

PSC Case No. 2022-00363 – Responses of Columbia Gas of Kentucky (December 2022)

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).

Ticket Types (2a)	
Cancel	838
Damage	246
Design Notice	348
Emergency	3,359
Fiber To The Premises	1
Normal Notice	81,391
On-Site Exposed Facility	76
Remark	3,809
Update	166
Grand Total	90,242

Large Projects		Turnbacks	
Cancel	4	*	44
Design Notice	6	Damage	3
Emergency	33	Design Notice	13
Normal Notice	1,281	Emergency	331
Remark	3	Normal Notice	4,222
Grand Total	1,327	Remark	177
		Update	11
		Grand Total	4,801

KRS 367.4909 lists the following types of locate requests:

- (a) normal excavation locate request
- (b) emergency locate request,
- (c) design information request
- (d) large project request
- (e) unmapped or untonable facility request
- (f) fiber-to-the-premises broadband deployment excavation request

The ticket types (d) large project request and (e) unmapped or untonable facility request are not generated by the One Call Notification Center (811). Instead, these tickets are a subcategory of the original notification of which are determined by a field representative while conducting a locate. In the tables labeled 'Large Projects' and 'Turnbacks' you will find the original ticket type before this subcategorization.

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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).

Second Requests (2b)	
Null	604
*	14
Normal Notice	1,376
Remark	1,634
Update	12
Grand Total	3,640

Please note the “Null” and “*” categories are second notices, received from 811, that do not match any previous ticket called in. Columbia is unsure how the One Call Notification Center is generating these tickets.

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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.

On Time/Not on Time (2c)			Average Time (Hrs) to Locates (2c)	
Cancel	ON TIME	734	Cancel	8.5
	NOT ON TIME	104		
Damage	ON TIME	246	Damage	0.7
	NOT ON TIME	3		
Design Notice	ON TIME	345	Design Notice	143.5
	NOT ON TIME	3		
Emergency	ON TIME	3,326	Emergency	5.7
	NOT ON TIME	33		
Fiber To The Premi..	ON TIME	1	Fiber To The Premi..	118.0
In Progress	ON TIME	8	In Progress	25.5
Normal Notice	ON TIME	79,840	Normal Notice	26.5
	NOT ON TIME	1,551		
On-Site Exposed Facility	ON TIME	62	On-Site Exposed F..	26.9
	NOT ON TIME	14		
Remark	ON TIME	3,809	Remark	33.4
Update	ON TIME	166	Update	30.7

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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).

Agreements with Excavator (2d)

Cancel	4
Design Notice	6
Emergency	40
Normal Notice	1,322
Remark	2
Grand Total	1,374

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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.

Locate Vendor (2e)

1st Party/Screening 38,481

GridHawk 47,570

URG 3,662

1st Party/Screening are tickets conducted by internal Columbia personnel. Gridhawk and URG are tickets completed by our contractors.

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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.

Accurate v Inaccurate Locates (2f)

VOLUME 89,713

ASSIGNED 59,185

Locator Error & Poor Records 34

Note: *Volume* is the number of tickets received from the One Call Notification Center, *Assigned* are the amount of tickets post screening that were sent to our locating personnel, and the *Locator Error & Poor Records* are the amount of damages attributable to locator error and/or poor records.

