

Title: Davao Del Norte Electric Cooperative vs. Heirs of Victorino Lucas

Facts:

The case originated from a complaint for quasi-delict, damages, and attorney's fees filed by the heirs of Victorino C. Lucas against the Davao Del Norte Electric Cooperative (DANECO). On November 8, 2001, Victorino Lucas encountered an accident involving a low-hanging high-tension electrical wire maintained by DANECO, leading to injuries that resulted in his death on November 16, 2001. Despite providing financial assistance for medical expenses, DANECO refused to fully assume liability, citing adherence to safety standards and attributing the accident to unforeseeable forces and the victim's negligence. Throughout the trial process, testimonies and evidence were presented by both parties. The Regional Trial Court (RTC) ruled in favor of the respondents, a decision which was affirmed with modifications by the Court of Appeals (CA).

Issues:

1. Did DANECO exhibit negligence in maintaining its electrical wirings and power lines, and whether such negligence was the proximate cause of Victorino's death?
2. Application and effects of the doctrine of *res ipsa loquitur* in the case.
3. The appropriateness of the CA's awards for damages.

Court's Decision:

The Supreme Court denied the petition, upholding the CA's findings. The Court reasoned that the established circumstances and the application of the doctrine of *res ipsa loquitur* sufficiently proved DANECO's negligence. It was held that DANECO failed to exercise due diligence in maintaining its power lines, leading to the accident. Furthermore, the Court found the CA's modification of awards for damages to be justified given the circumstances, indicating that DANECO's negligence was the proximate cause of the accident.

Doctrine:

The case reiterates the application of the doctrine of *res ipsa loquitur* in instances where the accident's nature and the control of the instrumentalities involved imply negligence on the part of the entity in control. Additionally, it emphasizes the necessity of proving negligence and the causal connection for claims based on quasi-delict.

Class Notes:

- Quasi-delict: Requires proof of damage, fault or negligence, and a causal connection.
- Negligence: Failure to observe the degree of care expected to be exercised by a

reasonable person under similar circumstances.

- Proximate Cause: The primary cause that in a natural and continuous sequence, unbroken by efficient intervening causes, produces the injury and without which the result would not have occurred.
- Doctrine of *res ipsa loquitur*: Permits the inference of negligence in cases where the accident couldn't have occurred in the absence of negligence by the defendant, in control of the instrumentality causing harm, and where other potential causes have been eliminated.
- Damages: Include actual or compensatory, moral, and exemplary damages, computed based on established jurisprudential guidelines.

Historical Background:

This case highlights the responsibilities of utility providers in maintaining public safety through the diligent maintenance of infrastructure. It underscores the judicial system's role in holding entities accountable for negligence and in providing just compensation for the aggrieved parties. This decision contributes to the body of jurisprudence concerning utility companies' liability for accidents involving their equipment and installations, emphasizing the importance of proactive safety measures and the potential consequences of their neglect.