

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**RESPONSE OF NORTH MARSHALL WATER DISTRICT
TO ORDER OF NOVEMBER 16, 2022**

In response to the Commission's Order of November 16, 2022 in the above referenced case, the North Marshall Water District ("North Marshall") submits the attached Declaration of Roger Colburn, Superintendent of the North Marshall Water District.

Dated: December 14, 2022

Respectfully submitted,

/s/ Kip C. Mathis
KIP C. MATHIS
JOHNSON & MATHIS, PLLC
1114 Main Street
P. O. Box 450
Benton, KY 42025
Phone: 270-527-3153
Fax: 270-527-9276
Email: kmathis@mjohnson-law.com
Email: mj@mjohnson-law.com
Counsel for North Marshall Water District

CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8, the Commission's Order in Case No. 2020-00085 entered July 22, 2021, and the Commission's Order entered herein on November 16, 2022, this certifies that the foregoing along with the Declaration of Roger Colburn, Superintendent of the North Marshall Water District, were electronically filed with the Commission on December 14, 2022; no paper copies of this filing will be made; and there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

/s/ Kip C. Mathis
KIP C. MATHIS

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

**DECLARATION OF ROGER COLBURN, SUPERINTENDENT OF
NORTH MARSHALL WATER DISTRICT IN RESPONSE
TO ORDER OF NOVEMBER 16, 2022**

The undersigned, Roger Colburn, being first duly sworn, states and deposes as follows:

1. I am the Superintendent of North Marshall Water District ("North Marshall").
2. The following sets forth North Marshall's Response to the Commission's

Order of November 16, 2022, and is true and accurate to the best of my knowledge, information and belief formed after a reasonable inquiry:

Q-2(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);

A-2(a). For the period from January 1, 2022 through December 7, 2022 North Marshall Water has received 2,297 locate requests. The current system of tracking the locate requests does not differentiate the requests by types of locate requests.

Q-2(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);

A-2(b). North Marshall's current system of tracking does not differentiate the requests by initial or second request by type. North Marshall can only provide the total number of locate requests, as described in the response to question 2(a).

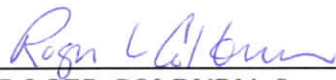
- Q-2(c). Since January 1, 2022, the length of time required to respond to each requestor/excavator in total and broken out into the types of locate requests contained in KRS 367.4909(5). Also, provide information showing whether underground facilities are marked within the statutory window, and the average time it takes to respond to a locate request;**
- A-2(c) North Marshall responds to all locate request types within the limits set forth in the statutory requirements. The average response time is not tracked.
- Q-2(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);**
- A-2(d) Since January 1, 2022, there is no record of North Marshall needing an agreement with an excavator outside of the statutory time limits required by KRS 367.4909.
- Q-2(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;**
- A-2(e). All locate requests have been performed by North Marshall personnel.
- Q-2(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;**
- A-2(f). Specific records or statistics are not kept referencing accurate versus inaccurate location of North Marshall infrastructure. However, North Marshall's staff recalls approximately 3-4 incidents where service lines and/or water mains were compromised due to inaccurate information about our system.
- Q-2(g). Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and**
- A-2(g). North Marshall uses a combination of at least two methods described in the response to Question 2(h) to determine the accuracy of its underground infrastructure.
- Q-2(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.

A-2(h). Methods/policies/procedures are described below:

- (1) All North Marshall underground infrastructure that is exposed is located using GPS within sub-meter accuracy using an iPad and a GPS enhancement module. This process provides additional location data which enhances the other processes used for location of utilities.
- (2) All new installations of North Marshall underground infrastructure are captured using high-accuracy GNSS to the horizontal centimeter level. This allows for locating of collected infrastructure using the high-accuracy GNSS devices to fulfill marking requests within inches of actual location.
- (3) Where tracer wire has been installed on underground North Marshall infrastructure, field staff are trained and required to utilize the tracer wire for locating to fulfill marking requests.
- (4) North Marshall field staff are trained to use probing methods for accurately locating and marking underground infrastructure.
- (5) North Marshall typically assigns locates to employees with 15+ years of experience with completing utility locates.

Dated: December 14, 2022



ROGER COLBURN, Superintendent
North Marshall Water District

STATE OF KENTUCKY
COUNTY OF MARSHALL

The foregoing was subscribed, sworn to and acknowledged before me by Roger Colburn, Superintendent of the North Marshall Water District on this 14 day of December 2022.



NOTARY PUBLIC

My commission expires: 01-19-24

