



**CALIFORNIA UNDERGROUND FACILITIES SAFE EXCAVATION BOARD
INVESTIGATION DIVISION
INVESTIGATION REPORT**

DATE: April 3, 2023
CASE No.: **D222980003**
INCIDENT: Damage to an unmarked facility at 16th Street and Potrero Avenue in San Francisco, California.

Violations:

City and County of San Francisco Water Department

Government Code § 4216.3(c)(1)(A): Failure to provide electronic positive response.
Cal. Code Regs., title 19, §4151(c): Refusal to cooperate with the investigation.
Cal. Code Regs., title 19, §4003(a): Failure to maintain current contact information with the regional notification center.

City and County of San Francisco Public Works Department

Cal. Code Regs., title 19, §4151(c): Refusal to cooperate with the investigation.
Cal. Code Regs., title 19, §4003(a): Failure to maintain current contact information with the regional notification center.

City and County of San Francisco Heat/Power/Light Department

Government Code § 4216.3(c)(1)(A): Failure to provide electronic positive response before the legal start date and time.
Cal. Code Regs., title 19, §4151(c): Refusal to cooperate with the investigation.
Cal. Code Regs., title 19, §4003(a): Failure to maintain current contact information with the regional notification center.

City and County of San Francisco Parking & Traffic Department

Government Code § 4216.3(c)(1)(A): Failure to provide electronic positive response.
Cal. Code Regs., title 19, §4151(c): Refusal to cooperate with the investigation.
Cal. Code Regs., title 19, §4003(a): Failure to maintain current contact information with the regional notification center.

City and County of San Francisco Department of Technology

Government Code § 4216.3 (c)(1)(A): Failure to provide electronic positive response.

San Francisco Municipal Transportation Agency Overhead Lines Department

Government Code § 4216.3(c)(1)(A): Failure to provide electronic positive response.

Phoenix Electric Company

Government Code § 4216.4(c)(3): Failure to report damage to the regional notification center within 48 hours.

Executive Summary:

Phoenix Electric Company was excavating to install a duct bank for the San Francisco Municipal Transportation Agency by trenching with an excavator when they struck an unmarked facility on October 22, 2022. After receiving locate requests following Phoenix Electric’s first contact with the regional notification center (on October 11, 2022, ticket number X228404711-00X), four operators on the ticket did not provide an electronic positive response, and one operator provided an electronic positive response the day after the “legal start” date indicated on the ticket. All four operators are members of the regional notification center.

Three days after damaging the unmarked line, Phoenix Electric contacted the regional notification center, which generated ticket number X228404711-01X (damage ticket). No operator claimed ownership of the unmarked line following the creation of that damage ticket.

During the investigation, the investigator asked the nine operators on the ticket about ownership of the unmarked, damaged line. Five operators responded to those requests and denied ownership. Four operators, all part of the City and County of San Francisco, did not respond to the investigator’s request.

The investigation was not able to determine the owner of the unmarked facility that Phoenix Electric encountered.

In February 2023, the Board mailed Notices of Probable Violation (NOPV) to all the subjects of this investigation and received the mail postmarked return to sender for all NOPV’s.

Report Date:	Case Number:	Notification Date:
April 3, 2023	D222980003	October 25, 2022

Subjects of Investigation:

City and County of San Francisco Water Department
30 Van Ness Avenue, 5th Floor
San Francisco, California 94102

City and County of San Francisco Public Works Department
30 Van Ness Avenue, 5th Floor
San Francisco, California 94102

City and County of San Francisco Heat/Power/Light Department
30 Van Ness Avenue, 5th Floor
San Francisco, California 94102

City and County of San Francisco Parking & Traffic Department
30 Van Ness Avenue, 5th Floor
San Francisco, California 94102

City and County of San Francisco Department of Technology
1 South Van Ness Avenue, 2nd Floor
San Francisco, California 94103

San Francisco Municipal Transportation Agency
Overhead Lines Department
2502 Alameda Street
San Francisco, California 94103

Phoenix Electric Company
1350 Van Dyke Avenue
San Francisco, California 94124

Reporting Party Information:

Arjun Subbarum
Phoenix Electric Company
1350 Van Dyke Avenue
San Francisco, California 94124

Prior Relevant Board Actions:

None

Date and Time of Incident:

October 22, 2022

Location of the Incident:

Intersection of 16th Street and Potrero Avenue
San Francisco, California 94110

Ticket:

X228404711-00X
X228404711-01X

Operator:
Unidentified

Excavator:
Phoenix Electric Company

Facility Type Damaged:
4-inch conduit with interior unidentified cable

Scene Description:
Multilane intersection in an urban area near a crosswalk with trenching excavation running through the middle of 16th Street.

Investigation:
Phoenix Electric submitted damage ticket X228404711-01X (Exh. 1.), at 2:39 pm on October 25, 2022, about a possible telecommunications facility that it had damaged on October 22, 2022, at the intersection of 16th Street and Potrero Avenue in San Francisco. (Exh. 2.) Phoenix Electric submitted damage notification D22298003 through the damage reporting portal, which was received by the Board's investigation case management system at 2:51 pm on October 25, 2022.



Photo 1: Photo of the intersection of 16th Street and Potrero Avenue from Google Maps. Red square indicating approximate area of the incident.

Damage to Unidentified Facility

I interviewed Arjun Subburam of Phoenix Electric Company by phone on October 27, 2022, and again, via email, on November 9, 2022, (Exh. 2 and 3.) After the phone interview, I immediately

On October 31, 2022, I emailed Subburam regarding whether the dig ticket number was correct and whether any operator had claimed the damaged utility. Subburam did not respond (Exh. 2.)

On November 2, 2022, I again requested information from Subburam by email. Subburam that same day (Exh. 2.)

On November 9, 2022, as I still had not received the photographs or additional requested information from Subburam, I emailed him. Subburam replied by email on November 9, 2022, and indicated the following:

- Phoenix Electric Company was excavating with a Cat 305 excavator and struck an unmarked facility at a depth of about 30 inches.
- The facility was a 4-inch conduit, possibly made of asbestos that was damaged.
- The conduit contained an interior cable that was undamaged in the incident.
- The cable inside the conduit was possibly a telecommunications cable.
- The facility was not either a water or sewer facility, and they believed the interior cable to be electrified.
- Subburam believed the facility was a telecommunication Comcast facility. Some utility operators had visited the site in response to the damaged ticket X228404711-01X.
- Pacific Gas & Electric visited the site and stated it was not their facility.
- No operator had claimed ownership of the facility as of November 9, 2022. (Exh. 2 and 3.)

Phoenix Electric Company provided the following photos of the unmarked facility to aid in the investigation.



Photo 2: Photo and description in red provided by Phoenix Electric Company.



Photo 3: Photo and box in red provided by Phoenix Electric showing the facility conduit and interior cable running roughly north-south along Potrero Street. Black box inserted by investigator to remove uncertain description provided by Phoenix Electric Company.

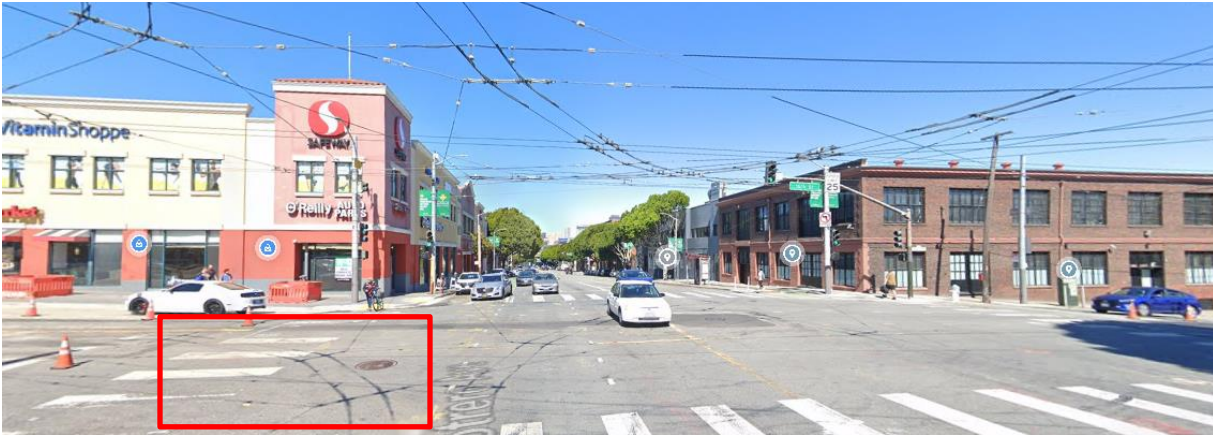


Photo 4: A wider-angle view of the intersection taken from Google Maps with the red box created by investigator indicating the approximate incident location.

Electronic Positive Responses

The initial ticket X228404711-00X was created on October 11, 2022, with a legal start time of October 13, 2022, at 5:01 pm. (Exh. 4.)

The City and County of San Francisco Heat/Power/Light Department provided its electronic positive response late, on October 14, 2022, at 6:24 am, with the code "(001) Clear – No Conflict". (Exh. 5.)

