

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

RESPONSE OF KENTUCKY UTILITIES COMPANY

In response to the Kentucky Public Service Commission’s Order dated November 16, 2022, Kentucky Utilities Company (“KU”) provides 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)

See table below for requests during the period of January 1, 2022 through November 30, 2022. KU is a member of Kentucky811 in 15 counties and locate requests are made directly to KU in the remaining 62 counties where the company has limited underground facilities. For locate requests received through Kentucky811, KU records do not differentiate “large project” requests or “unmapped or untonable” requests from “normal” requests in the table below. For locate requests made directly to KU, records do not reflect detail to break locate requests out into different types.

Request Types	Requests received through 811	Requests received directly to KU	Total
Normal	95,162	2,636	97,798
Emergency	3,122		3,122
Fiber to Premises	NA	NA	NA
Design	225		225
Total	98,509	2,636	101,145

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);

For locate requests received through 811, from January 1, 2022 through November 30, 2022, KU received 1,217 second requests for locates.

For locate requests made directly to KU from January 1, 2022 through November 30, 2022, KU received 46 second requests for locates.

- 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;**

See table below for requests during the period of January 1, 2022 through November 30, 2022 made through the 811 center.

Request Type	Average Time to Completion
Normal	2.14 working days
Emergency	0.07 working days
Design	8.86 working days

KU's average completion times for 811 requests are at or very near the statutory window for each request type. Approximately 90% of all normal requests, over 99% of all emergency requests, and 96% of all design requests during the period covered by this response were marked as completed within the statutory window.

KU does not track completion date/time in the aggregate for the relatively small number of locate requests made directly to KU. The request is marked completed when the work request status is marked closed in the work management system. This can often occur a few days after the locate is actually completed in the field and the excavator is notified. The average time for the work request status to be marked closed for the KU direct requests is approximately 5 working days and those requests are not differentiated by type.

- 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);**

KU does not make agreements with excavators outside 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;**

Locate requests received through 811 are performed by third-party contractors and locate requests made directly to KU (in counties where KU is not a member of 811) are performed by utility personnel. From January 1, 2022 through November 30, 2022, third-party contractors performed 98,284 locates and KU personnel performed 2,636 locates.

- 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;**

KU does not have records and statistics for the aggregate 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;**

Investigations are performed for all damages to determine if the locator's inaccuracy is the root cause of the damage.

- 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.**

For locates performed by a third-party contractor for KU, the contractor provides training and performs periodic audits on locate personnel.

For locates performed by utility personnel, KU provides on the job training to educate employees on locate tools and processes. Personnel typically contact the requestor and attempt to meet on site to ensure locates cover the impacted area.

KU does not track metrics specific to the efficacy of policies and procedures established to reduce the number of inaccurately located underground facilities.