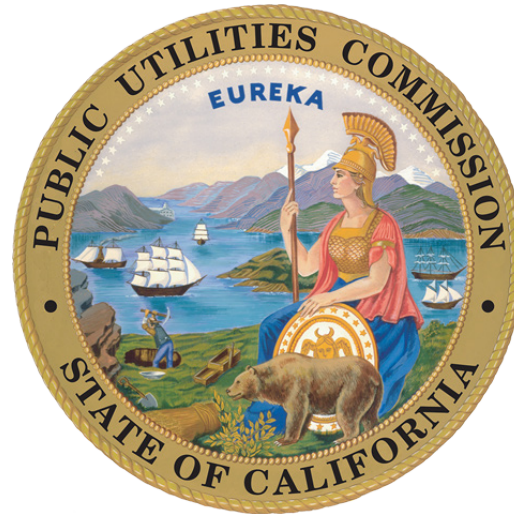




Utility Pole Safety



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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

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





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A black bear climbed this pole in Three Rivers, Ca. to scavenge for acorns out of the cross arm. (📷: Jim Kennard)



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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

