

BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

In the Matter of a Penalty Assessment against
SEFNCO COMMUNICATIONS, INC.
in the amount of \$10,000

DOCKET PL-171148
DECLARATION OF
KEVIN JONES

1 I, KEVIN JONES, under penalty of perjury under the laws of the State of
Washington, declare as follows:

2 I am over 18 years of age, a citizen of the United States, a resident of the State of
Washington, and competent to be a witness.

3 I am employed by ELM as a lead locate technician (“locator”), and I have worked
for ELM as a locator since February 2015. ELM is a damage prevention and energy
compliance contractor in Washington for Puget Sound Energy and Avista Corporation.

4 My duties involve performing locates for PSE. When I receive notice that a locate is
needed, I travel to the site of the proposed excavation and mark the location of any PSE gas
lines in yellow paint (yellow is for gas, oil, steam, petroleum, or other hazardous liquid or
gaseous materials).

5 On July 28, 2017, I performed a gas line locate in Tacoma associated with
Washington One Call Ticket No. 17284954 for SEFNCO Communications, Inc. (“Ticket”).
I observed white paint markings on 100th Street near the Credit Union, between Pacific
Avenue and the alley entrance behind the Credit Union. PSE has lines in the area, but no
lines are located within the location of the white paint markings on 100th Street. I “cleared”
the area, by indicating in yellow paint that PSE did not have lines within the white paint
markings near the Credit Union. I observed that other utilities had cleared the area as well.

6 I noted, however, that there seemed to be a discrepancy in the white paint markings
and the directions on the Ticket. I called SEFNCO and spoke with Mike Violette. While I
was on the phone with Mr. Violette, I walked east on 100th Street to the intersection with A
Street, where there is another utility pole. I observed multiple utility attachments on the pole
at the intersection of 100th Street and A Street, and I observed manhole covers in the street
near the intersection. There were no white paint markings.

7 From my conversation with Mr. Violette I understood that SEFNCO would be
starting to drill across A Street. I advised him to call in a new locate, and I understood that
he was going to do that.

8 On August 1, 2017, I was dispatched back to 100th Street by Aaron Christel, who I
reported to. Mr. Christel is ELM's area manager for Tacoma. I understood that Mr. Christel
had received a call from Mr. Violette, and my instructions were to perform another locate at
100th street. I proceeded to 100th Street on August 1, 2017, and performed the locate for PSE
gas lines at the intersection of 100th Street with A street.

9 On August 2, 2017, SEFNCO's drill hit the McChord pipeline.

10 ELM prepared an internal investigation report, and I contributed photographs as well
as my report to our internal investigation. A copy of ELM's internal investigation, "McCord
Pipeline Damage Investigation," prepared by Mr. Christel and including my input, is
attached to this declaration.

DATED at 4/14/2018 (city/town), Washington, and effective this ___th day
of April, 2018.



KEVIN JONES

Nad: Lat: Lon: Zone:
ExCoord NW Lat: 47.1667525 Lon:-122.4335611 SE Lat: 47.1665617 Lon:-122.4313831

Type of Work: INSTALL CATV MAINLINE
Location of Work: PLEASE PLACE LOCATES FROM THE SOUTH SIDE OF BUILDING TO
: POLE AND THEN EAST BOUND DOWN 100TH ST TO POLE ON EAST SIDE OF INTERSECTION
: OF A ST AND 100TH TO THE POLE

Remarks: AREA MARKED IN WHITE
:

Company : SEFNCO Best Time:
Contact Name: MIKE VIOLETTE Phone: (253)350-6417
Email Address: MVIOLETTE@SEFNCO.COM
Alt. Contact: TIM LUNDELL Phone: (253)375-3278
Contact Fax : (866)492-9650
Work Being Done For: COMCAST
Additional Members:
CC7711 MCCHRD01 PIERCE01 PRKLW01 QLNWA24 TACDPW01 TACH2001
TACFWR01

Excavation Polygon Coordinates
Latitude Longitude Latitude Longitude Latitude Longitude
(47.1665617, -122.4313831) (47.1666184, -122.4335611) (47.1667525, -122.4335557)

(47.1666855, -122.4334860) (47.1666700, -122.4313831)

