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 MOUNTAIN WATER DISTRICT TO ORDER OF NOVEMBER 16, 2022

In response to the Commission's Order of November 16, 2022, Mountain Water District provides the following information:

a. Since January 1, 2022, Mountain Water District has received 1,100 locate requests. Of those requests, 1.096 requests were normal excavation locate requests, and four (4) requests were emergency locate requests.

b. Since January 1, 2022, Mountain Water District has received six (6) second or subsequent requests for the same locate request.

c. Because Mountain Water District is no longer able to access the Kentucky 811 database, it is unable to provide exact and detailed information for its response times to locate requests. Since January 1, 2022, Mountain Water District has responded to most locate requests within the statutory window established by KRS 367.4909(5). However, some requests were located multiple times and Mountain Water District had some responses that exceeded the statutory window due to limited staffing and disaster recovery efforts for two flooding events.

d. Since January 1, 2022, Mountain Water District has reached agreements with excavators to complete a locate request outside of the statutory time limits on three (3) occasions. As Mountain Water District can no longer access the 811 data base, it is uncertain as to the exact

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nature of each request. It believes, but is unable to verify, that each request involved a normal locate request.

e. Since January 1, 2022, Mountain Water District performed all locate requests. No third-party is used to locate underground facilities.

f. Mountain Water District maintains a record only of instances in which a water line was damaged after completion of a location. Since January 1, 2022, there are no known instances of a damaged water line after a locate was performed.

g. Mountain Water deems an inaccurate locate to occur if damage to a water line results from an excavation after the locate has been performed.

h. Mountain Water District is not aware of any issue with inaccurately located lines within its service territory. Each District area foreman is well versed in the location of the District's underground facilities and has access to as-built maps whenever needed. Mountain Water District has not developed written policies or procedures regarding line locations and does not believe that, in light of the specific guidance found in KRS 367.4901-.4917, such policies or procedures are currently required.

Dated: December 8, 2022

Respectfully submitted,

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Counsel for Mountain Water District

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 8, 2022, and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.

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Counsel for Mountain Water District