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BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

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

WORKSHOP REPORT FOR MAY – OCTOBER 2025 WORKSHOPS SUBMITTED BY SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)

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Dated: **November 17, 2025**

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Pursuant to Rule 1.8(d) of the Rules of Practice and Procedure of the California Public Utilities Commission ("Commission") and the *Assigned Commissioner's Scoping Memo and Ruling* dated April 14, 2025 ("Scoping Memo"), Southern California Edison Company ("SCE") respectfully submits this Workshop Report for the 12 days of informal, virtual workshops held on May 28-29, June 24-26, July 22-24, August 26-28, October 1, 2025. The joint parties that created the report ("Workshop Report Team") are: Pacific Bell Telephone Company d/b/a AT&T California ("AT&T"), Pacific Gas and Electric Company ("PG&E"), Southern California Edison ("SCE"), and San Diego Gas & Electric ("SDG&E").

I.

INTRODUCTION

. General Order (GO) 95, generally governs the design, construction, and maintenance of overhead electric lines in California. GO 95 has historically required overhead electric lines to be designed consistent with either Allowable Stress Design (ASD) or Working Stress Design (WSD) methodology.

II.

PROCEDURAL HISTORY

The Rules Committee's efforts to develop LRFD-related PRCs as contained in Appendix A began more than ten years ago when the Commission ordered a series of technical panels and publicly noticed workshops in Phase 3, Track 3 of the Commission's Order Instituting Rulemaking to Revise and Clarify Commission Regulations Relating to the Safety of Electric Utility Communications Infrastructure Provider Facilities, Rulemaking (R.)08-11-005. In R.08-11-005, workshop participants began to discuss the need to modernize GO 95 by migrating from WSD methodology to the LRFD methodology. However, given the time and commitment required to develop the numerous changes necessary to migrate from GO 95's WSD methodology to an LRFD methodology, LRFD discussions were deferred. Eventually, on March 18, 2024, SCE filed the Petition, on behalf of the General Order 95/128 Rules Committee to Adopt, Amend, or Repeal a Regulation pursuant to Public Utilities Code Section 1708.5 (P.24-03-014). The Petition proposed amendments to GO 95 to incorporate the LRFD methodology. The Petition included 21 PRCs, five associated rule changes, and supporting rationale, all aimed at modernizing California's pole engineering approach. The Commission issued an Order Instituting Rulemaking (OIR) on October 23, 2024, granting the Petition and initiating Rulemaking 24-10-005. The OIR directed the facilitation of workshops to discuss the proposed rule changes and emphasized the importance of stakeholder collaboration in refining the proposals and addressing any additional considerations.

Following the issuance of the OIR, parties submitted comments and reply comments, which informed the structure and focus of the workshops. The Assigned Commissioner's Scoping Memo and Ruling, issued on April 14, 2025, provided further guidance on the proceeding. The Scoping Memo and Ruling outlined the issues to be addressed, including the potential adoption of the LRFD methodology, related revisions to GO 95, and the development of a framework to assess any safety impacts of the proposed changes.

III. THE WORKSHOPS, FACILITATED BY COMMISSION STAFF, WERE HELD BETWEEN MAY AND OCTOBER 2025. THESE WORKSHOPS PROVIDED A FORUM TO ENGAGE IN DETAILED DISCUSSIONS ON THE PROPOSED RULE CHANGES.

WORKSHOP PROCESS

A. Description of the Workshop Structure

Workshops were facilitated by the Safety Policy Division (SPD) of the CPUC. SPD went through the GO 95 changes proposed by SCE on behalf of the GO 95/128 Rule Committee and facilitated discussion between the workshop attendees. Various additional issues, such as retroactivity of load and strength factors, were discussed and addressed with additional language when needed. When an issue required additional time and discussion, meetings were set outside of the workshops with results presented to the workshop attendees at the next workshop. At the conclusion of the workshops, a straw poll was conducted.

