

OFFICE OF ENERGY INFRASTRUCTURE SAFETY

UNDERGROUND SAFETY BOARD

2023 RESULTS REPORT

APRIL 2024



For a hard copy of this report, please contact the California Underground Safety Board at the Office of Energy Infrastructure Safety at (916) 902-6000. The report may also be accessed on the Board's website:

<https://energysafety.ca.gov/who-we-are/undergroundsafetyboard/>

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Executive Summary

This report outlines the results of the Board's activities during 2023. These activities include:

- The Education and Outreach meeting demonstrated a desire among state and local government agencies, California operators, one-call centers, and trade associations for more coordination.
- Board members led eight outreach events to educate and solicit meeting and workshop participation from those in their industries.
- Board and Energy Safety staff continued implementation of several information technology initiatives, including updates to the investigations case management and system development of a solution to accept all 811 tickets and electronic responses for policy analysis, compliance audits, and investigation support.
- The Board received 1,232 damage notifications and complaints in 2023, of which 1,031 (83.7%) were damage notifications, and 146 (11.8%) were complaints, and 55 (4.5%) were complaints through a “No 811” pilot program. Of the notifications received, staff was able to open investigations into 48, or 3.9%.
- In the second half of 2023, the Board began “No 811” pilot program designed to streamline the intake and processing of complaints of excavation without contacting 811. The Board received 55 notifications under the pilot, of which 20 were assigned for investigation and two were completed with issued notices of probable violation.
- Investigations staff completed 15 investigations resulting in 54 notices of probable violation. The Board approved proposed fines of more than \$23,000 for violations of the Dig Safe Act and issued 45 orders and recommendations that violators attend the Board's education course.
- The Planning and Design Committee conducted surveys to understand what information designers need at different stages of the design process. The results showed that operators need more time than the two days for a standard 811 ticket to process design requests, and designers require design information during the conceptual design phase for designers to complete work and activities well before construction.
- The Potholing Committee released draft safety standards for public review and feedback to assist excavators in identifying locations to pothole.
- To aid utility operators in implementing the SB 856 (Hill, Statutes of 2020) requirement that they must record newly installed subsurface installations into a geographical information system (GIS), staff surveyed operators to determine current GIS usage, and the Board created a new committee to oversee the initiative.

The Board's 2023 activities will be used to inform the activities identified in the 2024 Work Plan.



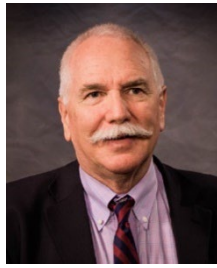
The Board

The Board is composed of nine members, seven of whom are appointed by the Governor and one each is appointed by the Speaker of the Assembly and the Senate Rules Committee. During 2023, the Board had two vacancies.

Members



Amparo Muñoz –
Chair



Bill Johns –
Vice Chair



Ron Bianchini



Randy Charland



Marjorie Del Toro



Marshall Johnson



Carl Voss

Committees

Unmarked and Abandoned Lines

Bill Johns and Amparo Muñoz

Potholing

Ron Bianchini and Randy Charland

Planning and Design

Bill Johns and Marshall Johnson

Ticket Process

Ron Bianchini and Randy Charland

Legislative Committee

Amparo Muñoz and Marjorie Del Toro

Education

Marjorie Del Toro and Marshall Johnson

Agriculture

Carl Voss and Bill Johns

Safety Lessons

Marshall Johnson

Geographical Information Systems

Amparo Munoz and Carl Voss

1. Operations and Administration

1.1 Staffing

1.1.1 Energy Safety Human Resources Challenges

The Office of Energy Infrastructure Safety (Energy Safety) experienced slow staff hiring in 2023 due to multiple human resources department transitions since Energy Safety's establishment in July 2021. As part of Energy Safety, the Board has experienced these challenges, which has impacted its ability to conduct investigations, develop safety standards, and build an outreach and education program. Energy Safety has worked with the Department of Finance to address these issues.

1.1.1.1 Results

- Energy Safety contracted with the Department of Parks and Recreation in July 2023 to process recruitments in a timelier fashion.
- The Legislature approved several new human resources positions for the department to conduct its own hiring beginning in July 2024.
- The time required for human resources to review a candidate for hiring went from months in early 2023 to approximately one week in late 2023.

1.1.2 Education and Outreach Positions Approved

Government Code § 4216.12 (b)(1) requires the Board to coordinate the state's education and outreach of safe excavation around buried utility infrastructure. The Legislature approved four (4) additional positions to develop education and outreach materials and conduct outreach and training activities.

1.1.2.1 Results

- The Board expects to fill vacant positions by mid-2024, after which new staff will require intense training and supervision.

1.1.3 Conclusions

- Energy Safety's engagement with the Department of Finance has led recruitment times to improve dramatically in 2023, allowing the department and Board to hire qualified staff more quickly.
- The addition of four education and outreach positions, expected to be hired by mid-2024, will allow the Board to coordinate the state's education and outreach, as required by Government Code § 4216.12 (b)(1).

1.2 Board Policy

1.2.1 Policy Updates

Senate Bill 865 (Hill, Statutes of 2020, Chapter 307) moved the Board from the Department of Forestry and Fire Protection (CAL FIRE) to Energy Safety and subjected it to review at least once every three years by the appropriate policy committees of the Legislature.

1.2.1.1 Results

Pursuant to the review frequency of each of the Board's adopted policies, the Board adopted Resolution 23-01-01 amending the following three policies in 2023:

- A-04: Accountability to the Legislature: recognized that Legislative review by the appropriate policy committees of the Legislature will happen on or after January 1, 2020 and every three years thereafter.
- C-01: Compliance with Legislative and Administrative Process Requirements: replaced CAL FIRE with Energy Safety as the Board's administrative umbrella and updated "Department of Personnel Management" to the department's more commonly used name of "Department of Human Resources."
- B-01: History: recognize the Board's first meeting in 2018 and its move from the Office of the State Fire Marshal to the Office of Energy Infrastructure Safety on January 1, 2022.

1.3 Regulatory Fee

1.3.1 2023-24 Fee-Setting

The Board had a structural deficit because of new positions and added administrative costs associated with being in a smaller department. Nonetheless, the Board had sufficient reserves due to staff vacancies that the Board didn't need to raise the 2023-24 fees. The Board will eventually need to increase the fee from the \$5 million dollars currently collected. When fee increases are necessary, the Board's goal is to keep the increases low and spread over several years to allow operators to predict the increases.

1.3.1.1 Results

- On February 28, 2023, staff notified its feepayer list that the regulatory fees for Billing Year 2023-24 were available on the Energy Safety website.
- The amount to be collected in the fee was unchanged in 2023 from 2022 and set at \$5 million.

1.3.2 Fee Communication

In 2021, the Board reported how it had modified its regulations to provide utility operators greater visibility into their fees by 1) creating advance notice of annual fee adjustments and 2) requiring that 811 notification center and Board invoices be provided to utility operators concurrently. This change went into effect in January 2022. These changes appear to have worked, as the number of fee questions the Board received only 32% of the fee-related questions it received in 2023 as it did in 2022 (a 68% drop, **Figure 1**).