Four operators did not provide an electronic positive response to the ticket according to a search of the USA North 811 Ticket Report database by the investigator (member responses below), each listed with their USA North 811 Member Code as it appears on the ticket:

1. CTYSF2 – City and County of San Francisco Water
2. CTYSF0 – City and County of San Francisco Parking and Traffic
3. MUNUTL – Municipal Overhead Lines Department
4. SFOTEC – City and County of San Francisco Department of Technology

The remaining operators provided an electronic positive response code before the legal start.

Ticket Responses for: X228404711-00X						
Member ^	Name	Rev	Responded	By	Response	
COMNCA	COMCAST - NORTHERN CALIFORNIA	00X	10/12/22 01:26:10 PM	AAA	(001) CLEAR - NO CONFLICT	
CTYSF2	CITY OF SAN FRANCISCO - WATER	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed	
CTYSF3	CITY OF SAN FRANCISCO - PUBLIC WORKS	00X	10/13/22 11:21:31 AM	Grace Barboza	(001) CLEAR - NO CONFLICT	
CTYSF4	CITY OF SAN FRANCISCO HEAT/POWER/LIGHT	00X	10/14/22 06:24:51 AM	Robert Pascual	(010) LOCATE AREA MARKED	
CTYSF4	CITY OF SAN FRANCISCO HEAT/POWER/LIGHT	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed	
CTYSFO	CITY OF SAN FRANCISCO PARKING & TRAFFIC	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed	
MUNUTL	MUNI OVERHEAD LINES DEPARTMENT	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed	
PACBEL	PACIFIC BELL	00X	10/12/22 01:27:21 PM	UQ Responder	(010) LOCATE AREA MARKED	
PGESFO	PGE DISTRIBUTION - SAN FRANCISCO	00X	10/13/22 10:18:07 AM	PGE	(010) LOCATE AREA MARKED	
PGEUET	PGE UNDERGROUND ELECTRIC TRANSMISSION	00X	10/12/22 12:51:09 PM	PGE	(010) LOCATE AREA MARKED	
SFOTEC	CITY COUNTY SAN FRANCISCO DEPT OF TECH	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed	

Photo 5: Member electronic positive responses to Ticket X228404711-00X recorded in the Newtin USA North Ticket Report database. Screenshot taken by investigator on December 29, 2022. (Exh. 5.)

Letters to Operators Regarding the Unidentified Facility

I emailed USA North 811 for contact information for all members associated with Ticket X228404711 and received a spreadsheet of that information on November 22, 2022 (Exh. 14 and 15).

Using the photographs provided by the excavator, on November 28, 2022, I sent letters to each of the operators listed on the ticket requesting ownership of the facility and how the operator came to that determination.

Four operators responded to the first request:

On December 13, 2022, Pacific Gas & Electric (PG&E) responded via email to my request and stated:

- PG&E does not own the facility.
- The “excavator verified it was a communication line,” and
- A PG&E response was not required. (Exh. 8.)

On December 1, 2022, Comcast responded via email to my request and stated:

- Comcast does not own the facility.
- Comcast facilities were located across the intersection of the incident site and markings were still present on site.
- That the closest vault to the construction was PacBell/AT&T. (Exh. 6, 7.)

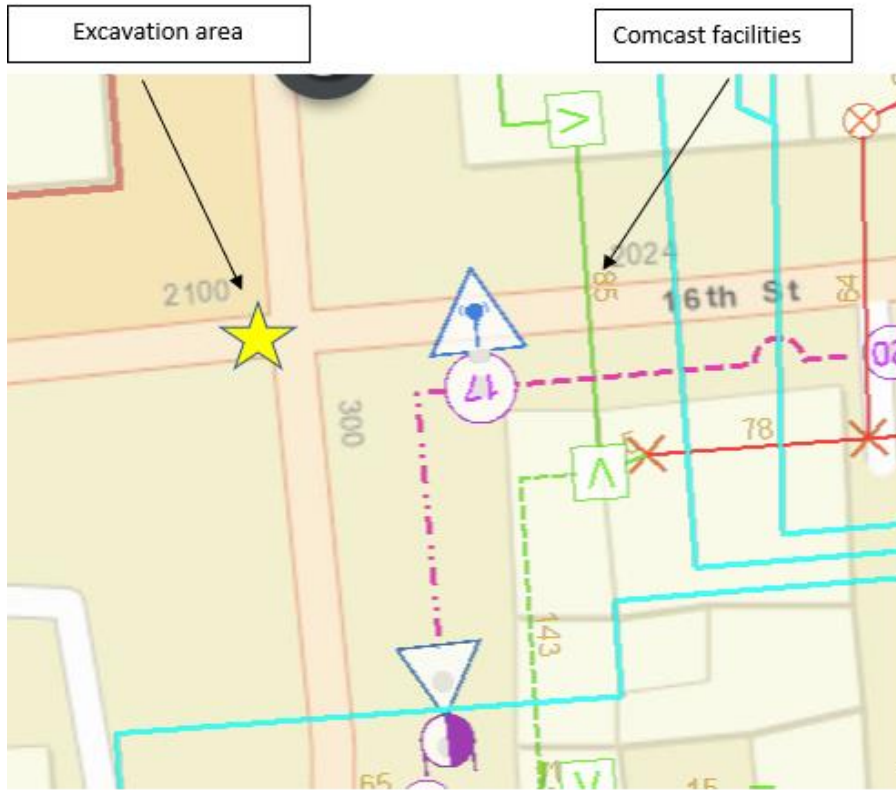


Photo 6: Map and information provided by Comcast. (Exh. 7.)



Photo 7: Map, description, and drawings provided by Comcast corresponding to map in Photo 5. (Exh. 7.)

On November 29, 2022, the City and County of San Francisco Department of Technology responded via email to my request and stated:

- City and County of San Francisco Department of Technology do not own this facility.
- They have facilities on the eastern side of Potrero on the side of the intersection that is across from where the line was damaged.
- That the Department of Technology facilities consist of four 2-inch conduits. (Exh. 9.)

On December 7, 2022, the San Francisco Municipal Transportation Agency Overhead Lines Department responded via email to my request and stated:

- The San Francisco Municipal Transportation Agency engineer, in charge of the project, stated they did not own the facility.
- The contractor had identified the facility as a telecommunications facility. (Exh. 10.)

On December 27, 2022, AT&T responded via email to my second request from December 14, 2022, and stated:

- Did not own the facility.
- AT&T owns a multi-conduit structure in the area that was marked on October 12, 2022, running east to west.
- AT&T visited the site on October 26, 2022, in response to the damaged ticket and determined the facility was not theirs. (Exh. 11.)

Four operators did not respond to my email information requests, the first request was on November 28, 2022, and the second was on December 14, 2022. (Exh. 12, 13.) Contact information obtained from the ticket database maintained by the regional notification center, USA North, indicates that those four operators have the same address and point of contact. Especially, as to these four operators I sent the first letter on November 28, 2022, (Exh. 12) and the second letter on December 14, 2022. (Exh. 13.) Given the single point of contact, I directed the letter to all four operators. None of the operators ever responded. For clarity, these operators are:

1. CTYSF2 – City and County of San Francisco Water
2. CTYSF0 – City and County of San Francisco Parking and Traffic
3. CTYSF3 – City and County of San Francisco Public Works
4. CTYSF4 – City and County of San Francisco Heat/Power/Light

Mailing Notices of Probable Violation

In February 2023, the Board mailed Notices of Probable Violation (NOPV) to all the subjects of this investigation:

1. City and County of San Francisco Water Department
2. City and County of San Francisco Public Works Department
3. City and County of San Francisco Heat/Power/Light Department
4. City and County of San Francisco Parking & Traffic Department
5. City and County of San Francisco Department of Technology
6. San Francisco Municipal Transportation Agency Overhead Lines Department
7. Phoenix Electric Company

On February 15, 2023, the Board received 6 NOPV's postmarked as return to sender for the following subjects of the investigation:

1. City and County of San Francisco Water Department
2. City and County of San Francisco Public Works Department
3. City and County of San Francisco Heat/Power/Light Department
4. City and County of San Francisco Parking & Traffic Department
5. City and County of San Francisco Department of Technology
6. San Francisco Municipal Transportation Agency Overhead Lines Department

The Board mailed NOPV's to four operator members at the address on file at the regional notification center provided by USA North 811 on November 22, 2022 (Exh. 15.):

1. CTYSF2 – City and County of San Francisco Water
2. CTYSF0 – City and County of San Francisco Parking and Traffic
3. CTYSF3 – City and County of San Francisco Public Works
4. CTYSF4 – City and County of San Francisco Heat/Power/Light

On February 16, 2023, the investigator emailed USA North 811 for updated contact information for the operator members on Ticket X228404711 and received updated contact information on March 6, 2023. (Exh. 16 and 17.)

In March 2023, the Board received the NOPV mailed to Phoenix Electric Company as return to sender.

Findings:

- 1. City and County of San Francisco Heating/Power/Light Department (USA North Member Code CTYSF4) provided its electronic positive response after the legal start time.**

Government Code §4216.3 (c)(1)(a) requires operators to respond with an electronic positive response prior to the legal start of the ticket. USA North Ticket Report records show that CTYSF4 provided a late electronic positive response to ticket X228404711-00X. The legal start for this ticket was October 13, 2022, at 5:01 pm and the response from CTYSF4 is recorded as 6:24 am on October 14, 2022.

