



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

DATE: September 14, 2023
CASE No.: C223470004

Violations:

Los Angeles Department of Water and Power - Water (member code LAWP3)

Government Code section 4216.3(a)(1)(A): Failure to respond to a locate request from a call center in one of three ways before the legal excavation start date and time: (1) locate and mark the work area, (2) provide information about the location of subsurface installation, or (3) state that no installations are within the work area.

City of Los Angeles (member code CITYLASTLI)

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

LA Co Pub Works – Flood Maintenance (member code LAF54)

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

Los Angeles Department of Water and Power (member code LAP03)¹

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

Paramount Pipeline LLC (member code PARPIPE)

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

Paramount Petroleum Corporation (member code PPC01)

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

Southern California Gas Company – Distribution San Pedro (member code SCG3Z9)

Government Code § 4216.3(c)(1)(A): Failure to provide positive electronic response before the legal start date and time.

¹ The Los Angeles Department of Water and Power uses multiple DigAlert member codes, and this ticket lists two of those codes. This report uses the acronym "LADWP" to refer to that department, which, as member code "LAP03", did not provide an electronic positive response. As member code "LAWP3", LADWP declined to field mark the work area, which this report discusses below.

Executive Summary:

On December 13, 2022, the Southern California Gas Company submitted a complaint that the Los Angeles Department of Water and Power – Water had refused to field mark in response to locate requests which related to installation of a gas main. That complaint led Board staff to investigate six instances in which LADWP refused to mark. This report documents one of those six investigations.

In the instance documented in this report, the LADWP stated in its electronic positive response that the excavator was not going to dig within 14 days (preplanning). In written statements, the LADWP explained that its decision not to field mark was based on DigAlert direction and that SCG was improperly using tickets for engineering work. SCG has asserted that it delineated the work area.

After creating the initial ticket, DigAlert created a revised ticket to include a comment from SCG about the refusal to mark, and 15 days after the legal start date, LADWP provided an electronic positive response indicating that both (1) its installations were not in conflict with the work area, and (2) no markings had been requested.

Further, six operators did not provide electronic positive responses to the locate request from DigAlert.

Reporting Party Information:

Southern California Gas Company
701 North Bullis Road, Compton, California 90221

Excavator:

Southern California Gas Company
701 North Bullis Road, Compton, California 90221

Complaint from Southern California Gas Company

The Southern California Gas Company submitted the following complaint on November 30, 2022:

ON MULTIPLE OCCASIONS, LADPW-WATER IN THIS AREA REFUSE TO MARK THEIR FACILITY STATING 'WE DO NOT MARK FOR PRE-PLANNING'. WE ARE POTHOLING TO FIND DEPTH OF UTILITIES IN ADVANCE FOR A HP GAS MAIN INSTALLATION PROJECT. NO OTHER UTILITIES USE THIS EXCUSE TO NOT PROVIDE MARKINGS. AFTER SPEAKING TO THEIR LOCATING OFFICE, UTILITY MEMBER HAS ALSO LIED WHEN RESPONDING TO THE USA TICKET, STATING 'NOT EXCAVATING, PREPLANNING ONLY', WHEN I SPECIFICALLY TOLD THEIR REPRESENTATIVE THAT WE WILL BE EXCAVATING. DUE TO

THEIR FAILURE TO RESPOND WE HAD TO PERFORM EXCAVATION WITHOUT KNOWING WATER MAIN LOCATION. (Exh. 1.)

Ticket and Locate Request

On October 11, 2022, the Southern California Gas Company contacted DigAlert, indicating that it planned to dig potholes on Lecouvreur Avenue, near East E Street, in the city of Wilmington. DigAlert created NEW ticket number A222840118-00A at 06:53 a.m. That ticket required operators to respond operators and indicated that the legal excavation start date and time was 5:01 p.m. on October 13, 2022. (Exh. 6.²)

Delineation

In his interview with the investigator, John Chow of SCG stated that the work area was delineated. (Exh. 3.) The ticket indicates that the work area was delineated with white paint. (Exh. 6.)

Electronic Positive Responses

An “electronic positive response” is “an electronic response from an operator to the regional notification center providing the status of an operator’s statutorily required response to a ticket.” (Gov. Code § 4216(e).) Government Code section 4216.3(c)(1)(A) requires operators to provide an electronic positive response to each locate request before the legal excavation start date and time.

The ticket (number A222840118-00A) indicates that the following six members did not provide electronic positive responses to the locate request:

- City of Los Angeles (member code CITYLASTLI)
- LA Co Pub Works – Flood Maintenance (member code LAF54)
- Los Angeles Department of Water and Power (member code LAP03)
- Paramount Pipeline LLC (member code PARPIPE)
- Paramount Petroleum Corporation (member code PPC01)
- Southern California Gas Company – Distribution San Pedro (member code SCG3Z9)

For each of these members, the ticket indicates “(999) Member did not respond by the required time”. (Exh. 6.)

² Exhibits 6, 7, 8, and 9 are tickets that DigAlert provided to the investigator. Exhibit 5 is the transmittal correspondence that DigAlert sent with those tickets.

Response of Los Angeles Department of Water and Power – Water

Government Code section 4216.3(a)(1)(A) requires an operator to respond to a locate request from a call center in one of three ways before the legal excavation start date and time: (1) locate and mark the work area, (2) provide information about the location of subsurface installation, or (3) state that no installations are within the work area.

The legal start date and time indicated on ticket number A222840118-00A was 5:01 p.m. on October 13, 2022. (Exh. 6.) The Los Angeles Department of Water and Power – Water³ (member code LAWP3) provided the following electronic positive response at 5:53 a.m. on October 12, 2022:

(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)

LADWP added this comment to the response:

[L]OOKING FOR INFORMATION FOR FUTURE INSTALLATION OF MAIN ... PER DIGALERT TICKETS CANNOT BE USED FOR PLANNING - PLEASE CONTACT DWP ENGINEERS FOR INFO OR RECORD REQUEST (Exh. 6.)

