From: Jeff Barker
To: Comments, Urc

Subject: IURC Comments 2022: Give your input on revisions to reporting and investigating damages

Date: Thursday, May 12, 2022 9:40:50 AM

Attachments: <u>image001.jpg</u>

**** This is an EXTERNAL email. Exercise caution. DO NOT open attachments or click links from unknown senders or unexpected email. ****

To whom it may concern:

I have provide responses to the basic questions as requested, and answered from the perspective of a Landscape Maintenance Supervisor, primarily.

In addition to comments on the strawman draft proposed rule, we invite your comments on any or all of the following issues which are not presently included in the strawman draft rule:

- 1. Should the rule address spacing of paint lines and flags? YES (THE CONTRACTOR SHOULD BE AFFORDED THE OPPORTUNITY TO SELECT A DEFINED 'PURPOSE' FOR THE TYPE OF WORK BEING DONE. DEFINITIONS WOULD INCLUDE DIG DEPTH, AND THEREFORE INFORM WHETHER ALL UTILITIES, OR PARTIAL UTILITIES NEED TO BE LOCATED BASED ON DEPTH OF WORK) THIS SHOULD SAVE RESOURCES OF TIME, ENERGY, AND MONEY. ADDITIONALLY, CONTRACTORS SHOULD BE CHARGED A SET FEE FOR LOCATES AS DEFINED BY THEIR SELECTED 'PURPOSE' AND ASSOCIATED COST FOR THE LOCATE.
- 2. Should the rule address the frequency of ongoing maintenance of the markings by the operator? YES, AND IN CONJUNCTION WITH THE LOCATERS WHEN NEEDED.
- 3. Do stakeholders see a need to require marking standardization, perhaps by incorporating CGA best practices?
- 4. Should there be an maximum limit for reschedules, so that, for instance, an 811 ticket cannot be rescheduled for a date after the 811 ticket would be expired? NO. WEATHER AND WORKSITE CONDITIONS ARE UNCONTROLLABLE FACTORS THAT CAUSE DELAYS, EVEN FOR THE BEST CONTRACTORS PLANS. IN ADDITION, SOME PROPERTIES WILL REQUIRE SUBSEQUENT VISITS FOR CONTRACTOR WORK TO BE PERFORMED AT OTHER TIMES WITHIN A SEASON.
- 5. Is there a benefit to defining a separate locate process for "project" locate tickets? Is there a standardized definition of "project" tickets? YES. LONGER PROJECTS DO OCCUR, AND THEY REQUIRE SOME MEASURE OF ONGOING OCCURRENCE FOR MARKING. ALSO SEE COMMENTS FOR QUESTION #1.
- 6. Should the clearance zone requirement spell out the calculation of the size of the tolerance zone, i.e. half the diameter of the facility plus 24 inches on all sides? THIS SEEMS WISE.
- 7. Should there be a penalty or other enforcement mechanism if an operator fails to provide positive response? YES.

Have a beautiful day!

Jeff Barker Service Division Manager (260) 385-2197

www.paragonlandscaping.com

