

NATURAL GAS OF KENTUCKY, INC.

P.O. BOX 23539
ANCHORAGE, KY 40223
270-565-4747

Dec 15th, 2022

Ms. Linda C. Bridwell

Executive Director

Kentucky PSC

PO Box 615

Frankfort, KY 40602-0615


RE: Case No 2022-00363

Dear Ms. Bridwell:

Please find the response attached from Natural Gas of Kentucky, Inc. to the above case. Order dated 11/16/2022.

Sincerely,

Natural Gas of Kentucky, Inc.



Mark H. O'Brien

President

To respond to the Public Service Commission's order dated November 16th, 2022 regarding excavator locate requests.

NATURAL GAS OF KENTUCKY, INC. provides the following:

12/15/2022

- a. Natural Gas of Kentucky, Inc. and Bluegrass Gas Sales, Inc. have received 674 locate request tickets since Jan 1, 2022 combined.

Bluegrass Gas Sales, Inc. is listed as the member of KY 811, each locate is reviewed by personnel who are employees of Bluegrass Gas Sales, Inc. and/or owners of Natural Gas of Kentucky, Inc.

The maps supplied to KY 811 include both the transmission lines owned by Natural Gas of Kentucky, Inc. and the distribution lines owned by Bluegrass Gas Sales, Inc. Both companies share common ownerships and operate in conjunction with each other from the same location.

These include: 651 normal tickets, 23 Emergency tickets, 0 Design tickets

- b. Of these, we have received 23 normal second or subsequent requests
- c. Since January 1, 2022, normal tickets are responded to within the statutory limits, with results conveyed verbally and/or by positive response through KY 811. From Jan 1, 2002 through Sept 30th, 2022 the positive response was recorded through KY 811 Exactix. After October 1, 2022, the positive responses were recorded through KY 811 OCCinc system.
Since January 1, 2022, Emergency tickets are responded to immediately upon receipt within the statutory limits and conveyed verbally and/or by positive response through KY 811. Normal practice is to verbally contact the excavator by phone or in person, and then complete the positive response through the KY 811 system. From Jan 1, 2002 through Sept 30th, 2022 the positive response was recorded through KY 811 Exactix. After October 1, 2022, the positive responses were recorded through KY 811 OCCinc system.
There have been no Design tickets received during the time period of January 1, 2022 through December 15th, 2022.

- d. Contact with excavators have resulted in extension of the time required to respond in 40 instances. These start date extensions were due to issues such as weather, actual start dates or times conveyed to us by the excavator being different as compared to the default start dates or times listed on locate requests received through KY 811, and delayed start dates or times due to other issues the excavator encountered.

These in include: 40 normal tickets, 0 Emergency tickets, 0 Design tickets

- e. Since January 1, 2022 all tickets received have been responded to by utility personnel.
- f. Since January 1, 2022, there have been no known instances of facilities being marked inaccurately, No records indicate that any lines located were located inaccurately.

g. Once a facility damage notice is received, the utility will investigate to determine if there was a proper dig ticket for the excavation site, and if there was, were the lines marked properly and within the tolerance zone per regulations.

h. Procedures and policies implemented to reduce the number of inaccurately located facilities:

After receiving the locate request from an excavator, the locator will review the maps and contact the excavator if there are any questions regarding the exact location of the planned excavation and any other pertinent information about the excavation. All of the utility lines in the systems are "plastic" or polyethylene. Lines are marked using paint and/or flags. Lines are located by use of locating devices that detect the tracer wire installed with the facilities. If the lines are untonable due to the utility's predecessors in some areas installing the lines without tracer wire, or lines that were installed with tracer tape that has degraded, the utility will use various methods to locate the lines. These methods include using probes, hand digging to expose lines, and meeting contractors on site during the excavation process.