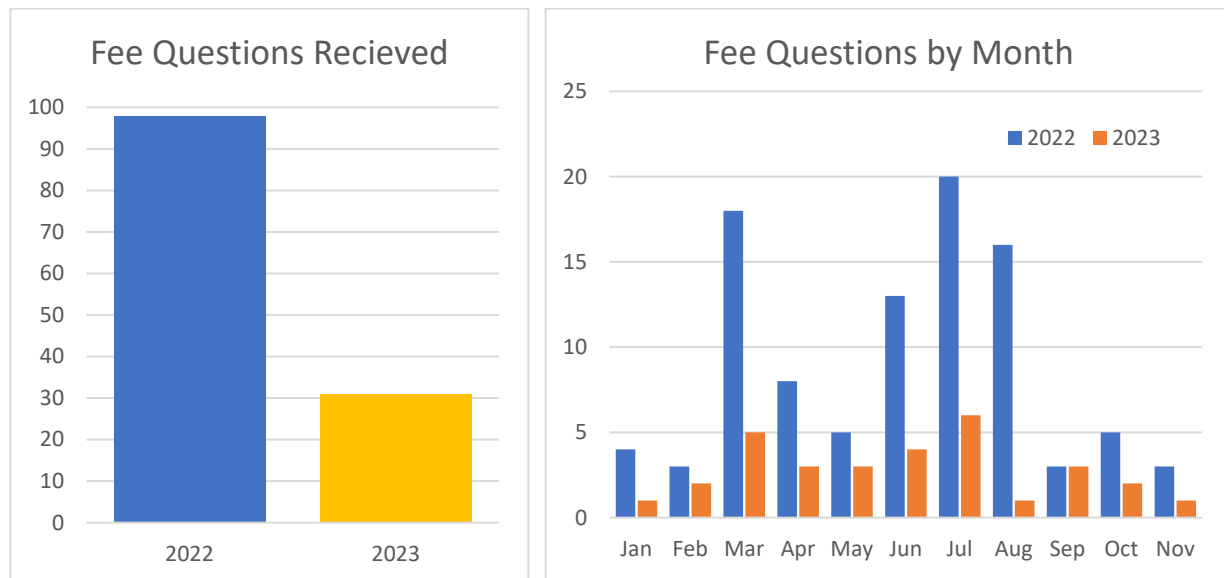


Figure 1: Fee-related questions received in 2022 and 2023, and fee-related questions by month.

In both years, fee questions increased following notification of the next Billing Year fees and following USA North's issuance of annual (fiscal year) fee invoices in July.

1.3.2.1 Results

- Fee-related questions were down 68% in 2023 compared to 2022.

1.3.3 Conclusions

- The Board has been able keep fees predictable because of a surplus in its fund, but it will eventually need to raise the fee to match rising costs.
- Proactive communication with fee payers can improve their understanding of the fee and reduce questions when they receive their regulatory fee invoices.

1.4 Membership Termination

Each year, DigAlert and USA North 811 have members who request to terminate their membership for different reasons. In 2023, two cases highlighted the need to develop more

structure around membership termination to maintain public safety and improve the Board's and the 811 notification centers' ability to administer their responsibilities.

1.4.1 Operator Switching Contractors – Who is the Operator?

In July 2023, DigAlert requested information from Board staff about how DigAlert should handle the 2023 regulatory fee of a member that had terminated membership in 2023. Upon investigation and review, and with the assistance of DigAlert, staff determined:

- The entity terminating membership had been under contract to operate and maintain the streetlights for a city.
- The city was not a member for the streetlights it owned and the city had changed contractors to the county.
- The county was under contract with approximately twenty cities for similar work and performed the work under a single member code.

Operators of subsurface installations must be members of the 811 notification center pursuant to Government Code § 4216.1. Thus, as the owner of the streetlight facilities, the city should have been an 811 notification center member for those assets. Similarly, while the county can perform 811 notification duties for the city, the membership of the city should be clarified through a member code separate from the county's.

Staff and DigAlert met with city and county representatives to discuss how the city's assets should have their own member code with DigAlert.

1.4.1.1 Results

- The city is in the process of obtaining membership with DigAlert for the assets they own. The county remains the contractor for 811 duties.

1.4.2 Operator Transferring Assets – Who is Responsible for Membership and Regulatory Fee Payment?

Following receipt of invoices from USA North 811 for 2023 membership and regulatory fees, a utility construction contractor requested termination and clarification of what portion of their fee they should pay.

The contractor had been a member of USA North 811 for the duration of construction of communications facilities. Once the work had been completed, the assets transferred to the communications company. It appears that the contractor remained a member until they were sent a bill. It is not currently clear when and if the communications company's shapefiles were updated to reflect their operation and excavator response responsibilities of the new facilities.

1.4.2.1 Results

- Staff is awaiting the resolution from USA North on membership to determine next steps.

1.4.3 Conclusions

- Membership application and termination processes may require more structure to ensure that Dig Safe Law provisions are being followed by operators.

1.5 Regulations

1.5.1 Non-Substantive Regulation Changes

In 2022, the Board moved from the California Department of Forestry and Fire Protection, Office of the State Fire Marshal to the Office of Energy Infrastructure Safety. As a result, many email and physical addresses in regulation were no longer valid. Additionally, the Board adopted a new seal in 2022, and the seal needed to replace the “Dig Safe Board” seal in Area of Continual Excavation (ACE) forms incorporated in regulation.

In November 2022, the Board approved the submission of non-substantive regulation changes to Office of Administrative Law (OAL).

1.5.1.1 Results

- The non-substantive regulation changes were submitted to OAL in 2023 and approved on October 25, 2023.

2. Education and Outreach

2.1 Education and Outreach Discussions

2.1.1 2023 Education and Outreach Meeting

In September 2023, an Education and Outreach meeting was held to facilitate discussion on how to coordinate current education and outreach efforts with state and local government agencies, California operators, one-call centers, and trade associations. State partners that participated in the discussion included the Office of the State Fire Marshal, California Public Utilities Commission, and Contractors State License Board.

2.1.1.1 Results

- Participants shared their current education and outreach efforts including social media efforts, public education events, and online and in-person trainings.
- Participants discussed gaps in homeowner education and reaching homeowners including homeowners understanding the risks and benefits and their willingness to use the 811 notification centers prior to excavating.
- Participants discussed next steps as developing collaborative training involving 811 notification centers, utility companies and state partners that target stakeholder leadership.
- Staff discussed next steps involving follow-up meetings and developing smaller workshops.

2.1.2 Electronic Positive Response Compliance Letters

In December 2023, Investigations staff sent 469 letters to DigAlert operators notifying them that DigAlert data from early 2023 showed them to not provide electronic positive response at least 50% of the time they were required to provide it. Many of the operators reached out to staff, indicating they were unaware of or confused about the requirement.

2.1.2.1 Results

- The results of this activity continue to be analyzed in 2024.

2.1.3 Conclusions

- Education and Outreach Meeting participants expressed desire to better coordinate to deliver needed outreach and education.
- While participants in the Education and Outreach Meeting focused mainly on excavator education, operator responses to electronic positive response letters

preliminarily demonstrated that operators need education on the Dig Safe Law as well.

2.2 Board Member Outreach

2.2.1 Area of Continual Excavation Outreach

In 2022, only 278 Area of Continual Excavation (ACE) tickets were requested out of the approximately 550,000 eligible agricultural parcels in California. Thirty of these tickets were from Kern County. Member Voss set a goal of 500 tickets in Kern County for 2023, and to accomplish this he spoke at several events:

- Kern County Farm Bureau Board of Directors (March 16)
- Kern County Farm Bureau (May 24)
- California Associate of Pest Control Advisors (September 5)
- Kern County Farm Bureau w/ USA North (December 7)



Member Voss presents to farmers and growers at the Kern County Farm Bureau, in an event hosted by USA North 811 on December 7. Photo: Matt Dodd, USA North 811.

