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December 29, 2022

Linda Bridwell  
Executive Director  
Public Service Commission  
211 Sower Blvd.  
Frankfort, KY 40601

Re: Atmos Energy Corporation  
Case No. 2022-00363

Dear Ms. Bridwell:

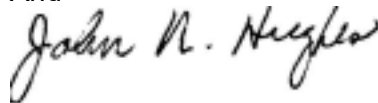
Atmos Energy Corporation submits its responses to the order of November 16, 2022. I certify that the electronic documents are true and correct copies of the original documents.

If you have any questions about this filing, please contact me.

Submitted By:

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Attorneys for Atmos Energy Corporation

**Case No. 2022-00363**  
**Atmos Energy Corporation, Kentucky Division**  
**Commission Order DR Set No. 1**  
**Question No. 1-01**  
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**REQUEST:**

Each utility shall file within 45 days of the date of service of this Order the following information:

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

a.

	<b>Totals</b>	<b>On Time %</b>
<b>Normal Locate</b>	75,888	99.73
<b>Untonable Locate</b>	3,020	94.34
<b>Emergency Locate</b>	2,854	100

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Note that Atmos Energy's record-keeping system does not distinguish design information requests or large project requests in a manner that is extractable. Those types of requests are included in the "normal locate" totals above. Atmos Energy has not received any requests pursuant to the fiber-to-the-premises broadband deployment provision in KRS 367.4909.

- b. Atmos Energy's record-keeping system does not record second locate requests in a manner that is extractable. However, Atmos Energy does not receive a material number of second locate requests that are a result of Atmos Energy's failure to locate facilities within the required statutory time periods, as evidenced by our on-time percentage of 99%. The majority of second locate requests that are received through the one-call system are attributable to another utility's failure to complete the locate within the statutory time period. That said, an inquiry was made to KY811, and their query found that Atmos Energy was notified on 877 second notice tickets but only found 12 that appear to be directed at Atmos Energy.
- c. Please see the response to subpart (a) for the on-time percentages of these locates by category.
- d. Zero.
- e. Atmos Energy performs locate requests using both utility personnel and third-party contractors.

Third-party contractor: 78,742 locates  
Utility personnel: 3,020 locates

- f. The data available for review on inaccurate locates stems from Atmos Energy's investigation of excavation damages. For the period January 1, 2022 to November 30, 2022, 326 excavation damages have occurred on Atmos Energy's systems. Each of these damages are investigated to determine root cause. Once root cause is determined, results are analyzed to determine if there are trends, performance issues, training, or opportunities to educate as needed. Of the 326 excavation damages in the relevant time period, Atmos Energy determined that 36 were due to insufficient locate practices. Note that, as described in subpart (h) below, Atmos Energy and its contract locators perform monthly audits for quality assurance/quality control ("QA/QC"). However, since all locates are not subject to this QA/QC check, data is not available on what percentage of total locate requests result in inaccurate markings.

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- g. During the investigation of excavation damages, the accuracy of marks are verified. Due to the excavation damage, the relevant facilities are uncovered and Atmos Energy can visually check the accuracy of the markings.
  
- h. As noted in subparts (f) and (g), all excavation damages are investigated and root cause determined. These investigations determine if an error occurred while locating and actions are taken to prevent recurrence when applicable. The use of QA/QC audits on locate requests performed by third-party contractors and utility personnel is also in place to support Atmos Energy's damage prevention efforts. The third-party contractors utilized by Atmos Energy perform monthly audits on their own personnel. Atmos Energy also performs a separate monthly audit on contract locators. In addition, Atmos Energy performs monthly audits on locates performed by Atmos Energy personnel. These audits include replication of marks, review of scope of locate, adequate markings, and assessment of photos and documentation.