

**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))

**DELTA NATURAL GAS COMPANY, INC.’S
RESPONSE TO NOVEMBER 16, 2022 ORDER**

Delta Natural Gas Company, Inc. submits the following information in response to the Commission’s November 16, 2022 in this proceeding:

Subpart 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: The following are the number of locate requests that Delta has received since January 1, 2022, in total and segregated into the types of locate requests contained in KRS 367.4909(5) as of December 7, 2022:

- Total Number of Locate Requests: 25,632
- Cancelled Locate Requests: 195
- Damage Locate Requests: 39
- Design Locate Requests: 49
- Emergency Locate Requests: 478
- In Progress Locate Requests: 8
- Normal Locate Requests: 23,965
- On-Site Exposed Facility Locate Requests: 14
- Remark Locate Requests: 853
- Update Locate Requests: 32

Subpart 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: The following is the number of second or subsequent requests for the same locate request received since January 1, 2022, in total and segregated into the types of locate requests contained in KRS 367.4909(5). This information is current as of December 7, 2022.

- Remark Locate Requests: 853
- Update Locate Requests: 32

Delta's software does not currently have the ability to track second and subsequent requests for the same locate request by the type of locate request.

Subpart 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: From receipt of the ticket in the 811 system, the average time for Delta to respond to a locate request within the last 60 days is 1 day, 5 hours, and 47 minutes. Delta's software only retains this information for 60 days, but upon information and belief, the 60-day average is consistent with Delta's response time throughout the year.

Subpart 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: Delta does not track the number of times an agreement has been reached with an excavator outside of the statutory time limits required by KRS 367.4909, but such agreements have occurred infrequently. When agreements are reached, the locate is typically for a large area and Delta works with the excavator to establish priority with respect to the order in which the work will be performed.

Subpart 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: All locate requests are performed by Delta Natural Gas Company, Inc. Operator Qualified personnel.

Subpart 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: To Delta's knowledge, as of December 7, 2022, nine locates were inaccurate based on resulting third-party damage.

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

Response: See response to Subpart f.

Subpart 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: Delta only permits employees who are Operator Qualified for line location to perform this task. These employees are instructed that all available information is to be used to ensure that underground natural gas facilities are located accurately for every locate request. The information and methods that Delta employees rely upon to accurately locate underground natural gas facilities include but are not limited to system maps, various locator devices/tools, and if needed, potholing the underground natural gas facilities to determine the location.

The efficacy of Delta's Operator Qualification has resulted in a material reduction in the total number of damages. There was a total of 108 damages in 2021. The increased awareness and training practices resulted in a 28% decrease in 2022, for a total of 79 damages. These damage statistics includes damages caused by third parties.

Dated December 19, 2022

Respectfully submitted,

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s/Monica H. Braun
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CERTIFICATE OF COMPLIANCE

In accordance with 807 KAR 5:001, Section 8(7), this is to certify that Delta's December 19, 2022 electronic filing is a true and accurate copy of the documents being filed in paper medium; that the electronic filing has been transmitted to the Commission on December 19, 2022; and that there are currently no parties that the Commission has excused from participation by electronic means.

s/Monica H. Braun
Counsel for Delta Natural Gas Company,
Inc.