## **COMMONWEALTH OF KENTUCKY**

## **BEFORE THE PUBLIC SERVICE COMMISSION**

In the Matter of:

ELECTRONIC INVESTIGATION INTO)COMPLIANCE WITH EXCAVATOR LOCATE)REQUESTS PURSUANT TO KRS 367.4909)AND KRS 367.4917(7))

## RESPONSE OF CONEXON CONNECT LLC TO ORDER OF NOVEMBER 16, 2022

While not admitting or acknowledging that the Kentucky Public Service Commission ("Commission") has the authority under KRS Chapter 278 or KRS 367.4901-.4917 to request or otherwise compel the production of the requested information from it and while expressly reserving its right to contest in any future regulatory or judicial proceeding the Commission's authority to request such information from it, Conexon Connect LLC ("Conexon") provides the following information in response to the Commission's Order of November 16, 2022:

- a. As of December 13, 2022, Conexon has not deployed any underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- b. As of December 12, 2022, Conexon has not deployed any underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.

c. As of December 12, 2022, Conexon has not deployed any underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.

d. As of December 12, 2022, Conexon has not deployed any underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests or reached any agreements with excavators to complete a locate request outside of the statutory time limits.

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As of December 12, 2022, Conexon has not deployed any underground facilities in e. the Commonwealth of Kentucky and therefore has not received any locate requests.

f. As of December 12, 2022, Conexon has not deployed any underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.

As of December 12, 2022, Conexon has not deployed any underground facilities in g. the Commonwealth of Kentucky and therefore has not received any locate requests.

As of December 12, 2022, Conexon has not deployed any underground facilities in h. the Commonwealth of Kentucky and therefore has not received any locate requests.

Dated: December 13, 2022

Respectfully submitted,

Gerald E. Wuetcher Stoll Keenon Ogden PLLC 300 West Vine Street, Suite 2100 Lexington, Kentucky 40507-1801 Telephone: (859) 231-3017 Fax: (859) 259-3517 gerald.wuetcher@skofirm.com

Counsel for Conexon Connect LLC

## **CERTIFICATE OF SERVICE**

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on December 13, 2022, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

ounsel for Conexon Connect LL