

**COMMONWEALTH OF KENTUCKY**  
**BEFORE THE PUBLIC SERVICE COMMISSION**

**IN THE MATTER OF:**

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

**RESPONSE**

**Carroll County Water District No.1 (CCWD), as a non-municipal utility, files this formal response to the Kentucky Public Service Commission Case Number 2022-00363. In the response to this case, the District response is as follows:**

- a)** Since January 1, 2022, Carroll County Water District has received 117 water line locate requests. Of these requests, (a) 82 were normal locate excavation requests; (b) 8 were emergency locate requests; (c) 11 were design information requests; (d) 3 were large project requests; (e) 0 were to an unmapped or untonable area; and (f) 13 to a fiber-to-the-premises broadband deployment excavation site.
- b)** CCWD received second or subsequent requests for the same location sites, (a) 6 for normal locate excavation requests; (b) 0 were emergency locate requests; (c) 3 were design information requests; (d) 1 were large project requests; (e) 0 were to an unmapped or untonable area; and (f) 2 to a fiber-to-the-premises broadband deployment excavation site. (The reason for repeat location requests is the maximum number of days expired or part of monuments were destroyed from a third party before the excavator started/completed the excavation or field surveys (data collection) were not ever collected on previous markings.)
- c)** Since January 1, 2022, CCWD responded to all locate request within the allotted time. The average time for (a) normal locate excavation requests was within the next business day usually in the morning hours when all other work order tickets are being executed. Emergency locate requests (b) takes on average of starting within 1 hour and being completed within 4 hours. Emergency response usually requires two service trucks, first technician to mark and the second

technician to confirm of the nearby isolation valves are accessible to be able to use if necessary. Design information requests (c) takes on average 1-2 days to complete. Large project requests (d) on average takes 5 days to complete if lines need to be pot hole (exposed). There were no Unmapped or untonable area requests (e) taken during the specified assessment period. Fiber-to-the-premises broadband deployment excavation site locates (f) takes on average 3 days to complete.

- d)** Since January 1, 2022, CCWD has reached 16 agreements with an excavator, contractor, or sub-contractor to complete a locate request outside the allotted time as outlined in section five (5) of KRS 367.4909. The breakdown is as follows: Large project (d) 3 agreements and fiber cable related (f) being 13 agreements. *(We have discovered that sub-contractors to large cable companies cannot be trusted so we make arrangements to spot dig in front of their next day work schedule. This allows us to attempt to map their additions and any of their on-site instant field changes which is never being witness by the future utility owner.)*
- e)** All locate requests are performed by the Carroll County Water District's personnel. *(At this time, there is no other option that would be successful to protect and/or reduce future maintenance cost.)*
- f)** A work order is generated for each request and provides details of the requests. If an inaccurate locate becomes apparent then part of the operation procedure requires our staff to collect GPS coordinates and field data such as pipe material ground elevation, etc for our GIS model. Also part of this process is to update any existing paper drawings if the original data is misleading or wrong. Since January 1, 2022 no records show that any inaccuracies were evident. This does not mean that all locates were pin point accurate.
- g)** The method used to determine whether a line is accurately or inaccurately located is based on any negative discoveries during excavation such as damages, potential future concerns or if it causes any negative impact to existing pipeline or development.
- h)** To help prevent inaccurate or any negative short or long term effects to the pipeline structure, Carroll County Water District has several steps throughout the process of marking CCWD's assets. The start of the process is CCWD's admin staff requests as much information as possible when a locate request is called into the office, including location, type of work, date of work begin and contact information. A work order is created with the information documented and has a work order number assigned within the billing software. This allows for the information to be obtained then entered electronically. Information is gathered throughout the open work

order ticket. Once all work is completed then the work order will be closed. On a minimum, a weekly report is ran to verify the status of all open work orders in the system. Therefore, every Monday morning staff meeting these types of work orders can be part of the weekly work agenda. Technicians are scheduled to pick up work orders at the start of the each business day. An assessment is made on site with an attempt to contact the point of contact of excavator/developer that is stated on the work order ticket. The important communication with the excavator usually expedites the type of work being done therefore allows integration of any other concerns such as proposed driveways, septic tanks and other fall outs that could possible put CCWD's water assets in danger. The assessment is to determine if there is going to be any short term or long term ill affects to our asset or the property owner / developer / or other utility's investment. Once clarity is given then blue pin flags with blue marking paint are established. Next documentation is collected. In the past, it has been argueded that the excavator has moved pin flags after damages occurred. If clarity is not achievable then an onsite meeting is scheduled. CCWD technicians are trained to determine if the type of the proposed work/disturbance requires more research and follow up action. If so, then historical as-built drawings, GIS model review, or additional equipment is needed. If it is determined that the pipeline was built in more recent times that has tracer wire then equipment is picked up. If not, then our crew is schedule to bring the water excavator to the site to gently expose our pipeline to get pin point accuracy to determine and resolve any conflicts. If excavation is required within an untunable, rough terrain area then CCWD will move forward to pot hole until pipeline is exposed. This usually creates a delay as we must obtain authorization to dig within the same said disturbed area, as well. Other methods is based on the type of work being proposed such as, arrangements can be achieved such as electric company moving their replacement poles to the same spot of existing or moving to the opposite side of roadway to avoid any possibility of damages, or even assist in hand dig and probe of their excavation area. If determined that the risk is moderate, follow up action is achieved and updates to the existing as-built mapping and GIS model performed to provide the best record keeping data for the future of CCWD's operation. It has become part of operations to follow and track excavation sites until the proposed construction is complete. CCWD has encounter contractors not installing the new underground as they stated or reporting any close encounters. (Contractors mind set is to get in/out and get paid by their client, knowing that they will be available when time comes that shows the actual placement of their new install. Then the utilities must deal with each other at

that time. Cable companies are large and not easy to work with.) In summary, the Carroll County Water District utilizes multiple methods to prevent inaccurately locating lines because of the possible short and long term ill effects. The District uses Geo Sync cloud based mapping system software, as-built plans, tracer wire if available, probing, hydro-excavation, and excavation with heavy equipment (potholing). The District has its own GPS data collection devices that are used as part of normal operation as it is constantly enhancing the current GIS model. The District updates its model of all water mains that are exposed.

All new water main installation requires tracer wire to be taped to the barrel of the pipe to determine the exact location and the approximate depth for future quick detection. Also, with as-built paper and digital coordinate (shp) files to be inserted into CCWD's GIS model. Furthermore, when CCWD constructs new water mains, the specification also requires specific types of markers or gate valves to be installed every 500 feet with wire coming to the surface to allow tracing and the visibility of the obvious water main location.

The District works with all excavators, developers, and all customers to assure of no direct damages or negative future impacts to all underground investments. CCWD supports any improvements such as new requirements for proposed encroachments on existing utilities that will reduce the operating cost for unneeded emergency repairs or higher cost when trying to provide additional connection to future customer taps.

Due to the age and the large rural setting of the CCWD's distribution system, every locate request is taken serious and started quickly as it may require more follow up actions.