

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF LEXINGTON)	Case No. 2025-CP-32-
)	
Anthony Locklear,)	
)	
Plaintiff,)	SUMMONS
)	(Jury Trial Demanded)
vs.)	
)	
Dominion Energy South Carolina, Inc.)	
F/K/A South Carolina Electric & Gas)	
Company,)	
)	
Defendant.)	

TO THE ABOVE-NAMED DEFENDANT:

YOU ARE HEREBY SUMMONED and required to answer the Complaint herein, a copy of which is herewith served upon you, and to serve a copy of your answer to this Complaint upon the subscriber, at the address shown below, within thirty (30) days after service hereof, exclusive of the day of such service, and if you fail to answer the Complaint, judgement default will be rendered against you for the relief demanded in the Complaint.

MCGOWAN HOOD FELDER & PHILLIPS, LLC

s/ Chad A. McGowan
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Rock Hill, South Carolina
December 2, 2025

STATE OF SOUTH CAROLINA)	IN THE COURT OF COMMON PLEAS
)	FOR THE ELEVENTH JUDICIAL CIRCUIT
COUNTY OF LEXINGTON)	Case No. 2025-CP-32-
)	
Anthony Locklear,)	
)	
Plaintiff,)	COMPLAINT
)	(Jury Trial Demanded)
vs.)	
)	
Dominion Energy South Carolina, Inc.)	
F/K/A South Carolina Electric & Gas)	
Company,)	
)	
Defendant.)	

NOW COMES Plaintiff Anthony Locklear (“Plaintiff”), by and through his undersigned counsel, complaining of Defendant Dominion Energy South Carolina, Inc. (“Dominion” or “Defendant”), would respectfully show unto the Court as follows

PARTIES, JURISDICTION, AND VENUE

1. Plaintiff Anthony Locklear (“Plaintiff”) is a citizen and resident of the State of North Carolina.
2. Defendant Dominion Energy South Carolina, Inc. (“Dominion”) is a corporation organized and existing under the laws of South Carolina and at all times relevant owned, operated, and maintained the McMeekin Station power generation facility located in Lexington County, South Carolina.
3. Venue is proper in this Court pursuant to S.C. Code Ann. § 15-7-30 because the acts and omissions complained of herein occurred in Lexington County, South Carolina.
4. This Court has subject matter jurisdiction over this action pursuant to S.C. Const. Art. V, § 11 and S.C. Code Ann. § 14-5-340.

FACTUAL ALLEGATIONS

5. This action arises out of a catastrophic arc-flash explosion that occurred on or about March 30, 2025, at Dominion's McMeekin Station power generation facility in Lexington County, South Carolina, in which Plaintiff, a 38-year-old industrial electrician, sustained severe burn injuries while performing outage work as a contractor on Dominion's premises.

6. Plaintiff was employed by Babcock TEiC Construction Services, Inc. ("TEiC"), which had been contracted to perform outage and related work at McMeekin Station.

7. Plaintiff was assigned to work on a 480-volt switchgear that had been locked and tagged out.

8. The 480-volt switchgear was located immediately adjacent to and attached to a 4160-volt switchgear, which remained energized.

9. Dominion did not lock out or de-energize the 4160-volt switchgear during the outage period, despite its proximity to the work area, the voltage involved, and Dominion's knowledge of the significant arc-flash hazards associated with that equipment, and Dominion's own Lockout/Tagout ("LOTO") procedures requiring strict energy isolation.

10. Dominion admits in correspondence that no LOTO was issued or performed for the 4160-volt gear during the outage period, and that the gear was receiving auxiliary power on March 30, 2025.

11. Upon information and belief, Dominion maintained a written LOTO procedure, identified as TSP-675, which required that equipment on which work is to be performed be shut down, isolated from energy sources, locked and tagged, stored energy released, and de-energization verified before work begins, in order to protect employees and contractors at the site.

12. Upon information and belief, a 4160-volt switchgear at McMeekin Station had been involved in a prior arc-flash event on or about March 5, 2012, which resulted in serious burn injuries to at least one Dominion employee and an OSHA investigation of Dominion's electrical safety practices at that facility.

13. Dominion's failures were not isolated or unforeseeable. Following the 2012 event, Dominion knew or should have known that the 4160-volt switchgear at McMeekin Station presented a serious arc-flash hazard capable of causing catastrophic burn injuries and that strict adherence to LOTO and related electrical safety procedures was required to protect workers in and around that equipment. Dominion therefore had actual knowledge of the hazard years before Anthony's injury.

14. Prior to the incident on March 30, 2025, Plaintiff became concerned that the job was not being performed safely and that the work area was not properly isolated from hazardous energy.

15. Due to these safety concerns, Plaintiff initiated the "STAR" protocol -- Stop, Think, Act, and Review (or similar internal safety process), and caused the job to be halted so that a safety review could be conducted.

16. Following a STAR safety review, Dominion's personnel and/or agents, upon information and belief, represented and reassured the TEiC crew that the relevant switchgear had been turned off, that the 4160-volt switchgear was de-energized, and that the work area was safe to proceed.

17. In reliance on these assurances from Dominion's personnel and/or agents, Plaintiff and his supervisor returned to the work area and resumed preparations for the job.

