locate requests have been performed by third-party contractors.

- 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.

Locate accuracy is generally only investigated when a facility damage occurs; non-damage related accuracy is not tracked. Therefore, the data provided below reflects records and statistics of accuracy from damage investigations.

Damages

Located Accurately	Located Inaccurately
189	16

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

AT&T audits monthly, both the administrative and field accuracy of locates, and utilizes industry-standard fundamentals to determine locate accuracy, including:

- Reasonable and consistent depth of facility;
- Locate path termination at a logical location;
- Peak and null agreement on electronic instrumentation; and
- On site investigation using a standard “hit kit,” measurements and photos.

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.

AT&T utilizes state-of-the art facility locating equipment, and participates in regularly scheduled meetings with USIC to discuss performance and cooperatively facilitate improvements to the process.

Respectfully Submitted



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