- 2. Four operators did not provide an electronic positive response: (1) City and County of San Francisco Department of Technology (USA North Member Code SFOTEC), (2) City and County of San Francisco Water (USA North Member Code CTYSF2), (3) City and County of San Francisco Parking & Traffic (USA North Member Code CTYSF0), and (4) San Francisco Municipal Transportation Agency Overhead Lines Department (USA North Member Code MUNUTL).**

Government Code §4216.3 (c)(1)(a) requires operators to respond with an electronic positive response prior to the legal start of the ticket. USA North Ticket Report records show that USA North 811 ticket system assigned these operator members electronic positive response “Code 999 – Utility has not provided 811 center with information to be displayed” and did not provide a response as of its search on December 19, 2022.

3. None of the operators who responded to the investigator's request for information claimed ownership of the damaged facility.

Operators PG&E, AT&T, Comcast, City and County of San Francisco Department of Technology, and San Francisco Municipal Transportation Agency Overhead Lines Department denied owning the unmarked, damaged facility.

4. Four operators that are part of the City and County of San Francisco failed to respond to the investigator's requests for information: (1) City and County of San Francisco Water (USA North Member Code CTYSF2), (2) City and County of San Francisco Parking and Traffic (USA North Member Code CTYSF0), (3) City and County of San Francisco Public Works (USA North Member Code CTYSF3), and (4) City and County of San Francisco Heat/Power/Light (USA North Member Code CTYSF4) departments.

CCR 19 § 4151(c) states that excavators or operators that take actions reasonably known to hinder or impede an investigation are subject to sanctions.

The City and County of San Francisco Water (CTYSF2), Parking and Traffic (CTYSF0), Public Works (CTYSF3), and Heat/Power/Light (CTYSF4) departments did not respond to the first and second requests to determine whether they owned the facility in question and how they arrived at that determination.

5. Phoenix Electric reported the damage to the regional notification center after the closure of the 48-hour requirement.

Government Code §4216.4 (c)(3) requires excavators to report the discovery or occurrence of any facility damage to the regional notification center within 48 hours.

Phoenix Electric stated that the damage to this facility occurred on October 22, 2022 and submitted damage ticket X228404711-01X to USA North 811 on October 25, 2022, outside of the 48-hour requirement.

6. Four operators failed to maintain current contact information with the regional notification center: (1) City and County of San Francisco Water (USA North Member Code CTYSF2), (2) City and County of San Francisco Parking and Traffic (USA North Member Code CTYSF0), (3) City and County of San Francisco Public Works (USA North Member Code CTYSF3), and (4) City and County of San Francisco Heat/Power/Light (USA North Member Code CTYSF4) departments.

CCR 19 § 4003 (a) states that members of regional notification centers must maintain current contact information and update the regional notification center with any changes of their contact information.

The Board mailed Notices of Probable Violation (NOPV) to four operator members at the address provided by the regional notification center and the mail was returned to the Board postmarked as return to sender.

The City and County of San Francisco Water (CTYSF2), Parking and Traffic (CTYSF0), Public Works (CTYSF3), and Heat/Power/Light (CTYSF4) departments did not maintain current contact information with the regional notification center.

Investigator Name	Supervisor Name
Jeff McClenahan	Daysi Alcantar
Signature	Signature
<i>Jeff McClenahan</i>	<i>Daysi Alcantar</i>

Witness List:

Name: Arjun Subburam

Organization: Phoenix Electric Company

Address: 1350 Van Dyke Avenue, San Francisco, California 94124

Knowledge of: Incident events

Exhibit List:

Exhibit #	Description	Date Received	Received From
1	Damage Ticket # 228404711-01X	10/31/2022	USA North 811 Ticket Report Search, Investigator
2	Email with Arjun Subburam	11/9/2022	Phoenix Electric Company
3	Interview with Arjun Subburam	10/27/2022	Arjun Subburam
4	Ticket # X228404711-00X	10/31/2022	USA North 811 Ticket Report Search
5	Electronic Positive Responses to Damage Ticket # X228404711-00X	12/28/2022	USA North 811 Ticket Report Search
6	Steve Belluzzi response to Abandoned Facilities Request	12/1/2022	Comcast
7	Comcast Diagrams in response to Abandoned Facilities Request	12/1/2022	Comcast
8	Pacific Gas and Electric response to Abandoned Facilities Request	12/13/2022	Aaron Lindh
9	San Francisco Department of Technology response to Abandoned Facilities Request	11/29/2022	Brian Roberts
10	San Francisco Municipal Overhead Lines Department response to Abandoned Facilities Request	12/6/2022	John Orkes
11	AT&T response to Abandoned Facilities Request	12/27/2022	Wayne Scott
12	Abandoned Facilities Request to City and County of San Francisco Departments	11/28/2022	Investigator
13	Abandoned Facilities Request Second Notice to City and County of San Francisco Departments	12/14/2022	Investigator

14	Member Contact Information Spreadsheet from USA North 811 for Ticket X228404711	11/22/2022	Trevor Harris
15	Email from USA North 811 with Contact Information	11/22/2022	Trevor Harris
16	Email from USA North 811 with Updated Contact Information for Ticket X228404711	3/6/2023	Trevor Harris
17	Updated Contact Information for Ticket X228303711 Spreadsheet	3/6/2023	Trevor Harris

Exhibit 1

Ticket: X228404711-01X

MBRCOD 00001A USAN 10/31/22 09:16:52 X228404711-01X DMEX RUSH POLY LREQ

Ticket: X228404711 Rev: 01X Created: 10/25/22 14:39 User: TFT Chan: CSR

Work Start: 10/13/22 17:01 Legal Start: 10/13/22 17:01 Expires: 11/08/22 23:59
Response required: N Priority: 0

Excavator Information

Company: PHOENIX ELECTRIC COMPANY
Co Addr: 1350 VAN DYKE AVENUE
City : SAN FRANCISCO State: CA Zip: 94124
Created By: ARJUN SUBBURAM Language: ENGLISH
Office Phone: 415-760-0431 SMS/Cell:
Office Email: ASUBBURAM@PECSF.COM

Site Contact: ARJUN SUBBURAM
Site Phone: 415-760-0431 Site SMS/Cell:
Site Email: asubburam@pecsf.com

Excavation Area

State: CA County: SAN FRANCISCO Place: SAN FRANCISCO
Zip: 94103,94110
Location: Address/Street: 16TH STREET
: X/ST1: BRYANT ST
:
: USA PEC MARKED IN THE MIDDLE OF THE STREET FROM THE INTERSECTION OF
: 16TH STREET AND BRYANT STREET FOR 900' EAST TOWARDS THE INTERSECTION
: OF 16TH AND POTRERO AVENUE.

Delineated Method: WHITE PAINT

Work Type: DIGGING TO INSTALL DUCT BANK, EXCAVATOR WILL BE USED

Work For : PHOENIX ELECTRIC COMPANY

Permit: N/A Job/Work order:

1 Year: N Boring: N Street/Sidewalk: Y Vacuum: N Explosives: N

Lat/Long

Center Generated (NAD83): 37.765876/-122.411127 37.766112/-122.406583
: 37.765277/-122.411096 37.765513/-122.406552

Excavator Provided:

Polygon : 37.765885/-122.409989 37.765991/-122.408914
: 37.766044/-122.406928 37.766028/-122.406795
: 37.765973/-122.406679 37.765887/-122.406599
: 37.765782/-122.406566 37.765677/-122.406586
: 37.765585/-122.406656 37.765521/-122.406765
: 37.765495/-122.406896 37.765442/-122.408879
: 37.765338/-122.409919 37.765318/-122.410756
: 37.765336/-122.410889 37.765360/-122.410950
: 37.765434/-122.411048 37.765480/-122.411082
: 37.765585/-122.411112 37.765639/-122.411107
: 37.765739/-122.411059 37.765781/-122.411017
: 37.765843/-122.410907 37.765867/-122.410775
: 37.765885/-122.409989

Map link:

https://newtin.usan.org/newtinweb/map_tkt.nap?TRG=8EKgJlDhGj7k3mY-F

Comments:

****DAMAGE**** A DAMAGED LINE FROM TELEPHONE, CABLE TV-CUSTOMER STATES DAMAGED UNMARKED UNKNOWN COMMUNICATION LINE AT INTERSECTION OF 16TH ST AND POTRERO AVE. PLEASE REPORT TO DIG SITE ASAP AND CONTACT CHEWY AT 415-608-3630. PER ARJUN SUBBURAM--10/25/2022 02:37:45 PM

Members:

COMNCA	CTYSF2	CTYSF3	CTYSF4	CTYSFO	MUNUTL	PACBEL
PGESFO	PGEUET	SFOTEC				

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Exhibit 2

From: [AJ Subburam](#)
To: McClenahan, Jeff@EnergySafety
Cc: [Justin Pack](#); [Eugene Briody](#)
Subject: RE: Follow-up to Unknown Facility Damage on 16th/Potrero
Date: Wednesday, November 9, 2022 3:03:32 PM
Attachments: [USAN811 Ticket Entry.pdf](#)
[16th & potrero.pdf](#)

Hi Mcclenahan,

1. Yes the USA ticket for this job is X228404711
2. We believe it's a comcast line.
3. CAT 305E excavator was used during the time of damage.
4. The Comcast line was unmarked, while we were carefully excavating our trench we hit the unmarked comcast line. This was a 4" pipe(maybe asbestos) found at a depth of 30". The cable inside was still not damaged. We cleaned the damaged part of the pipe, installed spliced PVC pipe over the undamaged cable after calling USA as no one claimed for it.
5. This damage happened on 10/22/22. I have attached our USA ticket that was live in this location during this time.