Member Voss gave a presentation to the Kern County Farm Bureau regarding ACE tickets and to raise awareness to farmers of the use of ACE tickets. Additionally, the Kern County Farm Bureau promoted the ACE ticket in their electronic newsletters. He also gave an ACE presentation to the California Association of Pest Control Advisors as part of their training seminar. Member Voss also attended the USA North annual safety breakfast and engaged with DigAlert regarding their standard and professional level users for company personnel.

2.2.1.1 Results

- In 2023, 1,084 ACE tickets were issued by DigAlert and USA North 811, a 390% increase from 2022.

- Of those tickets, 227 were issued in Kern County, a 756% increase from 2022.

2.2.2 Other Board Member Outreach Activities

Member Del Toro hosted a safety and health meeting for the Association of General Contractors. Executive Officer Tony Marino presented an update on recent changes to the law and the Board's work on improving electronic positive response compliance, planning and design, and potholing standards. Member Del Toro and Executive Officer Marino heard from contractors about their challenges with utility operator timeliness of response to their excavation notifications.

Member Johns attended the California State Fire Marshal's annual meeting with the Technical Hazardous Liquid Pipeline Safety Standards Committee (THLPSSC) and shared with the attendees his role as a Board member and his role in upholding safety in the energy industry.

Member Muñoz presented at the California Sustainability Summit on August 23rd on the topic of managing asset information and sustaining infrastructure above and below ground. Summit participants discussed how GIS and asset management systems will work together to streamline processes.

The main topics of discussion were:

- How well are we preserving assets underground?
- What are our maintenance strategies for maintaining asset information? and
- How does this impact climate change and our climate goals?

Member Muñoz also presented the Board's activities in implementing the GIS mapping provision of SB 865 (2020) (see Section 5.6 for more details) to the California Geographic Information Association's (CGIA) Community Council quarterly meeting on December 14, 2023. She also used the opportunity to solicit participants to apply to fill Board member vacancies.

2.2.2.1 Results

- Board members presented at several outreach events to inform stakeholders of Dig Safe Law requirements and hear their feedback.

2.2.3 Conclusions

- While education and outreach efforts provided greater Board visibility and—in the case of ACE ticket compliance—measurable improvements, more engagement is needed to make substantial improvement in engagement and compliance with the Dig Safe Law.

- The four staff positions approved by the Legislature in the 2023-24 Budget will be the first dedicated personnel approved to perform this work. They are expected to be hired in 2024.

2.3 Education Course

2.3.1 Developing a Self-Paced Online Version of the Education Course, in English and Spanish

Since its first year, the Board has expressed the desire to enhance proactive education for excavator and utility operator personnel. The Board's education course had been designed as instructor-led, and staff resources limited the course's presentation to those who had received a notice of probable violation.

In 2023, Energy Safety engaged in a contract to develop an online self-paced version of the Education Course. The contract includes a translation of the course into a Spanish-language version.

2.3.1.1 Results

- The online self-paced version of the education course is expected to be completed in mid-2024.

2.3.2 Conclusions

- Conclusions regarding self-paced online version of the Board's education course are expected upon its completion in 2024.

3. Information Technology and Data

3.1 Use Technology to Improve Investigation Management

To help manage the workload, the Board has focused on expanding technology. In 2023, the Board developed a ticket database, began developing ticket search and "no ticket" location search capabilities, and upgraded its investigations case management system (DigCase).

3.1.1 Dig Case Upgrades

In 2023, staff engaged in two separate contracts for updates to DigCase:

- 1) In 2021, the Board contracted with MERP Systems, Inc. to develop system administration documentation, develop fixes to broken functionality, and add reporting capabilities. After delays associated with the transition to Energy Safety, MERP completed the work in the second quarter of 2023.
- 2) Energy Safety contracted with Prodigy Consulting to upgrade DigCase to accept documents and other attachments in damage notifications and complaints, allow investigators to send information requests through the system, and update workflows to use up-to-date, easier to maintain, functionality.

3.1.1.1 Results

- Investigations staff now has access to more reports to view enforcement actions by respondent, allow supervisors and their staff to review case plans, review notification statistics, and provide notification information in investigation reports and in response to requests from notification submitters.
- The upgrades from the Prodigy contract are not yet complete, but are expected to be in place by mid-2024.

3.1.2 Investigations Dashboards

Staff built prototype Power BI dashboards connected to DigCase to view high-level statistical information about notifications and case statuses. This effort is in alignment with efforts across Energy Safety to enhance visibility into operational processes.

3.1.2.1 Results

- These dashboards are currently being used internally for overviews of investigation information and to review DigCase system limitations and gaps in data collection.
- Staff plans to continue modifying the dashboards and updating technology and data collection processes with the goal of making these dashboards publicly accessible.

3.1.3 Conclusions

- The continued development of DigCase and investigations dashboards will allow efficient ingestion of damage and complaint notification information (including photographs and other documentation), the efficient management of cases, and the high-level reporting needed to evaluate program success and needs.

3.2 Build Ticket Analysis Capabilities

Following the passage of SB 865 (Hill, 2020), the Board began developing a Dig Tickets application that could accept, store, and analyze the enormous amount of ticket and electronic positive response (EPR) information from the 811 Notification Centers. These activities were conducted in 2023 with the following results.

3.2.1 Development of DigTickets

DigTickets was developed to accept ticket and electronic positive response information from USA North and DigAlert to assist with investigations and audits and allow for advanced data analysis to support Board policy and outreach initiatives. To understand and gain feedback on the development of the DigTickets application so far in storing and analyzing call center records, Energy Safety's Data Analytics team presented updates on the capabilities of the application during the November Board meeting.

3.2.1.1 Results

The DigTickets application capabilities include:

- Providing a stable storage of call center records, growing the data set over time.
- Staff being able to interact with the data through ticket search and export features in the web application.
- Energy Safety's Data Analytics team supporting staff with advanced data queries through backend using SQL.
- The application providing a foundation for future applications that deal with complex and growing data sets like EPR responses.

The application began accepting ticket and electronic positive response information in August 2023, though issues identified through the process of accepting these notifications require more work to address, and data gaps remain.

Contracting issues and the migration of Energy Safety's information technology solutions from the Department of Water Resources to its own Microsoft tenant led to the project's temporary suspension in late 2023, with user interface, status notifications, and data mapping work unfinished. Work is expected to resume in the first months of 2024.

3.2.2 Conclusions

- The DigTickets application will allow the Board to further analyze ticket data to better inform policy initiatives and improve the efficiency of conducting investigation activities.
- The project was suspended in late 2023 and is expected to resume in the first months of 2024.

4. Investigations and Enforcement Program

4.1 Notification Data

Pursuant to Section 4100 of Title 19 of the California Code of regulations, persons must report damages within two hours if the damage:

- Was to a natural gas facility,
- Was to a high priority facility of any kind,
- Caused injury requiring treatment in a hospital or clinic, or
- Caused a fatality.

Damages that do not fit these criteria may be reported voluntarily.

4.1.1 Notification Overview

The Board received 1177 notifications through DigCase in 2023, of which 1,031 (87.6%) were damage notifications and 146 (12.4%) were complaints. Of the notifications received, staff was able to open investigations into 28, or 2.4%. This is similar to the percentage of notifications investigated in 2022 (2.7%). This number does not include the additional 20 cases opened through the “No 811” Pilot Program, discussed in Section **4.2.1**.