The first workshop was focused on (1) determining how future workshops would be structured, and (2) providing a forum for parties to ask questions to the GO 95 Rules Committee about the proposed rule changes, such as how the load and strength factors were determined. To determine the load and strength factor, the GO 95 Rules Committee stated it set the load factor at 1.5. To find the strength factor, the GO 95 Rules Committee divided the existing safety factor from Table 4 to find the strength factor. The load factor was set at 1.5 for Grade A and 1.25 for Grade B and C so that the highest strength factor was 1 for GO95 Light and Heavy Loadings. Importantly, the GO 95 Rules Committee stated that the factors were set to maintain equivalency between the existing WSD methodology and the LRFD methodology and not to take advantage of the perceived benefits of the LRFD methodology. The GO 95 Rules Committee stated that the current proposal is meant to set the LRFD methodology in place so that the perceived benefits of LRFD could be incorporated into GO 95 in the future without the complication of also changing between the methodologies. Subsequent workshops focused on discussion of the proposed rules in more detail. Agendas are attached in Appendix "G."

B. Number of Workshops Held and Duration

There was a two-day workshop in May, three three-day workshops held in June, July, August, and a one-day workshop in October. Workshops were scheduled from 9 am to 4 pm but concluded early if all agenda items were completed.

C. Overview of the Voting Process

Straw polls were taken at the conclusion of the workshops. Attendees were given a choice of numerical responses that corresponded with the level of agreement with each PRC. Poll responses were altered as needed but primarily took the form of Level 1 - I support/can live with this recommendation or PRC; Level 2 - I do not support/cannot live with this recommendation or PRC; and Level 3 - I abstain/am neutral.

D. Summary of Participation

Throughout the workshops, participants included, but were not limited to, representatives of various CPUC divisions such as SED and SPD, investor-owned utilities, publicly-owned utilities, telecommunication companies, and various advocacy groups.

IV.

DESCRIPTION OF CHANGES AGREED UPON DURING WORKSHOPS

A. List of All Consensus PRCs, Organized by GO 95 Rule Changes and Associated Rule Changes

Revised PRC 1	Rule 44 – Safety Factors
Revised PRC 2	Rule 44.1 – Installation and Reconstruction
Revised PRC 3	Rule 44.2 – Additional Construction
Revised RRC 4	Rule 44.3 – Replacement
PRC 5	Rule 45 – Transverse Strength Requirements
PRC 6	Rule 46 – Vertical Strength Requirements
PRC 7	Rule 47 – Longitudinal Strength Requirements
Revised PRC 8	Rule 48 – Strength of Materials
Revised PRC 9	Rule 48.1 – Wood
PRC 10	Rule 48.2 – Steel
PRC 11	Rule 48.3 – Concrete
PRC 12	Rule 48.4 – Fiber-Reinforced Polymer
PRC 13	Rule 48.5 – Other Engineered Materials
PRC 14	Rule 48.7 – Tower or Pole Foundations and Footings

Revised PRC 15	Rule 49.2-C – Crossarms (Strength)
PRC 16	Rule 49.3-C – Pins and Conductor Fastenings (Strength)
Revised PRC 17	Rule 49.4-B – Conductors (Size)
PRC 18	Rule 49.5 – Insulators
Revised PRC 19	Rule 49.6-B – Guys and Anchors(Size)
PRC 20	Rule 49.7 – Messengers and Span Wires
PRC 21	Rule 81.3 – Material Strength
ARC A (previously ARC 1)	Rule 43.1-C – Temperature
ARC B (previously ARC 2)	Rule 43.2 – C – Temperature
ARC C (previously ARC 3)	Rule 48.6 – Conductors, Span Wires, Guys and Messengers
Revised ARC D (previously ARC 4)	Rule 49.4 – Table 8 (Minimum Conductor Sizes)
ARC E (previously ARC 5)	Appendix B – Mechanical/Loading Data for Conductors
ARC 1	Rule 12.1-C
Revised ARC 2	Rule 12.2
Revised ARC 3	Rule 12.3
Revised ARC 4	Rule 34-G
ARC 5	Rule 54.5
ARC 6	Rule 56.2
ARC 7	Rule 57.2
ARC 8	Rule 66.2
ARC 9	Rule 77.3
ARC 10	Rule 84.5
ARC 11	Rule 86.2
ARC 12	Rule 87.2
ARC 13	Rule 87.5
ARC 14	Rule 94.3
ARC 15	Rule Appendix C Conductor Sags
ARC 16	Appendix F – Typical Problems

B. Description of New Rule Changes Proposed and Agreed Upon During Workshop

1. Revised PRC1 – Rule 44 - Safety Factors

This proposed rule change is to revise Working Stress Design (WSD) terminology to Load and Resistance Factor Design (LRFD) terminology. The content remains the same as the initial PRC1. During the workshop, it was agreed to move the statement that the ratio of load factors to strength factors is analogous to the safety factors into Note 2 to give readers

background on LRFD changes. This note also revises the reference to the original Minimum Safety Factors table which is now designated as Table F-1 located in Appendix F.

