

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

ELECTRONICALLY FILED

In the Matter of:

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

**RESPONSE OF BLUE GRASS ENERGY COOPERATIVE CORPORATION TO
COMMISSION’S NOVEMBER 16, 2022 ORDER**

In response to the Commission’s Order on November 16, 2022, in the above-styled case, Blue Grass Energy Cooperative Corporation (“Blue Grass Energy”) provides the following information in response to ordering paragraph number 2.

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

Since January 1, 2022 through mid-November, Blue Grass Energy has received 18,498 locate requests. All are broken out under the KRS 367.4909(5)(a) categories as:

1. Normal 18,072
2. Emergency 380
3. Design 46

Total: 18,498

- b. Since January 1, 2022, the number of second or subsequent requests for the same locate requests received in total and broken out into the types of locate requests contained in KRS 367.4909(5);**

1. Normal 213
2. Emergency 6
3. Design 0

Total: 219

- 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;**

1. Normal – 2 days
2. Emergency – Same day
3. Design - 6 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);**

Blue Grass Energy does not track this information although we do not recall any agreements reached outside of normal time limits. We would work with an excavator if the normal window did not meet its schedule.

- 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.**

Blue Grass Energy generally contracts out locate requests to a third party. Occasionally we also support the contractor with our own personnel. Locate counts are:

USIC -13,196

Blue Grass Energy personnel – 5,302

- 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.**

Blue Grass Energy does not keep records or statistics to differentiate between accurate and inaccurate locates.

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

Blue Grass Energy considers a locate to be inaccurate if facilities were exposed outside of the tolerance area as marked.

- 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.**

Blue Grass Energy uses several methods to prevent inaccurate locates. The Cooperative is a member of 811. Blue Grass Energy uses GPS maps of the facilities to review each locate request as it is received from 811. Areas with underground facilities are sent to locators to be marked. Locators carry GPS maps to compare markings in the field to our mapping.

Dated: December 21, 2022

Respectfully submitted,



David T. Royse
RANDELL ROACH & ROYSE PLLC
176 Pasadena Drive, Building 1
Lexington, KY 40503
Ph.: (859)276-6262
Fax: (859)276-4500
david@rrrfirm.com
*Counsel for Blue Grass Energy Cooperative
Corporation*

CERTIFICATE OF COMPLIANCE

This is to certify that the foregoing document was filed via the Commission's electronic filing system today, December 21, 2022; there are currently no parties that the Commission has excused from participation by electronic means in this proceeding and pursuant to Commission orders, no paper copies of this filing will be made.



*Counsel for Blue Grass Energy
Cooperative Cooperation*