LADWP's Reasons for Not Field Marking

In his written statement to the investigator, Fraser Campbell stated additional reasons for LADWP's decision not to field mark the areas where SCG planned to pothole:

We receive hundreds of USA Tickets each day, when someone tries to use our resources for their personal gain, it compounds our efforts to make sure we mark every USA Ticket by the legal time allowed.

Mr. Chow was not planning to dig in the next fourteen (14) calendar days. If someone calls in a USA Ticket and does not delineate the proposed excavation in white paint, we are not required to guess where someone may excavate. Mr. Chow was attempting to use Valuable LADWP Resources to help him engineer an upcoming project. We are in the business of Protecting the Public and LADWP's Underground Assets and complying with 4216 of the Government Code. We have informed Mr. Chow numerous times of the proper protocols for attaining the information he requires.

All six of these tickets have to do with our USA Office dealings with Mr. Chow w/ Socal Gas

I spoke to Mr. Chow re: his work. As he explained to me, the potholing was in order to find a location for a New main line that gas was engineering in the area – to that date they had no idea where their work area was going to be. As I

³ This report uses the acronym "LADWP" to refer to the Los Angeles Department of Water and Power.

explained to him, from the training directly provide to Utilities over the summer by Dig Alert, tickets cannot be used in the guise of engineering work, that information must be collected independently by contacting utility companies and requesting/purchasing that information. (Exh. 4.)

First Revised Ticket

SCG responded to LADWP's electronic positive response and comment by contacting DigAlert on October 12. At that time, DigAlert created ticket number A222840118-01A, which was:

- (1) An "amendment" ticket, designated "AMND".
- (2) A "locate request" category ticket, designated "LREQ".
- (3) A "normal" ticket priority, designated "NORM". (Exh. 2,⁴ 7.)

The ticket included this statement from SCG:

****AMENDMENT** CONCERNED WITH LACK OF MARKINGS FRM LADWP - WATER. IF YOU HAVE ANY QUESTION, PLEASE CALL SITE CONTACT. WORK WILL START ON 10/15/22 PER JOHN CHOW--[LEW 10/12/2022 02:48:47 PM] (Exh. 7.)**

LADWP Response

LADWP responded to this revised ticket on October 12 with this electronic positive response: "(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)". (Exh. 7.)

Second Revised Ticket

SCG, again, contacted DigAlert on October 14. At that time, DigAlert created ticket number A222840118-02A, which was:

- (1) A "no response" ticket, designated "NRSP".
- (2) A "locate request" category ticket, designated "LREQ".
- (3) A "RUSH" priority. (Exh. 2, 8.)

The ticket included this statement from SCG:

****NO RESPONSE** FROM WATR - CALLER CONFIRMS SITE IS DELINEATED CALLER STATES CREW WILL BE POTHOLING TOMORROW TO LOCATE UTILITIES AS STATED, LADWP WATER RESPOND ASAP TO MARK PER JOHN CHOW--[ZIM 10/14/2022 07:52:51 AM] (Exh. 8.)**

LADWP Response

LADWP responded to this revised ticket on October 14, 2022 with this electronic positive response: "(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)".

⁴ Exhibit 2, "DigAlert Ticket Types, Headers and Explanations", was obtained from the DigAlert website at the address: <https://docs.digalert.org/pages/viewpage.action?pageId=89358400>

(Exh. 8.)

LADWP - WATER added this comment to its electronic positive response:

LAWP3 UNABLE TO MARK PREV S/W CHOW WANTS INFORMATION FOR FUTURE INSTALLATION OF MAIN ... PER DIGALERT TICKETS CANNOT BE USED FOR PLANNING - PLEASE CONTACT DWP ENGINEERS FOR INFO OR SUBMIT RECORD REQUEST
(Exh. 8.)

Third Revised Ticket

SCG again contacted DigAlert on October 14. At that time, DigAlert created ticket number A222840118-03A, which was:

- (1) A "no response" ticket, designated "NRSP".
- (2) A "locate request" category ticket, designated "LREQ".
- (3) A "RUSH" priority. (Exh. 2, 9.)

The ticket included this statement from SCG:

****NO RESPONSE**** FROM WATR - CALLER CONFIRMS SITE IS DELINEATED CALLER CALLING IN RESPONSE TO MESSEGE FRM LADWP - WATER "EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)". THIS STATEMENT IS INCORRECT. THE POTHOLING IS GOING TO START TOMORROW 10/15/22 AND THERE WILL BE EXCAVATION/DISTURBANCE OF THE EARTH THAT REQUIRES A TICKET BY LAW. REQUESTING LADWP - WATER MARK THE AREA ASAP. DO NOT RESPOND WITH "EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)". DIG ALERT HAS CONFIRMED THAT THERE WILL BE EXCAVATION AND THE WORK QUALIFIES FOR A TICKET. PER JOHN CHOW--[RIC 10/14/2022 12:04:50 PM] (Exh. 9.)

LADWP Response

LADWP responded to this revised ticket on October 28, 2022 with these two electronic positive responses:

- (001) CLEAR NO CONFLICT
- (004) NO MARKINGS REQUESTED (Exh. 9.)

The legal excavation start date was October 13. (Exh. 6.) October 28 was 15 days after October 13.

