

Stakeholder Position on the Importance of Locating Electric Service Lines

The undersigned organizations represent a range of excavation construction contractors engaged in virtually all underground utility markets. Damage prevention is a shared responsibility among all stakeholders in the damage prevention process. While establishing “811” as the nationwide, toll-free one-call notification number has proven to be fundamental to reducing damages to underground facilities during excavation, one-call notification is but one part of the process.

Accurate locating by operators of *all* underground facilities is fundamental to damage prevention. We understand there is language under consideration that would revise the Kansas damage prevention law regarding a previous ruling of the Kansas Corporation Commission requiring electric companies to locate their facilities to the first building entry, regardless of ownership of that facility. We strongly oppose any language that would marginalize the locating responsibilities of *any* stakeholder, including electric companies.

Our organizations support and promote best practices developed by the Common Ground Alliance (CGA). CGA Best Practice 4.21 (Service Lines) is as follows:

Practice Statement

A service line is marked in response to a locate request to the operator who uses the service line to pursue a business that derives revenue by providing a product or service to an end-use customer via the service line. A service line is marked in response to a locate request to a governmental entity that provides a product or service to an end-use customer via the service line.

Practice Description:

A service line is a type of underground facility that is connected to a main facility. The service line is used by the following entities:

- *An operator who provides a product or service within a right-of-way, an easement, or an allowed access to or through private property while pursuing a business that generates revenue by providing a product or service to an end-use customer (other than another operator of like kind or themselves)*
- *A governmental entity that provides a product or service via that service line.*

The operator or the governmental entity locates and marks these service lines within the bounds of the locate request up to either 1) the point of their operational responsibility, 2) the point the service line enters a building, or 3) where the access to locate the line terminates, as designated by the prevailing law.

The responsibilities of electric companies certainly fall under the scope of this best practice, and exempting electric entities or limiting them from any locating responsibilities would compromise damage prevention and public safety. We’re perplexed that policymakers would even consider marginalizing state law in a way that would *reduce* excavation safety.



American Pipeline Contractors Association



Associated General Contractors of America



Distribution Contractors Association



National Utility Contractors Association



Power and Communication Contractors Association