The year 2021 was the first full year of damage notifications, and notifications were slightly higher in 2022 than in 2021 and down by 25.1% in 2023 (**Figure 2**).

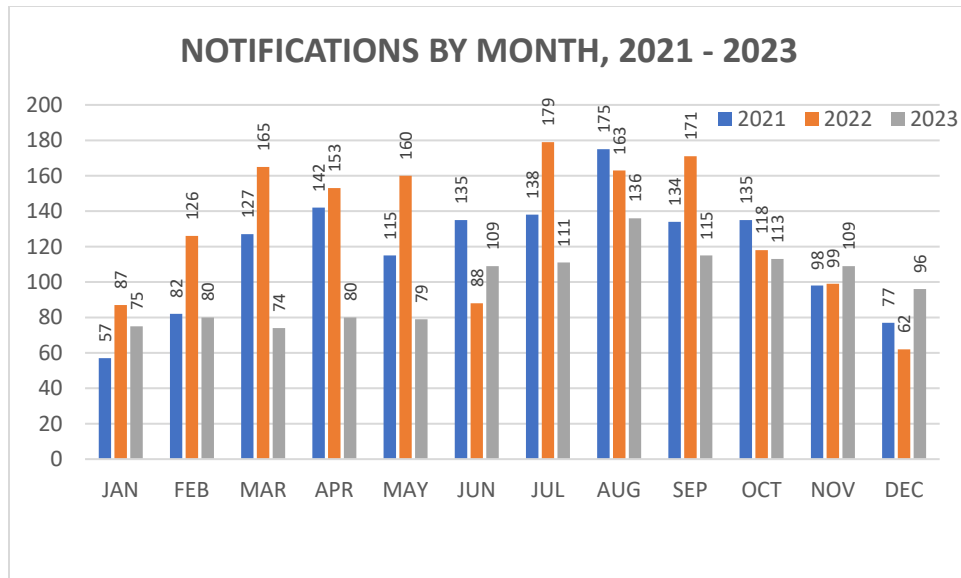


Figure 2: Comparison of damage notifications and complaints received in 2021, 2022, and 2023.

4.1.1.1 Results

- Notifications decreased by 25.1% in 2023, most notably in March, April, and May.
- Of the notifications made, staff was able to open investigations into 2.3%, a number that does not include the “No 811” pilot program investigations, discussed in Section 4.2.1.

4.1.2 Natural Gas Notifications

Pursuant to Title 19, Section 4100 of the California Code of Regulations, excavators are required to contact the 811 notification center upon striking a natural gas line. Of the 2023 notifications, 20.2% indicated that gas was the facility type struck or mentioned gas in the incident description (**Figure 3**). This percentage is consistent with the percentage of one-call tickets placed in the state that were received by the state’s three largest natural gas companies (Pacific Gas and Electric, Southern California Gas, and Southwest Gas, together approximately 16%), but lower than expected based on the damage reporting criteria. As approximately 5,000 natural gas damages are reported by the state’s natural gas companies to the Pipeline and Hazardous Materials Safety Administration (PHMSA) annually,¹ it is clear that there is massive underreporting of damages to the Board.

¹ Pursuant to [Section 191.11](#) of Title 49 of the Federal Code of Regulations.

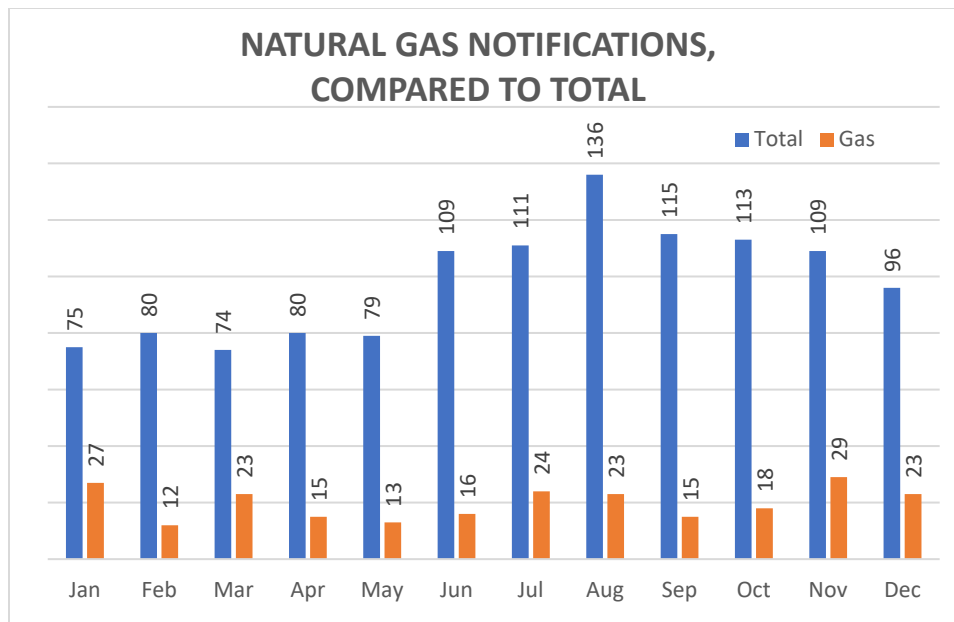


Figure 3: Comparison of notifications involving gas to all notifications. Note that Gas notifications include all damages notifications and complaints in which the reporter used the word "gas" in the "facility type" field or in the narrative description of the incident.

4.1.2.1 Results

- Underreporting of natural gas damages indicates widespread non-compliance with the damage reporting requirements in 19 CCR 4100.

4.1.3 Conclusions

- The Board is only receiving a fraction of the notifications it should be based on the number of natural gas damages reported to PHMSA.
- The investigations program nonetheless only had capacity to investigate a small number of these notifications.
- Actions taken to improve investigation capacity are discussed in Sections 3.1 and 4.2.1.

4.2 Investigation Initiatives

4.2.1 No 811 Complaint Pilot Program

Beginning in the third quarter of 2023, Investigators have piloted a new way for the public to file complaints that allows images and other documentation to be submitted with the complaint, rather than an investigator needing to request the information separately after a case has already been opened.

- With the assistance of Energy Safety’s Data Analytics team, investigative staff configured an ESRI-environment survey tool (“Survey 1-2-3”) to allow complainants to collect relevant evidence when submitting a complaint.
- A contractor has begun upgrading DigCase to accept information, including images and files, from the survey tool (see Section 3.1.1 above).
- The survey’s questions and design were developed in concert with Southern California Gas Company. The goal of the collaboration was to understand what information a complainant must collect and what internal processes they must have to be able provide actionable information in a complaint.

4.2.1.1 Results

- Southern California Gas received 55 notifications, of which 20 (36.4%) were assigned to investigators for investigation.
- In its November 2023 meeting, the Board heard its first two investigations from the pilot program, which led to two Notices of Probable Violation (NOPVs) and two Board enforcement actions:
 - 23NTS00001: Residential (Palm Desert) No 811 Complaint: The Board found ARK Plumbing in violation of failure to contact the 811 notification center prior to excavation (Government Code § 4216.2(b)), failure to call 811 after damage leading to a rupture of a natural gas line (§ 4216.4(c)(2)), and failure to contact the 811 notification center within 48 hours of causing the damage (§ 4216.4(c)(3)). The Board recommended that the CSLB order Ark Plumbing to take the Board’s education course and pay a financial penalty of \$1,000.
 - CAS-01555-W6J5P1: Saddleback Drive (Bakersfield) No 811 Compliant: The Board found Reliance Fence Company, Inc. in violation of (§ 4216.2(b)), failure to call 811 after damage leading to a rupture of a natural gas line (§ 4216.4(c)(2)), and failure to contact the 811 notification center within 48 hours of causing the damage (§ 4216.4(c)(3)). The Board recommended that the CSLB order Reliance Fence Company to take the Board’s Education Course and pay a financial penalty of \$1,000.

