

# ORCGA GEOGRAPHIC COUNCILS – TIMELY UTILITY LOCATES – EXPLORING SOLUTIONS

## A CASCADING FAILURE

The Northeast Blackout of 2003 saw widespread power outages throughout parts of Ontario and the Northeastern United States, impacting over 55 million people.

The primary cause of the blackout was a faulty alarm system that failed to alert electric utility operators to redistribute grid load. When the transmission line failed, the regional electrical grid broke into separate transmission islands which were not able to handle the increased load, which then also failed, leading to collapse.

The Northeast Blackout is known as a cascading failure, which occurs in both man-made and ecological systems, and, is an underlying condition of all complex systems. Each part of a system is expected to behave within a certain range.

When a system element fails (partially or completely) the load is shifted to nearby elements in the system, that are then pushed beyond their capacity. This process cascades until substantially all elements are compromised.

Frustratingly, Ontario Damage Prevention stakeholders have been sounding the alarm on Late Locates for quite some time.

The ORCGA led discussions on Timely Utility Locates at 13 chapter meetings across the province to give stakeholders an opportunity to voice concerns. Over 500 stakeholders participated and the ORCGA saw repeated themes emerging. All comments were captured, summarized, sorted by stakeholder group and ranked according to discussion frequency, as indicated below:

## UTILITY INFRASTRUCTURE OWNERS

High Frequency	Excavators must juggle various utility expiry dates which drains resources and adds to confusion.
High	Fibre to Home has severely impacted some cities across the province.
High	Due to competition, Fibre to Home future project plans cannot be shared openly, impacting planning.
High	Utility mapping records should be collated and shared.
Med	Utilities need to tap into private locator pools in times of heavy work overflows.
Med	Utility owners are not always able to accurately predict and plan work schedules, due to unknowns, budget shifts or projects that are suddenly announced/dropped.
Med	Some utilities expressed that they used to be about Damage Prevention when they had internal locates. When locates were outsourced, it seemed like the lowest bid won the tender and it was seen that cheaper was not always better.
Low	To avoid wasting money in refreshing marks, some utility owners delay marking their infrastructure because they know that other utilities will be late on site.
Low	To increase efficiency, is there some way to eliminate multiple locates for one location?
Low	Some utilities have found that due to Late Locates, they could not provide adequate service to their customers (i.e. installing temporary service lines to the homeowner), thus damaging their reputation.
Low	Water based paint is an issue.
Low	ALAs are insufficient due to various limitations.

## LOCATORS

High Frequency	There is a very limited pool of qualified and experienced locators in the province.
High	There are enormous responsibilities placed on locators.
High	The industry sees high turn-over rates due to stressful work conditions and low compensation rates (in comparison to other trades).
High	Locator error can cause serious threats to workers and public safety. As a result, Locators should be a licensed trade.
High	Does "Dedicated Locator" mean that whoever has the most money gets locates first, creating two tiers of locating? Will the lower tier then have a poorer quality of locates?
High	Dedicated Locators will only draw on the already limited pool of experienced locators.
High	Performing utility locates are much more complex, when compared to previous years. What is a locate? Locates differ vastly in terms of complexity, thus impacting accurate scheduling.
Med	Renegotiated dates can become problematic.
Med	Inaccurate locates are being generated.
Low	Locators are "playing games" regarding renegotiation, dig start dates, hourly vs. unit rates, etc.
Low	Illegible sketch drawings are being produced.
Low	Locators are caught between the utilities and the contractors and do not have a voice.
Low	Utility Kingston model: While not always possible for every utility/company, Utility Kingston seeks to keep experienced locators hired/busy during the off season to avoid rehiring/retraining time during Dig Season.

