



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE **FILED**

STATE OF CALIFORNIA

01-11-10

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Order Instituting Rulemaking to Revise and
Clarify Commission Regulations Relating to the
Safety of Electric Utility and Communications
Infrastructure Provider Facilities.

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)
) Rulemaking 08-11-005
) (Filed November 6, 2008)
)
)

REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO PHASE 2
PROPOSED RULE CHANGES SUBMITTED BY ALL PARTIES

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Dated: **January 11, 2010**

I.

GENERAL REPLY COMMENTS

SCE has reviewed each of the PRCs submitted by the parties on December 16, 2010. SCE is encouraged by the parties' submissions and believes that all issues can be addressed within the timelines established in the Phase 2 Scoping Memo. After having reviewed all the PRCs submitted on December 16, 2010, SCE has decided that it will take the opportunity to explain in these reply comments the positions SCE preliminarily intends to take on certain contested issues raised by the PRCs.²

SCE believes that its responses in this Reply will help with framing the issues for the workshops, and will help keep the workshops on schedule by giving notice to all parties regarding SCE's issues with the PRCs. SCE hopes, therefore, that all parties will be sufficiently prepared to discuss during workshops the contested issues in order to more quickly reach consensus or an understanding of each party's position.

II.

SCE'S REPLY TO CPSD'S PRCs

A. CPSD's PRC-1: GO-95, Rule 11

SCE has two issues with CPSD's PRC-1: First, CPSD's edits do not add communications facilities even though CPSD's justification for its changes state that "This PRC would apply to all owners of electrical supply and communication facilities that come within jurisdiction of this Commission"³ Second, the rules in GO 95 do not, and should not, address utility operations. In its justification section, CPSD states that "[g]iven that many of the present rules in GO 95 concern also the design, maintenance, and operation of these lines, CPSD

² SCE reserves the right to contest PRCs not mentioned in this Reply during workshops and to take positions different from the preliminary positions discussed herein.

³ See CPSD's Proposed Rules for Phase 2, at p. 9.

recommends revising the purpose statement in Rule 11 to reflect the true scope and intent of GO 95.”⁴ GO 95’s rules primarily address construction and certain design requirements, which is why Rule 11 is currently written the way it is. Inspection and maintenance requirements for electric utilities are contained in GO 165. This distinction is important to maintaining the integrity of GO 95 as a set of design and construction standards.

SCE did not recommend a PRC for Rule 11 in its December 16, 2009 filing. However, as an alternative to CPSD’s edits to Rule 11, SCE offers the following, which more accurately describes the purpose of GO 95:

Original Rule

11 Purpose of Rules

The purpose of these rules is to formulate, for the State of California, uniform requirements for overhead electrical line construction, the application of which will insure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead electrical lines and to the public in general.

CPSD Strikeout and Underlined Rule

11 Purpose of Rules

The purpose of these rules is to formulate, for the State of California, uniform requirements for overhead electrical line design, construction, maintenance and operation, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead electrical lines and to the public in general.

***SCE Alternative* Strikeout and Underlined Rule**

11 Purpose of Rules

The purpose of these rules is to formulate, for the State of California, uniform requirements for overhead electric~~al~~ and communication line construction, the application of which will help ~~insure~~ adequate service and secure safety to ~~persons engaged in the construction, maintenance, operation or use of overhead electrical lines~~ utility workers and to the public in general.

SCE Alternative Final Rule

⁴ See CPSD’s Proposed Rules for Phase 2, at pp. 9-10.

11 Purpose of Rules

The purpose of these rules is to formulate, for the State of California, uniform requirements for overhead electric and communication line construction, the application of which will help ensure adequate service and secure safety to utility workers and to the public in general.

B. CPSD’s PRC-2: GO 95, Rule 12

As SCE stated in its filings during Phase 1, Rule 12 should remain unchanged. CPSD’s edits reflect an attempt to adjudicate its jurisdictional dispute with public utilities through a rule change. The phrase currently found in Rule 12, “These rules apply to all overhead electrical supply and communication facilities that come within the jurisdiction of this Commission . . .”⁵ is all that is required – publicly-owned utilities either come within the Commission’s jurisdiction or they don’t. The dispute over the extent of the Commission’s jurisdiction will be answered by the courts or the Legislature, it should not be answered in this Rulemaking. In the meantime, there is nothing preventing Commission staff from attempting to exercise the jurisdiction it believes it possesses.

