

COMMONWEALTH OF KENTUCKY  
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

LOGAN TELEPHONE COOPERATIVE, INC.	)	
	)	
COMPLAINANT	)	
	)	
V.	)	CASE NO.
	)	2021-00248
	)	
EAST LOGAN WATER DISTRICT, INC.	)	
	)	
DEFENDANT	)	

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION  
TO LOGAN TELEPHONE COOPERATIVE, INC.

Logan Telephone Cooperative, Inc. (Logan Telephone), 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 Logan Telephone 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

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<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.

Logan Telephone shall make timely amendment to any prior response if Logan Telephone 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 Logan Telephone fails or refuses to furnish all or part of the requested information, Logan Telephone 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, Logan Telephone 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 to East Logan Water District, Inc. to locate underground water lines did Logan Telephone submit 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 the Logan Telephone'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?

4. Identify each instance of excavation damage to one of Logan Telephone's underground fiber optic and related telecommunications/data facilities from January 1, 2020, to present. Your answer should include the following information:

- a. Date of the damage.
- b. Location of the damage.
- c. Whether temporary underground facility markers had been provided to show the approximate location of the underground facilities.
- d. The identity of the excavator that caused the damage.
- e. Description of all efforts by Logan Telephone to recover from the responsible excavator costs associated with the damage to its underground facilities.

5. Identify each incidence of excavation damage caused by Logan Telephone 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 Logan Telephone or its contractor.

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

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

7. Identify any excavation damage to an underground facility owned or operated by Logan Telephone from January 1, 2019, to present.



Linda C. Bridwell, PE  
Executive Director  
Public Service Commission  
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DATED JAN 12 2022

cc: Parties of Record

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