

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

Petition of Southern California Edison Company (U338E) on behalf of the General Order 95/128 Rules Committee to Adopt, Amend or Repeal a Regulation Pursuant to Pub. Util. Code Section 1708.5.

Petition 24-03-014

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.

FILED  
PUBLIC UTILITIES COMMISSION  
OCTOBER 17, 2024  
SAN FRANCISCO, CALIFORNIA  
RULEMAKING 24-10-005

**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**

**Summary**

We issue this Order Instituting Rulemaking and grant the petition filed by Southern California Edison Company, on behalf of the General Order 95/128 Rules Committee, to consider proposed changes to the Commission's General Order 95 to modernize the rules and regulations governing the design and construction of overhead electric and communications facilities in California.

Petition 24-03-014 is closed, and a new rulemaking proceeding is opened to consider the proposed changes to General Order 95.

## **1. Background**

On March 18, 2024, Southern California Edison Company (SCE or Petitioner) filed a petition to adopt, amend, or repeal a regulation pursuant to Public Utilities (Pub. Util.) Code Section 1708.5, which opened Petition (P.) 24-03-014.

The petition requests that the Commission consider modernizing General Order (GO) 95 to update the rules and regulations governing the design and construction of overhead electric and communications facilities in California through the incorporation of Load and Resistance Factor Design (LRFD).<sup>1</sup> In its petition, SCE states that the LRFD is an engineering methodology taught in engineering schools and adopted and applied through the United States and North America.<sup>2</sup> Also in its petition, SCE proposed a package of 21 proposed rule changes designed to incorporate LRFD into GO 95.<sup>3</sup> SCE states that the proposed rule changes aim to improve GO 95's fire-safety, improving public and worker safety, as well as electric and communications systems reliability.<sup>4</sup>

On April 10, 2024, the California Municipal Utilities Association (CMUA) filed a response to SCE's petition.

On April 17, 2024, the Public Advocates Office (Cal Advocates) and Safety and Enforcement Division (SED) filed responses to SCE's petition.

---

<sup>1</sup> Petition at 1.

<sup>2</sup> Petition at 1-2.

<sup>3</sup> Petition at 2.

<sup>4</sup> Petition at 2.

## 2. Position of Parties

Generally, Cal Advocates, CMUA, and SED supported the petition's request for rulemaking as well as the merits of its proposal. Specifically, Cal Advocates, stated it generally supports the request to update GO 95 and offered the following recommendations: (1) public workshops should be held to address the proposed updates;<sup>5</sup> (2) SED should host public workshops to discuss the implications of the proposed GO 95 amendments for safety and reliability;<sup>6</sup> and (3) the economic impacts, cost impacts, and safety benefits of implementing the proposed GO 95 amendments should be thoroughly investigated as part of the proceeding.<sup>7</sup>

CMUA supports the proposed GO 95 amendments as well. For example, CMUA states that the petition identifies steps towards modernizing GO 95 by transitioning from the use of the current Working Stress Design methodology<sup>8</sup> to a LRFD methodology.<sup>9</sup> Additionally, CMUA supports the schedule of activities proposed by the petition, asserting that all-party meetings would provide an adequate process for the parties to informally discuss the proposed GO 95 rule changes.<sup>10</sup>

Finally, SED states that it does not oppose the petition but argues that the petition should show that the proposed rule changes confer benefits to safety and

---

<sup>5</sup> Cal Advocates Response to Petition at 1-2.

<sup>6</sup> Cal Advocates Response to Petition at 2.

<sup>7</sup> Cal Advocates Response to Petition at 2-3.

<sup>8</sup> Working Stress Design is typically referred to as the Allowable Stress Design in contemporary discussion.

<sup>9</sup> CMUA Response to Petition at 5.

<sup>10</sup> CMUA Response to Petition at 5.

reliability.<sup>11</sup> SED asserts that if the Commission grants the petition, the Commission should consider requiring the utilities to perform a statistical survey of their facilities to: (a) quantify the actual number of structural failures in their system, e.g., annual failures for the past 10 years, grouped by structure type, grade of construction, installation date, material, High Fire Threat District (HFTD) tier, and failure cause; (b) quantify the maximum statistically allowable number of failures under the proposed rule changes and ancillary rule changes; and (c) as part of the utilities' survey of their facilities, the utilities should include the various datasets that they use to perform such statistical analyses, e.g., wire down databases, wind maps, pole loading databases.<sup>12</sup>

Furthermore, SED argues that the Commission should hold workshops for the utilities to address the safety and reliability of incorporating LRFD into GO 95. In the workshops, SED proposes that the SCE, SED, and other actively participating parties and intervenors should also identify, address, and propose appropriate modifications to any rule directly affected by the proposed rule changes and ancillary rule changes, and ensure that such rules are consistent with the new LRFD methodology.<sup>13</sup>

### **3. Petition 24-03-014**

#### **3.1. Grant of Petition**

As discussed below, the petition is granted.

