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December 29, 2022

**VIA ELECTRONIC FILING**

Ms. Linda Bridwell  
Executive Director  
Kentucky Public Service Commission  
211 Sower Boulevard  
Frankfort, Kentucky 40602-0615

**Re: Case No. 2022-00363**

In the Matter of the Electronic Investigation into Compliance with Excavator Locate Requests Pursuant to KRS 367.4909 and KRS 367.4917(7)

Dear Ms. Bridwell:

In response to the Commission's November 16, 2022 Order, Duke Energy Kentucky, Inc. hereby submits Attachment A, which includes all requested information. I certify that the electronic documents are true and accurate copies of the original documents. The Company will retain the original filing in paper medium as the requirement to file it with the Commission was permanently granted a deviation in Case No. 2020-00085.

If you have any additional questions, please do not hesitate to contact me.

Respectfully submitted,

*/s/Rocco D'Ascenzo*

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Enclosures: As stated

**REQUEST:**

Each utility shall file within 45 days of the date of service of this Order the following information:

- 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).

**RESPONSE:**

Type of locate requests contained in KRS 367.4909(5)	Electric (Code 0516)	Gas	Telecom (Code 0916)	Totals
Normal Locates (a)	35,006	60,408	683	<b>96,097</b>
Emergency Locates (b)	1,232	2,003	13	<b>3,248</b>
Design Locates (c)	363	529	5	<b>897</b>
Damage	107	184	2	<b>293</b>
In Progress	6	8		<b>14</b>
On-Site Exposed Facility	19	28	1	<b>48</b>
Large Project Locates (d)				
Unmapped/Untonable (e)		1,633		<b>1,633</b>
Fiber-to-premises broadband (g)	22	44		<b>66</b>
<b>TOTALS</b>	<b>36,755</b>	<b>64,837</b>	<b>704</b>	<b>102,296</b>

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).

**RESPONSE:**

Additional Notices and Retransmissions:

Type of locate requests contained in KRS 367.4909(5)	Electric (Code 0516)	Gas	Telecom (Code 0916)	Totals
Normal Locates	1,214	1,880	13	<b>3,107</b>
Emergency Locates	31	48		<b>79</b>
Design Locates	7	15		<b>22</b>
Damage				
In Progress				
On-Site Exposed Facility				
Large Project Locates				
Unmapped/Untenable				
Fiber-to-premises broadband	2	4		<b>6</b>
<b>TOTALS</b>	<b>1,254</b>	<b>1,947</b>	<b>13</b>	<b>3,214</b>

Remarks (Tickets made on-time and needed to be refreshed)

Type of locate requests contained in KRS 367.4909(5)	Electric (Code 516)	Gas	Telecom (Code 916)	Totals
Normal Locates	2,480	4,024	21	<b>6,525</b>
Emergency Locates	5	8		<b>13</b>
Design Locates				
Damage	10	17		<b>27</b>
In Progress				
On-Site Exposed Facility	13	19	1	<b>32</b>
Large Project Locates				
Unmapped/Untenable				
Fiber-to-premises broadband	1	1		<b>2</b>
<b>TOTALS</b>	<b>2,509</b>	<b>4,069</b>	<b>22</b>	<b>6,600</b>

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.

**RESPONSE:**

The average days below could include additional positive responses such as rescheduled, no access, and even late according to KRS 367.4909(5).

Average Response Time in Days (Required time frame per KY367.4909)		Electric (Code 516)	Gas	Telecom (Code 916)
Normal (within 2 working days)	Locates	2.70 days	2.72 days	2.45 days
Emergency (not to exceed 48 hours)	Locates	0.21 days (5.04 hrs.)	0.26 days (6.24 hrs.)	0.40 days (9.60 hrs.)
Design (within 10 working days)	Locates	1.03 days	1.14 days	2.88 days
Damage				
In Progress				
On-Site Exposed Facility				
Large Project (within 5 days)	Locates	3.17 days	3.17 days	2.17 days
Unmapped/Untonable (within 5 working days)				
Fiber-to-premises (within 4 working days)	broadband	8.92 days	7.03 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).

**RESPONSE:**

Type of locate requests contained in KRS 367.4909(5)	Electric (Code 0516)	Gas	Telecom (Code 0916)	Totals
Normal Locates	14,597	24,722	329	<b>39,648</b>
Emergency Locates	41	60		<b>101</b>
Design Locates	6	17		<b>23</b>
Damage	1			<b>1</b>
In Progress	1	1		<b>2</b>
On-Site Exposed Facility				
Large Project Locates				
Unmapped/Untonable				
Fiber-to-premises broadband	9	19		<b>28</b>
<b>TOTALS</b>	<b>14,655</b>	<b>24,819</b>	<b>329</b>	<b>39,803</b>

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.

**RESPONSE:**

Duke Energy Kentucky utilizes a third-party contractor for all locates.

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.

**RESPONSE:**

Locate accuracy is generally only investigated when a facility damage occurs.” We do not track accuracy, when there is damage an investigation takes place and since January 1, 2022, a total of 44 locates have been determined to be inaccurate.

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

**RESPONSE:**

Duke Energy Kentucky’s outside investigating contractor’s investigators measures the distance between the locate mark and the damaged facility to verify if it is within the state-required tolerance zone.

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.

**RESPONSE:**

Duke Energy Kentucky has implemented the following procedures:

Untonable Repair Program

The Untonable Repair Program started in KY in 2019. This program takes untonable turnback tickets from our contract locator and dispatches a contractor out

to the site to attempt to repair tonability to the asset. Since 2019 our untonable turn-backs have decreased by nearly 31%.

#### Historical Pipeline Data Management (HPDM)

A proactive program that reviews historical records to update GIS and improve accuracy.

#### Curb Box Program

Over the course of a couple years, we tracked repair data for untonables and noticed that a large number of these could effectively be repaired and located with an extra pothole at the curb box. Many times, the wire was either too short to be accessed or had fallen out of the curb box during the installation. We added the extra step to the contract locators process when time and site permits such an excavation. The success rate of these has remained around 20%.

#### Inactive Abandonment Program (IAP)

This program was developed to remove inactive service lines from our natural gas distribution system. These inactive services are often hard to locate and pose an unnecessary excavation hazard. This program uses a live database of services that have been inactive for more than 36 months. From January 1, 2022, to November 30, 2022, there were 568 services abandoned with the program.

#### Watch and Protect

Watch and Protect start in Kentucky in 2019 and aims to educate excavators on high-risk tickets. Tickets are designated as high risk by an internally developed risk model that uses internal and external data to assign a risk score to each ticket. The



Watch and Protect Contractor then contacts the excavator on those tickets and attempts to meet with them onsite. They use this meeting to answer any questions the excavator has on the facilities in the area and educate them on safe digging practices. Between January 1, 2022, and November 30, 2022, our Watch and Protect contractor performed 3000 contacts with excavators in Kentucky.

Duke Energy's third-party underground facilities contractor conduct the following procedures:

- New training program that extends the time a new locator is in class
  - Increased from 4 to 6 weeks of training
- Reduced supervisor/technician span of control by adding additional supervisor to the market
- Wage adjustments across the market for new and tenured technicians
  - Goal is to obtain and retain top talent
- Dedicated auditor in place to proactively review locate practices before excavation commences

**PERSON RESPONSIBLE:** Eric Lochner

