



Utility Safety & Design, Inc.
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December 16, 2022

Public Service Commission
P.O. Box 615
Frankfort, KY 40602

RE: In the Matter of Electronic Investigation into Compliance with Excavator Locate Requests Pursuant to KRS 367.4909 and KRS 367.4917(7) – Case No. 2022-00363

To Whom it May Concern:

Enclosed please find Paducah Power System's response to the Public Service Commission order entered on November 16, 2022 in case Number 2022-00363.

Sincerely,

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Paducah Power System's response to the Kentucky Public Service Commission's Order Entered November 16, 2022.

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).	Normal	299
	Emergency	6
	Design	0
	Total	305

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). Paducah Power System has not received any second requests since January 1, 2022.

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 requests.

A-2(c). Paducah Power System responds to all locate requests within the statutory requirements. The average response time for normal locate requests is less than 24 hours and emergency requests are responded to within 2 hours. Paducah Power System did not receive any design information requests in 2022 but would respond within the statutory requirements.

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, Paducah Power System has not reached any agreements outside of the statutory time limits.

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-(e). All locate requests have been performed by third-party contractor Utility Safety & Design, Inc.

Q-(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-(f). N/A

Q-(g). Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and

A-(g). Trained and Operator Qualified (OQ) personnel are utilized to mark the pipeline location. Locating of the pipeline is done in accordance with Company procedures contained in Covered Task 54 of the Transmission Procedure Manual.

Q-(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-(h). All pipeline facilities shall be located with the aid of a line-finder and shall be spotted with yellow marking paint or flags or a combination of both. The location of the facility(s) shall be displayed clearly with yellow marking paint or flags or a combination of both. Locates should be sufficiently accurate to insure no damage will be done to facilities by a contractor utilizing proper excavation techniques. This method has proved to be effective as Paducah Power System's natural gas transmission pipeline has not been hit during excavation.