18. As Plaintiff and his supervisor were positioned in the area, a door opened and closed to the switchgear room.

19. Upon information and belief, combustible coal dust had been allowed to accumulate in and around the energized 4160-volt switchgear and within the switchgear room.

20. Upon information and belief, when the door to the switchgear room was opened and closed, the accumulated coal dust was stirred up, became suspended in the air, and came into contact with the energized 4160-volt switchgear, igniting and causing a catastrophic arc-flash explosion.

21. Plaintiff and his supervisor were engulfed in flames and Plaintiff sustained severe burn injuries as a direct result of the arc-flash explosion.

22. As a direct and proximate result of the conditions created and allowed to exist by Dominion at McMeekin Station, including the failure to de-energize and lock out the 4160-volt switchgear, the accumulation of combustible dust, and the false reassurances following the STAR safety meeting, Plaintiff suffered catastrophic, permanent injuries and damages.

23. Plaintiff's injuries were directly and proximately caused by Dominion's failure to follow safe electrical and dust hazard practices, including but not limited to:

- a. Failing to de-energize the 4160-volt switchgear during the outage period;
- b. Allowing coal dust to accumulate in hazardous quantities near energized electrical equipment;
- c. Failing to warn TEiC and Plaintiff of the dangerous conditions present;
- d. Failing to implement and enforce its own LOTO and combustible dust safety procedures;
- e. Failing to provide a safe workplace for contractors.

**CAUSES OF ACTION
COUNT I – NEGLIGENCE**

24. Plaintiff realleges and incorporates the preceding paragraphs as if set forth verbatim.

25. Dominion owed Plaintiff a duty to exercise reasonable care in maintaining its premises, equipment, and operations in a reasonably safe condition, including compliance with OSHA standards, NFPA standards, and its own LOTO procedures.

26. Dominion breached its duties by the acts and omissions described above.

27. As a direct and proximate result of Dominion's negligence, Plaintiff sustained severe and permanent injuries, endured excruciating pain and suffering, incurred substantial medical expenses, lost wages, and diminished earning capacity, and will continue to suffer damages in the future.

COUNT II – NEGLIGENCE PER SE

28. Plaintiff realleges and incorporates the preceding paragraphs.

29. Dominion's conduct violated OSHA standards and NFPA codes governing control of hazardous energy (29 CFR §1910.147; 29 CFR §1910.269; NFPA 70E; NFPA 652 and 654), which are designed to protect workers such as Plaintiff from the very harms suffered.

30. Dominion's violations constitute negligence per se, entitling Plaintiff to recover damages proximately resulting from such violations.

COUNT III – PREMISES LIABILITY

31. Plaintiff realleges and incorporates the preceding paragraphs.

32. Plaintiff was a business invitee on Dominion's premises. Dominion owed Plaintiff the duty to exercise reasonable care to keep the premises safe and to warn of hidden dangers.

33. Dominion breached these duties by allowing coal dust to accumulate, failing to control hazardous energy, and failing to warn of known hazards.

34. As a direct and proximate result, Plaintiff suffered catastrophic injuries and damages.

COUNT IV – GROSS NEGLIGENCE / RECKLESSNESS

35. Plaintiff realleges and incorporates the preceding paragraphs.

36. Dominion had actual notice of arc-flash hazards at McMeekin Station, including the 2012 OSHA-investigated arc-flash explosion.

37. Despite this knowledge, Dominion consciously disregarded worker safety by failing to implement adequate protections, choosing production and expedience over safety.

38. Dominion's conduct was willful, wanton, and reckless, entitling Plaintiff to an award of punitive damages.

DAMAGES

39. As a direct and proximate result of Dominion's negligence and recklessness, Plaintiff sustained catastrophic, life-altering injuries, including but not limited to:

- a. Severe burn injuries involving approximately 30% of his total body surface area (TBSA), including deep second- and third-degree burns requiring operative intervention, grafting, and prolonged hospitalization;
- b. Burn injuries to his face with associated ocular trauma and injury to his right eye, requiring ophthalmology consultation and ongoing treatment;
- c. Extensive burns to his torso and extremities, with findings of pale eschar to his flanks and full-thickness injury to approximately 10% of his body;

- d. Prolonged hospitalization at the Joseph M. Still Burn Center at Doctors Hospital in Augusta, Georgia, including multiple surgical procedures, skin grafting, and debridement;
- e. Excruciating pain, mental anguish, and emotional trauma, including the trauma of facial disfigurement and permanent scarring;
- f. Loss of vision in his right eye and diminished functional capacity due to his burn injuries;
- g. Loss of wages, loss of earning capacity, and inability to return to work in his trade as an industrial electrician;
- h. Past and future medical expenses, including lifelong medical care, burn rehabilitation, and adaptive support;
- i. Permanent disability, disfigurement, and loss of enjoyment of life; and
- j. Punitive damages, given Dominion's conscious disregard for worker safety despite its knowledge of prior arc-flash incidents on the same equipment.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully prays for judgment against the Defendant for actual damages, special damages, consequential damages, and punitive damages in an amount to be determined by the jury at the trial of this action, for the costs and disbursements of this action and for such other and further relief as this Court deems just and proper. Plaintiff specifically avers that the damages at issue in this case are more than \$100,000, such averment made to allow all manner of discovery under South Carolina Law.

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