2. Revised PRC2 – Rule 44.1 - Installation and Reconstruction

This proposed rule change provides the minimum load factors and maximum strength factors to be used in the LRFD methodology. During the workshop, it was agreed to add a third decimal place to the LRFD load and strength factors presented in Table 4-1 and Table 4-2 to achieve better agreement when comparing the ratios of load factors to strength factors to the original safety factors.

3. Revised PRC 3 – Rule 44.2 – Additional Construction

In order to update WSD terminology to LRFD terminology, various modifications of individual rules have been introduced throughout Section 4. During the workshop it was agreed to incorporate language allowing WSD as an alternative methodology to show compliance for lines or portions of lines designed, constructed, added, or reconstructed prior to the adoption of the LRFD.

4. Revised PRC 4 – Rule 44.3 – Replacement

The purpose of this proposed rule change is to revise WSD terminology to LRFD terminology. During the workshop, it was agreed to clarify that the "use" of lines or parts thereof with strengths less than the effects of loads specified in Rule 43 is not permitted. The initial proposal only mentioned "design" of lines, whereas the new language references any lines or parts thereof which includes lines already constructed.

5. Revised PRC 8 – Rule 48 – Strength of Materials

Rule 48 provides criteria for compliance and has been revised to replace WSD terminology with LRFD terminology. A small group of parties met outside of workshops to resolve Rule 48 comments made on OIR. After meeting, SCE and SDG&E submitted what they represented to be the revised consensus proposal. The workshop participants incorporated a sample calculation in the workshop report to illustrate the application of Rule 48 and Rule 44.3. Examples 10 and 11 below are based on GO 95 Appendix F, Part 1:

10. Poles

The crossing poles are western red cedar and their dimensions are as follows:

Length	*55 feet*
Height above ground	*48 feet*
Circumference at top	*28 inches*
Diameter at top	*8.9 inches*
Circumference at ground line	*49.0 inches*
Diameter at ground line	*15.6 inches*

Distance from ground line to conductors supported is given as follows:

Top supply conductors	*48' 9"*
Middle supply conductors	*43' 3"*
Lower supply conductors	*37' 9"*
Private telephone conductors	*28' 4"*

Ground level at base of pole is considered to be at the same elevation as top of rail.

Dimensions of adjacent poles B and E are:

Length	*50 feet*
Height above ground	*43.5 feet*
Circumference of top	*28.0 inches*
Diameter of top	*8.9 inches*
Circumference at ground line	*47.0 inches*
Diameter at ground line	*15.0 inches*

11. Transverse Load on Crossing Poles C and D

Example 1: Same as Example in Appendix F

The moment at the ground due to an 8-pound wind pressure on conductors is:
$Mc = Ln\ P_h\ ((S_1 + S_2) / 2)$ *pound–feet*

Where:

L	*= Height of conductors above ground in feet*
n	*= Number of wires*
S_1 *and* S_2	*= Length of crossing and adjacent spans, respectively*
P_h	*= Horizontal load per lineal foot due to an 8 pound8-pound wind pressure on projected area of wire*
	= 0.276 pounds per lineal foot for 00 AWG bare, stranded copper
	= 0.108 pounds per lineal foot for 6 AWG bare, solid copper

= 0.085 pounds per lineal foot for 8 AWG bare, solid copper

M_{c0} = Moment due to pressure on top supply conductors
M_{c1} = Moment due to pressure on middle supply conductors
M_{c2} = Moment due to pressure on lower supply conductors
M_{c3} = Moment due to pressure on telephone conductors

