

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

**In the Matter of:**

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

**RESPONSE OF**  
**EAST CLARK COUNTY WATER DISTRICT**  
**TO**  
**COMMISSION'S NOVEMBER 16, 2022 ORDER**

**FILED: DECEMBER 30, 2022**

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

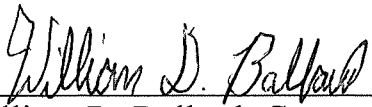
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**CERTIFICATION OF RESPONSE OF EAST CLARK COUNTY WATER  
DISTRICT  
TO COMMISSION’S NOVEMBER 16, 2022 ORDER**

This is to certify that I have supervised the preparation of East Clark County Water District’s Responses to Commission’s November 16, 2022 Order. The response submitted on behalf of East Clark County Water District is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

Date: December 30, 2022

  
\_\_\_\_\_  
William D. Ballard, General Manager  
East Clark County Water District


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**RESPONSE OF EAST CLARK COUNTY WATER DISTRICT  
TO COMMISSION’S NOVEMBER 16, 2022 ORDER**

Comes East Clark County Water District (“East Clark”) for its Response to Commission’s November 16, 2022 Order, and states as shown on the following pages.

  
\_\_\_\_\_  
William D. Ballard, General Manager  
P.O. Box 112  
Winchester, Kentucky 40392  
wdballard@bellsouth.net

## CERTIFICATE OF SERVICE

In accordance with the Commission's Order of July 22, 2021 in Case No. 2020-00085 (Electronic Emergency Docket Related to the Novel Coronavirus COVID-19), this is to certify that the electronic filing has been transmitted to the Commission on December 30, 2022; and that there are currently no parties in this proceeding that the Commission has excused from participation by electronic means.

  
\_\_\_\_\_  
William D. Ballard

**EAST CLARK COUNTY WATER DISTRICT**

**CASE NO. 2022-00363**

**Response to Commission's November 16, 2022 Order**

**Question No. 2**

**Responding Witness: William D. Ballard, General Manager**

**Q-2(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);**

**A-2(a).** Since January 1, 2022, East Clark County Water District ("East Clark") has received approximately 2,380 locate requests. The current system of tracking the locate requests does not differentiate the requests by types of locate requests.

**Q-2(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);**

**A-2(b).** Since January 1, 2022, East Clark has received numerous second or subsequent requests, but these were for situations where the excavator did not perform its work in a timely manner and East Clark had to re-mark the location of the water lines. All of these subsequent requests were for normal relocates.

**Q-2(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;

**A-2(c).** Since January 1, 2022, East Clark has responded to and completed all locate requests within the allotted time, except for where there were large project requests. In these situations an agreement was reached with the excavator. East Clark complied with the terms of the agreements that were reached. The average response time for normal requests was 2 days.

**Q-2(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);

**A-2(d).** Spectrum is installing fiber optic cable throughout East Clark's Service area. Spectrum is using two (2) contractors to install the fiber. Since July 2022, East Clark and each of these contractors have reached an agreement whereby they notify the specific area where they will be digging. East Clark has complied with these agreements and timely located its water lines.

**Q-2(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;

**A-2(e).** All locate requests have been performed by the utility's personnel.

**Q-2(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;

**A-2(f).** Specific records or statistics are not kept referencing accurate versus inaccurate location of East Clark's infrastructure. However, our work orders indicate there were two (2) service lines and two (2) water mains that were compromised due to inaccurate information about our system.

**Q-2(g).** Explain the method used to determine whether an underground facility has been located accurately versus inaccurately; and

**A-2(g).** See the answer to Question 2 (f) above. Only four (4) times has damage occurred to East Clark's water lines.

**Q-2(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.

**A-2(h).** East Clark relies on tracer wires to locate its newer water lines. For older lines, it relies upon maps, institutional knowledge of the system, probes, and pot holing (spot digging).