C. CPSD’s PRC-3: GO 95 Rule 31.2

Rule 31.2 already applies to both electric and communications companies and requires all lines to be inspected “frequently and thoroughly.”⁶ SCE encourages CPSD and the

⁵ Emphasis added.

⁶ SCE has concerns with CPSD’s statement in its justification for changes to Rule 31.2 that “certain CIPs and other utilities have not complied with this requirement [to inspect frequently and thoroughly]. CPSD has found numerous facilities of CIPs which have not been properly maintained and which utilize electric poles.” First, CPSD offers no evidence or examples to substantiate this statement. Second, “[t]he Commission does not expect utility systems to remain pristine and newly built 100% of the time; some deterioration is inevitable.” (D. 04-04-065, Finding of Fact No. 1 and No. 10). And, “[i]t is impossible for a utility to keep its distribution system in full compliance with the safety GOs at all times, and, at any given time, there will be multiple violations on a utility’s system.” (D. 04-04-065, Finding of Fact No. 1 and No. 10). GO 95 nonconformances should be expected during any audit. Without specific evidence regarding the scope of the problem, CPSD has not met its burden of production on this issue.

communications companies⁷ to discuss during the workshops their respective proposals for defined inspection cycles for those facilities affixed to poles jointly used with electric companies, poles jointly used by communication companies, and poles in sole use by a communication company throughout the state, especially in high fire hazard areas. However, SCE will object to the placement of any new rule applying solely to communications companies in GO 95, Rule 31.2 because that rule currently applies to all overhead lines, including those of electric and communications companies.⁸ Instead, the new communications-only requirements should be placed in an entirely new General Order, or in Section VIII of GO 95, which applies only to communications companies.

Finally, SCE disagrees with CPSD’s statement in its justification for changes to Rule 31.2 that “[i]t is a fundamental aspect of GO 95, however, to have an auditable inspection and maintenance program, in order to ensure that the rules are being complied with.”⁹ GO 95’s purpose is to provide minimum construction and certain design requirements for overhead electric and communication lines. GO 95 does not include any prescribed inspection and maintenance cycles. Instead, those requirements as applied to electric utilities are contained in GO 165. If such requirements are going to be extended to communications companies, they should appear in an entirely new General Order (similar to GO 165) that applies only to communications companies.

D. CPSD’s PRC-5: GO 95, Rule 44.2

CPSD’s PRC would add “towers” to the scope of the rule and adopt the process-oriented ordering paragraphs from the Phase 1 decision. SCE objects to both additions and recommends, instead, that the Commission adopt the Joint Electric Utilities’ proposal, JEF-8. “Towers” refers

⁷ SCE does not believe the term “Communications Infrastructure Provider” or CIP should be inserted into the General Orders. The term is not an excepted industry term. GO 95 should continue to use the term “communication” when needed to describe communications facilities as distinguished from electric facilities.

⁸ The CIP Coalition made a proposal to change GO 95, Rule 31.2 as well. SCE’s argument regarding the correct placement of a final consensus rule applies equally to the CIP Coalition’s proposal.

⁹ See CPSD’s Proposed Rules for Phase 2, at pp. 13-14.

to transmission, which SCE addresses in the next section. The remainder of CPSD's additions to the rule attempt to prescribe processes that are better left to the parties via existing contractual relationships. Moreover, the "5% - 10%" exception is not based upon any evidentiary foundation and should be rejected. JEF-8 deals with all these issues and should be adopted as an alternative:

Original Rule

44.1 Installation and Reconstruction

Lines and elements of lines upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4 for vertical loads and loads transverse to lines and for loads longitudinal to lines except where longitudinal loads are balanced or where there are changes in grade of construction (see Rules 47.3, 47.4 and 47.5). The design shall consider the structural loading requirements of all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing utility at the time of design.

44.2 Additional Construction

Any utility planning the addition of facilities that materially increase the load on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Section IV. Such utility shall maintain these pole loading calculations and shall provide such information to authorized joint use pole occupants and the Commission upon request.

All other utilities or on the subject pole shall cooperate with the utility performing the load calculations described above including, but not limited to, providing intrusive pole loading data and other data necessary to perform those calculations.

Note: Nothing contained in this rule shall be construed as allowing the safety factor of a facility to be reduced below the required values specified in Rules 44.1 and 44.3.

44.3 Replacement

Strikeout / Underline

44.1 Installation and Reconstruction

Lines and elements of lines upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4 for vertical loads and loads transverse to lines and for loads longitudinal to lines except where longitudinal loads are balanced or where there are changes in grade of construction (see Rules 47.3, 47.4 and 47.5). The design shall consider the structural

loading and mechanical strength requirements of all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing utility company at the time of design.