4.2.2 Electronic Positive Response Compliance Letters

In December 2023, Investigations staff sent 469 letters to DigAlert operators notifying them that DigAlert data from early 2023 showed them to not provide electronic positive response at least 50% of the time they were required to provide it. The letters notified the operators that continued non-compliance could lead to notices of probable violation.

4.2.2.1 Results

- The results of this activity continue to be analyzed in 2024.

4.2.3 Conclusions

- Between notifications made into DigCase and “No 811” pilot complaints, the Board received a total of 1,232 notifications, and investigations were opened into 48 (3.9%) of them.
- Once the process and the technology is proven, the Board intends to direct investigations staff to end the No 811 pilot and open the program to all complaints statewide. If successful, the Board intends to pursue pilot programs for other complaint types, such as when a utility operator fails to respond to an 811 notification.
- Electronic positive response non-compliance is widespread among operators, and the appropriate means for creating compliance is still to be determined.

4.3 Federal Determination of Enforcement Program

4.3.1 2022 Determination of Adequacy

The federal Pipeline and Hazardous Materials Administration (PHMSA) annually evaluates state 811 enforcement programs² to determine if those programs are “adequate” or “inadequate.”

PHMSA conducted the 2022 review after receiving a joint data submission from the Board, CPUC, OSFM, and CSLB in May 2023. PHMSA has a funding agreement with CPUC and OSFM to enforce federal pipeline safety regulations³ but has no funding or regulatory authority over the Board or CSLB.

In October 2023, PHMSA notified the Board via letter that it found the state’s investigations program “adequate” but expressed concern that the state did not levy sufficient penalties to significantly reduce the number of damages.

In December 2023, the Executive Officer responded to PHMSA outlining the actions that the Board was taking to address “no 811,” locate error, and poor excavation practice damage drivers of excavation damages in California. Some of these actions are related to Dig Safe Law enforcement, but others are related to standards, regulations, and education and outreach.

4.3.1.1 Results

² Pursuant to Section [60114](#)(f) Title 49 of the United States Code and Section [198.55](#) of Title 49 of the Code of Federal Regulations.

³ [49 USC 60105](#).

- California was determined by PHMSA to have an “adequate” damage prevention enforcement program in 2022.

4.3.2 Conclusions

While PHMSA directed its evaluation toward the Board, excavation safety responsibility in California is shared across four different state departments (the Board, California Public Utilities Commission, Office of the State Fire Marshal, and Contractors State License Board). Investigative staff intends to further coordinate with its state partners to align and catalogue all of California's efforts to communicate to PHMSA and California residents the state's safety activities.

4.4 Investigations and Board Action

4.4.1 Notices of Probable Violation and Board Action

The **Attachment 1** shows the 54 Notices of Probable Violation issued in 2023 resulting from 15 investigations, and the Board's action on each.

4.4.1.1 Results

- Staff issued 54 NOPVs in 2023 from 15 investigations.
- The Board found violations in 45 NOPVs, in each of which it recommended or required violators take the Board's Education Course. Seven NOPVs issued in 2023 were left to be decided in 2024.
- In each of its 45 decisions finding violation, the Board ordered or recommended that the violator take the Board's education course.
- The Board made 10 recommendations that violators pay financial penalties, the largest of which was \$10,000. The penalty amounts recommended by enforcement jurisdiction are as follows:
 - Contractors State License Board: \$17,000
 - Local Government: \$5,005 Action on Board Referrals

In 2023, enforcement jurisdictions took no action on Board Referrals.

4.4.2 Education Course Delivery and Attendance

In 2023, investigations staff held one Education Course session.

4.4.2.1 Results

- The following entities attended the Education Course:
 - Angelica and Miguel Delgado

- Coastal Development Group
- Phoenix Electric
- A total of 23 people attended the course.

4.4.3 Conclusions

The Board will continue to hear investigation cases in each of its quarterly Board meetings.

In 2024, the Board plans to release a self-paced, online education course to open up the Education Course training to the industry and help prevent accidents and possible violations (see Section [2.3.1](#)).

5. Policy Program

5.1 Develop Processes to Assist Excavators in Identifying Unmarked and Abandoned Lines

Following activity in 2022, the Abandoned Lines Committee sought to define “abandoned” lines, identify processes excavators can use to identify the owner and line status of unmarked lines in the field, and explore how unmarked and abandoned line information may be recorded through geographic information systems (GIS).

In 2023, the Abandoned Lines Committee conducted the following activities with the following results.

5.1.1 Distinction Between Abandoned and Unmarked Lines Research

To understand the distinction between what constitutes an abandoned line versus an unmarked line, the Abandoned Lines Committee researched the excavator’s process in determining whether a line is abandoned or unmarked.

Excavators are required to presume all buried facilities are active and notify the 811 Notification Center the utility operator failed to identify the buried facility. Excavators face challenges in finding operators to claim unmarked lines and determining the active, inactive, or abandoned status of the line.

5.1.1.1 Results

- Abandoned lines are defined by operator actions, such as taking the pipeline out of service including safe disconnection and sealing of pipes and conduits. The excavator encountering an unmarked line does not have access to this information.
- Most usages of the word “abandoned” are unwarranted, as the excavator cannot make the determination that a line is abandoned. The Board and stakeholders should recognize the excavator’s point of view and recognize the problem as one of “unmarked” lines.
- The committee was renamed the “Unmarked and Abandoned Lines Committee.”

5.1.2 Using GIS Tools to Report Abandoned and Unmarked Lines

Energy Safety’s Data Analytics team explored a possible solution on how unmarked and abandoned line information discovered during excavation could be preserved to better inform future excavation work.

Excavators face the following problems when encountering unmarked and abandoned lines in the field:

- Unmarked lines are the real problem and further development of an appropriate process for excavators to use to determine the status of a line should be considered.
- Identifying who the operator of the line is and the appropriate plan of action.

Energy Safety's Data Analytics team demonstrated how the use of an ESRI survey tool could allow excavators to report abandoned and unmarked lines found during excavation. The solution includes a custom electronic form to report the location of abandoned and/or unmarked buried facilities and includes spatial maps and locational data of buried facilities.

The Board identified these points when discussing the identification and reporting of abandoned and unmarked lines:

- Use of a tool such as ArcGIS Survey 1-2-3 would allow excavators to create a communal database of unmarked line information that excavators could reference and report on when working in the field to help reduce facility damage and to help map the location of these facilities.
- Processes should be developed for excavators to follow when encountering unmarked lines, such as documentation of outreach to utility operators to better record the status of the line.

5.1.2.1 Results

- Use of an unmarked lines reporting system would require the Board to resolve several policy questions, such as
 - What level of verification is needed in permitting a submission to the database,
 - To what extent the line's status (unmarked, inactive, abandoned) should be known before entering the information, and
 - How information retrieved from the system should be used (and how it shouldn't be used).