$M_{c0} = 48.75 \times 2 \times 0.276 \times ((150 + 200)/2) = 4710$ lb-feet
$M_{c1} = 43.25 \times 2 \times 0.276 \times ((150 + 200)/2) = 4180$ lb-feet
$M_{c2} = 37.75 \times 2 \times 0.276 \times ((150 + 200)/2) = 3650$ lb-feet
$M_{c3} = 28.33 \times 2 \times 0.108 \times (200/2) = 610$ lb-feet
$M_{c3} = 28.33 \times 2 \times 0.085 \times (150/2) = 360$ lb-feet

Total Moment due to Wind pressure on conductors = 13,510 lb-feet

The moment at the ground due to an 8-pound wind pressure on the pole is:

$$M_p = PH^2 ((D_1 + 2D_2) / 72) \text{ pound-feet}$$

Where:

M_p = Moment due to wind pressure on pole
P = Pressure in lbs per sq. ft. on projected area of pole (8 lbs/sq. ft.)
H = Height of pole above ground in feet (48')
D_1 = Diameter of pole at ground in inches (15.6")
D_2 = Diameter of pole at top in inches (8.9")

$M_p = (8 \times 48^2 \times 15.6 + 2 \times 8.9) / 72 = 8550$ lb-ft
Total moment = 13,510 + 8,550 = 22,060 lb-ft
Moment of resistance of pole = $M = FI / c$

Where:

F = Fiber stress in pounds per sq. in.
I = Moment of inertia of section = $(\pi D_1^4) / (64 \times 12)$
c = Distance from neutral axis to outer fiber = $D_1 / 2$

$M = (\pi F D_1^3) / 384 = (F D_1^3) / 122$
$F = (122M) / D_1^3 = (122 \times 22060) / 15.6^3 = 710$ lbs per square inch

SAFETY FACTOR BASED-APPROACH

The allowable fiber stress for western red cedar poles to provide a factor of safety of 4 is 1,500 pounds per sq. in., hence the crossing poles are not required to be side guyed since they have a factor of safety of 8.5 for transverse load.

LRFD-BASED APPROACH

The effect of the load (710 psi) multiplied by the load factor of 1.5 (Table 4-1) must not exceed the strength of the pole (6000 psi, Table 5) multiplied by the strength factor of 0.375 (Table 4-2), or it is required that

$$710 \text{ psi} \times 1.5 \leq 6000 \text{ psi} \times 0.375$$
or
$$710 \text{ psi} \leq 6000 \text{ psi} / (1.5/0.375) = 1500 \text{ psi}$$

Hence the crossing poles are not required to be side guyed.

WHAT DOES THIS MEAN WITH REGARDS TO RULE 48 AND 44.3?

It means that upon installation the pole will not fail or be seriously distorted at any load less than that which would cause a bending stress in the pole of

$$710 \text{ psi} \times (1.5/0.375) \times .6667 = 1893 \text{ psi}$$

Further, this threshold criteria must be met while accounting for the effects of any facility modifications that have added load (e.g., adding conductors) and/or deterioration that may have reduced the strength of the pole.

11. Transverse Load on Crossing Poles C and D

Example 2: Same as Example 1 Except with Larger Conductors so Pole is Fully Loaded

The moment at the ground due to an 8-pound wind pressure on conductors is:

$$Mc = Ln\ P_h\ ((S_1 + S_2) / 2) \text{ pound–feet}$$

Where:

L	*= Height of conductors above ground in feet*
n	*= Number of wires*
S_1 and S_2	*= Length of crossing and adjacent spans, respectively*
P_h	*= Horizontal load per lineal foot due to an 8 pound wind pressure on projected area of wire*
	=~~0.276~~ 0.779 pounds per lineal foot for ~~00~~ X AWG bare, stranded copper
	=~~0.108~~ 0.305 pounds per lineal foot for ~~6~~ Y AWG bare, solid copper
	= ~~0.085~~ 0.240 pounds per lineal foot for ~~8~~ Z AWG bare, solid copper