44.2 Additional Construction

Any utility supply or communication company planning the addition of facilities that materially increase the vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Section IV. Such utility company shall maintain these pole loading calculations for five years and shall provide such information to authorized joint use pole occupants and the Commission upon request.

All other utilities or companies on the subject pole shall cooperate with the utility company performing the load calculations described above including, but not limited to, providing intrusive pole loading test data results and other data necessary to perform those such calculations.

~~Note: Nothing contained in this rule shall be construed as allowing the safety factor of a facility to be reduced below the required values specified in Rules 44.1 and 44.3.~~

44.32 - Replacement (*change to rule number only*)

Final Proposed Rule or Rule Change

44.1 Installation and Reconstruction

Lines and elements of lines (facilities) upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4 for vertical loads and loads transverse to lines and for loads longitudinal to lines except where longitudinal loads are balanced or where there are changes in grade of construction (see Rules 47.3, 47.4 and 47.5). The design shall consider the structural loading and mechanical strength requirements of all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

Any supply or communication company planning the addition of facilities that materially increase vertical, transverse or longitudinal loading on a structure shall perform a loading calculation to ensure that the addition of the facilities will not reduce the safety factors below the values specified by Section IV. Such company shall maintain these pole loading calculations for five years and shall provide such information to authorized joint use pole occupants and the Commission upon request.

All other companies on the subject pole shall cooperate with the company performing the load calculations described above including, but not limited to, providing intrusive pole test results and other data necessary to perform such calculations.

44.2 - Replacement (*change to rule number only*)

E. CPSD's PRC-6: GO 165

CPSD's PRC-6 suggests several alterations to General Order 165, which seek to: a) add electric transmission lines; b) add non-electric utilities; c) add publicly owned utilities; and d) modify the annual reporting requirements. First, SCE agrees in principle with CPSD's proposed revisions to Section V and VI of GO 165, noting that similar revisions are offered by the Joint Utilities in PRC JEF -10. Where there are minor differences in language, SCE is fairly confident the affected parties can reach agreement. Second, SCE retains its stated position made in Phase 1 comments and again above regarding the applicability of GO 165 upon non-electric and publicly owned utilities.

Finally, as before, SCE strongly disagrees with CPSD's proposal to incorporate electric transmission facilities into GO 165. Notably, CPSD bases its proposal to add transmission lines to GO 165 on its belief that unnamed utilities have not complied with Public Utilities Code section 451 and GO 95, Rule 31.2.¹⁰ CPSD offers no evidence for its unfounded belief and could not do so with respect to SCE. In fact, all of SCE's transmission facilities are inspected and maintained in accordance with the program which has been reviewed and approved by the CAISO. For example, as SCE has stated before, it files with the CAISO an inspection and maintenance plan for its transmission facilities and follows that plan. In addition, SCE must comply with FERC-mandated NERC and WECC standards for its transmission facilities. Moreover, SCE's transmission system (wood poles and steel structures) is already designed and constructed to GO 95 standards. Any duplication of regulation for transmission inspection and maintenance between the CPUC and CASIO, NERC, and WECC would only add duplicity and inefficiencies that would translate into higher ratepayer costs for those unnecessary activities.

¹⁰ See CPSD's Proposed Rules for Phase 2, at pp. 25-26.

SCE would not object to coordination between CAISO (or other agencies) and the Commission such that Commission staff would be invited to observe CAISO audits of our transmission inspection and maintenance activities to satisfy themselves that such requirements are being enforced. What SCE does object to is having two sets of overlapping and different requirements, two sets of audits of the same activities, and two sets of reporting requirements. CPD has offered no evidence to suggest that transmission inspection and maintenance practices are lacking or that the current standards provide an increased risk of fire. Without such evidence, it makes no economic or practical sense to extend GO 165 requirements to transmission activities.

III.

SCE’S REPLY TO MUSSEY GRADE ROAD ALLIANCE’S PRCs

A. MGRA PRC-1: Fire Data Collection

SCE will raise several issues regarding this proposal during the workshops. First, the Alliance makes no suggestion regarding where the rule should be located within the General Orders. The proposal is not a design or construction standard, so it is not appropriate for GO 95. Moreover, substantively, the proposal would create additional costs for the utilities – costs that would be borne by ratepayers – without substantial evidence of need or benefit. Ultimately, the proposal will cost-shift responsibility for collecting data on small fire incidents from the public and academic researchers (via their research into various public records) to the public utilities who will act as the data aggregator for every fire that starts within the vicinity of their facilities.¹¹

¹¹ It is very often difficult to determine whether a fire was “caused” by utility equipment or something else, such as a spark from nearby mechanical equipment, cigarette butts, lightning, etc. This fact will force utilities to over report incidents, which in itself makes the value of the data questionable.