5.1.3 Conclusions

- In the pursuit of developing a definition for "abandoned" lines, the Abandoned Lines Committee identified that the main problem for excavators is not the discovery of abandoned lines, but rather the discovery of unmarked lines. Currently, there is no standardized process to identify the owners of unmarked lines.
- In 2024, the Unmarked and Abandoned Lines Committee will explore the use of the word "abandoned" and whether current practices help an excavator clarify the status of an unmarked line, will begin developing draft safety standards, and will potentially

continue to explore technological solutions to assist with the identification and reporting of abandoned and unmarked lines.

5.2 Develop Planning and Design Ticket

Following activity in 2022, the Board sought to develop a planning and design ticket to allow project designers to send information requests to utility operators through the one-call centers in a standardized manner.

In 2023, the Planning and Design Committee conducted the following activities with the following results.

5.2.1 Planning and Design Survey Results

To continue developing a design ticket option, the Planning and Design Committee conducted two surveys—one to designers and another to operators—to understand the components of the design process and what types of information designers need at different stages of the design process.

5.2.1.1 Results

The Planning and Design Committee received the following survey results, which were presented at the Board's April 2023 meeting:

- Operator survey responses (16 total responses):
 - Operators indicated they need more time than the two-day turnaround for 811 tickets to process design requests. Factors such as the size of the excavation footprint impact how long it takes to process a design request.
 - Operators are interested in obtaining copies of design documents from the designers for their own records.
- Designer survey responses (197 total responses):
 - Design information is primarily needed during the conceptual design phase for designers to complete design work and activities during the conceptual and 30% Design phase.
 - Designers provided additional feedback indicating costs and project delays are significant if the buried facilities are not identified early and accurately in the design phase.
 - Designers responded that potholing is completed between the conceptual and 60% Design phases of the design process to confirm buried facilities during the design process.

- Designers indicated 10-15 working days is a reasonable time for operators to respond to the design ticket.
- Field locates and marks are needed early in the design phase versus waiting until construction due to increased costs and delays from project redesign and inaccurate buried facility information.

5.2.2 Pennsylvania 811 Planning and Design Ticket Workshop and Analysis of Design Ticket Construction Options

The Planning and Design Committee held a virtual workshop in June 2023 to understand how Pennsylvania 811 handles design tickets and to gain feedback from stakeholders on how to structure a design ticket. During the July Board meeting, staff presented a report on the workshop and different types of design tickets.

Pennsylvania 811 also presented their Coordinate PA application which is a tool used to collaborate, plan, and manage projects with buried facilities stakeholders. The application enables users to add design projects and share documents with operators and other contacts during any phase of the design process.

The Planning and Design Committee asked workshop participants questions to determine how they would structure a design ticket:

- How would you structure an 811-design request?
- What information should designers provide in a design request? What information gets designers what they need? What information is lacking in many design requests that makes the requests challenging to fulfill?

In addition to the workshop results, staff provided a high-level overview of the different types of planning and design tickets used in other states during the July Board meeting.

5.2.2.1 Results

- Pennsylvania 811 processes two types of design notifications: Preliminary and Final Design.
- Only one participant commented on the need for legislation before the Board develops a design ticket and to obtain stakeholder agreement on the design process.
- Design tickets in other states include the following:
 - *Inquiry only*: allows designers to obtain utility operator contact information within the planned project area.
 - *Information only (no field marks)*: 811 notification centers process design requests, and utility operators provide records such as maps and surveys directly to operators.

- *Information only (field marks is an option for the operator):* same as above, but operators are allowed to provide marks instead of maps and records.
- *Design locate:* 811 notification centers process field mark requests for design purposes.

5.2.3 Planning and Design Committee Special Report on Infrastructure Deployment

The Planning and Design Committee presented a special report in November 2023 highlighting how the Board's planning and design efforts can support the Governor's goal to cut infrastructure deployment timelines, save California businesses and governments hundreds of millions of dollars, and effectively use the Federal Infrastructure Investment and Jobs Act and Inflation Reduction Act.

5.2.3.1 Results

The Planning and Design Committee's special report highlighted the following planning and design efforts that could support the Governor's goals:

- *Developing an electronic platform for design coordination:* this online platform would facilitate the exchange of design plans and could reduce excavation damages that CGA estimated to be \$30 billion in 2019.
- *Developing a virtual space for utility coordinating councils:* the councils would be integrated into the project design process and will help facilitate coordination of utility installations to reduce the impact of street closures.
- *Facilitating tribal engagement:* a design platform would be able to promptly notify Native American tribes of excavation activities on tribal land, supporting the tribe's ability to monitor culturally-sensitive sites.

5.2.4 Conclusions

- Operators and excavators need clear expectations on how to work together to design buried facility infrastructure projects.
- To effectively implement a planning and design request, the Board provided a recommendation in the 2022 and 2023 Annual Reports to require operators to participate in the planning and design request.
- In 2024, the Board will release draft safety standards and a framework for a design ticket option for stakeholder review and feedback. The 811 notification centers' ability to implement a design ticket option is contingent upon the Legislature requiring operators to participate in responding to design requests. When developing draft design safety standards, the Planning and Design Committee will need to review the

draft safety standards in conjunction with the potholing safety standards to ensure alignment between the two standards.

- As the development of the planning and design ticket moves forward, the Board will explore developing a virtual space for utility coordination councils and technological solutions to help facilitate collaboration during the design process.

5.3 Align Electronic Positive Response with Statute and Communication Principles to Promote Excavator Use

Following activity in 2022, the Ticket Committee began reviewing electronic positive response (EPR) codes to evaluate revising EPR codes to reduce ambiguity in their meanings, align with statute, and facilitate better communication between operator and excavator.

5.3.1 EPR Code Development

When assessing and updating the current EPR codes, the Ticket Committee recognized the limitations of the current system, which only allows the operator to communicate with the excavator, and evaluated the benefits and challenges of implementing two-way positive response and enhanced positive response as possible long-term solutions.

- Two-way positive response would allow excavators to respond to EPR codes to communicate with operators through the regional notification centers.
- Enhanced positive response would allow the operator to include additional facility information such as pictures or drawings to a ticket to provide clarification of a facilities' location in an excavation area.

5.3.1.1 Results

The results of the Ticket Committee's analysis of two-way and enhanced positive response were presented at the Board's November meeting.

- Two-way positive response:
 - *Benefits include* better documentation of responses, improved communication between operator and excavator, and additional clarification of details provided in the ticket.
 - *Challenges include* developing a system for two-way response, operator and excavator training on system use, and the potential for unending communication loops between operator and excavator.
- Enhanced positive response:

- *Benefits include* improved safety due to the additional facility information and improved communication regarding markings and facility location.
- *Challenges include* operator and excavator need to manage the new information made available, training on how to use the system, data standardization in tickets, potential overlap with planning and design, and compliance issues of determining whether statute or regulations should implement enhanced positive response.

5.3.2 Conclusions

- Two-way and enhanced positive response are valuable long-term solutions to implement in the revisions of EPR codes.
- In 2024, the Ticket Committee will be collaborating with the regional notification centers and other states' 811 centers to gather more information on ways we can revise positive response codes. The Ticket Committee will also continue to explore long-term positive response solutions and study how excavators and operators read and understand these communications.

5.4 Develop Standards to Assist Excavators in Identifying Locations to Pothole

The Board developed potholing standards to provide guidance on how to safely and effectively sample the location of utility infrastructure to reduce damaging to a buried facility through the following activities in 2023.

