

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

**In the Matter of:**

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

**RESPONSE OF LOUISVILLE GAS AND ELECTRIC COMPANY**

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In response to the Kentucky Public Service Commission’s Order dated November 16, 2022, Louisville Gas and Electric Company (“LG&E”) 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.

<b>Request Types</b>	<b>Total</b>	
Normal	114,640	
Emergency	8,722	
Fiber to Premises	NA	
Design Information	202	
Large Project	9,113	
Unmapped or untonable	Gas	8,300
	Electric	5,263
Total: <sup>1</sup>	123,564	

- 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);**

As a result of the 811 call center structure, second requests are often sent to all utilities even if they responded to the first request. From January 1, 2022 through November 30, 2022, LG&E had already responded to 67% of the second requests it received and only provided a positive response for the second request if it has not responded to the first. For locate requests received through 811, from January 1, 2022 through November 30, 2022, LG&E received 1,233 second requests for locates.

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<sup>1</sup> LG&E receives requests as: Normal, Emergency, or Design and the total is comprised of these three categories. The Large Project and Unmapped type requests are a subset of the requests received and their number is not cumulative of the total number of requests.

- 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. This information is tracked for all types of locate requests except for design. The average time it takes to respond to a design locate request is estimated to be 24 hours.

<b>Request Types</b>	<b>Average Time to Positive Response</b>		<b>Average Time to Completion</b>	
Normal	1 calendar day 12 hours 6 minutes		2 calendar days 0 hours 2 minutes	
Emergency	2 hours 41 minutes		2 hours 42 minutes	
Project	22 hours 34 minutes		3 calendar days 22 hours 18 minutes	
Unlocateables	Gas	2 calendar days 9 hours 34 minutes	Gas	4 calendar days 22 hours 37 minutes
	Electric	2 calendar days 10 hours 27 minutes	Electric	4 calendar days 22 hours 4 minutes

LG&E tracks this information in calendar days and not working days, so the average response time is lower if stated in working days. LG&E’s average positive response and completion times are within the statutory window for each request type. Approximately 99.5% of all normal requests and 99.7% of all emergency requests during the period covered by this response were marked as completed within the statutory window.

- 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);**

LG&E 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;**

All locates are 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;**

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

Facility	Number of Inaccurate Locates Leading to a Damage
Gas	65
Electric	10

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

Internal audits are performed to determine the accuracy of locates. The locator’s notes are used to recreate the locate and determine if the same result is obtained. The contract locator company also performs its own audits.

Investigations are performed for all damage incidents 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.**

The following policies, procedures and programs are in place to promote the accuracy of facilities locates:

- GWS-1291 - Locate Underground Pipelines
- GWS-0941 - Install Tracer Wire and Other Locating Devices
- GOMI-PO-005 - Damage Prevention
  - Section 6.2 - LG&E shall furnish Kentucky 811 and Indiana 811 with updated maps or facilities data.
  - Section 6.8 - Line markers must be placed and maintained as close as practical over each buried main and transmission line.
  - Section 9.2 - Personnel responsible for locating and marking facilities must be qualified by experience or training.
- Auditing procedures described in subpart (g) above.
- Operator Qualification (OQ) program for LG&E (for gas locates).
- OQ suspension

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