Findings

I. The following six operators failed to provide electronic positive responses before the legal start date and time:

- (1) City of Los Angeles (member code CITYLASTLI)
- (2) LA Co Pub Works – Flood Maintenance (member code LAF54)
- (3) Los Angeles Department of Water and Power (member code LAP03)
- (4) Paramount Pipeline LLC (member code PARPIPE)
- (5) Paramount Petroleum Corporation (member code PPC01)
- (6) Southern California Gas Company – Distribution San Pedro (member code SCG3Z9)

Government Code section 4216.3(c)(1)(A) requires operators to provide an electronic positive response to each locate request before the legal excavation start date and time.

II. Los Angeles Department of Water and Power - Water (LADWP)

Government Code section 4216.3(a)(1)(A) requires an operator to respond to a locate request from a call center in one of three ways before the legal excavation start date and time: (1) locate and mark the work area, (2) provide information about the location of subsurface installation, or (3) state that no installations are within the work area.

The legal start date and time to ticket number A222840118-00A was 5:01 p.m. on October 13, 2022.

LADWP initially refused to field mark the work area, then, 15 days after the legal excavation start date, used electronic positive responses to state that (1) the work area was not in conflict with any LADWP installations, and (2) that SCG did not request markings.

Investigator Name	Supervisor Name
Daysi Alcantar	Brittany Branaman
<i>Daysi Alcantar</i>	<i>Brittany Branaman</i>

Exhibit List

Exhibit No.	Description	Date Received	Received From
1	Complaint submitted by the Southern California Gas Company	12/13/ 2022	SCG
2	DigAlert Ticket Types, Headers and Explanations		DigAlert website: https://docs.digalert.org/pages/viewpage.action?pageId=89358400
3	Notes of interview with John Chow	12/21/2022	Notes taken by investigator Pattison
4	Email from Fraser Campbell to Pattison	12/22/2022	Fraser Campbell
5	Letter from Amber Dahl (DigAlert) transmitting tickets to Pattison	1/06/2023	Amber Dahl
6	DigAlert Ticket no. A222840118-00A	01/06/2023	DigAlert
7	DigAlert Ticket no. A222840118-01A	01/06/2023	DigAlert
8	DigAlert Ticket no. A222840118-02A	01/06/2023	DigAlert
9	DigAlert Ticket no. A222840118-03A	01/06/2023	DigAlert

Exhibit 1

Ticket Summary

Ticket Number	---
Notification Created	12/13/2022 8:10 PM
Notification type	* complaint
Notification Number	* C223470004
Address1	---
Expires	---
One Year	---
Location	---
Map URL	---
State	CA
City	---
Vacuum	No
Remarks Type	---
Work Order	---
Comments	---
Ticket Type	---
Zip Code	---
Work Date	---
violation	---
Phone	---
Date Logged to CMS	12/13/2022

Complaint/Incident Information

County	Los Angeles
Incident/Complaint Description	ON MULTIPLE OCCASIO...
Incident Date	* 11/30/2024 9:01 PM
Incident State	CA
Incident County	* Los Angeles
Incident Place	Wilmington
Incident St from Address	---
Incident St to Address	---
Incident Street	Marine Ave and Harry Bri...
Incident Cross1	Marine Ave
Type of complaint	No response/Late respons
Other complaint Detail	NONE
Notification Number	* C223470004
Notification Created	* 12/13/2022 8:10 PM
Notification type	* complaint
Incident Location	USA TICKE# A222840096...
Damage Injury	Undefined
Damage Death	Undefined
Damage Fire Evacuation	Undefined

ON MULTIPLE OCCASIONS, LADPW - WATER IN THIS AREA REFUSE TO MARK THEIR FACILITY STATING 'WE DO NOT MARK FOR PRE-PLANNING'. WE ARE POTHOLES TO FIND DEPTH OF UTILITIES IN ADVANCE FOR A HP GAS MAIN INSTALLATION PROJECT. NO OTHER UTILITIES USE THIS EXCUSE TO NOT PROVIDE MARKINGS. AFTER SPEAKING TO THEIR LOCATING OFFICE, UTILITY MEMBER HAS ALSO LIED WHEN RESPONDING TO THE USA TICKET, STATING 'NOT EXCAVATING, PREPLANNING ONLY'; WHEN I SPECIFICALLY TOLD THEIR REPRESENTATIVE THAT WE WILL BE EXCAVATING. DUE TO THEIR FAILURE AND REFUSAL TO RESPOND WE HAD TO PERFORM EXCAVATION WITHOUT KNOWING WATER MAIN LOCATION.

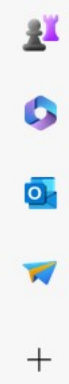


Exhibit 2

DigAlert Ticket Types, Headers & Explanations

Create snapshot

Updated: 7/7/2022

Version: 21.12.1a

Effective: Jan 1st 2023

⚠ WARNING

This information contained within this page will become effective January 1st, 2023

Email Header & Subject line

1 2 3 4 5 6 7 8 10

USAS USA01 2018/03/01 #00001A A121231234-00A NORM NEW LREQ

(See "Ticket Header" below for corresponding numbers)

Ticket Header

2 4 1 3 5 6 8 7 9 10
USA01 00001A USAS 3/1/2018 00:00:00 A121231234-00A NEW NORM POLY LREQ

- Center identification – USAS = Underground Service Alert Southern California
- Member Code – sometimes referred to as a CDC code or Member ID
- Date (or Date and Time) the ticket was completed
- Ticket Sequence number. This is incremented from zero each day from each server (A or B). This tells you how many tickets you receive each day from each server.
- Ticket Number
 - The server ID. This will either be A or B
 - Last 2 digits of the year the ticket was issued
 - The Julian date. The number of the day in the year the ticket was issued
 - The number of the ticket issued for that day. Incremented from 0001 on each day from each server
- Ticket revision number. Incremented each time the ticket is sent. The Server ID will change each time depending on which server issued the revision.
- Ticket Priority
- Ticket Type
- States how the member was added to the ticket. This will always be 'POLY'
- Category of ticket.
 - LREQ - Locate Request
 - PRJT - Project ticket (FOR FUTURE USE)**