M_{c0}	*=*	*Moment due to pressure on top supply conductors*

M_{c1} = Moment due to pressure on middle supply conductors

M_{c2} = Moment due to pressure on lower supply conductors

M_{c3} = Moment due to pressure on telephone conductors

$M_{c0} = 48.75 \times 2 \times$ ~~0.276~~ 0.779 $\times ((150 + 200)/2) =$ ~~4,710~~ 13,292 lb-feet
$M_{c1} = 43.25 \times 2 \times$~~0.276~~ 0.779 $\times ((150 + 200)/2) =$ ~~4,180~~ 11,797 lb-feet
$M_{c2} = 37.75 \times 2 \times$~~0.276~~ 0.779 $\times ((150 + 200)/2) =$ ~~3,650~~ 10,301 lb-feet
$M_{c3} = 28.33 \times 2 \times$~~0.108~~ 0.305 $\times (200/2) =$ ~~610~~ 1722 lb-feet
$M_{c3} = 28.33 \times 2 \times$ ~~0.085~~ 0.240 $\times (150/2) =$ ~~360~~ 1016 lb-feet

Total Moment due to Wind pressure on conductors = ~~13,510~~ 38,128 lb-feet

The moment at the ground due to an 8-pound wind pressure on the pole is:

$$M_p = PH^2 ((D_1 + 2D_2) / 72) \text{ pound-feet}$$

Where:

M_p = Moment due to wind pressure on pole

P = Pressure in lbs per sq. ft. on projected area of pole (8 lbs/sq. ft.)

H = Height of pole above ground in feet (48')

D_1 = Diameter of pole at ground in inches (15.6")

D_2 = Diameter of pole at top in inches (8.9")

$M_p = (8 \times 48^2 \times 15.6 + 2 \times 8.9) / 72 = 8550$ lb-ft
Total moment = ~~13,510~~ 38,128 + 8,550 = ~~22,060~~ 46,678 lb-ft
Moment of resistance of pole = $M = FI / c$

Where:

F = Fiber stress in pounds per sq. in.

I = Moment of inertia of section = $(\pi D_1^4) / (64 \times 12)$

c = Distance from neutral axis to outer fiber = $D_1 / 2$

$M = (\pi F D_1^3) / 384 = (F D_1^3) / 122$

$F = (122M) / D_1^3 = (122 \times$ ~~22,060~~ 46,678$) / 15.6^3 =$ ~~710~~ 1500 lbs per square inch

The allowable fiber stress for western red cedar poles to provide a factor of safety of 4 is 1,500 pounds per sq. in., hence the crossing poles are not required to be side guyed since they have a factor of safety of ~~8.5~~ 4.0 for transverse load.

LRFD-BASED APPROACH

The effect of the load (1500 psi) multiplied by the load factor of 1.5 (Table 4-1) must not exceed the strength of the pole (6000 psi, Table 5) multiplied by the strength factor of 0.375 (Table 4-2), or it is required that

$$1500 \text{ psi} \times 1.5 \leq 6000 \text{ psi} \times 0.375$$

or
1500 psi ≤ 6000 psi /(1.5/0.375) = 6000 psi/4.0 = 1500 psi

Hence the crossing poles are not required to be side guyed.

WHAT DOES THIS MEAN WITH REGARDS TO RULE 48 AND 44.3?

It means that upon installation the pole will not fail or be seriously distorted at any load less than that which would cause a bending stress in the pole of

1500 psi x (1.5/0.375) x .6667 = 4000 psi

Further, this threshold criteria must be met while accounting for the effects of any facility modifications that have added load (e.g., adding conductors) and/or deterioration that may have reduced the strength of the pole.

6. Revised PRC 9 – Rule 48.1 - Wood

This proposed rule change revises WSD terminology to LRFD terminology. During the workshop, it was agreed to insert the word "designated" in Rule 48.1-A(1),when referring to the fiber strength, and to clarify the application of the 0.55 factor for long-time loading.

7. Revised PRC 15 - Rule 49.2-C – Crossarms (Strength)

8. This proposed rule change revises WSD terminology to LRFD terminology. During the workshop, it was agreed to remove the word "applied" in Rule 49.2-C(2). Revised PRC 17 - Rule 49.4-B – Conductors (Size)

9. This proposed rule change revises WSD terminology to LRFD terminology. During the workshop, it was agreed to use the phrase "meet the load and strength" instead of the original proposed "be consistent with the load and strength." Revised PRC 19 - Rule 49.6-B – Guys and Anchors (Size)

This proposed rule change revises WSD terminology to LRFD terminology. During the workshop, it was agreed to use the phrase "meet the load and strength" instead of the original proposed "be consistent with the load and strength."