The petitioner requests that the Commission adopt a rulemaking pursuant to Pub. Util. Code Section 1708.5.<sup>14</sup> SCE states that the merits of the petition was

---

<sup>11</sup> SED Response to Petition at 1.

<sup>12</sup> SED Response to Petition at 1-2.

<sup>13</sup> SED Response at 2.

<sup>14</sup> All subsequent references are to the Public Utilities Code unless otherwise specified.

discussed through a meet and confer process. SCE states that the Rules Committee of GO 95 and GO 128 met and conferred over the course of 14 months, from July 2022 through September 2023, where members of the Rules Committee's Executive Board communicated and/or met in person or via teleconference with SED and SED's Electric Safety and Reliability Branch (ESRB) to review and discuss the proposals contained in the petition. SCE states that the ESRB staff contributed to the content proposed in the petition, noting that several of the proposed rule changes set forth in the petition are based on direction and considerations shared by SED during the meet and confer process.

Section 1708.5, in relevant parts, provide:

- (a) The commission shall permit interested persons to petition the commission to adopt, amend, or repeal a regulation.
- (b)(1) The commission shall consider a petition and, within six months from the date of receipt of the petition, either deny the petition or institute a proceeding to adopt, amend, or repeal the regulation. (2) The commission may extend the six month period for consideration of a petition pursuant to paragraph (1) to allow public review and comment pursuant to subdivision (g) of Section 311.
- (c) If the commission denies a petition, the order or resolution of the commission shall include a statement of the reasons of the commission for that denial.
- (d) If the commission finds that it is precluded by law from granting a petition, the statement of reasons for denial pursuant to subdivision (c) shall identify the relevant provisions of law. ...

The Commission implements Section 1708.5 in Rule 6.3. As discussed below, the petition complies with the applicable sections of Rule 6.3.

Application of Rule 6.3(a): Rule 6.3(a) provides as follows:

Pursuant to this rule, any person may petition the Commission under Public Utilities Code Section 1708.5 to adopt, amend, or repeal a regulation. The proposed regulation must apply to an entire class of entities or activities over which the Commission has jurisdiction and must apply to future conduct.

Here, the petition focuses on a single class of activities or resources — modernizing GO 95.<sup>15</sup> The proposed changes to GO 95 affect the activities of the Commission’s regulated entities, particularly the investor-owned utilities. We find that petitioner has complied with Rule 6.3(a) requirement to show that the proposed regulation would apply to an entire class of entities or activities over which the Commission has jurisdiction.

Application of Rule 6.3(b): Rule 6.3(b), in relevant part, provides:

... A petition must concisely state the justification for the requested relief, and if adoption or amendment of a regulation is sought, the petition must include specific proposed wording for that regulation. In addition, a petition must state whether the issues raised in the petition have, to the petitioner's knowledge, ever been litigated before the Commission, and if so, when and how the Commission resolved the issues, including the name and case number of the proceeding (if known). A petition that contains factual assertions must be verified. Unverified factual assertions will be given only the weight of argument. The caption of a petition must contain the following wording: "Petition to adopt, amend, or repeal a regulation pursuant to Pub. Util. Code § 1708.5."

Here, petitioner stated the request for relief and proposed regulation and tariff language in the petition. Petitioner states that while Rulemaking (R.) 08-11-005 and its accompanying workshops were driven to expeditiously identify and implement changes to mitigate the risk of utility-related wildfires prior to

---

<sup>15</sup> Petition at 1-3.

upcoming fire seasons, stakeholders tabled the LRFD discussions.<sup>16</sup> Petitioner also states that given the time and commitment required to develop the numerous changes necessary to migrate from GO 95's WSD methodology to an LRFD methodology, the members of the GO 95 Rules Committee committed themselves to the longer-term undertaking presented in this petition.<sup>17</sup> Thus, the LRFD methodology has not been previously litigated in prior Commission proceedings.<sup>18</sup> The caption reflects the required wording. We therefore find that the petition complies with Rule 6.3(b).

Application of Rule 6.3(c): Rule 6.3(c), in relevant part, provides:

... Petitions must be served upon Executive Director, Chief Administrative Law Judge, Director of the appropriate industry division, and Public Advisor. Prior to filing, petitioners must consult with the Public Advisor to identify any additional persons upon whom to serve the petition. If a petition would result in the modification of a prior Commission order or decision, then the petition must also be served on all parties to the proceeding or proceedings in which the decision that would be modified was issued. The assigned Administrative Law Judge may direct the petitioner to serve the petition on additional persons.

This petition was served on all parties of R.17-10-010, which last considered changes to GO 95. Petitioner served transmitted copies of the petition to the Commission's Executive Director, the Commission's Chief Administrative Law Judge, the Safety Enforcement Director, and the Commission's Public Advisor's Office.<sup>19</sup> We therefore find that the petition complies with Rule 6.3(c).

---

<sup>16</sup> Petition at 2.