## EXCAVATORS

High Frequency	Excavators are taking the brunt of the Late Locate issue.
High	Across the province, excavators stated multiple times that Late Locates have resulted in liquidated damages levied against them.
High	Excavators, in some regions, are afraid to complain, as they fear a loss of future business, damage to their reputations, and loss of the ability to “call in a favour” when truly needed.
High	Due to financial pressures, some excavators admitted to not being able to wait for locates and start excavation without paint and paperwork!
High	Excavators have limited time and resources to follow up multiple expiry dates, let alone take <i>even more</i> time to submit formal late locate complaints. Some have expressed they have “given up” on Ontario One Call.
High	Excavators who don’t follow the law and dig without locates will get fined. But when locates are late, in contravention to OUNIS, no fine is ever levied.
High	Excavators are very unclear as to what Ontario One Call is responsible for, and, for what Ontario One Call can and cannot do.
High	Excavators are unclear on: <ul style="list-style-type: none"> <li>• That OUNIS provides “wiggle room” (this perceived as a loophole) between Day 5 and Day 8;</li> <li>• That OUNIS speaks to business days and not calendar days;</li> <li>• How the OUNIS statement “The member shall <b>make all reasonable attempts</b> to do the things required by subsection (1) within five business days of the day the member receives notification about the proposed excavation or dig” is being interpreted by Ontario One Call.</li> </ul>
High	Excavators are unclear on what is the actual goal of submitting formal complaints.
High	Multiple instances of locators “sitting on” locates, that are many weeks late, and not understanding that there are steps that can be taken to action the late locates.
High	Excavators submit large areas to be marked in hopes of getting “some” locates done – a shotgun approach.
High	Much confusion surrounds the legalities of excavators sharing locates on the job site – how to indicate which companies are sharing a locate via the web portal, and, is this legal?
Low	Excavators who correctly portion large excavation work into smaller areas, now must chase multiple locates, making more work for themselves.
Low	To place accurate tender bids, multiple excavators are submitting locate requests for the same area, before being awarded the actual work. Municipalities should be paying and providing for this information.
Low	Confusion surrounding 30 days, 60 days and “life of project”. Bell has provided conflicting information to excavators.
Low	Emergency locate emails should be identified in the email subject line, or, via a phone call.
Low	Mark preservation, and the correct methodology, is playing a part in late locates.
Low	Border tickets (i.e. CLI north side of street, PVS south side of street) are problematic.

## ONTARIO ONE CALL (OOC)

High Frequency	Entering locates into the OOC portal, as well as deciphering the onerous locate paperwork, is very complex for excavators.
High	Excavators are not understanding the repercussions of ticket dumping or relocates/remarks.
High	No fines have been levied – which is broadly perceived as a conflict of interest – that OOC members are not fining their own, or, OOC members are hiding behind the process.
High	The OUNIS states a person or entity who does not comply with section 5, 6 or 7 is guilty of an offence and on conviction is liable to the fine. <i>There were many questions asking for this process to be explicitly defined, along with timelines.</i>
High	Why should anyone submit formal complaints? OOC isn't going to issue a fine. What's the point other than wasting time?
High	The OUNIS states that the utility owner is mandated to provide the locates in 5 days, When locates aren't received in 5 days, this is in total contravention to the act.
Low	In 2018, Colorado revised its One Call legislation, primarily because the legislation did not provide for enforcement. Now the Colorado Underground Damage Prevention Safety Commission has been created to review complaints and ordering appropriate remedial action/penalties.
Low	Alberta is seeking to establish a One Call act, and, may use the Washington state model – a peer driven process.
Low	Some US states have achieved locates in 2-3 days. Notwithstanding Canadian weather and seasonal work, how are they achieving that success rate? This statement was countered by saying Late Locates were an issue across North America. Some debated this anecdotal pervasiveness of Late Locates.
Low	When submitting the locate request to OOC, is there a way to indicate/rank the complexity/ importance of a job? For example, all Metrolinx, Ottawa LRT, Kitchener Waterloo LRT locate requests get first priority vs. homeowner pool job?
Low	OOC gave member rebates worth millions of dollars rather than spending money on compliance and enforcement.

## ORCGA

Mid Frequency	Excavator education is a necessity.
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## MISCELLANEOUS

Mid Frequency	Late Locates is all about the dollar. Damage Prevention has been superseded by the dollar.
Low	It was estimated that 30% of relocates are due to late locates.
Low	The discussions often referred to Late Locate penalties, but what about the rewards for a job done well and on time?