10. ARC A, B, C, E – Rule43.1-C, 43.2-C, 48.6, Appendix B

The proposed rule changes are not directly related to the WSD or LRFD terminology. The proposed rule changes clarify that messengers are not conductors but should be held to similar temperature requirements as conductors. The proposed rule changes also update ASTM verbiage to match current terminology.

11. Revised ARC D - Rule 49 – Table 8 (Minimum Conductors Sizes)

This proposed rule change is intended to revise the method of referring to wire sizes in the minimum conductor size table. The workshop participants agreed to specify three decimal places instead of the originally proposed two decimal places.

V.

DESCRIPTION OF NEW RULE CHANGES PROPOSED AND AGREED UPON DURING WORKSHOP

A. ARC 1, Revised ARC 2, Revised ARC 3 - Rule 12.1-C, 12.2, 12.3 – Applicability of Rules

There were numerous discussions on these rules and how they relate to retroactivity of LRFD Rules. SED wanted to add that maintenance of lines shall meet the requirements of Rule 44.1, 44.3, and 48 in Rule 12.2. The utilities asserted that assets constructed prior to adoption of LRFD Rules should be grandfathered and asked that WSD be allowed for those assets. It was the position of the utilities that LRFD should not be retroactively imposed as it would be a large effort and expense to review and recalculate all existing assets under LRFD. A note was added to Rule 12.3 and Rule 44.2 to allow for WSD methodology to be used to show compliance for lines or portions of lines designed, constructed, added, or reconstructed prior to adoption of LRFD.

Participants from SED asked why the note was necessary if the safety factor of any pole in the field should be mathematically equivalent to the strength and load factors under LRFD for the same pole. In response, participants representing the GO 95 Rules Committee and utilities

stated there could be(1) a mistake or (2) a small subset of conditions where the rules would not be equivalent. No participant came forth at the workshops with a specific example where either circumstance exists.

B. Revised ARC 4 – Rule 34-G – Foreign Attachments (Guying)

This associated rule change revises WSD terminology to LRFD terminology. The first proposed iteration of ARC 4 replaced the term "safety factors" with "strength requirements". During the workshop it was agreed to omit "strength" and simply reference "requirements" since the requirements of the Rules specify strength requirements as well as other requirements.

C. ARC 5 through ARC 15

These associated rule changes revise WSD terminology to LRFD terminology by replacing the term "safety factor" with "requirements" and omitting the term "Table 4".

D. ARC 16 – Appendix F – Typical Problems

The detailed calculations in the design examples provided in Appendix F were revised. The new calculations use the same parameters as the previous WSD methodology-based examples except that the safety factors are replaced with the proposed LRFD load factors and strength factors, as specified in the proposed Rules.

Table F-1 was added to Appendix F. Table F-1 is a reproduced version of Table 4 from Rule 44 from the existing version of GO 95. Accompanying Table F-1, an explanation of was added which explained it is reference for historical purposes and so that General Orders that reference Table 4 may continue to reference it. The accompanying explanation also explains how the strength and load factors were derived from the safety factors in Table F-1

VI.

IMPLEMENTATION RECOMMENDATIONS

During the October 1, 2025 workshop, parties requested that the Commission in any decision in this proceeding afford a reasonable period to implement any changes the Commission

issues. The workshop participants also stated they would be more specific about their timing requests in comments on this Workshop Report

VII.

CONCLUSION

Finally, the Workshop Report Team wish to thank the Commission's SPD staff for hosting and facilitating the workshops from May 2025 – October 2025. The Workshop Report Team also thanks the parties and technical experts for their participation and willingness to address the safety issues identified in this proceeding in a good faith manner and engage in open, direct dialogue.

Respectfully submitted,

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Dated: November 17, 2025

Appendix A

Full text of Consensus Proposed Rule Changes (PRCs)

Appendix B

Associated Rule Changes

Appendix C

UPDATED General Order 95 APPENDIX F

Appendix D

Workshop Protocols

Appendix E

List of Workshop Participants

Appendix F

Confirmation Voting Records

Appendix G

Workshop Agendas

END ATTACHMENT 1