Attached are the pictures of reference.

Thanks,

Arjun Subburam

Assistant Project Manager at Phoenix Electric Company

P 415-760-0431

E asubburam@pecsf.com

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Wednesday, November 9, 2022 2:16 PM
To: AJ Subburam <asubburam@pecsf.com>
Subject: RE: Follow-up to Unknown Facility Damage on 16th/Potrero

Hi Arjun,

Just checking in on these questions and the photos of this facility damage.

If you can please provide the photos, I will follow up with the operators on the ticket and see if they will respond as to their determination whether they own the facility.

Can you confirm the ticket number **X228404711** is correct and answer the following;

- On this ticket you state you think the line was telecom and in conversation you thought electric; which utilities have visited the site to check out the facility?
- Has any utility operator claimed the facility yet?
- What equipment were you using at the time of the damage?

Thanks,

Jeff McClenahan

He/him

Investigator | Underground Investigations Division

(279) 789-1818

Office of Energy Infrastructure Safety

From: AJ Subburam <asubburam@pecsf.com>

Sent: Wednesday, November 2, 2022 9:36 AM

To: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>

Subject: Re: Follow-up to Unknown Facility Damage on 16th/Potrero

Sorry I've been busy.

I'll make sure to respond to this with pictures today.

Thanks,

Arjun Subburam

Assistant Project Manager at Phoenix Electric Company

P 415-760-0431

E asubburam@pecsf.com

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>

Sent: Wednesday, November 2, 2022 9:34:24 AM

To: AJ Subburam <asubburam@pecsf.com>

Subject: RE: Follow-up to Unknown Facility Damage on 16th/Potrero

Hi Arjun,

Please see the attached information request for photos and records associated with this incident. Provide this information by **November 16** to comply with this investigation.

I believe that I was able to locate the ticket if you can confirm it is: **X228404711-01X** ?

Can you confirm the ticket number is correct and answer the following;

On this ticket you state you think the line was telecom and in conversation you thought electric; which utilities have visited the site to check out the facility?

- Has any utility operator claimed the facility?
- What equipment were you using at the time of the damage?

Thanks,

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

(279) 789-1818

[Office of Energy Infrastructure Safety](#)

From: McClenahan, Jeff@EnergySafety

Sent: Monday, October 31, 2022 10:57 AM

To: asubburam@pecsf.com

Subject: Follow-up to Unknown Facility Damage on 16th/Potrero

Hi Arjun,

Thanks for the information last week. I believe that I was able to locate the ticket if you can confirm it is: **X228404711-01X** ?

A few questions if this is correct:

- On this ticket you state you think the line was telecom and in conversation you thought electric; which utilities have visited the site to check out the facility?
- Has any utility operator claimed the facility?
- What equipment were you using at the time of the damage?
- Are you able to provide any photos of the damage and marks?

I'll continue to follow-up to learn more about this possibly abandoned facility.

Thanks,

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

715 P Street, 20th Floor

Sacramento, CA 95814

(279) 789-1818

EnergySafety.ca.gov

Exhibit 3



**CALIFORNIA UNDERGROUND FACILITIES SAFE EXCAVATION BOARD
INVESTIGATION DIVISION
INTERVIEW REPORT**

REPORT DATE: 10/27/2022

CASE NO: CAS-01527-J9L3T5

DATE/TIME OF INTERVIEW: 10/27/2022 10:00 AM

LOCATION OF INTERVIEW: Phone

NAME/ADDRESS OF INTERVIEWEE:

Arjun Subburam,
1350 van dyke avenue
san francisco, CA 94124
Tel: [REDACTED]

NARRATIVE:

Q: What is the ticket number for this project?

Driving right now so don't have it with me but can talk through the incident.

Q: What happened?

16th and Potrero. Have photos of the incident can provide. Not marked and still not marked. Assuming abandoned because first not marked, second called 811 to report the damage and no one has shown up to fix or say anything. All other utilities marked. I think facility is damaged and not only exposed.

Q: Did any utilities return to check on the facility?

Some other utilities did call again. Have been working at this intersection for a while now so know the utilities here. A few swing by the job site and saw if was their utility or not and confirmed with foreman that it was not their utility.

Q: Do you know who confirmed theirs?

PGE confirmed not theirs. Gas confirmed not theirs. PGE high voltage confirmed not theirs. It is definitely not a water or sewer. Definitely an electrical.

Q: Why say that it is an electrical line?

Because it is a 4" line.

Q: Asbestos, is that correct?

Yes, asbestos line.

Investigator Name	Supervisor Name
Jeff McClenahan	Tony Marino

Exhibit 4

Ticket: X228404711-00X

MBRCOD 00001A USAN 10/31/22 09:18:12 X228404711-00X NEW NORM POLY LREQ

Ticket: X228404711 Rev: 00X Created: 10/11/22 14:14 User: ASUBBURAM Chan: WEB

Work Start: 10/13/22 17:01 Legal Start: 10/13/22 17:01 Expires: 11/08/22 23:59
Response required: Y Priority: 2

Excavator Information

Company: PHOENIX ELECTRIC COMPANY
Co Addr: 1350 VAN DYKE AVENUE
City : SAN FRANCISCO State: CA Zip: 94124
Created By: ARJUN SUBBURAM Language: ENGLISH
Office Phone: 415-760-0431 SMS/Cell:
Office Email: ASUBBURAM@PECSF.COM

Site Contact: ARJUN SUBBURAM
Site Phone: 415-760-0431 Site SMS/Cell:
Site Email: asubburam@pecsf.com

Excavation Area

State: CA County: SAN FRANCISCO Place: SAN FRANCISCO
Zip: 94103,94110
Location: Address/Street: 16TH STREET
: X/ST1: BRYANT ST
:
: USA PEC MARKED IN THE MIDDLE OF THE STREET FROM THE INTERSECTION OF
: 16TH STREET AND BRYANT STREET FOR 900' EAST TOWARDS THE INTERSECTION
: OF 16TH AND POTRERO AVENUE.

Delineated Method: WHITE PAINT

Work Type: DIGGING TO INSTALL DUCT BANK, EXCAVATOR WILL BE USED

Work For : PHOENIX ELECTRIC COMPANY

Permit: N/A Job/Work order:

1 Year: N Boring: N Street/Sidewalk: Y Vacuum: N Explosives: N

Lat/Long

Center Generated (NAD83): 37.765876/-122.411127 37.766113/-122.406584
: 37.765276/-122.411096 37.765513/-122.406553

Excavator Provided:

Polygon : 37.765885/-122.409989 37.765991/-122.408914
: 37.766044/-122.406928 37.766028/-122.406795
: 37.765973/-122.406679 37.765887/-122.406599
: 37.765782/-122.406566 37.765677/-122.406586
: 37.765585/-122.406656 37.765521/-122.406765
: 37.765495/-122.406896 37.765442/-122.408879
: 37.765338/-122.409919 37.765318/-122.410756
: 37.765336/-122.410889 37.765360/-122.410950
: 37.765434/-122.411048 37.765480/-122.411082
: 37.765585/-122.411112 37.765639/-122.411107
: 37.765739/-122.411059 37.765781/-122.411017
: 37.765843/-122.410907 37.765867/-122.410775
: 37.765885/-122.409989

Map link:

https://newtin.usan.org/newtinweb/map_tkt.nap?TRG=9EJlImCiFk2l6iY-A

Members:

COMNCA CTYSF2 CTYSF3 CTYSF4 CTYSFO MUNUTL PACBEL
PGESFO PGEUET SFOTEC

Exhibit 5

Ticket Responses for: X228404711-00X

Member ▲	Name	Rev	Responded	By	Response
COMNCA	COMCAST - NORTHERN CALIFORNIA	00X	10/12/22 01:26:10 PM	AAA	(001) CLEAR - NO CONFLICT
CTYSF2	CITY OF SAN FRANCISCO - WATER	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed
CTYSF3	CITY OF SAN FRANCISCO - PUBLIC WORKS	00X	10/13/22 11:21:31 AM	Grace Barboza	(001) CLEAR - NO CONFLICT
CTYSF4	CITY OF SAN FRANCISCO HEAT/POWER/LIGHT	00X	10/14/22 06:24:51 AM	Robert Pascual	(010) LOCATE AREA MARKED
CTYSF4	CITY OF SAN FRANCISCO HEAT/POWER/LIGHT	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed
CTYSFO	CITY OF SAN FRANCISCO PARKING & TRAFFIC	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed
MUNUTL	MUNI OVERHEAD LINES DEPARTMENT	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed
PACBEL	PACIFIC BELL	00X	10/12/22 01:27:21 PM	UQ Responder	(010) LOCATE AREA MARKED
PGESFO	PGE DISTRIBUTION - SAN FRANCISCO	00X	10/13/22 10:18:07 AM	PGE	(010) LOCATE AREA MARKED
PGEUET	PGE UNDERGROUND ELECTRIC TRANSMISSION	00X	10/12/22 12:51:09 PM	PGE	(010) LOCATE AREA MARKED
SFOTEC	CITY COUNTY SAN FRANCISCO DEPT OF TECH	00X	10/13/22 06:34:14 PM	Late Notice	(999) Utility has not provided 811 center with information to be displayed

Exhibit 6

From: [Cabrera, Carlos](#)
To: [Belluzzi, Steven](#); McClenahan, Jeff@EnergySafety
Subject: RE: Information Request with USA Ticket X228404711
Date: Thursday, December 1, 2022 12:45:54 PM
Attachments: [image003.png](#)
[16th St and Potrero Ave. SF.docx](#)

You don't often get email from carlos_cabrera@comcast.com. [Learn why this is important](#)

Steve,

Here are our findings.

