Bear Valley Electric Service, Inc.
A Subsidiary of American States Water Company

Liberty™

PACIFIC POWER
A DIVISION OF PACIFICORP

September 3, 2025

VIA OEIS E-FILING
#2025-07-01-PC

Office of Energy Infrastructure Safety
Underground Safety Board
715 P Street, 15th Floor
Sacramento, CA 95814
Digboard@energysafety.ca.gov

RE: Bear Valley Electric Service, Inc. (U 913 E), Liberty Utilities (CalPeco Electric) LLC (U 933 E), and PacifiCorp (U 901 E) Geographic Information Systems (GIS) Regulatory Language Public Comments

Dear Jaime Hastings,

Bear Valley Electric Service, Inc. (BVES), Liberty Utilities (CalPeco Electric) LLC (Liberty), and PacifiCorp d/b/a Pacific Power (PacifiCorp or the Company) (collectively, the small and multi-jurisdictional utilities or SMJUs) submit these comments on GIS Regulatory Language Public Comments.[1] The SMJUs appreciate the opportunity to comment on the draft language for Geographic Information Systems (GIS).

If you have any questions regarding this request, please contact Pooja Kishore, Regulatory Affairs Manager at (503) 813-7314.

Sincerely,

Robert Meredith
Director, Regulation

[1] PacifiCorp has been authorized to submit these comments on behalf of BVES and Liberty.

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California Underground Safety Board
Office of Energy Infrastructure Safety
Attn: Jaime Hastings, Underground Infrastructure Directorate
715 P Street, 15th Floor
Sacramento, California 95814
digboard@energysafety.ca.gov

Re: GIS Regulatory Language Public Comments

Dear Jaime Hastings,

BVES, Liberty, and PacifiCorp (the SMJUs) respectfully submit these comments regarding the proposed draft regulatory language for Geographic Information Systems. We appreciate the opportunity to provide feedback on these important proposed changes and their potential impact on utility operations.

I. GENERAL CONCERNS

The SMJUs have significant concerns about the proposed regulatory changes due to their substantial financial and operational impact. The proposed high-precision requirements would necessitate major changes to the SMJUs' existing systems, processes, and equipment, representing a considerable financial burden that ultimately would impact ratepayers through increased operational costs.[2]

PacifiCorp's current GIS system, which manages facility data and connectivity across six states, as well as BVES' and Liberty's GIS systems, were not designed to accommodate survey-grade precision data. The SMJU systems currently operate with mapping-grade precision, which is appropriate for SMJU operational needs. Adjusting and purchasing new business systems, applications, and high-precision survey equipment would require substantial capital investment. Additionally, changing SMJU data management processes, construction procedures, and field information systems would create significant operational disruption. These requirements would add considerable expense to the small customer bases of the SMJUs.

[2] For example, the SMJUs would likely need to invest in new equipment.

II. SPECIFIC COMMENTS ON PROPOSED REGULATORY LANGUAGE

A. New Definitions - Section 4000

Geospatial Coordinates Definition: While geospatial coordinate information is inherently available in GIS systems, the proposed definition raises several technical concerns. Coordinate attribution in GIS is not automatically updated when features are repositioned. Rather, attribution must be manually regenerated, creating potential for data inconsistencies.

New Subsurface Installation Definition: The SMJUs request that the definition of "New" be limited to actual new installations such as new trenches, which would effectively include positional relocations. The definition should exclude conductor replacement through existing conduit where no positional change occurs, as well as other activities with no positional, dimensional, or size changes. The terms "major modifications" and "major repairs" are too ambiguous, and the SMJUs recommend that they either be removed or specifically defined with clear criteria.

B. Additional Regulations

1. Accuracy of Geospatial Coordinates

The requirement for 100mm horizontal positional accuracy presents several significant challenges. The SMJUs do not currently have digital as-built capture systems or applications capable of this precision level. This would require survey-grade GPS equipment for all subsurface installations, including both planned and unplanned construction, as well as additional training to operate such equipment.[3]

The SMJUs' GIS systems cannot preserve high-precision data due to the volume of existing non-precision data and cartographic requirements for digital display and PDF map clarity. The systems must often adjust facility locations to ensure readable connectivity illustrations that serve primary business and safety display purposes. These necessary adjustments would compromise the integrity of any high-precision data collected.[4]

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[3] In addition to new equipment, the SMJUs would need to develop entirely new processes for new construction. Further, the SMJUs may need new staff or additional contractors to adhere to new accuracy and record maintenance requirements, additionally increasing costs for customers.

[4] Additionally, to meet both existing mapping-grade precision as well as proposed survey-grade requirements, the SMJUs would likely need to maintain two separate data sets for each precision level, effectively doubling the work required and potentially leading to data discrepancies.

2. Component and Attribute Records

Based on our interpretation, none of the specified components (tracer wire access points, marker balls, RFID devices, stubs, pipe wrap, warning tape, coating, or insulation) are currently mapped in the SMJUs' systems or provided in as-built construction drawings. The applicability of these requirements to SMJU operations is unclear. However, changes to GIS requirements often necessitate updates to the Electric Service Requirements to ensure consistency across systems and workflows, which can directly impact contractors who rely on these standards for planning, design, and field operations.

3. Geospatial-Coordinate Metadata Records

The metadata requirements assume the use of high-precision GPS equipment and the capability to preserve feature-level metadata, which is typically managed at the layer level in geospatial systems. These requirements also assume that data will never be modified, edited, or moved. This assumption is problematic because data frequently requires modification for cartographic reasons or due to unplanned construction. Such modifications would void metadata validity, resulting in unreliable information with no confidence in accuracy. Even if attribution was expanded in the data model to hold this information, any future modifications would effectively invalidate the metadata, making the collected information meaningless.

III. RECOMMENDATIONS

The SMJUs recommend that the Underground Safety Board perform a comprehensive cost-benefit analysis before adoption of these standards to ensure the benefits justify the substantial costs involved particularly for small and multi-jurisdictional utilities like BVES, Liberty, and PacifiCorp. The Board should continue dialogue with affected utilities to develop practical, implementable solutions that achieve safety objectives without creating undue operational burdens. Definitions within the proposed regulations should be refined to remove ambiguity and focus requirements on truly new installations. Finally, realistic precision standards should be established that balance accuracy needs with operational feasibility and cost considerations.

IV. CONCLUSION

While the SMJUs understand the importance of improving positional accuracy of utility installations, the proposed regulations go considerably beyond reasonable requirements and would create substantial financial and operational burdens. While this level of detail can reduce mislocates, minimize excavation errors, and enhance safety for field crews and the public, aligning GIS data with real-world conditions to the recommended degree will be a long-term

effort, potentially taking years or even decades. We respectfully request that the Underground Safety Board carefully consider these concerns and work with the industry to develop more practical and cost-effective approaches to achieving the underlying safety and accuracy objectives.

We appreciate the opportunity to provide these comments and look forward to continued dialogue on this important matter.

Respectfully submitted,

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