Ticket Types

- AMND – (Amendment tickets). For all reasons other than listed below that is not requesting any members to respond, for example: correcting a ticket, adding more information, clarifying the location, etc.
- CNCL – (Cancel tickets). When the ticket is being canceled.
- ~~DMEX – (Damage/Exposed tickets). When the excavator states there is a damage or exposed line.~~
- DMGE – (Damaged line ticket). When the excavator states there is a damaged line and requests members to respond.**
- DSGN – (Design tickets). **FOR FUTURE USE ONLY. These tickets will not be used until a later date that has not been determined at this time.**
- EXPD - (Exposed tickets). When the excavator states there is an unmarked exposed line and requests the members to respond to be identified.**
- NEW – (New tickets). New first time tickets. The revision number will always be 00A or 00B.
- NRSP – (No Response tickets). When the excavator states that any or all members failed to respond by the work date and time on the ticket.
- RNEW – (Renewal tickets). Tickets where the work is continuing past 28 calendar days.
- REMK – (Re-mark requested tickets). When the excavator requests any or all members to remark their lines. Also extends the ticket for 28 calendar days.
- RTRN - (Return Trip requested). When the excavator states they need any or all members to respond to the site for any reason other than listed above. This ticket type will reset the legal notice for members required to respond back to the site.**

Ticket Priorities

- NORM or (2) – 2 working days or more notice (not including the date of notification)
- SHRT or (1) – From 4 hours to 1 minute less than 2 working days' notice (not including the date of notification)
- RUSH or (0) – From 0 hours to 3 hours 59 minutes notice
- DSGN or (8) – Dedicated priority for design tickets. **FOR FUTURE USE ONLY. These tickets will not be used until a later date that has not been determined at this time.**
- EMER or (9) – Dedicated priority for Emergency tickets

Excavator Types

- CDOT - Caltrans

- CITY - City
- CNTY - County
- CONT - Contractor
- FARM - Farmer
- HOME - Home owner
- MEMB - Member of DigAlert
- MILT - Military

Searchable Tags

Searchable tags is the name of the field that will hold hashtags for systems to index, parse and also for members to read. If the hashtag appears, then that means whatever the hashtag says will be done on that ticket. For example, #microtrench would mean that micro trenching is taking place on this ticket. If it isn't there, then micro trenching will not be done on this ticket. This field allows the format to adapt to excavation situations in the future without needing a format change which is lengthy and costly for members. This list will be a living list and change as needed.

Searchable tags will be listed with a space between each tag, for example "Searchable Tags: #microtrench #pipe_burst"

Possible hashtags:

- #microtrench
- #PipeBurst
- #night_weekend

Possible Email Subject Headers by Ticket Type

New (NEW):

- USAS USA01 2015/01/01 #00001A A0121231234-00A NEW NORM LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-00A NEW SHRT LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-00A NEW RUSH LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-00A NEW EMER LREQ

Renewal Only (RNEW):

- USAS USA01 2015/01/01 #00001A A0121231234-01A RNEW NORM LREQ

Request Remarks & work Continuing (REMK):

- USAS USA01 2015/01/01 #00001A A0121231234-01A REMK NORM LREQ

Amendment (AMND):

- USAS USA01 2015/01/01 #00001A A0121231234-01A AMND NORM LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-01A AMND SHRT LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-01A AMND RUSH LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-01A AMND EMER LREQ

No Response (NRSP):

- USAS USA01 2015/01/01 #00001A A0121231234-01A NRSP RUSH LREQ
- USAS USA01 2015/01/01 #00001A A0121231234-01A NRSP EMER LREQ

Damage (DMGE):

- ~~USAS USA01 2015/01/01 #00001A A0121231234-01A DMEX RUSH LREQ~~
- **USAS USA01 2015/01/01 #00001A A0121231234-01A DMGE EMER LREQ**

Exposed (EXPD):

- **USAS USA01 2015/01/01 #00001A A0121231234-01A EXPD RUSH LREQ**

Return Trip Requested (RTRN):

- **USAS USA01 2015/01/01 #00001A A0121231234-01A RTRN NORM LREQ**

Cancel (CNCL):

- USAS USA01 2015/01/01 #00001A A0121231234-01A CNCL RUSH LREQ

Read about Ticket Format as Well

Be sure to read about ticket format → [Plain Text Ticket Format Details](#)

These types, headers and explanations become effective **January 1st, 2023**

Search this
documentation

The selected root page could
not be found.

Search

Exhibit 3

CASE NO: CAS-01533-W6P3L2

DATE/TIME OF INTERVIEW: 12/21/2022 10:30-11:30 AM

LOCATION OF INTERVIEW: Teams

NAME/ADDRESS OF INTERVIEWEE:

John Chow, Lead Planning Associate, Pacific Region of Southern California Gas
701 North Bullis Road., Compton, California 90221
Tel: 626-378-9664

Q. What's your title with Southern California Gas Company?

A. John Chow, Lead Planning Associate, Pacific Region

Q. What was the excavation for?

A. The excavation was for potholing to locate gas lines and depth.

Q. Was there ever an issue with delineation?

A. No, my crew had the area delineated in white paint.

Q. Did any damage occur?

A. No damage

Q. What was the issue with the Los Angeles Department of Water and Power (LADWP)?

A. They refused to mark their owned utility line, made excuses, and said we were pre-planning.

Q. Who did you talk to about the issue?

A. I spoke with Fraser Campbell to tell him that excavation was scheduled for October 15, 2022.

Q. What step was the project at the last phase of excavation?

A. Reinstalment was completed.

Q. Did you speak to, DigAlert about the issue?

A. I don't recall the person's name, but I communicated that no pre-planning was occurring, just excavation.

Q. What tools were used?

A. Hand shovels, hose

Q. Has the work evaluation been completed?

A. Yes, the excavation work was completed.

Q. Why do you believe the LADWP refused to mark?

A. They thought my project was for preplanning only, but I kept informing LADWP that preplanning was completed, and excavation would occur on October 15, 2022.

