

**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**



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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.

R.24-10-005

**REPLY COMMENTS OF THE CALIFORNIA MUNICIPAL UTILITIES
ASSOCIATION ON PROPOSED DECISION ADOPTING GENERAL ORDER 95
MODIFYING METHODOLOGY TO LOAD AND RESISTANCE FACTOR DESIGN**

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In accordance with Rule 14.3 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), the California Municipal Utilities Association¹ (“CMUA”) respectfully submits these reply comments on the *Proposed Decision Adopting General Order 95 Modifying Methodology to Load and Resistance Factor Design* (“PD”), issued on August 14, 2026. In these reply comments, CMUA responds to the opening comments jointly filed by Pacific Gas and Electric Company, San Diego Gas & Electric Company, Southern California Edison Company, and AT&T California (the “Joint Parties”).

I. REPLY COMMENTS ON PD

A. The Final Decision Should Retain the Explanatory Notes for Rules 12.3 and 44.2 or Otherwise Provide Guidance.

In opening Comments, the Joint Parties request that the PD be modified to either reinstate the explanatory notes in Rule 12.3 and 44.2 or to provide clarity on the applicable compliance demonstration requirements. As the Joint Parties explain, the purpose of these explanatory notes is not to alter the outcomes, but instead to establish the methodology that may be used to

¹ CMUA is a statewide organization of local public agencies in California that provide electricity and water service to California consumers. CMUA’s membership includes publicly owned electric utilities (“POUs”) that operate electric and transmission systems, and CMUA’s membership services approximately 25 percent of the electricity load in the state.

demonstrate compliance for facilities that were the designed under the prior rules.² While the PD correctly notes that the two different methodologies are algebraically equivalent,³ the specific concern that was discussed extensively during the workshops is whether a utility demonstrating compliance would need to *recreate* the original design using load and resistance factor design (“LRFD”) in place of a working stress design (“WSD”) methodology. This unnecessary step would add costs and regulatory uncertainty without any corresponding safety benefit. CMUA supports the recommendation of the Joint Parties to either add the explanatory notes back or to otherwise provide guidance that would clarify that the original designs will not need to be recreated using LRFD in order to demonstrate compliance.

B. The Effective Date of the Revised GO 95 Rules Should Be December 1, 2027.

In comments on the Workshop Report,⁴ CMUA recommended a phase-in period of one year for the revised rules. As CMUA noted in its prior comments, the conversion from WSD to LRFD will require time-consuming steps, including: (i) the conversion of utility software platforms from WSD to LRFD, and (ii) the development and implementation of updates to each utility’s internal rules and regulations, operational practices, and customer documents.⁵ These steps must be accomplished in a manner that ensures that the resulting calculations are properly implemented to provide the required consistent level of safety. Further, for projects that are already in the design phase, it would be costly and time consuming to convert to LRFD mid-way through the process. The PD’s proposed effective date of July 1, 2027 risks rushing this transition process.

² Joint Parties Comment at 3.

³ PD at 14.

⁴ CMUA Comments on *Administrative Law Judge’s Ruling on Workshop Report and Supplemental Questions*, Jan. 16, 2026, at 3-4.

⁵ *Id.*

CMUA supports the recommendation of the Joint Parties to set the effective date for the revised rules to December 1, 2027. This should guarantee that utilities have at least one year from the date on which the final decision is adopted and issued to complete the conversion to LRFD. That additional time will help to support a careful and organized transition.

II. CONCLUSION

CMUA appreciates the opportunity to provide these reply comments to the Commission.

September 8, 2026

Respectfully submitted,

/s/ Justin Wynne

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