Let me know if more information is needed.

- Are you the owner or operator of the pipeline depicted in the photo?
[Comcast does not own the pipeline in question.](#)
- If you are not the owner or operator of the pipeline depicted in the photo, provide all information that establishes that fact.
[Comcast facilities cross 16th St East of Potrero Ave. Opposite side of construction site. \(See attachment \)](#)
[Tech reported orange locate markings are present but faded.](#)
[Closest underground vault to construction area belongs to Pacific Bell/ATT](#)

Carlos E. Cabrera

Manager HFC Network - Engineering.

Comcast Cable Corporation - West Bay

3760 Haven Avenue | Menlo Park, CA | 94025

Mobile 510.377.5511

From: Belluzzi, Steven <Steven_Belluzzi@cable.comcast.com>
Sent: Wednesday, November 30, 2022 4:09 PM
To: Cabrera, Carlos <Carlos_Cabrera@cable.comcast.com>; McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Subject: FW: Information Request with USA Ticket X228404711

Carlos,

Can you and your team please investigate this request?

Thanks,

Steve Belluzzi
Sr. Director, Network Operations
Comcast California
3055 Triad Place
Livermore CA 94551
M: (415) 859-0870

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Monday, November 28, 2022 11:26 AM
To: Belluzzi, Steven <Steven_Belluzzi@cable.comcast.com>
Subject: [EXTERNAL] Information Request with USA Ticket X228404711

Hi Steven,

I'm conducting an investigation with the Underground Safety Board into a utility excavation damage in San Francisco, CA (at Potrero and 16th) where an excavator found an unidentified facility.

Your contact information at Comcast is associated with the USA ticket number (X228404711), so I'm following up to determine whether your organization owns this facility and how you came to a positive or negative determination.

Please see the attached information request for a photo of the facility in question and the ticket attached for further information.

Let me know if I can address anything by responding here, and thanks for your time on this.

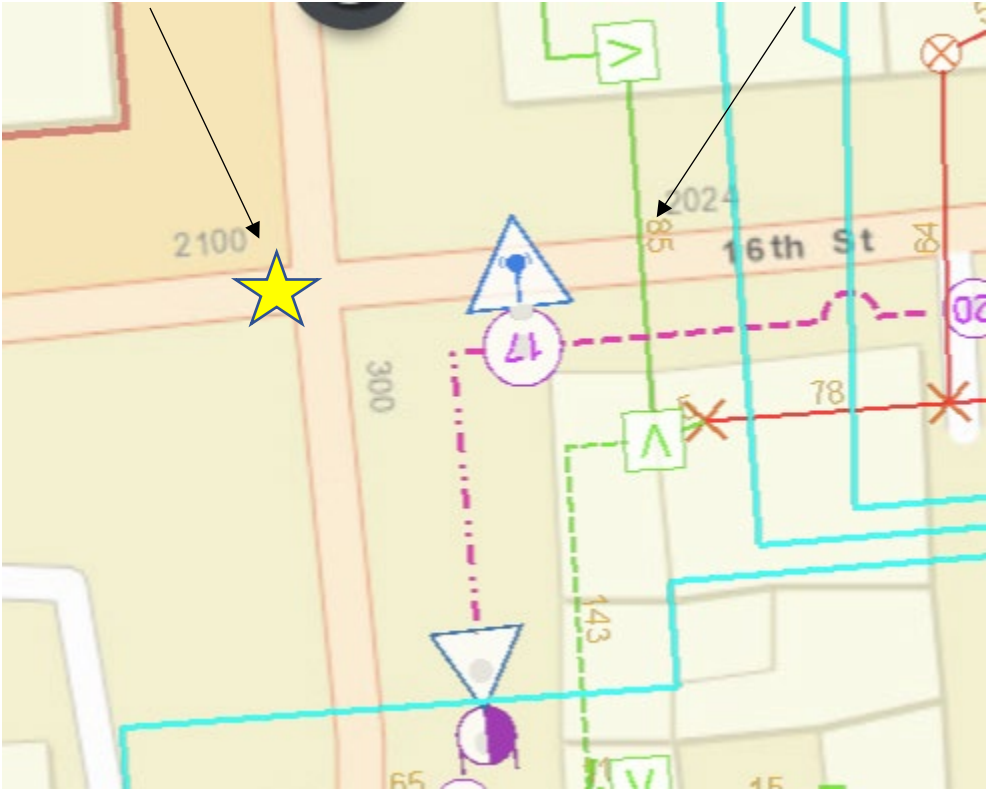
[Jeff McClenahan](#)
He/him
Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)
715 P Street, 20th Floor
Sacramento, CA 95814
(279) 789-1818
EnergySafety.ca.gov

Exhibit 7

Excavation area

Comcast facilities



Excavation area

Comcast facilities





Exhibit 8

**PACIFIC GAS AND ELECTRIC COMPANY
Gas Operations Data Response**

PG&E Data Request Index No.:	16203		
Request Date:	11-29-2022	Date Sent:	12-12-2022
Requesting Party:	Government Relations		
External Requester:	Jeff McClenahan, Underground Safety Board	PG&E Contact:	Aaron Lindh

QUESTION 16203.01: Are you the owner or operator of the pipeline depicted in the photo?

RESPONSE 16203.01: PG&E is not the owner or operator of the pipeline depicted in the photo.

QUESTION 16203.02: If you are not the owner or operator of the pipeline depicted in the photo, provide all information that establishes that fact.

RESPONSE 16203.02: Per PG&E's USA ticket database, on October 25, 2022, a PG&E Locator received a damage notification regarding USA ticket X228404711. The PG&E Locator made direct contact via phone with the excavator, Phoenix Electric Company, who verified that the exposed damaged pipeline was not a PG&E facility. The excavator verified it was a communication line and that a PG&E response was not required.

Exhibit 9

From: [Roberts, Brian \(TIS\)](#)
To: McClenahan, Jeff@EnergySafety
Cc: [Cassidy, Gerald \(TIS\)](#)
Subject: Re: Information Request with USA Ticket X228404711
Date: Tuesday, November 29, 2022 2:21:37 PM
Attachments: [image001.png](#)

Hello Jeff, we have confirmed that this is **not** our conduit.

We do have facilities on Potrero Avenue, but they are on the Eastern side of Potrero and consist of 4 x 2" conduit within San Francisco Municipal Transportation Agency (MTA) Traffic Signal Interconnect infrastructure. All of our records indicate that our facilities are on the opposite side of the street.

Please let me know if you have any further questions.

Sincerely,
Brian



Brian Roberts

Policy Analyst
1 South Van Ness Ave., 2nd Floor
Phone: 628-224-1187

www.sfgov.org/dt
Past President, National Assoc. of
Telecommunications Officers and Advisors
(NATOA)

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Date: Monday, November 28, 2022 at 11:21 AM
To: Roberts, Brian (TIS) <brian.roberts@sfgov.org>
Subject: Information Request with USA Ticket X228404711

This message is from outside the City email system. Do not open links or attachments from untrusted sources.

Hi Brian,

I'm conducting an investigation with the Underground Safety Board into a utility excavation damage

in San Francisco, CA (at Potrero and 16th) where an excavator found an unidentified facility.

Your contact information with City and County of San Francisco Department of Technology is associated with the USA ticket number (X228404711), so I'm following up to determine whether your organization owns this facility and how you came to a positive or negative determination.

Please see the attached information request for a photo of the facility in question and the ticket attached for further information.

Let me know if I can address anything by responding here, and thanks for your time on this.

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

715 P Street, 20th Floor

Sacramento, CA 95814

(279) 789-1818

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Exhibit 10

From: [Ho, Eddy](#)
To: [Spain, Christopher](#)
Cc: [Jones, Moore](#); [McClenahan, Jeff@EnergySafety](#); [Orkes, John A](#); [Wang, Jane](#); [Drane, Charles](#); [Lau, Frank](#); [Yuen, Victor](#); [Nguyen, Roger](#)
Subject: RE: Information Request with USA Ticket X228404711
Date: Wednesday, December 7, 2022 2:41:59 PM

Hi Chris,

No one ever claimed the ownership of the cable, but contractor identified this as either Comcast or AT&T cable. Again the cable wasn't damaged. The damaged conduit was repaired on site. Thank you.

