



October 23, 2025

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

VIA ELECTRONIC MAIL ONLY

Re: California-American Water Company - Monterey
Response to A Notice of Probable Violation
Case Number: D222970001

Dear Office of Energy Infrastructure Safety:

California-American Water Company ("California American Water") timely submits this written contest in response to the Notice of Probable Violation dated September 11, 2025 ("Notice"). California American Water acknowledges that it responded a day late to the "legal excavation start date and time" and agrees that relevant employees will complete the Board's education course identified in the Notice. California American Water believes, however, that no financial penalty or further corrective actions are necessary considering the circumstances and actions described below.

No California American Water Facilities Were Involved

As noted in the Investigation Report, the location of the event was outside of California American Water's service territory, so California American Water had no facilities in the area.¹ Additionally, the facility involved in the event was a telecommunications cable.² California American Water is a water and wastewater service provider and does not maintain any telecommunications lines.

¹ California American Water maintains maps of its service territories on its website:

- Monterey Water service area:
https://www.amwater.com/caaw/resources/PDF/Customer-Service-Billing/Rates-AL/Monterey/Central%20Division%20Service%20Area%20Maps.pdf?language_id=1
- Monterey Wastewater service area:
<https://www.amwater.com/caaw/resources/PDF/Customer-Service-Billing/Rates-AL/Wastewater/Service%20Area%20Maps%20Monterey.pdf?l...>

² Investigation Report, page 2.

California American Water Responded to the Ticket Prior to the Event

Although California American Water acknowledges its response was a day late, California American Water's response was received nearly 3 months prior to the event.³

California American Water's Corrective Actions

California American Water utilizes both a contractor, American Locating Services, and an employee to perform our mark out requests. For the event at issue, a California American Water employee responded. Following this incident, California American Water discussed with relevant employees the importance of timely and accurately responding to mark out requests. California American Water follows the American Public Works Association, Uniform Color standards, as well as USA North 811 California Excavation Manual. California American Water agrees relevant employee(s) will complete the Board's education course. In addition, California American Water is exploring additional education training opportunities for employees via EHS International, Inc., a NULCA-accredited and CGA-compliant training firm, meeting the requirements of CAL/OSHA, PHSMA, and the California State Contractors Licensing Board for qualified utility locators responding to 811 (USA) Dig Notifications.

Request & Conclusion

Based on the corrective actions taken since the event occurred, the fact the event occurred outside of California American Water's service territory, did not involve California American Water's facilities and a response was received from California American Water months prior to the event, California American Water respectfully requests that no financial penalty or further corrective actions be ordered by the Board. Although it receives hundreds of mark out requests, California American Water is aware of no other violation in Monterey since the incident.

Sincerely



Spencer Vartanian
Director of Operations, Coastal Division

³ California American Water responded on July 22, 2022. Per the Investigation Report, the event occurred on October 24, 2022.