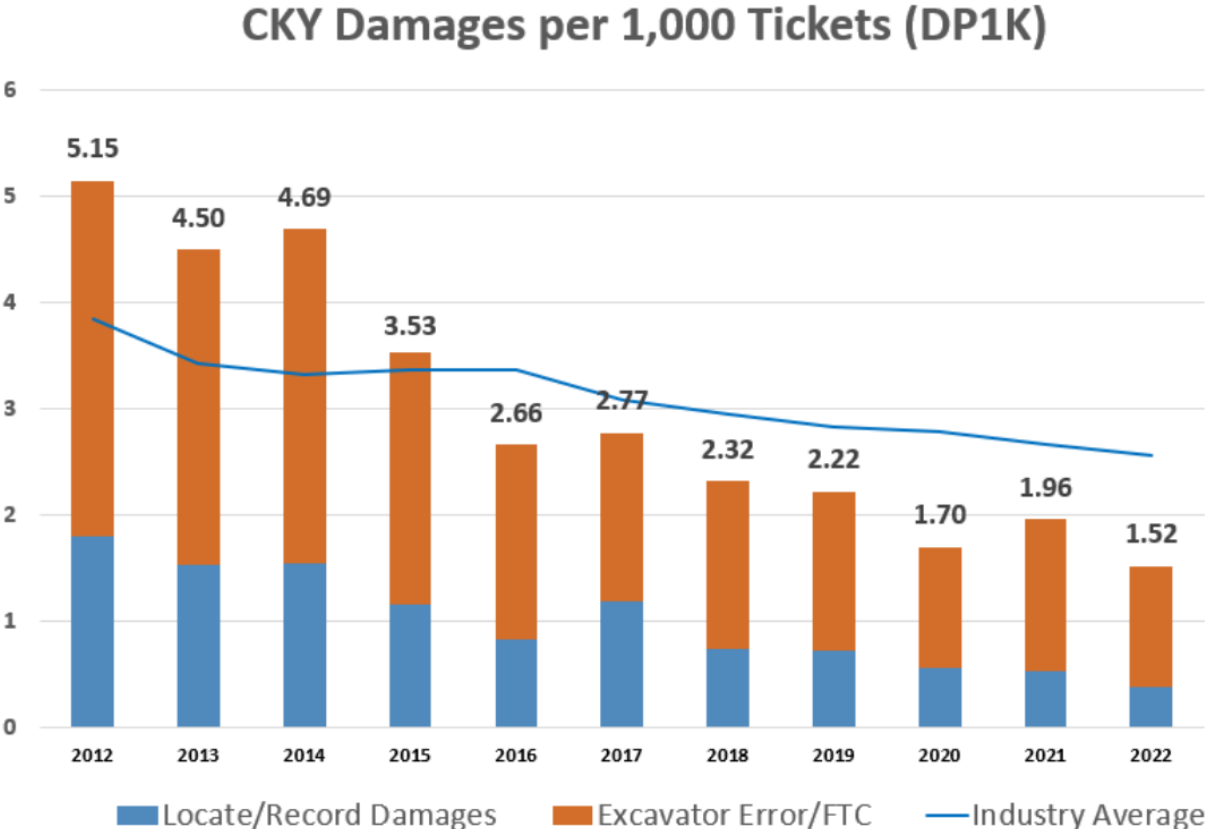
g. Explain the method used to determine whether an underground facility has been located accurately versus inaccurately.

When a damage occurs, our personnel conducts an onsite investigation. This includes, but is not limited to, review of the initial locate request and the process used by the locating technician. After this initial investigation we conduct a root cause analysis and share lessons learned with our locating personnel and contractors. This process of continual learning and adaptation to an ever-changing environment leads us to accurately located facilities.

Columbia's Damage Prevention Specialists also conduct locate specific quality assurance audits to understand our locating opportunities. The information learned from these audits are widely shared with vendors and internal employees which helps prevent future inaccurate locates and/or damages from occurring.

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.

Columbia’s locating standards are robust and continuously updated when new opportunities are identified. Over the past decade Columbia has seen a steady decline in our DP1K (listed in the table below) which is reflective of not only these standards, but of the other strategic decisions made in this space.



Columbia’s addition of Damage Prevention Specialists to its team has had tremendous impact in its Damage Prevention efforts. More specifically, this role has been pivotal in reducing the number of inaccurately located facilities. Damage Prevention Specialists do this by providing direct support, locate auditing, and coaching of both internal and external locating personnel.

In an effort to minimize risk of excavation damage at regulator stations, Columbia has implemented a ‘dual notification’ process. This process sets 250’ polygons around station locations within our GIS records sent to 811. When a ticket is received within

this parameter, a second (dual) ticket is created. This second notification is an indication to the locate vendor that a station is present within the scope of the locate request and requires additional action on their part. They – the locate vendors – are required to work with the excavator to determine the extent of the excavation. If this work is to be performed within the scope of the station itself, then Columbia’s Meter and Regulation group will work with the excavator to have qualified employees onsite while work is being performed. The intent of this latter effort is to ensure that: (1) critical facilities are not damaged and; (2) if a damage were to occur then qualified technicians, with the ability to control the flow of gas, are on site.

Vendor selection is an important policy decision that directly impacts the efficacy of locate accuracy. Columbia takes great care in this selection process and only selects locating vendors who share our vision and goal of zero damages. This selective approach leads to experienced technicians in the locating role who take great care in locating facilities accurately. We also require our vendors to adopt the Gold Shovel program. The following link provides more information about Gold Shovel.
<https://goldshovelstandard.org/>

Lastly, Columbia implemented a Damage Prevention Risk Model (DPRM) to assess incoming locate requests. This tool helps direct the Damage Prevention Specialists by filtering tickets by risk level. Through the use of the DPRM they are better able to target their public outreach efforts to the riskiest excavators and riskiest excavations. This risk-based approach is pivotal in controlling such a large audience of excavators and the increasing volume of locate requests.