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Utility Pole Safety En Banc

Panel Three

Commission Rules and Processes

CPUC Agenda: *“Stakeholders will discuss whether there are opportunities to update existing CPUC rules concerning utility poles, e.g., General Order 95, and whether changes to CPUC processes might contribute to greater utility pole safety.”*

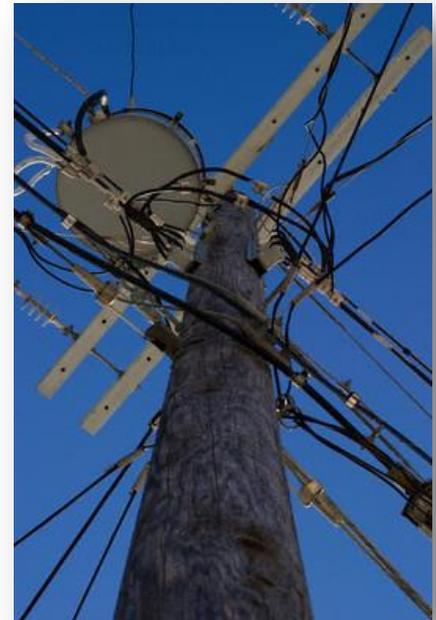
Discussion Topics

- Introduction
- Pole safety impacts of grandfathering and standards variability
- Opportunities to assess and advance pole safety by leveraging additional resources:
 - National Electrical Safety Code (NESC)
 - Other industry resources

Grandfathering & Standards Variability

CPUC Agenda: *“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?”*

- The impacts of rule changes, grandfathering and standards variability on pole to pole safety are generally manageable.
- Poles are designed and constructed to the standards in effect at the time.
 - Subsequent changes to a pole within a line segment, e.g., changing out or modifying a pole, may affect nearby poles. However, the impact on safety is generally negligible.



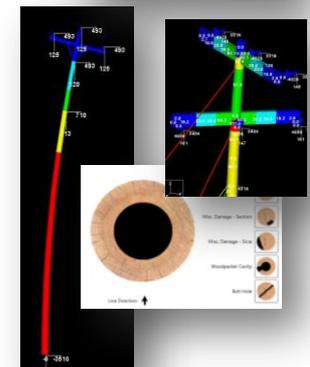
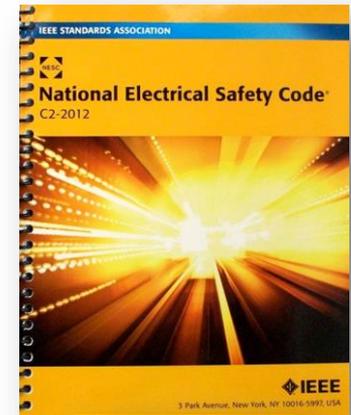
Opportunities to Assess & Advance Pole Safety: National Electrical Safety Code (NESC)

CPUC Agenda: “Does the National Electrical Safety Code contain rules that might inform the CPUC’s regulation of utility pole safety?”

- The NESC contains rules and reflects practices that could be leveraged to advance General Order 95 and enhance utility pole safety.

EXAMPLES OF DIFFERENCES

Attribute	General Order 95	NESC
Structural Design Process	More straightforward Does not cover every situation	More precise methodology and more consistent reliability
Loading Criteria	Silent on extreme wind and ice loads	Leverages national standards for extreme wind and ice loads
Operation & Maintenance	Allows safety to be reduced for additional attachments and/or deterioration	Reductions in safety are allowed only for deterioration



CPUC Agenda: *“Are there other industry best practices that might similarly inform CPUC rules?” + “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?”*

- Several resources are available that can be leveraged to identify best practices, and assess and advance pole safety:
 - Networking with other utilities on an individual basis or via professional industry/trade organizations
 - Reviewing industry standards, guidelines and reports
 - ASCE, IEEE, CIGRE, CSA, IEC, EPRI, CEATI, DFI, etc.
 - Seeking input from safety SME’s/intervenors