From: Spain, Christopher <Christopher.Spain@sfmta.com>
Sent: Wednesday, December 7, 2022 1:37 PM
To: Ho, Eddy <Eddy.Ho@sfmta.com>
Cc: Jones, Moore <Moore.Jones@sfmta.com>; McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>; Orkes, John A <John.Orkes@sfmta.com>; Wang, Jane <Jane.Wang@sfmta.com>; Drane, Charles <Charles.Drane@sfmta.com>; Lau, Frank <Frank.Lau@sfmta.com>; Yuen, Victor <Victor.Yuen@sfmta.com>; Nguyen, Roger <Roger.Nguyen@sfmta.com>
Subject: RE: Information Request with USA Ticket X228404711

Eddy,

I think your team might be in the best position to answer this question. Looping in Charles, Frank and Jane and others as well.

Thank you,

Chris

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Wednesday, December 7, 2022 9:32 AM
To: Orkes, John A <John.Orkes@sfmta.com>
Cc: Jones, Moore <Moore.Jones@sfmta.com>; Spain, Christopher <Christopher.Spain@sfmta.com>; Ho, Eddy <Eddy.Ho@sfmta.com>
Subject: RE: Information Request with USA Ticket X228404711

EXT

Thanks for looking in to this, John.

Can you say who identified that the facility was either ATT or Comcast and/or a telecom type facility?

Best,

Jeff McClenahan

He/him

Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

From: Orkes, John A <John.Orkes@sfmta.com>

Sent: Wednesday, December 7, 2022 9:17 AM

To: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>

Cc: Jones, Moore <Moore.Jones@sfmta.com>; Spain, Christopher <Christopher.Spain@sfmta.com>;
Ho, Eddy <Eddy.Ho@sfmta.com>

Subject: RE: Information Request with USA Ticket X228404711

You don't often get email from john.orkes@sfmta.com. [Learn why this is important](#)

I spoke with the SFMTA Engineer in-charge of the project, the unidentified facility were not Muni Overhead Lines Department facility associate with USA ticket number X228404711, the unidentified facility were AT&T or Comcast.

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>

Sent: Monday, November 28, 2022 11:23 AM

To: Orkes, John A <John.Orkes@sfmta.com>

Subject: Information Request with USA Ticket X228404711

EXT

Hi John,

I'm conducting an investigation with the Underground Safety Board into a utility excavation damage in San Francisco, CA (at Potrero and 16th) where an excavator found an unidentified facility.

Your contact information at Muni Overhead Lines Department is associated with the USA ticket number (X228404711), so I'm following up to determine whether your organization owns this facility and how you came to a positive or negative determination.

Please see the attached information request for a photo of the facility in question and the ticket attached for further information.

Let me know if I can address anything by responding here, and thanks for your time on this.

Jeff McClenahan

He/him
Investigator | Underground Investigations Division

Office of Energy Infrastructure Safety

715 P Street, 20th Floor

Sacramento, CA 95814

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This message is from outside of the SFMTA email system. Please review the email carefully before responding, clicking links, or opening attachments.

Exhibit 11

From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Wednesday, December 14, 2022 8:52 AM
To: SCOTT, LAWAYNE <ls3139@att.com>
Subject: RE: Information Request with USA Ticket X228404711

Hi Wayne,

I'm following up on this information request involving a utility excavation damage in San Francisco, CA (at Potrero and 16th) where an excavator found an unidentified facility. Pacific Bell is associated as operator on the ticket (X228404711), so I'm following up to determine whether your organization owns this facility and how you came to a determination.

Let me know if I can address anything by responding here, and thanks for your time on this.

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

(279) 789-1818

[Office of Energy Infrastructure Safety](#)

From: McClenahan, Jeff@EnergySafety
Sent: Monday, November 28, 2022 11:25 AM
To: wayne.scott.1@att.com
Subject: Information Request with USA Ticket X228404711

Hi Wayne,

I'm conducting an investigation with the Underground Safety Board into a utility excavation damage in San Francisco, CA (at Potrero and 16th) where an excavator found an unidentified facility. Pacific Bell is associated as operator on the ticket (X228404711), so I'm following up to determine whether your organization owns this facility and how you came to a positive or negative determination. Please see the attached information request for a photo of the facility in question and the ticket attached for further information.

Let me know if I can address anything by responding here, and thanks for your time on this.

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

715 P Street, 20th Floor

Sacramento, CA 95814

(279) 789-1818

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December 14, 2022

AT&T Communications
Wayne Scott
420 S. Grand Avenue
Los Angeles, CA 90071-1902

Dear Mr. Scott:

On October 26, 2022, we responded to a notification at the intersection of 16th and Potrero Ave. in San Francisco CA. The corresponding ticket number is X228404711. While investigating the occurrence, an unidentified 4" pipe, possibly made of asbestos and with an interior cable, was damaged and exposed by the excavator.

The 4" facility was not located and marked by any of the operators listed on the one-call ticket. The facility is depicted in the attached photographs, marked Exhibits 1, 2, and 3. As part of the investigation, we are attempting to identify the owner or operator of the pipeline and determine why it was not marked or otherwise identified.

Upon contacting the regional notification center, we learned that your company operates subsurface infrastructure at this location. After reviewing the attachments, please answer the following two questions and return your response to the undersigned in 10 business days via email.

1. Are you the owner or operator of the pipeline depicted in the photo?
2. If you are not the owner or operator of the pipeline depicted in the photo, provide all information that establishes that fact.

Thank you for your assistance.

Sincerely,

Jeff McClenahan
Investigator
Underground Investigations Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
P: 279-789-1818
jeff.mcclenahan@energysafety.ca.gov

Exhibit 1



Exhibit 2



Exhibit 3



UNDERGROUND SAFETY BOARD REGIONAL NOTIFICATION CENTER - TICKET INQUIRY

After examining the described unidentified single 4" conduit in the photograph pictures labeled Exhibit 1, Exhibit 2, and Exhibit 3 of your inquiry and assessed our AT&T Distribution Engineering Cable Records for posted subsurface infrastructure facilities in the immediate area of POTRERO AVE and 16th ST., SAN FRANCISCO, CA. I have concluded that AT&T Distribution is not the owner, nor the operator, of the unidentified single 4" conduit. Our AT&T Distribution Engineering Cable Records does not indicate the posting of a single 4" conduit that cross on Potrero Ave south of 16th St.

Our AT&T Distribution Engineering Cable Records do indicate there is a posted **(8) multi-conduit duct structure** span (*west-to-east*) "on the southside of 16th St," intersecting at Potrero Ave per/ AT&T Distribution Engineering Cable Record number's ol0403b15u, ol0403b12u, ol0603a09u. This multi-conduit duct structure was located and marked by AT&T Distribution on ticket# X228404711-00X NEW NORM, date 10/12/2022 01:23 PM.

Also, AT&T Distribution dispatched a Cable Locator Tech on ticket X228404711-01X DMEX RUSH, responding to the worksite on 10/26/2022 01:14 PM to assess the unidentified single exposed & damaged conduit and determined the conduit was not owned by AT&T Distribution.

PACBEL 04825X USAN 10/25/22 14:40:02 **X228404711-01X DMEX RUSH POLY LREQ**

Excavator Information

Company: PHOENIX ELECTRIC COMPANY

Created By: ARJUN SUBBURAM Office Phone: 415-760-0431 SMS/Cell:

Excavation Area

State: CA County: SAN FRANCISCO Place: **SAN FRANCISCO** Zip: 94103,94110

Location: Address/Street: **16TH STREET**

: **X/ST1: BRYANT ST**

: USA PEC MARKED IN THE MIDDLE OF THE STREET FROM THE INTERSECTION OF 16TH STREET

: AND BRYANT STREET FOR 900' EAST TOWARDS THE INTERSECTION OF 16TH AND POTRERO AVENUE.

Delineated Method: WHITE PAINT

Work Type: DIGGING TO INSTALL DUCT BANK, EXCAVATOR WILL BE USED

Work For: PHOENIX ELECTRIC COMPANY

This photo is the unmarked damaged conduit.

It was repaired on 10/25/2022 by the PHOENIX ELECTRIC COMPANY.



Exhibit 12



November 28, 2022

City and County of San Francisco
Heat/Power/Light/Public Works/Water/Parking & Traffic
Iqbal Dhapa
30 Van Ness Ave, 5th Floor
San Francisco, CA 94102 US

Dear Iqbal Dhapa:

On October 26, 2022, we responded to a notification at the intersection of 16th and Potrero Ave. in San Francisco CA. The corresponding ticket number is X228404711. While investigating the occurrence, an unidentified 4” pipe, possibly made of asbestos and with an interior cable, was damaged and exposed by the excavator.

