



ALJ/J06/kp7 12/17/2025

FILED

12/17/25

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

11:35 AM

R2410005

Order Instituting Rulemaking to Consider Proposed Changes to General Order 95 to Modernize the Rules and Regulations Governing the Design and Construction of Overhead Electric and Communications Facilities in California.

Rulemaking 24-10-005

ADMINISTRATIVE LAW JUDGE'S RULING ON WORKSHOP REPORT AND SUPPLEMENTAL QUESTIONS

This ruling requests party comments on the joint workshop report and appendices for changes to General Order 95 (Attachments 1-7) and responses to supplemental questions. The joint workshop report has been revised to reflect it is a document provided by parties. Opening comments are due on January 16, 2026, and reply comments are due on February 16, 2026.

1. Supplemental Questions

Please respond to the questions below with the same numbering. Use the Joint Workshop Report attached to this ruling (Joint Workshop Report).

1. Respond to the parties' suggestion of an addition of a proposed note in Rule 12.3 in Appendix B of the Joint Workshop Report at page B-5 which states:

Note: R.24-10-005 replaced the working stress design methodology previously incorporated in Section IV of this Order with load and resistance factor design (LRFD) methodology. The previous working stress design methodology may be used to show compliance with the rules of this Order for lines or portions of lines constructed, or

reconstructed prior to the adoption of the load factor and strength factor requirements under R.24-10-005.

- a. Do you support this language? Why or why not?
 - b. Why is this proposed note needed if other proposed rule changes are purportedly the algebraic equivalent to the current standards in GO 95?
 - c. Would an existing asset previously designed with the WSD methodology to meet the standards of GO 95 meet the requirements of the proposed new rules in the Joint Workshop Report without the proposed note in Rule 12.3? Why or why not?
 - d. Discuss the legal issues regarding retroactivity, with citations to Commission and court decisions.
2. Respond to parties' suggestion of an addition of a proposed added paragraph in Rule 44.2 in Appendix A of the Joint Workshop Report at page A-14 which states:
- The previous working stress design methodology may still be used to show compliance with Rule 44.2 for lines or portions of lines designed, constructed, added, or reconstructed prior to the adoption of the load factor and strength factor requirements under R.24-10-005 in this general order.
- a. Do you support this language? Why or why not?
 - b. Why is this proposed addition needed if other proposed rule changes are purportedly the algebraic equivalent to the current standards in GO 95?
 - c. Would an existing asset previously designed with the WSD methodology to meet the standards of GO 95 meet the requirements of the proposed new rules in the Joint Workshop Report without the proposed addition in Rule 44.2? Why or why not?
 - d. Discuss the legal issues regarding retroactivity, with citations to Commission and court decisions.

3. Respond to parties' suggestion of an addition of a proposed note in Rule 12.3 in Appendix B of the Joint Workshop Report at page B-5 which states:

Note: R.24-10-005 replaced the working stress design methodology previously incorporated in Section IV of this Order with load and resistance factor design (LRFD) methodology. The previous working stress design methodology may be used to show compliance with the rules of this Order for lines or portions of lines constructed, or reconstructed prior to the adoption of the load factor and strength factor requirements under R.24-10-005.

- a. How does the proposed language maintain equivalent safety to the current rules in GO 95 if the language no longer explicitly references the safety factor currently specified in Rule 44 for safety factors which increased (e.g. for certain classifications of Guys per Decision 14-02-015)?
 - b. Should the proposed standards as written be clarified that WSD methodology may be used, with the safety factors in Table F-1?
4. Respond to parties' suggestion of an addition of a proposed added paragraph in Rule 44.2 in Appendix A of the Joint Workshop Report at page A-14 which states:

The previous working stress design methodology may still be used to show compliance with Rule 44.2 for lines or portions of lines designed, constructed, added, or reconstructed prior to the adoption of the load factor and strength factor requirements under R.24-10-005 in this general order.

- a. Does the proposed language maintain equivalent safety to the current rules in GO 95 if the language no longer explicitly references the safety factor currently specified in Rule 44 for safety factors which increased (e.g. for certain classifications of Guys per Decision 14-02-015)? Explain.

- b. Should the standards as written be clarified that WSD methodology may be used, with the safety factors in Table F-1?
- 5. Since changes to Rule 56.2, Rule 66.2, and Rule 86.2 vary slightly in the Joint workshop report versus the workshop discussion, explain whether you have a preference. See Attachment 8 providing the language comparison.
 - a. Are there any other cases where language agreed upon in the workshops was inadvertently left out of the proposed rules in the Joint Workshop Report?
- 6. Should the Table on page iii of GO 95 be updated to reflect the addition and changes to tables resulting as part of the proposed rule changes from the Joint Workshop Report? If so, how?
- 7. Do you have any additional comments on the workshops or workshop report?

IT IS SO RULED.

Dated December 17, 2025, at San Francisco, California.

/s/ JOANNA PEREZ-GREEN

Joanna Perez-Green
Administrative Law Judge