Exhibit 4

From: [Campbell, Fraser](#)
To: Pattison, Adela@EnergySafety
Subject: FW: [EXTERNAL] Alleged complaint follow-up
Date: Thursday, December 22, 2022 11:59:28 AM
Attachments: [image002.png](#)
[image004.png](#)

Inspector Adela Pattison,

I have looked into your request, and will answer your questions. In my answers I will explain what Mr. Chow is trying to accomplish. We receive hundreds of USA Tickets each day, when someone tries to use our resources for their personal gain, it compounds our efforts to make sure we mark every USA Ticket by the legal time allowed. That is our safety standard, and in a five hundred square mile metropolitan city such as Los Angeles we do accomplish this task routinely.

1. How do you handle (what is the process) when you receive a request for a marking due to an excavation? *We receive our Notification of Proposed Excavation from DigAlert of Southern California Regional Control Center. We pull up our Water and Power underground maps and prints for the area of the proposed excavation. Then we either print the maps out or electronically send the maps to our LADWP Locator's Laptop and assign the Underground Service Alert (USA) Ticket to the Locator responsible for that area. The locator routes themselves to the area via the information on the USA Ticket. Then they look for the area of Proposed Excavation delineated in White. Through our Maps and Electronic Locating Device our Locator locates the substructure, and marks it in either RED or Blue chalk paint per 4216 depending on the asset. Then moves on to the other tickets in his area of responsibility.*
2. Who oversees the processing of the USA DigAlert Tickets? *We have two (2) USA Operations Offices, one (1) in Metro Los Angeles, and one (1) in the San Fernando Valley of the City Of Los Angeles. The District Senior Underground Distribution Construction Supervisor is responsible for the daily staffing of the USA Operations Office, along with LADWP's underground construction activity in that district. The office consists of a Underground Distribution Construction Supervisor "A", and a Electrical Craft Helper "A". Depending on*

the USA ticket volume, we pull Underground Distribution Construction Mechanics from the field if needed to staff the office or go out and Locate & Mark USA Tickets.

3. Can you please explain why there was no response from LADWP on the six USA Dig Alert Tickets? Government Code 4216.3(c)(1)(A) indicates that every Operator needs to supply a response. Yes there were multiple responses (see below). Mr. Chow was not planning to dig in the next fourteen (14) calendar days. If someone calls in a USA Ticket and does not delineate the proposed excavation in white paint, we are not required to guess where someone may excavate. Mr. Chow was attempting to use Valuable LADWP Resources to help him engineer an upcoming project. We are in the business of Protecting the Public and LADWP's Underground Assets and complying with 4216 of the Government Code. We have informed Mr. Chow numerous times of the proper protocols for attaining the information he requires.

Inspector Adela Pattison, please see below our interactions with Mr. Chow. If you have any further questions on this issue or any other concerns about Underground Service Alert or Underground Construction Excavation please do not hesitate to contact me. My contact information is in my signature below. Happy Holidays...

All six of these tickets have to do with our USA Office dealings with Mr. Chow w/ Socal Gas.

Prior to processing the original 3 tickets, I spoke to Mr. Chow re: his work. As he explained to me, the potholing was in order to find a location for a New main line that gas was engineering in the area – to that date they had no idea where their work area was going to be. As I explained to him, from the training directly provide to Utilities over the summer by Dig Alert, tickets cannot be used in the guise of engineering work, that information must be collected independently by contacting utility companies and requesting/purchasing that information. While this was not the answer he was hoping for, I sent our positive response that same day – and every other time he sent a “no show” - and I also provide him with information about the AB regarding this and the contact number to the locating foreman.

10/14/2022 A222840096

10/14/2022 A222840105

10/14/2022 A222840118

Status: CLOSED • RLONA "Ronald Lona"

Response: 043 · By: MBALLESTEROS

+Comment: LOOKING FOR INFORMATION FOR FUTURE INSTALLATION OF MAIN...PER DIGALERT TICKETS CANNOT BE USED FOR PLANNING - PLEASE CONTACT DWP ENGINEERS FOR INFO OR

RECORD REQUEST

Response Date: Wed Oct 12 2022 5:53AM (2 Months Ago)

Date Located: Wed Oct 12 2022 5:52AM (2 Months Ago)

Units Marked: Time Worked: 0m

In December, Mr. Chow create another 3 tickets in another location. Both myself and the Locator assigned to that area spoke with Mr. Chow via phone. Mr. Chow explain the exact same thing as before, and I reiterated the Dig alert standard. However, in a show of good will the locator took out the tickets to inspect the area Mr. Chow was looking at, Upon arriving, no delineations were found, not even minimal brackets. Corresponding positive responses where sent that same day.

12/12/2022 B223320138

12/13/2022 A223320201

12/13/2022 A223320254

Status: CLOSED • RLONA "Ronald Lona"

Response: 043 · By: RLONA

+Comment: SPOKE TO JOHN CHOW , NO DELIN. RESEND TKT. AS REQUESTED

Response Date: Wed Nov 30 2022 2:24PM (3 Weeks Ago)

Date Located: Wed Nov 30 2022 2:20PM (3 Weeks Ago)

Units Marked: Time Worked: 0m

Fraser Campbell

Manager of Underground Transmission

& Distribution Conduit Construction.

& Underground Service Alert Operations.

