COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF CUMBERLAND 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, Cumberland Connect LLC ("Cumberland") provides the following information in response to the Commission's Order of November 16, 2022:

- a. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- b. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- c. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- d. Cumberland has no 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.

- e. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- f. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- g. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.
- h. Cumberland has no underground facilities in the Commonwealth of Kentucky and therefore has not received any locate requests.

Dated: December 19, 2022 Respectfully submitted,

Gerald E. Wuetcher

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Counsel for Cumberland 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 19, 2022, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

Counsel for Cumberland Connect LLC