Photo showing white marked area and overhead view of white marked area



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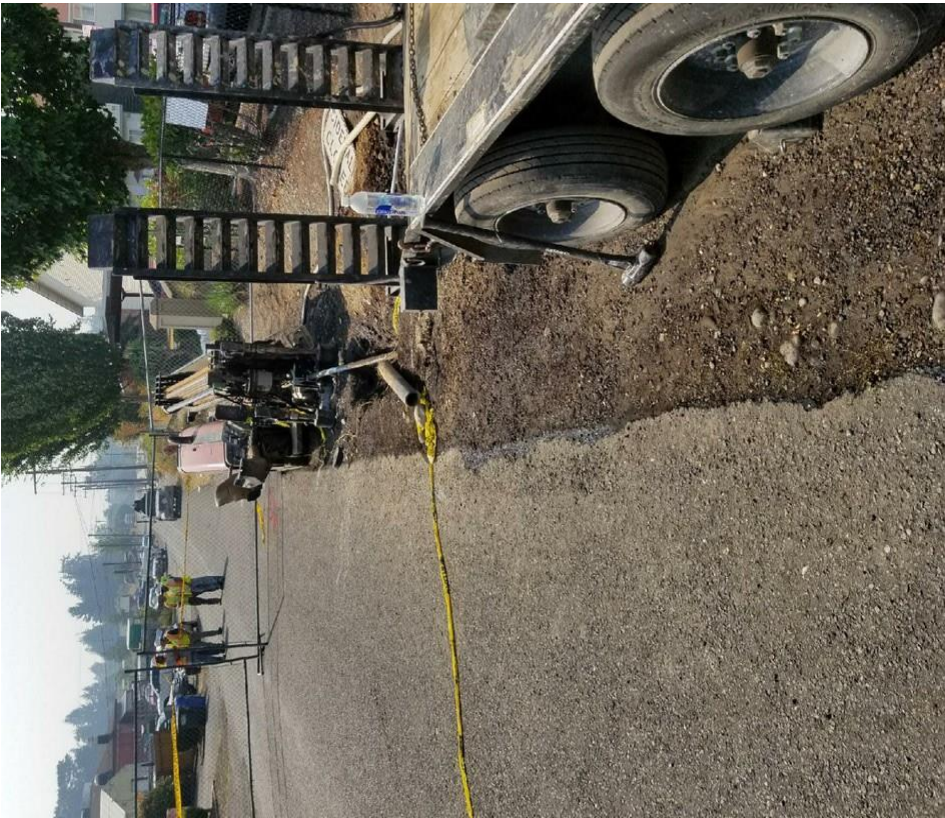
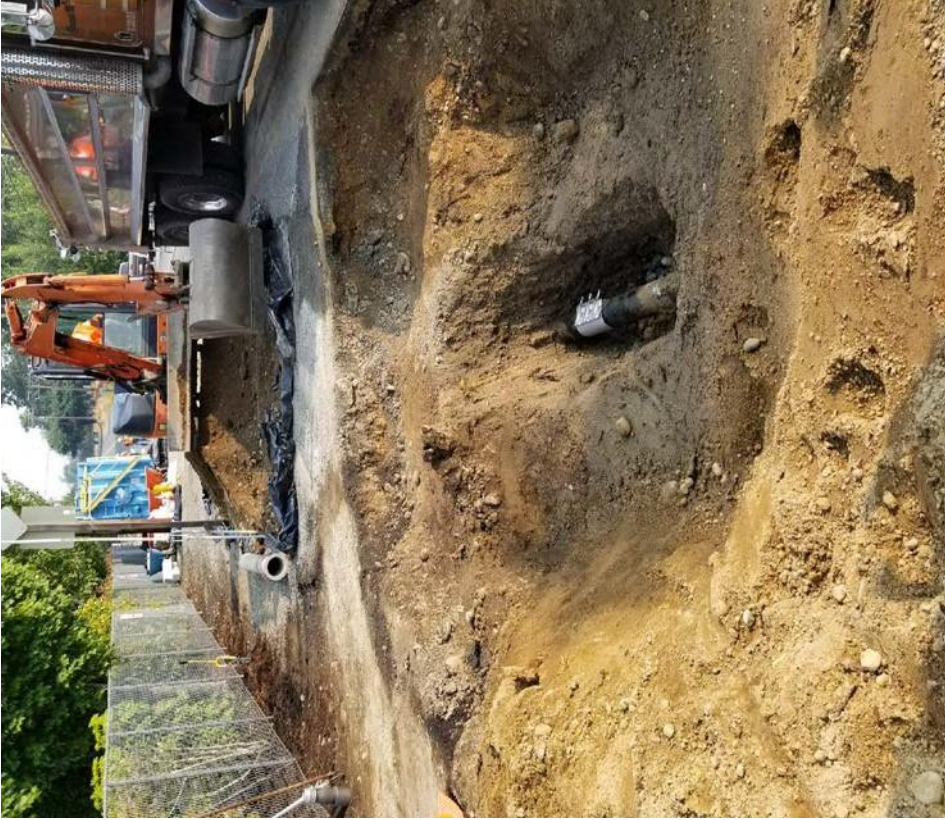
The screenshot displays a Microsoft Excel spreadsheet with a Google Earth map embedded in cell B4. The map shows an aerial view of an industrial area. Key features on the map include:

- 9911 Pac Ave**: A large building with a brown roof.
- 100th St**: A major road running horizontally across the middle of the map.
- A St.**: A road running vertically on the right side of the map.
- Damage Location**: A yellow starburst icon marking the intersection of 100th St and A St.
- White marked area**: A yellow rectangular area on the left side of the map.

The Excel interface shows the 'Insert' tab selected, with various toolbars for PivotTables, Pictures, Charts, and Maps. The taskbar at the bottom indicates the system date is 8/10/2017 and the time is 1:24 PM.

Photos from the day of damage





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My Statement: I was contacted by ELM Dispatch on the morning of 8/1/2017 and informed that the ticket in question had not been marked properly and to contact the contractor. Here is the text of the email:

Hi -

Please call Jessie at 253-263-0847 about no gas locates on A Street, for ticket #17284954. Please have the locator call him before arriving so he can make sure we are in the right spot. They will be crossing A Street.

I attempted to contact Jessie, but he did not answer. I then reopened the ticket, contacted the original locator, and sent him back to the job site. When Kevin, the original locator, arrived, he met the crew on site and was verbally instructed of the work area. He then marked out the main under my instruction that passed through the described work area. Kevin recommended to the forman on site that they call in a new locate request due to the confusion of the white marks behind 9911 Pac Ave. He explained that the other utility companies in the area had marked only that location and that he did not see any white marks indicating that the work would extend to the pole on A st. Here is a photo of that meeting taking place, the gas main marked in the described on site work area. Notice white marks are not visible.





This photo is taken from the north facing south.