
California Underground Facilities Safe Excavation Board
(“Dig Safe Board”)

August 10, 2020

Agenda Item No. 3 (Action Item) – Staff Report

*Electronic Positive Response – Consideration of Applications Received in the
Month of July 2020*

PRESENTER

Jeff Brooks, Attorney

APPLICATION FOR CONSIDERATION

The Board has received one application for extension of the electronic positive response deadline. The application is attached.

The Regulation¹ provides that the Board may extend an operator’s compliance deadline for good cause, which the Board defined in this way:

- (c) To establish good cause, an operator must establish that the operator will be unable to provide electronic positive responses to the appropriate regional notification center before January 1, 2021 for reasons that arise from a need to hire personnel, train personnel, or procure software.

ATTACHMENTS

A: EPR Extension Application EPR-2020-07-17-001 *Los Angeles Department of Water and Power*. Received July 17, 2020.

¹ 19 CCR 4020 “Extension of Time in Which to Provide Electronic Positive Response Through Regional Notification Centers,”
[https://govt.westlaw.com/calregs/Document/I09E07E3DFE0B4F61B30AD77BEABCE7D0?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)](https://govt.westlaw.com/calregs/Document/I09E07E3DFE0B4F61B30AD77BEABCE7D0?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default))

ATTACHMENT A

EPR EXTENSION APPLICATION EPR-2020-07-17-001 LOS ANGELES DEPARTMENT OF WATER AND POWER. RECEIVED JULY 17, 2020

Information Page

Application ID: EPR-2020-07-17-001
Received Date: July 17, 2020
Operator Name: City of Los Angeles, Department of Water & Power
Member ID(s): LAP04, LAP4W, LAWP2, LAWP3
Submitter Name: Fraser Campbell
Submitter Title: Manager of Power Transmission & Distribution
Underground Conduit Construction and USA
Operations
Submitter Email: fraser.campbell@ladwp.com
Submitter Phone: off. (213) 367-0406 Cell. (213) 792-6465
Mailing Address: 111 North Hope Street Rm# 856
Mailing City: Los Angeles
Mailing State: CA
Mailing Zip: 90012

Needs Identified

A Need to Hire Staff: Yes
A Need to Train Staff: Yes
A Need to Procure Software: Yes

Explanation Page 1

Thank You for the Opportunity for LADWP to request an extension. This will allow us to upgrade our Underground Service Alert System to comply with Electronic Positive Response (EPR). In order to be compliant with the new changes in Government Code 4216.3, we believed we were on track to go live on January 1st, 2021. Then in March the COVID-19 Pandemic shutdown occurred, which has disrupted our ability to conduct normal business let alone be in compliance with EPR. I will explain how our current system functions, and what we had been doing up to March 2020 to achieve compliance with EPR. Then finally five major issues that LADWP will need to address in order to comply with 4216.3.

Currently LADWP's USA Operations Offices (Metro & Valley) uses a soon to be antiquated E-mail Based USA Ticket System from the mid 1980's. We have two computers in each of the two USA Offices here in Los Angeles that receives the e-mailed USA Tickets directly from DigAlert of Southern California. We have made our system work to protect the Public

and the Departments Assets, and comply with California Government Code 4216 for decades. With the change in the Government Code looming on January 1st, 2021 we needed to completely change our USA Ticket Operation. So I reached out to our partners at DigAlert. We were looking for some guidance to implement a Web Based Ticket Management System that could perform the functions for EPR. At the end of 2019 some of my staff, our IT group and I held meetings with DigAlert to explore the web based options. We had decided to go with Norfield, a software company commonly used in the protection of underground facilities. We had begun talks, and had our USA Offices using Norfield's test programs to become familiar with its operation. Things were progressing, and we were in the process of purchasing new devices to accommodate the new system. But then the COVID-19 shut down happened in March bringing everything to a complete halt! Our focus had to change to protecting our employees, protecting the public and our facilities. There was no time to continue to explore the New Web Based System, nor support from our IT Group since they were affected too. We needed to process our incoming USA tickets with less staffing and get our facilities marked with less Locators. It has been very difficult to manage, rotating shifts, employees assigned to pod groups to prevent cross infections. Just when we thought we were going to get back to a "new normal", the latest COVID-19 spike here in Los Angeles County has but us back to where we were at the onset of the Pandemic. We have lost valuable time to be up and running by the January 1st, 2021, the deadline for EPR.

Explanation Page 2

Here are the five major issues that are not insurmountable, but will take time to work through to be able to achieve compliance:

- The COVID-19 Pandemic has made staffing and performing our normal operational functions extremely difficult. The safety of our employees, the public and the members of the excavation community are of the highest priority. In time things should return to a "new normal", the question is when will this take place? But we here at LADWP remain optimistic.
- All contracts here at The Department of Water & Power need time to review due to scrutiny and rules that the City of Los Angeles mandates for all our service contracts. The process takes time for public comment, and protest. Then the contract is sent to the LADWP Board of Commissioner's for their approval. All this should have begun in early June of 2020.
- LADWP has been in a hiring freeze since the start of the Pandemic, we have just started to conduct interviews again via a WebEx. We need time to hire more staff, especially in the IT, clerical support, and the replacement of retirees in our existing USA Group.
- Once we have hired operational staff, we need to not only train them to maintain our current system, because the USA Tickets never stop. As well as learn our new system with training needed across the whole group. This includes office and field personnel to operate the new devices and system.
- Finally, we will need to work out the bugs of the new system, yet keep the core function of locating and marking Water & Power Infrastructure uninterrupted.

So in conclusion, The Los Angeles Department of Water & Power is respectfully requesting an extension until December 31st, 2021 in order to comply with California Government Code 4216.3 Electronic Positive Response. We were on the road to compliance, but had to pull over due to the COVID-19 Pandemic. Thank you for your consideration...

Fraser Campbell
LADWP

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