The 4” facility was not located and marked by any of the operators listed on the one-call ticket. The facility is depicted in the attached photographs, marked Exhibits 1, 2, and 3. As part of the investigation, we are attempting to identify the owner or operator of the pipeline and determine why it was not marked or otherwise identified.

Upon contacting the regional notification center, we learned that your organization operates subsurface infrastructure at this location. After reviewing the attachments, please answer the following two questions and return your response to the undersigned in 10 business days via email.

1. Are you the owner or operator of the pipeline depicted in the photo?
2. If you are not the owner or operator of the pipeline depicted in the photo, provide all information that establishes that fact.

Thank you for your assistance.

Sincerely,

Jeff McClenahan
Investigator
Underground Investigations Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
P: 279-789-1818
jeff.mcclenahan@energysafety.ca.gov

Exhibit 1



Exhibit 2



Exhibit 3



Exhibit 13



December 14, 2022

City and County of San Francisco
Heat/Power/Light/Public Works/Water/Parking & Traffic
Iqbal Dhapa
30 Van Ness Ave, 5th Floor
San Francisco, CA 94102 US

Dear Iqbal Dhapa:

On October 26, 2022, we responded to a notification at the intersection of 16th and Potrero Ave. in San Francisco CA. The corresponding ticket number is X228404711. While investigating the occurrence, an unidentified 4” pipe, possibly made of asbestos and with an interior cable, was damaged and exposed by the excavator.

The 4” facility was not located and marked by any of the operators listed on the one-call ticket. The facility is depicted in the attached photographs, marked Exhibits 1, 2, and 3. As part of the investigation, we are attempting to identify the owner or operator of the pipeline and determine why it was not marked or otherwise identified.

Upon contacting the regional notification center, we learned that your organization operates subsurface infrastructure at this location. After reviewing the attachments, please answer the following two questions and return your response to the undersigned in 10 business days via email.

1. Are you the owner or operator of the pipeline depicted in the photo?
2. If you are not the owner or operator of the pipeline depicted in the photo, provide all information that establishes that fact.

Thank you for your assistance.

Sincerely,

Jeff McClenahan
Investigator
Underground Investigations Division
Office of Energy Infrastructure Safety
715 P Street, 20th Floor
P: 279-789-1818
jeff.mcclenahan@energysafety.ca.gov

Exhibit 1



Exhibit 2



Exhibit 3



Exhibit 14

Account Name	Billing Code	Email	Phone	Contact Type	Mailing Address	Full Name	Parent Account: Account Name
SFOTEC	109653	brian.roberts@sfgov.org	4159024408	Member Representative	1 S. Van Ness Ave, San Francisco, CA 94103 US	Brian Roberts	City and County of San Francisco Department of Technology
CTYSF4	109442	iqbalbhai.dhapa@sfdpw.org	6282712570	Member Representative	30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US	Iqbal Dhapa	City & County of San Francisco Heat/Power/Light
CTYSFO	109600	iqbalbhai.dhapa@sfdpw.org	6282712570	Member Representative	30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US	Iqbal Dhapa	City & County of San Francisco Parking & Traffic
CTYSF3	109284	iqbalbhai.dhapa@sfdpw.org	6282712570	Member Representative	30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US	Iqbal Dhapa	City & County of San Francisco Public Works
CTYSF2	109495	iqbalbhai.dhapa@sfdpw.org	6282712570	Member Representative	30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US	Iqbal Dhapa	City & County of San Francisco Water
MUNUTL	154528	john.orkes@sfmta.com	4155183750	Member Representative	2502 Alameda St, San Francisco, CA 94103 US	John Orkes	Muni Overhead Lines Department
PGESFO	158869	kma8@pge.com	925-324-2087	Member Representative	6121 Bollinger Canyon Rd, Room 4680, San Ramon, CA 94583 US	Kevin Armato	Pacific Gas & Electric
PGEUET	158869	kma8@pge.com	925-324-2087	Member Representative	6121 Bollinger Canyon Rd, Room 4680, San Ramon, CA 94583 US	Kevin Armato	Pacific Gas & Electric
PACBEL	158236	mj2949@att.com	5106452929	Member Representative	420 S. Grand Ave Rm 1500, Los Angeles, CA 90071 US	Marshall Johnson	Pacific Bell
COMNCA	134021	steven_belluzzi@comcast.com	9252323413	Member Representative	427 East Eaton Road, Chico, CA 95973 US	Steve Belluzzi	Comcast

Exhibit 15

From: [Trevor Harris](#)
To: [McClenahan, Jeff@EnergySafety](mailto:McClenahan.Jeff@EnergySafety); [Germain Suess](#)
Subject: RE: Member Contact Info. Ticket X228404711
Date: Tuesday, November 22, 2022 12:18:25 PM
Attachments: [image001.png](#)
[image002.png](#)
[Contact information for ticket X228404711.xlsx](#)

Jeff,

Sorry for the late response, we have been extremely busy with our cutover to our new system. I have attached the information that you have requested.

You can reach out to both of us for the request.

Let us know if you have any questions.

Thank you,



Trevor Harris
Member Services Specialist
C: 925-222-6516
W: undergroundservicealert.org
4005 Port Chicago Hwy #100 Concord, CA 94520



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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Tuesday, November 22, 2022 12:00 PM
To: Germain Suess <germain.suess@usan.org>; Trevor Harris <trevor.harris@usan.org>
Subject: RE: Member Contact Info. Ticket X228404711

Hi Germain and Trevor,

Could you please provide the contact information for all the operators on this ticket?

And who should be my main point of contact on requests such as this one?

Thanks for your time on this,

Jeff McClenahan

He/him

Investigator | Underground Investigations Division

(279) 789-1818

[Office of Energy Infrastructure Safety](#)

From: McClenahan, Jeff@EnergySafety

Sent: Thursday, November 10, 2022 9:02 AM

To: Germain Suess <germain.suess@usan.org>; Trevor Harris <trevor.harris@usan.org>

Subject: Member Contact Info. Ticket X228404711

Hi Germain and Trevor,

Will you please provide the operator members contact information (email and address) included on Ticket X228404711?

That should be these members: COMNCA CTYSF2 CTYSF3 CTYSF4 CTYSFO MUNUTL PACBEL PGESFO PGEUET SFOTEC

Thanks for your help.

Best,

Jeff McClenahan

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

715 P Street, 20th Floor

Sacramento, CA 95814

(279) 789-1818

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Exhibit 16

From: [Trevor Harris](#)
To: McClenahan, Jeff@EnergySafety
Cc: [Nick White](#)
Subject: RE: Contact information with Ticket X228404711
Date: Monday, March 6, 2023 12:33:00 PM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image004.png](#)
[Contact information for ticket X228404711.xlsx](#)

I have attached the spreadsheet with the contact information.

The company mailing address is the billing address, and sometime the rep mailing address is different.

Let us know if you have any questions.



Trevor Harris
Member Services Specialist
O: 925-222-6516
W: undergroundservicealert.org
4005 Port Chicago Hwy #100 Concord, CA 94520

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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Monday, March 6, 2023 12:08 PM
To: Trevor Harris <trevor.harris@usan.org>
Cc: Nick White <nick.white@usan.org>
Subject: Re: Contact information with Ticket X228404711

That does help; how do you use the Member Representative mailing address as opposed to the Company?

And, yes, could you please provide a spreadsheet of both the mailing addresses for all the companies and member representative and make clear which corresponds to the company and the member representative? That would be for this ticket X228404711:

CTYSF2

CTYSF3

CTYSF4

CTYSFO

MUNUTL

PACBEL

PGESFO

PGEUET

SFOTEC

Thanks for clarifying,

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

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From: Trevor Harris <trevor.harris@usan.org>

Sent: Monday, March 6, 2023 11:48 AM

To: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>

Cc: Nick White <nick.white@usan.org>

Subject: RE: Contact information with Ticket X228404711

The mailing address that you receive on January 10th are the mailing addresses for the member reps, we have a different mailing address for the company. Did you want the mailing address for the rep or the company?

| Trevor Harris



Member Services Specialist
O: 925-222-6516
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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Monday, March 6, 2023 11:36 AM
To: Trevor Harris <trevor.harris@usan.org>
Cc: Nick White <nick.white@usan.org>
Subject: RE: Contact information with Ticket X228404711

One more thing which I find odd is I was just looking at information I requested associated with a different ticket (X225902277) and it looks like USA North provided a different mailing address for CTYSF4 back on January 10, 2023 and November 22, 2022 so I just want to double check:

On November 22, 2022 the mailing address for CTYSF4 was said to be **30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US** in a request returned from you, Trevor, attached.

Also attached is the mailing addresses from January 10, 2023 associated with information I received from Nick White where CTYSF4 is associated with this address: **525 Golden Gate Avenue, San Francisco, CA 94102 US.**

Then earlier today the address for CTYSF4 you said is **30 Van Ness Ave, 5th Floor, San Francisco, CA 94102 US** again.

I find it odd that CTYSF4 would have reverted back to the former mailing address, so can you please confirm the current mailing address for CTYSF4 one more time?

