

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

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 TO INFORMATION REQUEST

Pursuant to Commission Order released November 16, 2022 in the above referenced case, submitted here are the responses to the requested information filed on behalf of Logan Telephone Cooperative dba LTC Connect.

Respectfully submitted,

/s/ Joe Gran Clark

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Request 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 a:

Normal locates:	2,985
Normal locates with negotiated commitment:	0
Emergency locate:	135
Design Information Request:	5
Large project request:	0
Unmapped or untonable request:	0
Fiber-to-the-premises broadband deployment request:	0
Total Requests (sum of above):	3,125

Logan Telephone Cooperative dba LTC Connect

Request 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 b: Out of the 3,125 total requests 33 of them were second or subsequent request in all of these were of the normal type.

Normal locates: 33

Request 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 c: Exhibit A includes those locate requests completed through the 811 system. Not included are some large projects, such as lengthy road projects by the Kentucky Department of Transportation and Charter's RDOF construction near the Logan borders, in which Logan employees communicated directly with the excavators outside the 811 record keeping system.

Our records on other locates also show total calendar days from the time of the request until the marking is complete and do not account for weekends and holidays that would not be counted in response times. 100% of our locates and markings are done within the timelines required in KRS 367.4909(5) with approximately 80% cleared within 24 hours.

Request 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 d: LTC Connect has not reached any agreements with excavators outside of the statutory time limits.

Request 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 e: All locates are performed by LTC Connect personnel.

Request 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 f: While LTC Connect would otherwise maintain records of inaccurate locate requests, it has not had any inaccurate requests and accordingly can provide no records.

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

Response g: Inaccurate locates would be identified either by the excavator or due to a service outage. Any such claims are investigated by outside plant personnel to see if the facilities were located properly. In the unlikely chance that such inaccurate locates are identified, LTC Connect will determine and correct the source of the inaccuracy including additional training for its locator personnel, locating equipment maintenance, or map corrections.

Request 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 h: LTC Connect has very accurate GIS based maps and the company's engineering firm collects GPS locations during the inspection of LTC Connect fiber construction to make maps even more accurate. Each service technician is trained in proper locating techniques and are provided a 3M Dynatel, model 2573 cable locator for all locates. LTC Connect also purchased a hydro-vac unit a few years ago to expose cable or other utility facilities in complex construction scenarios. LTC Connect has ongoing internal and external training for employees that perform locates. These actions not only improve the accuracy of locates but allow LTC Connect to respond to locate requests more efficiently.