



Natural Energy Utility Corporation

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606-324-3920

December 20, 2022

Kentucky Public Service Commission
211 Sower Blvd
Frankfort, KY 40602

RE: Case Number 2022-00363 – Electronic Investigation Into Compliance With
Excavator Locate Requests Pursuant to KRS 367.4909 and KRS 367.4917(7)

RESPONSE

Natural Energy Utility Corporation (NEUC) does hereby offer this response to the Commission's Order about NEUC's Positive Response results from January 1, 2022, through December 9, 2022.

Under Item No. 2 of the Order:

- a. NEUC received a total of 1,410 locate requests.
 1. 1,298 were normal locate requests,
 2. 112 were emergency locate requests.
- b. NEUC received 16 subsequent requests for same locate remarks all of which were normal.
- c. NEUC has responded to all locate requests within the allotted time. Response to normal locate requests are within 2 working days. Response to emergency locate requests are as soon as possible but no longer than 48 hours after receiving the ticket.
- d. NEUC has not had to reach any type of agreement with any excavator due to a locate not being completed in time.



RESPONSE (cont.)

- e. All locate requests are performed by NEUC personnel. No third-party contractor is utilized.
- f. Yes, we maintain records and statistics, and Natural Energy has not had any inaccurately marked locates.
- g. A NEUC field technician will physically go to the site of the locate. Locate requests include GPS co-ordinates to assist in finding the correct location. All plastic pipe has tracer wire. There are two (2) different methods to locate lines using tracer wire; conductive or sweep. One or both methods will be used to locate lines. In the event a line cannot be detected, the technician will uncover our lines to assure accuracy.
- h. Natural Energy Utility Corporation is a member of a qualified one-call system, Kentucky 811, that operates in accordance with KAR 198.39. NEUC implements the following Kentucky 811 procedures:
 - 1. An email is received in the office from Kentucky 811 for a locate request.
 - 2. Office personnel immediately prepare a work order for the locate request. The work order will ensure all locate requests are not overlooked. The work order is then given to the field supervisor, who will certify the locate is complete. If the locate is an emergency, the field supervisor will be contacted by telephone and given the locate instructions.
 - 3. The locate will be clearly marked with flags and/or paint and the field technician will take a picture of the markings to be attached to that locate request.
 - 4. Once marked, the field technician will contact the person listed on the locate by phone or email that the lines have been marked.
 - 5. The locate ticket is then turned into the office and a positive response to Kentucky 811 is submitted.
 - 6. Pictures are matched to each locate request and work order to ensure compliance.

Natural Energy Utility Corporation maintains a positive presence with local utilities, contractors, and customers. All field technicians are trained in accurately performing an 811 locate request so we may assure the safety of the public and our employees and avoid interruption of service to our customers.

If additional information is required, please let us know.

Mark T. Baldock, CPA