



Utility Pole Safety En Banc

Panel Three: Commission Rules and Processes –

Question: General Order 95 Rule 12 permits grandfathering, and some safety rules only become applicable to facilities when those facilities are replaced or reconstructed. How does the variability of standards from pole to pole affect safety?

- In general, a new, possibly stronger, pole may support a greater share of the loads. On the other hand, the adjacent poles may benefit from the proximity of the new, stronger pole.
- Ordering wholesale and immediate reconstruction of all existing overhead lines would be unreasonable....but may be Ordered for individual or sections of poles where absolutely necessary...

Does the National Electric Safety Code (NESC) contain rules that might inform the CPUC's regulation of utility pole safety?

The NESC is not intended as a design specification or as an instruction manual, although its safety criteria may be used as baseline parameters in design and engineering calculations for the network.

Wholesale adoption of the NESC would require reconciling various clearance and load requirements with those established by GO 95.

LRFD (Load and Resistance Factor Design)

- The NESC uses LRFD (Load and Resistance Factor Design) in Contrast to the GO 95 Safety Factors
- The LRFD method is the accepted academic and industry method for designing structures, properly accounting for different material, and load characteristics.
- LRFD has the advantage of understanding the significance of the "safety factors" as related to the loads ("load factors" typically ≥ 1) vs. the product strength ("strength factors" typically ≤ 1), in comparison to GO 95 which essentially only considers their ratio (load factor divided by strength factor, typically ≥ 1)
- LRFD Can be Reconciled with GO 95.

Question: ***Investor-owned utility General Rate Cases tend to have more limited service lists than safety related investigations. Should the CPUC explore inviting safety Intervenors to participate in General Rate Cases in which utility pole safety issues are addressed?***

- The rate-setting environment of a GRC is ill-suited to provide forward looking consideration of joint-use safety
- Safety Design and Rules are better addressed in an open forum where all Interested parties have an opportunity to be heard on what can be relatively complex technical issues,
- The Commission Should ensure *qualified* Intervenors.

Other best Practices:
**Further Support Safety & Enforcement
Division's Role as "Educator."**

Further SED-Industry Safety-collaboration by creating education opportunities to meet with Industry outside of litigation or enforcement actions.

Provide Industry-Specific Education Opportunities for SED Staff.

Continue to Recognize the Role of Industry Collaboration in Advancing Safety Rules Specific to California

The GO 95/128 Rules Committee, for example....