O. (213) 367-0406

C. (213) 792-6465



From: Pattison, Adela@EnergySafety <Adela.Pattison@energysafety.ca.gov>

Sent: Wednesday, December 21, 2022 5:56 PM

To: Campbell, Fraser <Fraser.Campbell@ladwp.com>

Subject: [EXTERNAL] Alleged complaint follow-up

EXTERNAL EMAIL! This email was generated from a non-LADWP address. If any links exist, do not click/open on them unless you are 100% certain of the associated site or source. ALWAYS hover over the link to preview the actual URL/site and confirm its legitimacy.

My name is Adela Pattison, and I am the assigned Investigator from the Department of Energy Safety

Infrastructure. At your earliest convenience, if you can answer the following questions regarding the following Dig Alert Tickets.

DATE: USA TICKET

10/14/2022	A222840096
10/14/2022	A222840105
10/14/2022	A222840118
12/12/2022	B223320138
12/13/2022	A223320201
12/13/2022	A223320254

Question: How do you handle (what is the process) when you receive a request for a marking due to an excavation?

Question: Who oversees the processing of the USA Dig Alert Tickets?

Question: Can you please explain why there was no response from LADWP on the six USA Dig Alert tickets?

Government Code 4216.3(c)(1)(A) indicates that every Operator needs to supply a response.

Adela Pattison
Investigator | Underground Infrastructure Safety Directorate

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, CA 95814
Mobile: (279) 789-1811
<https://energysafety.ca.gov/>



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Exhibit 5



Underground Service Alert of Southern California

January 6, 2023

Adela Pattison
Underground Safety Board
715 P Street, 20th Floor
Sacramento, CA 95814

File Number: C223470004

Dear Adela:

Attached are DigAlert ticket(s) A222840096, A222840105, A222840118, B223320138, A223320201, A223320254 as requested. I hope this information will be helpful.

If we can be of further assistance, please call us at 951-808-8100.

Sincerely,

A handwritten signature in black ink that reads "Amber Dahl". The signature is written in a cursive, flowing style.

Amber Dahl
Safety Awareness Director

Exhibit 6

MBRCOD 00001A USAS 01/06/23 07:11:04 A222840118-00A NEW NORM POLY LREQ

Ticket: A222840118 Rev: 00A Created: 10/11/22 06:53 User: RKC Chan: 100

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: SOUTHERN CALIFORNIA GAS
Co Addr: 701 N. BULLIS RD
City : COMPTON State: CA Zip: 90221
Created By: JOHN CHOW Language: ENGLISH
Office Phone: 310-605-7925 SMS/Cell: 626-378-9664
Office Email: CCHOW@SOCALGAS.COM

Site Contact: JOHN CHOW
Site Phone: 626-378-9664 Site SMS/Cell:
Site Email:

Excavation Area

State: CA County: LOS ANGELES Place: WILMINGTON
Zip: 90744
Location: Address/Street: LECOUVREUR AVE
: X/ST1: E E ST
:
: PROPERTY LINE TO P/L ON LECOUVREUR AVE FROM APPROX 30FT S/OF THE S/P/L
: OF THE E/BOUND E E ST, S/FOR APPROX 70FT

Delineated Method: WHITEPAINT
Work Type: REPL GAS MAIN
Work For : SOUTHERN CALIFORNIA GAS
Permit: U-2286-0269 Job/Work order:
1 Year: N Boring: N Street/Sidewalk: Y Vacuum: N Explosives: N

Lat/Long
Center Generated (NAD83): 33.775979/-118.255830 33.776008/-118.255337
: 33.775372/-118.255795 33.775400/-118.255302

Excavator Provided:

Map link:
https://newtin.digalert.org/newtinweb/map_tkt.nap?TRG=468s7rCm7m5tws3-k

Members:
ATTDSOUTH CHELA CITYLASTLI LAF54 LAP03 LAWP3 PARPIPE
PPC01 SCG3Z9 SCG68T SPLCSOUTH WARRENEP

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Ticket Responses for: A222840118-00A

Member	Name	Rev	Responded	By	Response	Comment
ATDTSOUTH	AT&T - DISTRIBUTION	00A	10/11/22 08:50:44 AM	PRATTDIST	(001) CLEAR - NO CONFLICT	
CHELA	CHEVRON	00A	10/11/22 03:31:32 PM	AAA	(001) CLEAR - NO CONFLICT	Reviewed ticket from office. Determined the work will not involve our pipeline.
CITYLASTLI	CITY OF LOS ANGELES	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
LAF54	LA CO PUB WORKS-FLOOD MAINTENANCE	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
LAP03	LA DEPARTMENT WTR & PWR	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
LAWP3	LADWP - WATER	00A	10/12/22 05:53:31 AM	TMS:MBALLESTEROS	(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)	OOKING FOR INFORMATION FOR FUTURE INSTALLATION OF MAIN...PER DIGALERT TICKETS CANNOT BE USED FOR PLANNING - PLEASE CONTACT DWP ENGINEERS FOR INFO OR RECORD REQUEST
PARPIPE	PARAMOUNT PIPELINE LLC	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
PPC01	PARAMOUNT PETROLEUM CORP	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
SCG3Z9	SOCALGAS DISTRIBUTION SAN PEDRO	00A	10/13/22 05:01:17 PM	Late Notice	(999) Member did not respond by the required time	
SCG68T	SOCALGAS TRANSMISSION - PLAYA DEL REY	00A	10/11/22 03:13:14 PM	PRSDG01 EJGONZALEZ	(001) CLEAR - NO CONFLICT	
SPLCSOUTH	SHELL OIL PIPELINE - SOUTH	00A	10/12/22 07:31:22 AM	AAA	(001) CLEAR - NO CONFLICT	
WARRENEP	WARREN E & P INC	00A	10/12/22 07:42:39 AM	GONZALO BUCIO	(001) CLEAR - NO CONFLICT	

