## COMMONWEALTH OF KENTUCKY

## BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOGAN TELEPHONE COOPERATIVE, INC.

COMPLAINANT

V.

EAST LOGAN WATER DISTRICT, INC.

DEFENDANT

CASE NO. 2021-00248

## <u>COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION</u> <u>TO EAST LOGAN WATER DISTRICT, INC.</u>

East Logan Water District, Inc. (East Logan District), pursuant to 807 KAR 5:001, is to file with the Commission an electronic version of the following information. The information requested is due on January 28, 2022. The Commission directs East Logan District to the Commission's July 22, 2021 Order in Case No. 2020-00085<sup>1</sup> regarding filings with the Commission. Electronic documents shall be in portable document format (PDF), shall be searchable, and shall be appropriately bookmarked.

Each response shall include the question to which the response is made, and 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

<sup>&</sup>lt;sup>1</sup> Case No. 2020-00085, *Electronic Emergency Docket Related to the Novel Coronavirus COVID-19* (Ky. PSC July 22, 2021), Order (in which the Commission ordered that for case filings made on and after March 16, 2020, filers are NOT required to file the original physical copies of the filings required by 807 KAR 5:001, Section 8).

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.

East Logan District shall make timely amendment to any prior response if East Logan District obtains information that indicates the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which East Logan District fails or refuses to furnish all or part of the requested information, East Logan District 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, East Logan District shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. How many requests from excavators to locate underground water lines did East Logan District receive from January 1, 2020, to present?

2. How many of the requests received from January 2, 2020, to present were requests to locate unmapped or untonable facilities?

3. What is East Logan District's current procedure when it receives a request to locate its facilities in an area of intended excavation if the facilities are unmapped or untonable?

-2-

4. Identify each instance of excavation damage to one of East Logan District's underground water lines from January 1, 2020, to present. Your answer should include the following information:

- a. Date of the damage.
- b. Location of the damage.

c. Amount of water loss as a result of the damage.

d. Whether temporary underground facility markers had been provided to show the approximate location of the water line.

e. The identity of the excavator that caused the damage.

f. Description of all efforts by East Logan District to recover from the responsible excavator costs associated with the damage to the water line.

5. Identify each incidence of excavation damage caused by East Logan District or one of its contractors from January 1, 2020, to present. Your answer should include the following information:

- a. Date of the damage.
- b. Location of the damage.
- c. The type of underground facility damaged.
- d. The identity of the operator of the underground facility damaged by

East Logan District or its contractor.

e. Description of all efforts by the operator of the damaged facility to recover from East Logan District costs associated with the excavation damage.

6. Is East Logan District a member of Kentucky Underground Protection, Inc. (Kentucky 811 Contact Center)?

7. In 2021, the Kentucky General Assembly enacted amendments to the Kentucky Underground Facility Damage Prevention Act. The amendments, effective January 1, 2022, specify the duties of operators and excavators when underground facilities in an area of intended excavation are unmapped or untonable. How does East Logan District intend to comply with the new requirement under KRS 367.4909(5) for an underground facilities operator to respond and provide a positive response to facility locate requests, including requests to locate and mark unmapped or untonable facilities?

idwell

Linda C. Bridwell, PE Executive Director Public Service Commission P.O. Box 615 Frankfort, KY 40602

DATED JAN 10 2022

cc: Parties of Record

\*Christopher S. Zelli Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202

\*Logan Telephone Cooperative, Inc. dba LTC 10725 Bowling Green Road P. O. Box 97 Auburn, KY 42206

\*John E Selent Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202

\*East Logan Water District, Inc. East Logan Water District, Inc. 333 S Franklin Street Russellville, KY 42276

\*Edward T Depp Dinsmore & Shohl, LLP 101 South Fifth Street Suite 2500 Louisville, KENTUCKY 40202