



NC 380

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March 26, 2018

State of Oregon Public Utility Commission
201 High Street Ste. 100
Salem, Oregon 97301

Loy Clark Pipeline (LCP) submits the following response in compliance with Commission Order Number 18 050 entered February 8, 2018. The Order requires LCP to provide "a plan or procedure (policy) that identifies the company's workflow process for giving notice of proposed excavations to the Oregon Utility Notification Center (OUNC)." As specified, the policy covers the following elements:

- 1) Describe purpose of the policy and commitment by leadership, management and employees
- 2) Identify conditions and type of work required to call in locates
- 3) Identify tasks of participants based on position and title
- 4) Identify technology or systems used throughout the policy to enable the completion of the task
- 5) Establish criteria for periodic review of the effectiveness of this policy and identify best practices for its completion

Loy Clark Pipeline prides itself on the constant focus and dedication by all employees to continue to strive to be viewed as a safe and preferred contractor. The Company's attached policy satisfies the elements and demonstrates Loy Clark Pipeline priority commitment to safety.

1. *Describe the purpose of the policy and commitment by leadership, management, and employees;*
The commitment of the Senior Leadership and Management of LCP is to assist and oversee the guidelines and best practices of its staff and field management in accordance to the policy below.
 - a. To eliminate unnecessary locate requests
 - b. Train Supervisory and Administrative staff on how to initiate and manage locate requests
 - c. Train staff in proper procedures related to requesting utility locates:
 - i. Define/review processes involved from receipt of a Work Order (WO) / Job
 - ii. Identify the personnel requesting locates (Locate Coordinator, Division Manager, Locate Pre-checker)
 - iii. Identify where the WO goes after entered into our accounting system with locate number
 - iv. Identify how locate information is received by the crew(s)
 - v. Identify the criteria required to request an updated locate ticket
 - vi. Identify processes/specifics in requesting updated locate tickets



2. *Identify conditions and type of work that would determine the need to request locates;*

As stated in the Oregon Utility Notification Council Standards Manual, and by OSHA 1926.651(b)1 LCP is basing our plans and procedures upon the following rules;

952-001-0050 Excavator to Give Notice of Proposed Work; Exemption

(1) Except as provided in section (2) of this rule, at least two (2) business days, but not more than ten (10) business days before commencing an excavation, the excavator shall notify the Oregon Utility Notification Center of the date and location of the proposed excavation, and the type of work to be performed

1926.651(b) Underground installations.

(1) The estimated location of utility installations, such as sewer, telephone, fuel, electric, water lines, or any other underground installations that reasonably may be expected to be encountered during excavation work, shall be determined prior to opening an excavation.

As described below the need for notification of locates per the following LCP company divisions:

- a. Natural Gas Distribution Crews- Conversion, New Construction, Directional Drilling
- b. Ancillary- Vacuum Excavation and Dispatched Operated Equipment
- c. Civil Underground Infrastructure- Vault sets, Trenching/Open Excavation
- d. Directional Drilling- Various directional drilling work, Open Excavation

3. *Identify tasks assigned to participants based on title and position;*

The following illustrates the sequential flow of the respective divisions within LCP regarding the locate request process.

- a. Natural Gas Distribution crews
 - i. Routine WO gets "dropped" into the work order queue by customer
 - ii. Locate Coordinator retrieves WO from the queue then maps its geographical location and requests locates electronically from information provided within the WO from customer
 - iii. Locate Coordinator enters WO information into our accounting system
 - iv. Scheduling/Dispatch personnel assigns WO to the correct crews which creates the construction schedule
 - v. On occasion, the customer will place WO on hold after WO has been located and assigned due to a required site-specific permit which changes the status of this WO. The WO's status is then changed from "routine" to "permit pending"
 - vi. WO may also be placed "on hold" (passed by the LCP crew) due to the builder not being ready or out of compliance with customer's installation requirements, or there is a scope of work change that leads to a new route of the job
 - vii. Should any one of the above personnel be absent or unavailable for work, other staff members assist in completing this process



- b. Directional Drilling
 - i. WOs/Jobs have locates requested after the Purchase Order (PO) has been received by our office or based on the customer specified start date of the project. Locates are requested electronically by the Division Manager or General Foreman
 - ii. Locate tickets are forwarded by email to the project foreman. They are also kept on file to review as needed
 - iii. A hard copy of the locate ticket is also placed in the work order packet for the project to be kept on site
 - iv. On larger projects the job is divided up into phases, which allows us to call in locates in smaller sections as we move to that phase of the project
 - c. Ancillary Services
 - i. Locates are requested electronically by the Division Manager
 - ii. A hard copy of the locate ticket is given to the foreman with their work packet before the start of each project
 - iii. The locate ticket is also emailed to the foreman if needed
 - d. Civil Underground Infrastructure
 - i. Once the job has been awarded and the purchase order / contract is received in our office the locates are requested electronically by the Division Manager or General Foreman/Project Manager
 - ii. A hard copy of the locate ticket is given to the foreman with their work packet
 - iii. Upon start of the project the foreman "brackets" the utilities that have been located to preserve their location
 - iv. The locate ticket is emailed to the foreman if needed
 - v. On larger projects the job is divided up into phases (or geographical sections throughout the work site), this allows us to call in locates in smaller sections as we move to the next phase of the project
4. *Identify technology or systems used throughout the policy to enable the completion of the task;*
- a. How we input tickets online
 - i. All divisions generally request locates electronically from their office based personal computers
 - 1. In some instances, the locate requests are made via smart phones, tablets and or other mobile electronic device
 - 2. The ticket when issued is then emailed to the Supervisor or Locate Coordinator
 - ii. Utilizing the electronic mapping feature allows the user to further identify work area
 - iii. The locate ticket is also stored in our internal data center



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- b. The locate ticket is distributed to the crew foreman via email as well as a hard copy in their work packets
 - c. All of LCP's crew foremen are issued smart phones that are data enabled which allows them to have secured company email addresses so that they can receive the locate, permit and other project specific information electronically
 - d. The locate ticket can be viewed on laptop, smartphone or tablet to verify all utilities have been located or given a positive response
 - e. Use the electronic ticket to contact utilities if there is a question or to initiate a repair if needed
 - f. LCP is in the process to train all Supervisors and Field Personal to utilize the Enhanced Positive Response (EPR) feature
5. *Establish criteria for periodic review of the effectiveness of this policy and identify best practices for its completion;*
- a. On a periodic basis, locate requests are reviewed using ITIC to verify we are not unnecessarily updating or calling in tickets
 - b. Using established policies/best practices which promote appropriate procedures for correctly initiating locate requests as well as staff on site able to assist with questions on new and updated locate requests
 - c. LCP has scheduled an all-day safety summit in April 2018. One of the topics will be proper locating procedures which will be reviewed, discussed and tested for comprehension/understanding which will be a mandatory attendance by all LCP staff member

If after review of this document, you have any questions or concerns please feel free to contact me directly.

Respectfully,

Nick Olsen
Vice President Operations
Loy Clark Pipeline Co.