

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

BASHAM CONSTRUCTION AND RENTAL COMPANY, INC.)	
)	
_____)	CASE NO.
)	2019-00299
)	
ALLEGED VIOLATION OF UNDERGROUND FACILITY DAMAGE PREVENTION ACT)	
)	

COMMISSION STAFF'S INITIAL REQUEST FOR INFORMATION
TO BASHAM CONSTRUCTION AND RENTAL COMPANY, INC.

Basham Construction and Rental Company, Inc. (Basham), pursuant to 807 KAR 5:001, is to file with the Commission the original and six copies in paper medium of the following information, with a copy to all parties of record. The information requested herein is due within ten days of the date of this request. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed.

Each response shall include the name of the witness responsible for responding to the questions related to the information provided. Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or the person supervising the preparation of the response on behalf of the entity that the response is true and accurate to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

Basham shall make timely amendment to any prior response if Basham obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which Basham fails or refuses to furnish all or part of the requested information, Basham shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention shall be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When applicable, the requested information shall be separately provided for total company operations and jurisdictional operations. When filing a paper containing personal information, Basham shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read. Any partnership, corporation, or business entity (including a limited liability company) must be represented by an attorney licensed to practice law in Kentucky, and such representation includes the filing of papers with and appearances at hearings before the Commission.

1. State whether Basham took any photographs of the damage that was the subject of Incident No. 31394 or the site where the damage occurred at the time of the incident or in the course of investigating the incident. If so, provide a copy of the photographs.

2. Describe the type of activity that was occurring at the site when the damage was discovered.

3. State whether Basham has generally accepted engineering guidelines, policies, or procedures in place to direct backfilling in the area of natural gas lines. If so, provide a copy of the policy or procedure.

4. List and describe the tools or equipment that were used during excavation and backfilling at the site of Incident No. 31394.

5. List and describe the material(s) that were used to backfill the trench involved in Incident No. 31394, and why.

6. State whether Basham tapped down the fill material either during or after the backfilling that occurred in the trench involved in incident 31394. If so, state what tools or equipment were used in the tapping down process and at what depth(s) it was done.



Gwen R. Pinson
Executive Director
Public Service Commission
P.O. Box 615
Frankfort, KY 40602

DATED OCT 09 2019

cc: Parties of Record

Randall Basham
Registered Agent
Basham Construction and Rental Company, Inc.
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