

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

In the Matter of:

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

**RESPONSE OF
WESTERN ROCKCASTLE WATER ASSOCIATION
TO
COMMISSION'S NOVEMBER 16, 2022 ORDER**

FILED: DECEMBER 15, 2022

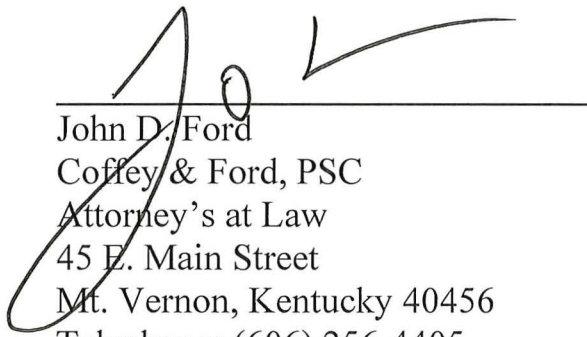
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RESPONSE OF WESTERN ROCKCASTLE WATER ASSOCIATION
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Comes Western Rockcastle Water Association (“WRWA”) for its Response to Commission’s November 16, 2022 Order, and states as shown on the following pages.



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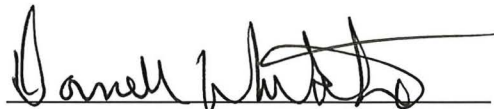
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**CERTIFICATION OF RESPONSE OF WESTERN ROCKCASTLE WATER
ASSOCIATION TO COMMISSION'S NOVEMBER 16, 2022 ORDER**

This is to certify that I have supervised the preparation of Western Rockcastle Water Association's Responses to Commission's November 16, 2022 Order. The response submitted on behalf of Western Rockcastle Water Association is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: December 15, 2022



Darrell Whitaker, President
Western Rockcastle Water Association

CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 15, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.



John D. Ford

WESTERN ROCASTLE WATER ASSOCIATION

CASE NO. 2022-00363

Response to Commission's November 16, 2022 Order

Question No. 2

Responding Witness: Darrell Whitaker, President

Q-2(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);

A-2(a). For the period from January 1, 2022 thru December 7, 2022 the Western Rockcastle Water Association (WRWA) has received thirty-six (36) locate requests. All 36 requests were for underground water utilities.

Q-2(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);

A-2(b). For the period from January 1, 2022 through December 7, 2022 WRWA has received seven (7) second or subsequent requests.

Q-2(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;

A-2(c). WRWA responds to all locate request types within twenty-four (24) hours and/or the limits set forth in the statutory requirements. Should request be reported during the weekend, then the request will be responded to on the following Monday. The average response time is not tracked.

Q-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 requests contained in KRS 367.4909(5);**

A-2(d). Since January 1, 2022, WRWA has made agreements with four (4) excavator/contractor for normal locates due to size of the locate area, multiple dig sights, or the length of the time the excavator/contractor would be working in the area.

Q-2(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;**

A-2(e). Since January 1, 2022, WRWA Staff has performed all locate requests. No third-party contractor is used to locate underground facilities.

Q-2(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;

A-2(f). Specific records or statistics are not kept referencing accurate versus inaccurate location of WRWA infrastructure. However, Since January 1, 2022, our work orders indicate there were two (2) water mains that were compromised due to inaccurate information about our system. Those lines since have been captured by physical measurements and the Association's records updated.

Q-2(g). Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and

A-2(g). WRWA uses only two methods to locate water lines, As-Built maps, and hand-held locators. If maps are incorrect, the Association field verifies the actual location and updates the file.

Q-2(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.

A-2(h). To prevent inaccurate locations, the Association uses a combination of methods and tools. These include tracer wire, probing, as-built prints, and excavation to expose the water line. The Association maintains

positive relationships with local utilities, contractors, and customers to express the importance of accurately located facilities to minimize damage and interruption of service.