B. MGRA PRC-2: Definition of “Reasonable” Vegetation Management Practices

The Alliance’s second proposal would limit tree trimming to two-years’ growth at the time of trim. As a matter of policy, SCE does not believe that its tree trimming activities should be limited in such a manner. As an alternative, SCE will support the Joint Electric Utility proposals on this subject: JEF-3, JEF-4, and JEF-6.¹²

C. MGRA PRC-4: GO 95, New Rule 18C – Utility Contingency Plans

The Alliance’s fourth proposal, like its first, is process-oriented and does not belong in GO 95. SCE also has serious concerns regarding how to operationalize the proposed new rule. Moreover, it appears redundant to state “[t]hese plans shall include measures to prevent ignitions of wildland fires by equipment that meets GO 95 wind loading and vegetation management requirements” when, by definition, the utilities’ equipment already must meet GO 95 wind loading and vegetation management requirements. No additional contingency plan is needed.

IV.

**SCE’S REPLY TO THE CIP COALITION’S PROPOSED CHANGES TO
GO 95, RULE 44.2**

As with CPSD’s proposed changes to GO 95, Rule 44.2, SCE believes that the Joint Electric Utilities’ alternative PRC, JEF-8, is superior and should be adopted over the CIP Coalition’s proposed changes to Rule 44.2. The main subject that will be at issue during the workshops is the proposed new language under the heading “Cooperation Between Companies” wherein the CIP Coalition proposes its wish list for joint pole attachments. These additional paragraphs would forever prescribe a process into GO 95 that should be worked out through the joint pole organizations or via contracts between the parties. No party has submitted evidence suggesting that applications for pole attachments are improperly rejected by pole owners. The

¹² See Joint Electric Utilities Proposed Rules for Phase 2, Appendix A.

language proposed here has traditionally resided with the joint pole organizations – committees of stakeholders – and nothing in this proposal suggests that a new, statewide regime should be adopted in the place of the joint pole organization’s expertise.

V.

SCE’S REPLY TO CMUA’S PROPOSED CHANGES TO RULE 18B

CMUA makes some recommended changes to Rule 18B that are at odds with the Joint Electric Utilities’ proposal on Rule 18B, JEF-01. SCE will advocate for JEF-01 as an alternative to CMUA’s proposals in the workshops. SCE believes that the Joint Electric Utilities’ proposal sufficiently addresses CMUA’s concerns regarding identification of attaching pole entities and that the General Orders are sufficiently flexible to allow for accommodations during emergency conditions. SCE looks forward to a lively discussion on the topic.

VI.

COST RECOVERY

One of the topics specified for resolution in Phase 2 of this rulemaking is cost recovery.¹³ At the pre-workshop conference scheduled for January 14, 2010, SCE will request that time be set aside during the workshops to consider mechanisms for cost recovery due to compliance with all rules adopted in this rulemaking.

VII.

CONCLUSION

SCE respectfully submit these reply comments to the parties’ PRCs in advance of the January 14, 2010 pre-workshop conference. We appreciate the time committed by ALJ Kenney and the Commission staff to this proceeding. We look forward to participating in the Phase 2

¹³ See, e.g., Phase 2 Scoping Memo issues 16, 22, and 24.

workshops to be facilitated by ALJs Vieth and Minkin to discuss all the PRCs proposed by the parties to this proceeding.

Respectfully submitted,

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January 11, 2010

VERIFICATION

I am an officer in the Transmission and Distribution Business Unit of Southern California Edison Company and am authorized to make this verification on its behalf. I am informed and believe that the matters stated in the foregoing pleading are true.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this **11th day of January, 2010**, at Rosemead, California.

/s/ WALTER J. JOHNSTON

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CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of the REPLY OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) TO PHASE 2 PROPOSED RULE CHANGES SUBMITTED BY ALL PARTIES on all parties identified on the attached service list(s). Service was effected by one or more means indicated below.

Transmitting the copies via e-mail to all parties who have provided an e-mail address. First class mail will be used if electronic service cannot be effectuated.

Executed this **11th day of January, 2010**, at Rosemead, California.

/s/ RAQUEL IPPOLITI

Raquel Ippoliti
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