

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))	

**KENTUCKY FRONTIER GAS RESPONSES
TO COMMISSION'S ORDER OF NOVEMBER 16, 2022**


In response to the Common's Order of November 16, 2022, Kentucky Frontier Gas provides the following:

- a) Kentucky Frontier Gas has received 1287 normal tickets, 19 emergency tickets and 3 design tickets since January 1, 2022
- b) Kentucky Frontier Gas has received 4 normal second notice requests since January 1, 2022.
- c) Kentucky Frontier Gas has a dedicated line locator technician who receives and responds to 811 requests each working day. All tickets are responded to verbally and/or by email within the statutory time limit indicating whether the ticket is clear or that lines have been marked. In the case of a larger than usual numbers of tickets received within the same time frame, a second technician will be dispatched to ensure response within the statutory limit. All emergency 811 tickets are dispatched immediately including calls received after business hours. Design notice tickets are responded to within the 10-day time frame per regulation.
- d) Since January 1, 2022 4 normal ticket agreements have been reached when line locates will take place outside of the statutory limits on large projects.
- e) All 811 tickets received by Kentucky Frontier Gas are responded to by utility personnel.

- f) Since January 1, 2022 Kentucky Frontier Gas has had no facility damages that were due to inaccurately marked lines. There have been instances of unknown or untonable lines being uncovered during excavation. “Untonable” lines are typically PE pipelines installed by Frontier’s predecessor without locate wire, or with locate tape or wire that has now deteriorated. Upon investigation of these lines, the field technician will install subsurface markers and update the line mapping system.
- g) During the investigation of a facility damage, the Kentucky Frontier Gas technician will determine if the excavator called in a dig ticket and if so, were the lines marked within the tolerance zone per statutory regulation.
- h) Over the last several years, Kentucky Frontier Gas has implemented new procedures for responding to 811 tickets. For better precision and timely responses, a dedicated line locator technician will make verbal contact with the 811 requestor on the same day an 811 ticket comes through, in most cases. This gives greater understanding of the dig site and opens communication with the excavator. Frontier purchased new specialized line locating equipment to increase the accuracy of locating unmapped or untonable lines. The GIS mapping system is consistently being updated as unknown lines are found during the regular course of work or on construction jobs. Marker balls or subsurface line markers are placed in the ground when untonable lines are uncovered, and are recorded in the mapping system. Kentucky Frontier Gas purchased a vacuum excavator for projects where all traditional methods of line locating have failed. The use of the vac trailer has shown to be a safe and effective way to remove ground cover in areas of where a gas line is suspected to be. The change of policy and implementation of new procedures has resulted in a significant decrease in line damages due to unmapped or untonable lines.

This 9th day of December, 2022.

Respectfully submitted,



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CERTIFICATE OF SERVICE

This is to certify that the foregoing electronic filing was transmitted to the Commission on December 9, 2022 and that there are currently no parties that the Commission has excused from participation by electronic means in this proceeding. Pursuant to the Commission's July 22, 2021 Order in Case No. 2020-0008525 no paper copies of this filing will be filed.



Representative for Kentucky Frontier Gas, LLC