

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE TO INFORMATION REQUEST

Pursuant to Commission Order entered November 16, 2022 in the above-referenced case, West Kentucky Rural Telephone Cooperative Corporation, Inc. d/b/a WK&T or West Kentucky and Tennessee Telecommunications hereby submits the following responses to the Commission's requests.

Request 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);

Response a:

Normal locates:	7,387
Normal locates with negotiated commitment:	0
Emergency locate:	221
Design Information Request:	8
Large project request:	6
Unmapped or untonable request:	9
Fiber-to-the-premises broadband deployment request:	12
Total Requests (sum of above):	7,643

Request 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);

Response b:

Normal locates:	17
Normal locates with negotiated commitment:	0
Emergency locate:	0
Design Information Request:	0
Large project request:	0
Unmapped or untonable request:	0
Fiber-to-the-premises broadband deployment request:	0
Total Requests (sum of above):	17

Request 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;

Response c: Please refer to Exhibit A for length of time required to respond to each requestor/excavator.

As shown in Exhibit A, the average response times are as follows:

Normal locates:	6.2 hours
Emergency locate:	22.4 hours
Design Information Request:	17.1 hours
Large project request:	6.2 hours
Unmapped or untonable request:	16.3 hours
Fiber-to-the-premises broadband deployment request:	5.4 hours

Request 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);

Response d: None. No such agreement was reached.

Request 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;

Response e: All locates have been completed by WK&T employees.

Request 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;

Response f: No such records are kept.

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

Response g: Locates are assumed to be accurate unless an excavator notifies otherwise or a service outage occurs as a result of facility damage during excavation.

Request 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.

Response h: WK&T provides maps to all locate requestors and requests feedback on the accuracy of its mapping. Locating equipment is routinely updated to newest technology available subject to budget constraints.

Respectfully submitted,

/s/ Edward T. Depp

Edward T. Depp

Sarah D. Reddick

Dinsmore & Shohl LLP

101 S. Fifth Street

Suite 2500

Louisville, KY 40202

(502) 540-2300

(502) 585-2207

[tip.depp@dinsmore.com](mailto:tip.depp@dinsmore.com)

[sarah.reddick@dinsmore.com](mailto:sarah.reddick@dinsmore.com)

*Counsel to West Kentucky Rural*

*Telephone Cooperative Corporation, Inc.*

*d/b/a WK&T or West Kentucky and*

*Tennessee Telecommunications*