5.4.1 Release of Draft Safety Standards for Potholing

During the July Board Meeting, the Potholing Committee released draft potholing safety standards for public review and feedback. The Potholing Committee used the Common Ground Alliance (CGA) Best Practices as a model for constructing standards. Draft safety standards include best practices for, locating and marking facilities, pre-excavation activities, and excavation. The draft safety standards and the standards roadmap were posted on Energy Safety's website.

5.4.1.1 Results

Safety standards for **locating and marking facilities** included:

- Utility operators provide locators with information to help them identify buried infrastructure locations.
- Surface indicators are used to confirm buried facility locations, and if a discrepancy is found, the locator contacts designated utility operator personnel for assistance.

- Operators are available to resolve their locator's problems during locating activities and have procedures for correcting mapping errors.

Safety standards for **pre-excavation activities** included:

- Potholing is used for facility verification prior to excavation when a project requires design.
- Operators identify deep subsurface utilities as part of the information provided to designers and excavators.
- Excavators place traffic control restrictions and contact information on ticket notifications, identifying contacts for locators to use if they have questions.
- For point excavations, a five- to ten-foot-wide area is delineated to maximize excavation opportunities outside the tolerance zone of buried facilities, using both mechanical and hand tools.

Safety standards for **excavation activities** included:

- Excavators have all relevant documentation onsite, including the ticket, electronic responses, and operator contact information.
- After operator locate and mark activities, excavators review the site with response information provided by operators.
- Excavators document field markings, including through photographs.
- Design plans, facility operator marks, maps, and surface indicator surveys help determine pothole locations.
- The excavator examines nearby structures and surface markings, such as sewer manholes, to determine if sewer laterals may be in the area of excavation.

5.4.2 Potholing Standards Workshops

The Potholing Committee hosted two workshops in August for stakeholders to identify which draft potholing standards should be modified to improve job efficiency and worker safety.

5.4.2.1 Results

Feedback from various locators and representatives from utility companies showed an underlying desire for developing potholing standards first and then identifying what should be considered for regulations. The workshop participants provided the following feedback:

- A minimum standard for locating equipment would be beneficial.
- Obtaining additional information such as depth, type of material, and diameter of utilities is beneficial.

- Operators are hesitant to provide depth information if they are not familiar with the excavator.
- What constitutes a “mapping error” remains undefined. This large umbrella can include typos in an address, unmapped facilities, and determining if an object is in a right-of-way or not.
- Some features, like T’s, stubs, and changes in direction, might require additional potholes.
- Pothole frequency is important. Some excavators have created their own standards for this.
- Insurance companies may wish to participate in the workshops, as an excavator’s adoption of standards could reduce their insurance rates.
- Information gathered through potholing can be used to better map existing utilities. Standards could help operators trust information provided and use the information when mapping utilities.

5.4.3 Conclusions

- Potholing standards are needed for all parts of the excavation process, including locating and marking facilities, pre-excavation activities, and the excavation.
- In 2024, the Potholing Committee will continue to engage stakeholders to develop the potholing standards as well as review the standards in conjunction with the draft design standards to ensure alignment between the two standards.

5.5 Develop Notification Center Practices to Manage Locate Work Volatility

Utility locators’ workload varies, making the function challenging for utility operators to staff, impacting operator ability to provide timely marks to excavators. The Board had begun to explore how workload volatility could be dampened in 2021, but the work was put on hold until more in-depth analysis could be performed using the ticket data to be housed in DigTickets. A description of progress on DigTickets development may be found in Section [3.2.1](#).

5.6 Determine What New Facilities Need to be Incorporated into Utility Operator Geographic Information Systems

With Senate Bill 865 amending Gov. Code § 4216.3, utility operators are required to enter location data for newly installed subsurface installations into a geographical information system (GIS). The California Regional Common Ground Alliance identified an issue: what constitutes a subsurface installation as “new”? The Board began exploring what constitutes the meaning of “new” through these various activities throughout 2023.

5.6.1 Forming the Geographic Information System Committee

To aid in researching and understanding the meaning of “new” for subsurface installations being mapped in a GIS pursuant to Government Code § 4216.3(c)(5), the Board created the GIS Mapping Committee during the July 2023 board meeting.

5.6.1.1 Results

- The Board created a GIS Mapping Committee of members Munoz and Voss.

5.6.2 Existing GIS Usage Survey

To understand what constitutes a “new” subsurface installation and to gather insight on the challenges operators face when mapping buried facilities in GIS, the GIS Mapping Committee released a survey to assess the current state of GIS mapping by operators.

The survey aimed to understand if operators:

- Are mapping their buried facilities using GIS.
- Made a complete transition to digital recordkeeping.
- Integrated GIS fully with asset management and other daily operations, including engineering and operations and maintenance.
- Implemented procedures to maintain their GIS databases thereby ensuring base maps and data layers are complete and accurate.
- Are facing any challenges when mapping buried facilities within GIS.

5.6.2.1 Results

The results of the survey were presented at the November 2023 meeting. Utility operators provided 103 responses, which included:

- Of the approximately 300 buried facilities represented by respondents, approximately 68% of the facility operators have begun mapping their buried facilities.

- Government respondents reported that nearly all their reclaimed water, sewer/stormwater and electrical systems are being mapped to some extent in their GIS systems.
- Non-government respondents reported lower amounts of facilities being mapped in GIS.
- Of the 199 buried facilities, approximately 64% of the facilities have been mapped in GIS for more than five years but only about 25% broadband facilities have been mapped for more than five years.
- 28 out of 73 respondents did not know the update frequency of their basemaps. 21 out of 73 respondents indicated the basemap was updated monthly.
- 17 out of 71 respondents reported updating GIS within three months of buried facility installation. 13 respondents indicated they updated GIS within one month and 10 respondents indicated updates within ten days.
- Government respondents ranked asset inventory and asset management as the most prevalent GIS mapping use. Non-government respondents ranked providing responses to 811 tickets as the most prevalent use. Respondents indicated the top challenges of mapping in GIS include:
 - Collecting accurate field coordinates.
 - Updating and maintaining accurate GIS data.
 - Integrating GIS into asset management or construction management systems.

5.6.3 Conclusions

- Operator use of GIS in mapping their facilities is already prevalent, though not universal.
- The GIS Committee expects to begin developing regulatory language and safety standards in the second half of 2024.

5.7 Lessons Learned Regional Notification Center Technology Updates

In 2022, USA North transitioned ticket system vendors from Norfield Development Partners to PelicanCorp. Following this transition, the Board received complaints and requested staff to identify lessons learned from this transition. Staff made an information of USA North and presented an 811 system assessment to the Board.

5.7.1 811 Notification Center System Transition Discussion

Staff presented the complexity of 811 notification system during the April Board Meeting and suggested working with both 811 notification centers to further develop lessons learned.

5.7.1.1 Results

Lessons learned included:

- Ticketing systems have become more complex due to the adoption of online request options and electronic positive response.
- An API is offered for operators' ticket management systems to interact with USA North's system but there is no API to allow excavator ticket management system to make and receive ticket information.
- Current system limitations include not updating the legal start date and time or otherwise recording mutual agreement between operators and excavators.
- Next steps include:
 - Reviewing USA North communications to excavators and operators.
 - Reviewing factors affecting transition timing.
 - Reviewing issues arising from the transition.