Exhibit 7

MBRCOD 00001A USAS 01/06/23 07:11:05 A222840118-01A AMND NORM POLY LREQ

Ticket: A222840118 Rev: 01A Created: 10/12/22 14:48 User: LEW Chan: 100

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

Excavator Information

Company: SOUTHERN CALIFORNIA GAS

Co Addr: 701 N. BULLIS RD

City : COMPTON State: CA Zip: 90221

Created By: JOHN CHOW Language: ENGLISH

Office Phone: 310-605-7925 SMS/Cell: 626-378-9664

Office Email: CCHOW@SOCALGAS.COM

Site Contact: JOHN CHOW

Site Phone: 626-378-9664 Site SMS/Cell:

Site Email:

Excavation Area

State: CA County: LOS ANGELES Place: WILMINGTON

Zip: 90744

Location: Address/Street: LECOUVREUR AVE

: X/ST1: E E ST

:

: PROPERTY LINE TO P/L ON LECOUVREUR AVE FROM APPROX 30FT S/OF THE S/P/L

: OF THE E/BOUND E E ST, S/FOR APPROX 70FT

Delineated Method: WHITEPAINT

Work Type: REPL GAS MAIN

Work For : SOUTHERN CALIFORNIA GAS

Permit: U-2286-0269 Job/Work order:

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

Lat/Long

Center Generated (NAD83): 33.775979/-118.255830 33.776008/-118.255337

: 33.775372/-118.255795 33.775400/-118.255302

Excavator Provided:

Map link:

https://newtin.digalert.org/newtinweb/map_tkt.nap?TRG=56BtAoFnAfDp2jI-R

Comments:

****AMENDMENT**** CONCERNED WITH LACK OF MARKINGS FRM LADWP - WATER. IF YOU HAVE ANY QUESTION, PLEASE CALL SITE CONTACT. WORK WILL START ON 10/15/22 PER JOHN CHOW--[LEW 10/12/2022 02:48:47 PM]

Members:

ATTDSOUTH CHELA CITYLASTLI LAF54 LAP03 LAWP3 PARPIPE
 PPC01 SCG3Z9 SCG68T SPLCSOUTH WARRENEP

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Ticket Responses for: A222840118-01A

Member	Name	Rev	Responded	By	Response
ATTDSOUTH	AT&T - DISTRIBUTION	01A	10/12/22 05:06:18 PM	UQ Responder	(001) CLEAR - NO CONFLICT
LAWP3	LADWP - WATER	01A	10/12/22 03:07:04 PM	TMS:MBALLESTEROS	(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)
SCG68T	SOCALGAS TRANSMISSION - PLAYA DEL REY	01A	10/12/22 03:23:44 PM	PRSDG01 EJGONZALEZ	(001) CLEAR - NO CONFLICT

Exhibit 8

MBRCOD 00001A USAS 01/06/23 07:11:05 A222840118-02A NRSP RUSH POLY LREQ

Ticket: A222840118 Rev: 02A Created: 10/14/22 07:53 User: ZIM Chan: 100

Work Start: 10/14/22 07:52 Legal Start: 10/14/22 07:52 Expires: 11/08/22 23:59
Response required: N Priority: 0

Excavator Information

Company: SOUTHERN CALIFORNIA GAS

Co Addr: 701 N. BULLIS RD

City : COMPTON State: CA Zip: 90221

Created By: JOHN CHOW Language: ENGLISH

Office Phone: 310-605-7925 SMS/Cell: 626-378-9664

Office Email: CCHOW@SOCALGAS.COM

Site Contact: JOHN CHOW

Site Phone: 626-378-9664 Site SMS/Cell:

Site Email:

Excavation Area

State: CA County: LOS ANGELES Place: WILMINGTON

Zip: 90744

Location: Address/Street: LECOUVREUR AVE

: X/ST1: E E ST

:

: PROPERTY LINE TO P/L ON LECOUVREUR AVE FROM APPROX 30FT S/OF THE S/P/L

: OF THE E/BOUND E E ST, S/FOR APPROX 70FT

Delineated Method: WHITEPAINT

Work Type: REPL GAS MAIN

Work For : SOUTHERN CALIFORNIA GAS

Permit: U-2286-0269 Job/Work order:

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

Lat/Long

Center Generated (NAD83): 33.775979/-118.255830 33.776008/-118.255337

: 33.775372/-118.255795 33.775400/-118.255302

Excavator Provided:

Map link:

https://newtin.digalert.org/newtinweb/map_tkt.nap?TRG=66Aq9pEk9k8qzr5-i

Comments:

****AMENDMENT**** CONCERNED WITH LACK OF MARKINGS FRM LADWP - WATER. IF YOU HAVE ANY QUESTION, PLEASE CALL SITE CONTACT. WORK WILL START ON 10/15/22 PER JOHN CHOW--[LEW 10/12/2022 02:48:47 PM]

****NO RESPONSE**** FROM WATR - CALLER CONFIRMS SITE IS DELINEATED CALLER STATES CREW WILL BE POTHOILING TOMORROW TO LOCATE UTILITIES AS STATED, LADWP WATER RESPOND ASAP TO MARK PER JOHN CHOW--[ZIM 10/14/2022 07:52:51 AM]

Members:

ATTDSOUTH CHELA CITYLASTLI LAF54 LAP03 LAWP3 PARPIPE
 PPC01 SCG3Z9 SCG68T SPLCSOUTH WARRENEP

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Ticket Responses for: A222840118-02A

