# **COMMONWEALTH OF KENTUCKY**

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

### **IN THE MATTER:**

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

# **RESPONSE**

Hardin County Water District ("HCWD1"), as a non-municipal utility, files this response to the Kentucky Public Service Commission Case Number 2022-00363. In response to case number 2022-00363, HCWD1 states as follows:

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: From January 1, 2022 to October 31, 2022, HCWD1 received a total of 3,091 locate requests. Of these 3,091 locate requests: 2,864 were normal excavation requests, 221 were emergency excavation requests, 1 was a large project request, 2 were design requests, 2 were damage requests, and 1 was an onsite exposed request.

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: There were no second or subsequent requests for any of the locate requests described in section (a) of this response.

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 January 1, 2022 to October 31, 2022, HCWD1 responded to and completed all locate requests within statutory time limits. The average response time for all locate requests is one (1) business day. All normal excavation requests and design requests were located within two (2) business days with roughly 90% of those requests being located within one (1) business day. All emergency excavation requests, damage requests, and the onsite exposed request were located within two (2) hours of notification. The large project request was located within two (2) business days.

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: From January 1, 2022 to October 31, 2022, there has been no need for HCWD1 to reach an agreement with any excavator to complete a locate request outside of the statutory time limits.

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: From January 1, 2022 to October 31, 2022, all locates have been performed by HCWD1. No locates were performed by third-party contractors.

*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: From January 1, 2022 to October 31, 2022, no records other than damage records noted in section (g) below have been kept to show the number of underground facilities located accurately versus inaccurately.

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

Response: The method to determine whether an underground facility has been located accurately versus inaccurately is damage caused to a HCWD1 underground facility during the excavation. HCWD1 utilizes a work order database that shows no such damage or repairs due to unexpected excavation of a located underground facility during the period from January 1, 2022 to October 31, 2022.

*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: To prevent inaccurately located facilities, HCWD1 uses a combination of the following techniques: electromagnetic location, tracer wire location, probing, sounding/thumping of the pipe, and hydro excavation to visualize facilities when in question. All new facilities are installed with a tracer wire. If a broken tracer wire is discovered, then it is immediately repaired. Additional tracer wire connections are added during new service connections and additions to the distribution and/or collection system. HCWD1 also maintains updated and accurate GIS maps of its underground facilities.

Respectfully for HCWD1,

Richard B. Shufelt Richard B. Shufelt

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### **CERTIFICATE OF SERVICE**

I certify that the foregoing electronic filing was transmitted to the Public Service Commission on December 8, 2022; that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding; and that pursuant to the Public Service Commission's July 22, 2021 Order in Case No. 2020-00085, no paper copies of the filing will be made.

Respectfully,

Richard B. Shufult Richard B. Shufelt

Richard B. Shufelt Counsel for Hardin County Water District No. 1