Thanks for looking in to this,

Jeff McClenahan
He/him
Investigator | Underground Investigations Division

(279) 789-1818

Office of Energy Infrastructure Safety

From: Trevor Harris <trevor.harris@usan.org>
Sent: Monday, March 6, 2023 11:17 AM
To: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Subject: RE: Contact information with Ticket X228404711

The mailing address that we have for SFOTEC is 1 S. Van Ness Ave, 2nd Floor Dept. of Technology, San Francisco, CA 94103, US



Trevor Harris
Member Services Specialist
O: 925-222-6516
W: undergroundservicealert.org
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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Monday, March 6, 2023 11:15 AM
To: Trevor Harris <trevor.harris@usan.org>; Nathan Oliver <nathan.oliver@usan.org>
Cc: Germain Suess <germain.suess@usan.org>; Nick White <nick.white@usan.org>
Subject: RE: Contact information with Ticket X228404711

Could you also provide the updated mailing address for Member Code SFOTEC?

Jeff McClenahan
He/him
Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

From: Trevor Harris <trevor.harris@usan.org>

Sent: Monday, March 6, 2023 10:54 AM

To: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>; Nathan Oliver <nathan.oliver@usan.org>

Cc: Germain Suess <germain.suess@usan.org>; Nick White <nick.white@usan.org>

Subject: RE: Contact information with Ticket X228404711

Jeff,

Here are the mailing addresses for each company,

COMNCA –

427 Eaton Rd
Chico, CA 95973
US

CTYSF2
CTYSF3
CTYSF4
CTYSFO –

30 VAN NESS AVE 5TH FLOOR
SAN FRANCISCO, CA 94102
US

MUNUTL –

2502 Alameda St
San Francisco, CA 94103
US

PACBEL –

420 S Grand Ave Rm 1500
Los Angeles, CA 90071
US

PGESFO
PGEUET-

6121 Bollinger Canyon Rd, Room 4680
San Ramon, CA 94583
US

Let us know if you have any questions.



Trevor Harris
Member Services Specialist
O: 925-222-6516
W: undergroundservicealert.org
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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Monday, March 6, 2023 10:32 AM
To: Trevor Harris <trevor.harris@usan.org>; Nathan Oliver <nathan.oliver@usan.org>
Cc: Germain Suess <germain.suess@usan.org>; Nick White <nick.white@usan.org>
Subject: Re: Contact information with Ticket X228404711

Thanks for this information, Trevor.

Could you please provide the current mailing address for these organizations?

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

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(279) 789-1818

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From: Trevor Harris <trevor.harris@usan.org>
Sent: Friday, March 3, 2023 2:42 PM
To: Nathan Oliver <nathan.oliver@usan.org>; McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Cc: Germain Suess <germain.suess@usan.org>; Nick White <nick.white@usan.org>
Subject: RE: Contact information with Ticket X228404711

Jeff,

I apologize, the member rep contact for CTYSF4 is Hieu Doan, Email: hdoan@swater.org, Phone: (415) 238-4612



Trevor Harris
Member Services Specialist
O: 925-222-6516
W: undergroundservicealert.org
4005 Port Chicago Hwy #100 Concord, CA 94520

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From: Nathan Oliver <nathan.oliver@usan.org>
Sent: Friday, March 3, 2023 1:55 PM
To: McClenahan, Jeff@EnergySafety <jeff.mcclenahan@energysafety.ca.gov>
Cc: Germain Suess <germain.suess@usan.org>; Nick White <nick.white@usan.org>; Trevor Harris <trevor.harris@usan.org>
Subject: RE: Contact information with Ticket X228404711

Hello Jeff,

Sorry for the delay. The contact information for the Member Rep's of the said codes are listed below. Let me know if you need anything else or have any questions.

COMNCA

Steve Belluzzi
Email: steven_belluzzi@comcast.com
Phone:
(925) 232-3413

CTYSF2
CTYSF3
CTYSF4
CTYSFO
Iqbal Dhapa
Email: iqbalbhai.dhapa@sfdpw.org
Phone:
(628) 271-2570

MUNUTL
John Orkes
Email: john.orkes@sfmta.com
Phone:
(415) 518-3750

PACBEL
Paul Bagneschi
Email: pb1419@att.com
Phone:
(650) 703-1616

PGESFO
PGEUET
Kevin Armato
Email: kma8@pge.com
Phone:
925-324-2087

Thanks,



Nathan Oliver
Member Services Specialist
C: 925-222-6512
W: undergroundservicealert.org
4005 Port Chicago Hwy #100 Concord, CA 94520



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From: Chris M. Brassart <chris.brassart@usan.org>
Sent: Friday, March 3, 2023 10:42 AM
To: Nathan Oliver <nathan.oliver@usan.org>; Nick White <nick.white@usan.org>
Cc: Germain Suess <germain.suess@usan.org>
Subject: FW: Contact information with Ticket X228404711

It appears that Germain is out. Could you please get back to Jeff with the contact information he is requesting?

Thanks,



Chris Brassart
IT Director
O: (925) 222-6519
W: undergroundservicealert.org
4005 Port Chicago Hwy #100 Concord, CA 94520

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From: McClenahan, Jeff@EnergySafety <Jeff.McClenahan@energysafety.ca.gov>
Sent: Thursday, March 2, 2023 12:19 PM
To: Chris M. Brassart <chris.brassart@usan.org>
Cc: Germain Suess <germain.suess@usan.org>
Subject: RE: Contact information with Ticket X228404711

Hi Chris and Germain,

Just following up on this request. Can you please provide updated contact information for the operator members on with Ticket X228404711?

That is for the following operator member codes:

COMNCA
CTYSF2
CTYSF3
CTYSF4
CTYSFO
MUNUTL
PACBEL
PGESFO
PGEUET

Thanks,

Jeff McClenahan

He/him

Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

From: McClenahan, Jeff@EnergySafety

Sent: Thursday, February 23, 2023 2:33 PM

To: Germain Suess <germain.suess@usan.org>

Subject: RE: Contact information with Ticket X228404711

Hi Germain,

Just following up on this. Can you please provide updated contact information for the operator members on with Ticket X228404711?

That is for the following operator member codes:

COMNCA
CTYSF2
CTYSF3
CTYSF4
CTYSFO
MUNUTL
PACBEL
PGESFO
PGEUET

Jeff McClenahan

He/him

Investigator | Underground Investigations Division
(279) 789-1818

Office of Energy Infrastructure Safety

From: McClenahan, Jeff@EnergySafety

Sent: Thursday, February 16, 2023 3:42 PM

To: Germain Suess <germain.suess@usan.org>

Subject: Contact information with Ticket X228404711

Hi Germain,

Can you please provide the contact information for the operator members on this ticket?

That is for the following operator member codes:

COMNCA
CTYSF2
CTYSF3
CTYSF4
CTYSFO
MUNUTL
PACBEL
PGESFO
PGEUET
SFOTEC

Thanks,

[Jeff McClenahan](#)

He/him

Investigator | Underground Investigations Division

[Office of Energy Infrastructure Safety](#)

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Exhibit 17

Full Name	Parent Account: Account Name	Account Name	Email	Phone
Steve Belluzzi	Comcast	COMNCA	steven_belluzzi@comcast.com	(925) 232-3413
Iqbal Dhapa	City & County of San Francisco Water	CTYSF2	iqbalbhai.dhapa@sfdpw.org	(628) 271-2570
Iqbal Dhapa	City & County of San Francisco Public Works	CTYSF3	iqbalbhai.dhapa@sfdpw.org	(628) 271-2570
Hieu Doan	City & County of San Francisco Heat/Power/Light	CTYSF4	hdoan@sflower.org	(415) 238-4612
Iqbal Dhapa	City & County of San Francisco Parking & Traffic	CTYSFO	iqbalbhai.dhapa@sfdpw.org	(628) 271-2570
John Orkes	Muni Overhead Lines Department	MUNUTL	john.orkes@sfmta.com	(415) 518-3750
Paul Bagneschi	Pacific Bell	PACBEL	pb1419@att.com	(650) 703-1616
Kevin Armato	Pacific Gas & Electric	PGESFO	kma8@pge.com	925-324-2087

Kevin Armato	Pacific Gas & Electric	PGEUET	kma8@pge.com	925-324-2087
Brian Roberts	City and County of San Francisco Department of Technology	SFOTEC	brian.roberts@sfgov.org	(415) 902-4408

Rep Mailing Address

427 Eaton Rd
Chico, CA 95973
US

Company Mailing Address

427 Eaton Rd
Chico, CA 95973
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

525 Golden Gate Avenue
San Francisco, CA 94102
US

30 VAN NESS AVE 5TH FLOOR
SAN FRANCISCO, CA 94102
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

30 Van Ness Ave, 5th Floor
San Francisco, CA 94102
US

2502 Alameda St
San Francisco, CA 94103
US

2502 Alameda St
San Francisco, CA 94103
US

420 S Grand Ave Rm 1500
Los Angeles, CA 90071
US

420 S Grand Ave Rm 1500
Los Angeles, CA 90071
US

6121 Bollinger Canyon Rd,
Room 4680
San Ramon, CA 94583
US

6121 Bollinger Canyon Rd,
Room 4680
San Ramon, CA 94583
US

6121 Bollinger Canyon Rd,
Room 4680
San Ramon, CA 94583
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San Francisco, CA 94103
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