

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

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

NKWD RESPONSE TO COMMISSION’S NOVEMBER 17, 2022 ORDER

Northern Kentucky Water District (“NKWD”), by and through counsel, submits its response to the Public Service Commission’s November 17, 2022 Order requesting information regarding locate requests pursuant to the Underground Facility Damage Prevention Act of 1994 (“Act”):

- 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: NKWD states as follows:

Type of Request	# of 1 st Request Occurrences
(a) Normal Excavation Locate Request	1213
(b) Emergency Locate Request	2
(c) Design Information Request	76
(d) Large Project Request	0
(e) Unmapped or Untonable Facility Request	0
(f) Fiber-to-the-premises Broadband Deployment Excavation Request	0
TOTAL:	1289

- 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: NKWD states as follows:

Type of Request	# of 2 nd Request Occurrences
(a) Normal Excavation Locate Request	0
(b) Emergency Locate Request	0
(c) Design Information Request	0
(d) Large Project Request	0
(e) Unmapped or Untonable Facility Request	0
(f) Fiber-to-the-premises Broadband Deployment Excavation Request	0
TOTAL:	0

- 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: NKWD states as follows for each type of locate request:

Type of Request	# of Request Occurrences	Total Length of Time to Respond	Average Time to Respond
(a) Normal Excavation Locate Request	1213	819.44 days	0.68 days
(b) Emergency Locate Request	2	2.0 hours	1.0 hours
(c) Design Information Request	76	111.19 days	1.46 days
(d) Large Project Request	0	0	0
(e) Unmapped or Untonable Facility Request	0	0	0
(f) Fiber-to-the-premises Broadband Deployment Excavation Request	0	0	0
TOTAL:	1289	930.62	0.72 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: NKWD states as follows:

Type of Request	# of Occurrences where Agreement reached outside of statutory time limits
(a) Normal Excavation Locate Request	0
(b) Emergency Locate Request	0
(c) Design Information Request	0
(d) Large Project Request	0
(e) Unmapped or Untonable Facility Request	0
(f) Fiber-to-the-premises Broadband Deployment Excavation Request	0
TOTAL:	0

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: NKWD states that NKWD personnel perform all locate requests.

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: NKWD states that it does not keep any record or statistics on the accuracy of locates. Locate accuracy is generally only investigated when facility damage occurs. Since January 1, 2022, NKWD is only aware of two (2) incidents where underground facility locate was inaccurate.

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

RESPONSE: NKWD states that it would only know that an underground facility has been located inaccurately in the event a water main has been struck during excavation and the marking was not at the location where the water main was struck.

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: NKWD states that it follows an internal procedure in completing locate request to ensure locates are completed accurately and minimize the number of inaccurately located facilities. In summary, these procedures include reviewing the utility maps and records prior to completing the locate to understand the underground assets in the locate request area; using above ground access points such as valve boxes, fire hydrants to assist in tracing the water lines(s) through the locate request area and using electronic radio frequency pipe locating equipment to properly mark the area to the actual water line location.

NKWD believes that the information provided contains all the information requested in the Commission's November 17, 2022 Order.

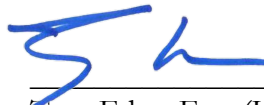
RESPECTFULLY SUBMITTED:



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CERTIFICATE OF SERVICE

In accordance with 807 KAR 5:001, Section 8, I certify that this document was submitted electronically to the Public Service Commission on December 30, 2022 and that there are currently no parties that the Public Service Commission has excused from participation by electronic means in this proceeding.



Tom Edge, Esq. (KBA #95534)