



Underground Safety Board
Office of Energy Infrastructure Safety
715 P Street, 15th Floor
Sacramento, California 95814

September 9, 2025
LEG 2025-0081

Sent via electronic mail to digboard@energysafety.ca.gov

Re: Sacramento Municipal Utility District's Comments on Draft Safety Practice Standards for Potholing

The Sacramento Municipal Utility District (SMUD), a publicly owned electric utility serving the Sacramento area, respectfully submits these comments on the *Draft Safety Practice Standards for Potholing* (Potholing Standards). SMUD generates, transmits and distributes electricity to a 900-square-mile territory that includes Sacramento County, and portions of Placer and Yolo counties. As a community-owned, not-for-profit utility, SMUD is governed by a seven-member Board of Directors elected by voters. SMUD has a board member representative on USA North 811 and has been following the development of USB's Potholing Standards.

SMUD supports the USB's development of the Potholing Standards and believes that overall, they align well with current industry standards. We remain concerned that Section 6, which establishes potholing data collection and sharing requirements may inadvertently impose substantial costs on excavators. SMUD encourages USB to consider costs associated with compliance with Section 6, weigh those costs against the potential safety benefit, and tailor the provision to achieve similar safety benefits in a more cost-effective manner.

Concerns Regarding Section 6 Requirements

Section 6 of the Potholing Standards provides the following (emphasis in original):

6. Documenting Utility Operator Marks and Potholes, and Communicating the Results of Potholing

The excavator records utility operator field marks, including through photographs. The photographs of field marks include reference information where feasible, especially of surface indicators. The excavator records buried facility location information in pothole maps or logs, including depth, ~~in pothole maps or logs, as well as the presence of~~ and any appurtenances that could interfere with the excavation or clearances of the new construction. The excavator adds a locating device, such as a marker ball or other tag when unmarked facilities are identified in all potholes that contain unmarked facilities.

The excavator conveys the results of potholing, and all facilities identified, to all work crews, contractors, and subcontractors working in or near the excavation zone.¹

SMUD performs maintenance on hundreds of thousands of feet of utility infrastructure each year. Operating as both a facility operator and an excavator, the obligation for each excavation activity to collect detailed facility location information, including depth, appurtenances, and setting locating devices, and then logging and/or mapping that information represents a substantial administrative burden for all underground activities. Such requirements will necessitate a substantial expansion of our surveying teams and could delay construction and maintenance activities due to the extensive data collection and post-processing effort required. While SMUD is aligned with the objectives of enhancing public and employee safety, USB should carefully evaluate the safety benefits of collecting this additional information against the increased costs imposed on excavators. For SMUD, and other similarly situated utilities, these increased costs will ultimately translate to higher costs for ratepayers.

Furthermore, SMUD recognizes its obligation as an operator to update and improve information on underground facilities continually.² However, the current standard appears to require excavators not only to collect information on their own facilities but also on any facilities encountered underground during excavation activities. To the extent that third parties rely on this information, this requirement might inadvertently expose excavators to increased liability risks.³

Before adopting Section 6, SMUD encourages USB to explore methods to better align proposed regulations with the current practices of operators and excavators, while still promoting best practices in the field and in data collection. We urge USB to continue development of the standards, specifically considering data on costs imposed on excavators by these provisions, carefully balance the incremental benefits against substantial costs, and finally, consider alternative approaches that might achieve similar safety benefits without disproportionately impacting operators and excavators.

¹ [Draft Standard Safety Practices for Potholing](#) at Section 6.

² See Gov. Code 4216.3(a)(4).

³ See e.g., September 2024 Staff Report at 3 of 65 (noting that operators have reservations about sharing depth information with some other excavators).

Conclusion

In conclusion, SMUD appreciates the efforts of USB to enhance safety and clarify operational procedures through these Potholing Standards. We look forward to continued development of the Potholing Standards to ensure that final provisions effectively balance the need for safety with the practical realities faced by utility operators and excavators.

/s/

JOSHUA STOOPS
Government Affairs Representative
Sacramento Municipal Utility District
P.O. Box 15830, MS B404
Sacramento, CA 95852-0830

cc: Corporate Files (LEG 2025-0081)