5.7.2 Conclusions

- With continued improvements in electronic response and other 811 systems, technology upgrades and transitions will continue at a hastened pace.

5.8 Non-Violation Safety Issues

As staff conducted damage and complaint investigations, they identified certain issues as non-violations which brought up safety concerns for further Board discussion.

5.8.1 Board Discussion of Non-Violation Safety Issues

In 2023, the Board discussed non-violation safety issues that arose from damage and complaint investigations.

April 10, 2023

- C221950004: Railroad Tracks in Patterson No-Call Complaint
 - The case involved, among other issues, an operator driving a probe rod into the ground without notifying 811.

- Statute exempts both the two-day wait prior to excavation and the 811 notification in case of emergency. The Board discussed whether or not the 811 notification exemption should continue to exist.
- An operator representative stated that emergency probing may not merit an 811 notification, as it would trigger all operators to locate and mark, and probing would be used to determine if there was an emergency situation that in-of-itself would constitute an emergency excavation, in which an 811 notification would be more relevant.

July 11, 2023

- C222500001: El Dorado County Complaint
 - The mobile home park owner operated a master metered propane gas system, which—since it was contained in the property—appeared not to require the owner to be an 811 notification center member.
 - The Board discussed if mobile home park owners should be required to be members of 811. The Board discussed how mobile home parks generally do not have their utilities mapped and do not know where and when they end in the park. Having maps of the master meter system and facilities starting in and out of the park is important information due to determining who is responsible for the private vs. public facilities.
- D223400004 and D222980003 Sacramento and San Francisco Complaints
 - Both the Sacramento and San Francisco cases were similar due to the challenges that excavators faced in identifying owners of unmarked lines and the owner’s contact information not being updated.
 - The Board discussed the need to develop processes to be able to contact operators and hold them accountable for keeping their contact information updated. Collaboration with the notification centers is needed to make sure operators have updated contact information and are easily accessible to contact by investigators, call centers, or other parties.
 - The Board discussed how some operators are hesitant to participate in investigations and may need to evaluate ways to improve cooperation.

5.8.1.1 Results

- The Board expects to review these issues again following more investigation examples.

5.8.2 Conclusions

- While some current exemptions in law are problematic policy, elimination of these exemptions would create significant noncompliance. Addressing these issues prior to exemption elimination requires considerable consideration.

2024 MEETING SCHEDULE

January 8-9: Sacramento

April 8-9: Riverside

July 8-9: Sacramento

September 9-10: Southern California

November 18-19: Sacramento



**UNDERGROUND SAFETY BOARD
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ATTACHMENT 1: NOTICE OF PROBABLE VIOLATIONS AND BOARD ACTION

Attachment 1: Notices of Probable Violation and Board Action

The following table shows the 54 Notices of Probable Violation issued in 2023 resulting from 15 investigations, and the Board's action on each.

Case #	Respondent	Date Issued	Brief Description	Hearing Date	Board Action	Enforcement Jurisdiction
CAS-01491-J2J3Q4	USA Construction	2/2/2023	Excavating without a valid ticket, failure to notify one-call center of damage	4/10/2023	Education/\$10,000	CSLB
C221950004	Miguel Delgado	2/3/2023	Excavating without a valid ticket	4/10/2023	Education	Board
C221950004	Angelica Delgado	2/3/2023	Excavating without a valid ticket	4/10/2023	Education	Board
C221950004	Kinder Morgan	2/3/2023	Excavating without a valid ticket	4/10/2023	No Action	OSFM
D223400004	MCI Worldcom/Verizon	5/5/2023	Refusal to cooperate with the investigation	7/10/2023	Education	Board
D223400004	AT&T/Pacbell	5/9/2023	Refusal to cooperate with the investigation	7/10/2023	No Action	Board
D223400004	Sacramento County Regional Park	5/9/2023	Excavating without a valid ticket	7/10/2023	Education	Local
D222980003	Phoenix Electric	5/8/2023	Failure to report the damage to the regional notification center	7/10/2023	Education	CSLB
D222980003	SF Heat & Power	5/8/2023	Failure to provide EPR, refusal to cooperate, and failure to maintain current contact information	7/10/2023	Education	Local
D222980003	SF Municipal	5/8/2023	Failure to provide EPR	7/10/2023	Education	Local
D222980003	SF Parking	5/8/2023	Failure to provide EPR, refusal to cooperate, and failure to maintain current contact information	7/10/2023	Education	Local
D222980003	SF Public Works	5/8/2023	Refusal to cooperate with the investigation, and failure to maintain current contact information	7/10/2023	Education	Local

D222980003	SF Technology	5/8/2023	Failure to provide EPR	7/10/2023	Education	Local
D222980003	SF Water	5/8/2023	Failure to provide EPR, refusal to cooperate, and failure to maintain current contact information	7/10/2023	Education	Local
C222500001	21st Century Plumbing Heating Air	5/5/2023	Excavating without a valid ticket, failure to call 911, failure to notify the call center of damage	7/10/2023	Education/\$5,000	CSLB
23NTS00001	ARK Plumbing	9/19/2023	Excavating without a valid ticket, failure to call 911, failure to notify the call center of damage	11/13/2023	Education/\$1,000	CSLB
D230130001	City of Atascadero Street and Storm Drains	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
D230130001	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
CAS-01555-W6J5P1	Reliance Fence Co, Inc.	9/18/2023	excavating without a valid ticket, failure to call 911, failure to notify the call center of damage	11/13/2023	Education/\$1,000	CSLB
C223470004-0096	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0096	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$5,000	Local
C223470004-0096	Paramount Petroleum Corporation	9/18/2023	Failure to provide EPR	11/13/2023	Education	OSFM
C223470004-0096	Los Angeles County Public Works	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0096	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-1105	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local

C223470004-1105	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$1	Local
C223470004-1105	Paramount Petroleum Corporation	9/18/2023	Failure to provide EPR	11/13/2023	Education	OSFM
C223470004-1105	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-0118	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0118	Los Angeles County Public Works	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0118	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$1	Local
C223470004-0118	Paramount Petroleum Corporation	9/18/2023	Failure to provide EPR	11/13/2023	Education	OSFM
C223470004-0118	Paramount Pipeline, LLC	9/18/2023	Failure to provide EPR	11/13/2023	Education	OSFM
C223470004-0118	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-0138	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0138	City of Los Angeles Department of Transportation	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0138	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$1	Local
C223470004-0138	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-0201	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local

C223470004-0201	City of Los Angeles Department of Transportation	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0201	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$1	Local
C223470004-0201	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-0254	City of Los Angeles	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0254	City of Los Angeles Department of Transportation	9/18/2023	Failure to provide EPR	11/13/2023	Education	Local
C223470004-0254	Los Angeles Department of Water and Power (LAPW3)	9/18/2023	No response to ticket	11/13/2023	Education/\$1	Local
C223470004-0254	Paramount Petroleum Corporation	9/18/2023	Failure to provide EPR	11/13/2023	Education	OSFM
C223470004-0254	Southern California Gas Company	9/18/2023	Failure to provide EPR	11/13/2023	Education	CPUC
C223470004-0096	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local
C223470004-1105	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local
C223470004-0118	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local
C223470004-0138	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local

C223470004-0201	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local
C223470004-0254	Los Angeles Department of Water and Power (LAP03)	11/9/2023	Failure to provide EPR	To be heard in 2024		Local
D230030002	City of Oakland	11/9/2023	Failure to provide EPR	To be heard in 2024		Local