Member	Name	Rev	Responded	By	Response	Comment
ATTDSOUTH	AT&T - DISTRIBUTION	02A	10/14/22 09:06:42 AM	UQ Responder	(004) NO MARKINGS REQUESTED	
CHELA	CHEVRON	02A	10/14/22 08:16:13 AM	AAA	(001) CLEAR - NO CONFLICT	This is an update ticket,. The ticket is deemed no conflict per previous ticket
LAWP3	LADWP - WATER	02A	10/14/22 08:33:16 AM	TMS:MBALLESTEROS	(043) EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)	LAWP3 UNABLE TO MARK PREV S/W CHOW WANTS INFORMATION FOR FUTURE INSTALLATION OF MAIN...PER DIGALERT TICKETS CANNOT BE USED FOR PLANNING - PLEASE CONTACT DWP ENGINEERS FOR INFO OR SUBMIT RECORD REQUEST
SCG68T	SOCALGAS TRANSMISSION - PLAYA DEL REY	02A	10/14/22 08:42:33 AM	PRSDG01 EJGONZALEZ	(001) CLEAR - NO CONFLICT	
SPLCSOUTH	SHELL OIL PIPELINE - SOUTH	02A	10/14/22 11:23:13 AM	AAA	(001) CLEAR - NO CONFLICT	

Exhibit 9

MBRCOD 00001A USAS 01/06/23 07:11:06 A222840118-03A NRSP RUSH POLY LREQ

Ticket: A222840118 Rev: 03A Created: 10/14/22 12:05 User: RIC Chan: 100

Work Start: 10/14/22 12:04 Legal Start: 10/14/22 12:04 Expires: 11/08/22 23:59
Response required: N Priority: 0

Excavator Information

Company: SOUTHERN CALIFORNIA GAS

Co Addr: 701 N. BULLIS RD

City : COMPTON State: CA Zip: 90221

Created By: JOHN CHOW Language: ENGLISH

Office Phone: 310-605-7925 SMS/Cell: 626-378-9664

Office Email: CCHOW@SOCALGAS.COM

Site Contact: JOHN CHOW

Site Phone: 626-378-9664 Site SMS/Cell:

Site Email:

Excavation Area

State: CA County: LOS ANGELES Place: WILMINGTON

Zip: 90744

Location: Address/Street: LECOUVREUR AVE

: X/ST1: E E ST

:

: PROPERTY LINE TO P/L ON LECOUVREUR AVE FROM APPROX 30FT S/OF THE S/P/L

: OF THE E/BOUND E E ST, S/FOR APPROX 70FT

Delineated Method: WHITEPAINT

Work Type: REPL GAS MAIN

Work For : SOUTHERN CALIFORNIA GAS

Permit: U-2286-0269 Job/Work order:

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

Lat/Long

Center Generated (NAD83): 33.775979/-118.255830 33.776008/-118.255337

: 33.775372/-118.255795 33.775400/-118.255302

Excavator Provided:

Map link:

https://newtin.digalert.org/newtinweb/map_tkt.nap?TRG=76DrCmHlCdFn4jI-R

Comments:

****AMENDMENT**** CONCERNED WITH LACK OF MARKINGS FRM LADWP - WATER. IF YOU HAVE ANY QUESTION, PLEASE CALL SITE CONTACT. WORK WILL START ON 10/15/22 PER JOHN CHOW--[LEW 10/12/2022 02:48:47 PM]

****NO RESPONSE**** FROM WATR - CALLER CONFIRMS SITE IS DELINEATED CALLER STATES CREW WILL BE POTHOLING TOMORROW TO LOCATE UTILITIES AS STATED, LADWP WATER RESPOND ASAP TO MARK PER JOHN CHOW--[ZIM 10/14/2022 07:52:51 AM]
****NO RESPONSE**** FROM WATR - CALLER CONFIRMS SITE IS DELINEATED CALLER CALLING IN RESPONSE TO MESSEGE FRM LADWP - WATER "EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)". THIS STATEMENT IS INCORRECT. THE POTHOLING IS GOING TO START TOMORROW 10/15/22 AND THERE WILL BE EXCAVATION/DISTURBANCE OF THE EARTH THAT REQUIRES A TICKET BY LAW. REQUESTING LADWP - WATER MARK THE AREA ASAP. DO NOT RESPOND WITH "EXCAVATOR NOT DIGGING WITHIN 14 CALENDAR DAYS (PREPLANNING)". DIG ALERT HAS CONFIRMED THAT THERE WILL BE EXCAVATION AND THE WORK QUALIFIES FOR A TICKET. PER JOHN CHOW--[RIC 10/14/2022 12:04:50 PM]

Members:

ATTDSSOUTH CHELA CITYLASTLI LAF54 LAP03 LAWP3 PARPIPE
 PPC01 SCG3Z9 SCG68T SPLCSOUTH WARRENEP

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Ticket Responses for: A222840118-03A

Member	Name	Rev	Responded	By	Response	Comment
ATTDSSOUTH	AT&T - DISTRIBUTION	03A	10/14/22 01:12:55 PM	UQ Responder	(004) NO MARKINGS REQUESTED	
CHELA	CHEVRON	03A	10/14/22 12:22:37 PM	AAA	(001) CLEAR - NO CONFLICT	This is an update ticket,. The ticket is deemed no conflict per previous ticket
LAWP3	LADWP - WATER	03A	10/28/22 07:59:40 AM	TMS:MBALLESTEROS	(001) CLEAR - NO CONFLICT	
LAWP3	LADWP - WATER	03A	10/28/22 07:59:40 AM	TMS:MBALLESTEROS	(004) NO MARKINGS REQUESTED	
SCG68T	SOCALGAS TRANSMISSION - PLAYA DEL REY	03A	10/14/22 12:13:39 PM	PRSDG01 EJGONZALEZ	(001) CLEAR - NO CONFLICT	
SPLCSOUTH	SHELL OIL PIPELINE - SOUTH	03A	10/14/22 12:58:48 PM	AAA	(001) CLEAR - NO CONFLICT	