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Principal Manager
T&D Compliance & Quality

August 27, 2020

Fadi Daye, P.E.
Program and Project Supervisor
California Public Utilities Commission
Electric Safety and Reliability Branch
Safety and Enforcement Division
320 West 4th St., Ste. 500
Los Angeles, California 90013

CPUCID: E20171202-01
Regarding: Notice of Violation
Location: 750 Clyde River Place Oxnard, CA

Dear Mr. Daye:

On behalf of the Southern California Edison Company (SCE), please accept this letter as acknowledgement and response to your letter dated July 27, 2020 regarding the above-referenced notice of violation.

Your letter states that on December 2, 2017, at 750 Clyde River Place in the city of Oxnard, an employee of Light and Power Inc., sustained burn injuries when he cut into an SCE 16 kV underground conductor. Your letter alleges that SCE is in violation of GO 128, Rule 17.1 for implementing a policy that can create dangerous conditions and prevents the furnishing of a safe environment for workers. In addition, the letter alleges SCE violated California Government Code (GOV) § 4216.3(a)(1)(B) by not marking the location of newly installed subsurface installations in areas with continuing excavation activity. Furthermore, the letter alleges SCE violated GO 128, Rule 17.7 since it failed to ensure that its underground facilities were marked properly prior to a third-party excavation. Finally, the letter alleges SCE is in violation of California Public Utilities Code (PU Code) § 451 for failing to furnish its services as necessary to promote the safety and health of the public and employees.

Without admitting that SCE violated GO 128, Rule 17.1, GOV § 4216.3(a)(1)(B), GO 128, Rule 17.7, or PU Code § 451, SCE responds as follows. The third-party contractor failed to follow industry protocol by failing to stop work and report the unidentified cable to SCE or the Dig Alert locating contractor (UtiliQuest) upon discovery. In addition, the third-party contractor failed to follow industry protocol by deliberately cutting into an unidentified cable without responsibly performing due diligence to investigate an unknown condition.



[Redacted]
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Nonetheless, in response to this incident, SCE will work with UtiliQuest to increase the speed and frequency that underground facility maps are updated. SCE will also provide additional education to third party excavator contractors concerning their required responsibilities in the event of discovering unmarked underground facilities.

Sincerely,

[Redacted Signature]

[Redacted]
Principal Manager, T&D Compliance & Quality
1 Innovation Way
Pomona, CA 91768