Utility Pole Safety

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Public Service Responsibilities

**Access to Infrastructure**

- Implement statutory programs to support universal telecommunication services
- Support broadband deployment programs to bridge the digital divide
- Implement income-qualified energy program (e.g. CARE)
- Provide consumer dispute resolution to minimize service cut-offs

**Safety**

- Conducts safety inspection of rail crossings
- Inspect electric and gas infrastructure
- Review regulatory filings for safety concerns
- Ensure compliance of water utilities to state and federal public health requirements
- Ensure access to telecommunication services to support public safety (e.g. 911)
- Utility pole safety

**Central Core**

1. PUC administrative support and control
2. Legislative committee and control agency oversight
3. Commissioner oversight and policy direction
4. State and Federal statutory authority

**Environment**

- Implement water conservation regulation across privately-owned water companies
- Implement state laws to mitigate greenhouse gas emissions and increase use of cleaner energy resources
- Support efforts by sister agencies such as Air Resources Board and California Energy Commission

**Regulation**

- Review license applications by goods and passenger carrier companies
- Review and audit utility costs
- Review rate cases by small telephone companies
- Implement and administer new state laws on rideshare companies
- Conduct oversight to ensure compliance of state law by regulated utilities
A black bear climbed this pole in Three Rivers, Ca. to scavenge for acorns out of the cross arm. (📷: Jim Kennard)
Current Efforts to Assure Pole Safety

CPUC is the only PUC in the country to have a dedicated electric safety program. Other states require compliance with the National Electric Safety Code, but don’t have an enforcement program or dedicated electric safety staff.

The CPUC:
• Cites electric utilities for violations of General Order 95, 128, et al.
• Reviews and approves utility expenditures for pole maintenance and replacement
• Performs risk-based analysis of pole safety for use in rate cases
• Hosted a Utility Pole Safety En Banc on April 28, 2016
  • Preceded by visit to site of 2007 Malibu Canyon Fire
2007 Malibu Canyon Fire

- CPUC Commissioners and staff toured site of fire prior to En Banc
- Visit showed abandoned utility poles
- More info on Malibu Fire:
  - CPUC and LA Fire investigations found fire started when three top-heavy, electric wire utility poles snapped during heavy winds
  - Burned almost 4,000 acres
  - Destroyed 14 structures and 36 vehicles, including Castle Kashan and Malibu Presbyterian Church
  - Injured 3 firefighters
  - CPUC required SCE and telco’s to pay over $60M in damages
Utility Pole Safety En Banc

• CPUC hosted En Banc on April 28, 2016 in Los Angeles

• Objective: to begin a high-level discussion of the state of pole safety not limited to a specific incident, industry or service territory, and to identify areas for improvement

• Part of the CPUC’s 2016 Safety Action Plan, which seeks to drive a safety culture

• 3 panels, 13 speakers. Participants included:
  • investor-owned utilities
  • communications providers
  • public safety agencies
  • consumer groups
  • utility worker groups
Utility Pole Safety En Banc Observations of Panelists

- Many factors can overload a pole (e.g. ice, wind, attached equipment, load imbalance, improper guying, wire tensions, and gradual strength degradation)
- Unauthorized attachments occur in all service territories and the current fine is viewed as inadequate
- Current process for coordinating attachments is paper-based and time-consuming
- There are pros and cons to solely-owned vs. jointly-owned poles
  - Sole ownership may improve pole management and safety
  - Joint ownership may reduce redundant infrastructure and cost to ratepayers
- Broad agreement on value of a compulsory, shared pole database
- GO 95 committee has done major work on pole safety over past decades
- GO 95 is largely compatible with National Electrical Safety Code (NESC) standards, but there may be areas where NESC standards could improve CA practice
- CPUC staff lack citation authority over communication infrastructure attachers
Utility Pole Safety En Banc
Takeaways

• CPUC enforcement action against electric utilities is severely hampered by a section in CPUC General Order 95 that allows electric utilities to claim compliance with safety rules so long as they have a plan in place for remedying the violation.

• Communication Infrastructure Providers (CIPs) are primary offenders for overloading poles. CPUC staff do not have citation authority over CIPs, only electric utilities.

• Outside San Diego, databases lack up-to-date pole loading information, resulting in unreliable records on pole loading and maintenance schedules.
Proposed Efforts to Improve Pole Safety

• Underway: CPUC’s Safety and Enforcement Division filed a petition to modify General Order 95 on May 6, 2016, to enhance CPUC’s ability to enforce safety rules

• Under Discussion: Grant CPUC staff authority to cite Communication Infrastructure Providers (CIPs), as is the practice for electric utilities

• Under Discussion: Explore creation of a statewide database with up-to-date information on pole loading
Underway: Improving Enforceability of General Order 95

- CPUC’s Safety and Enforcement Division has had authority to cite electric utilities for pole safety violations for a year, but has issued few citations.

- Why? General Order (GO) 95 allows utilities to claim compliance with safety rules so long as they have a plan in place for remedying the violation.

- Earlier this week, CPUC filed a petition to amend GO 95 to ensure timely compliance with safety standards.

- Matter is now before the Commission for action.
Under Discussion:
Grant CPUC staff authority to cite CIPs

- Communication Infrastructure Providers (CIPs), typically telco companies, often overload poles with equipment.
- Under current CPUC rules, CPUC staff do not have authority to cite CIPs, only electric utilities.
- Telco's tend to repair safety violations only when convenient. Some telco’s have 25-yr inspection intervals.
- CPUC staff can be granted citation authority via CPUC resolution or legislation.
Under Discussion: Explore creation of comprehensive state-wide databases

• There is no shared database for electric utilities and telco’s to maintain and access pole information, resulting in unreliable records on pole loading and maintenance schedules.

• A shared database with accurate data could decrease overloading of poles and improve compliance with safety rules.

• Potential Issues:
  • Costs of establishing shared databases may exceed benefits. Further analysis is recommended.
  • May require legislation to secure funding sources
  • CPUC does not have authority to command joint pole authorities directly