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COMMISSION

From:
To: [PSC Executive Director](#)
Cc:
Subject: Response / Case No. 2022-00373
Date: Thursday, December 8, 2022 4:17:51 PM

Dear Kentucky Public Service Commission:

My office represents Diaz Irrigation in relation to the above-referenced case. The recently received order in this matter directs Diaz Irrigation to file a written response to the allegations contained in Staff Incident Report which was attached to the tendered pleadings. Please consider this email to be the required response. While accepting the proposition that an employee of Diaz Irrigation severed the gas line in question, the depth of the gas line did not comply with the law and, but for, this prior violation of the law not being remedied, the gas line would not have been severed. As such, while Diaz Irrigation accepts responsibility for the actions of its employees, the undersigned believes the trier-of-fact in this matter needs to be aware of the entire set of circumstances that existed at the time of this incident.

Please feel free to contact me if you have any questions or concerns. I, along with an authorized representative of Diaz Irrigation, will be present at the hearing set for January 27, 2023 at 9:00 EST via [meet.goto.com](#).

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