<sup>17</sup> Petition at 3.

<sup>18</sup> Petition at 3; *see also* Petition at 6.

<sup>19</sup> Petition Certificate of Service at 1.

Application of Rule 6.3(f): Finally, Rule 6.3(f) provides:

The Commission will not entertain a petition for rulemaking on an issue that the Commission has acted on or decided not to act on within the preceding 12 months

Here, Petitioner has complied with Rule 6.3(f), with an affirmative statement in the petition noting that there has not been an instance where the LRFD has been litigated in a Commission proceeding.<sup>20</sup>

Based on the forgoing, the Commission grants the petition to consider the proposed changes to the existing policies, procedures, and rules governing the design and construction of overhead electric and communications facilities in California in GO 95.

### **3.2. Closure of the Docket for Petition 24-03-014**

Petition 24-03-014 is closed. All documents that are filed and/or served in the rulemaking proceeding instituted by this OIR should have the caption for the rulemaking proceeding only (and not for Petition 24-03-014).

### **3.3. Assignment of Petition 24-03-014**

Matthew Baker is the assigned Commissioner for P.24-03-014 and Colin Rizzo is the assigned ALJ.

## **4. Preliminary Scoping Memo for Order Instituting Rulemaking**

Pursuant to Rules 6.1 and 6.3 of the Commission's Rules of Practice and Procedure (Rules), this Order Instituting Rulemaking (OIR) opens this rulemaking proceeding to consider the proposed changes to General Order 95. This rulemaking proceeding will be conducted in accordance with the Commission's Rules. As required by Rule 7.1(d), this rulemaking includes a

---

<sup>20</sup> Petition at 5.

preliminary scoping memo as set forth below, and preliminarily determines the category of this proceeding and the need for hearings.

Comments on preliminary matters pertaining to the scope, schedule, and administration of this rulemaking proceeding are due no later than 30 days after the issuance of this OIR. Reply comments shall be filed no later than 15 days after the deadline for filing opening comments, as set forth in Sections 4.2 and 6 below.

#### **4.1. Issues**

While the above sections touch on the broad objectives that will shape this rulemaking proceeding, the precise issues to be addressed and the process for addressing those issues will be set forth in an assigned Commissioner's Scoping Memo and Ruling. For clarity, however, the preliminary scope of issues for this proceeding include:

1. Whether the Commission should revise GO 95 to replace the Working Stress Design methodology with the LRFD methodology?
2. If the LRFD methodology is adopted, what revisions in GO 95 should be made to incorporate LRFD for seamless use?
  - a. **Load and Strength Factors:** If LRFD is adopted, what changes to the rules in GO 95 are necessary to incorporate the LRFD methodology? This may include defining load factors and strength factors to replace the existing safety factors associated with the Working Stress Design methodology, as well as other necessary revisions,<sup>21</sup> to facilitate a comprehensive change in the GO 95 design methodology.

---

<sup>21</sup> This includes, but is not limited to, revising Appendix F of GO 95.

- b. **Safety Impact Assessment:** Should the Commission create a framework to assess the safety impacts of the LRFD Load and Strength Factors?<sup>22</sup>
- 3. If the LRFD methodology is adopted, what performance-based testing should occur to assess prior field performance against theoretical modeling?
  - a. **Potential Load or Strength Factor Modification to Enhance Safety Performance:** Should the Commission compare prior, in-field performance against theoretical, statistically targeted safety performance of the proposed load and strength factors?
- 4. If GO 95 is revised to use the LRFD methodology, are other changes to GO 95 necessary?

**4.2. Preliminary Schedule**

The preliminary schedule for this rulemaking is set forth below and includes the provisions of the filing of comments to the OIR. The below schedule is adopted here and may be modified by the assigned Commissioner and Administrative Law Judge (ALJ) as required to promote the efficient and fair resolution of the rulemaking. Identified below is the initial set of proceeding events which will be further developed in the Scoping Memo and Ruling.

Proceeding Milestone	Date
Comments on OIR filed and served	30 days after issuance of the OIR
Reply Comments on OIR filed and served	15 days after the deadline to file opening comments
IOU Led Party Workshop	30 days after filing and service of Reply Comments

---

<sup>22</sup> LRFD permits tuning the design of structures based upon known statistical variations related to two factors: (1) loads via load factors; and (2) materials via strength factors. Petition suggests using the lower fifth percentile strength as one way to determine the equivalent strength for engineered materials. Petition at 40.E

All Party Meeting Report, filed and served	10 days after IOU Led Party Workshop
Opening Comments on All Party Meeting Report, filed and served	20 days after filing and service of All Party Meeting Report
Reply Comments on All Party Meeting Report, filed and served	10 days after filing and service of Opening Comments on All Party Meeting Report
Assigned Commissioner’s Scoping Memo and Ruling <sup>23</sup>	Within 60 days after the Reply Comments of the All Party Meeting Report

We emphasize that the preliminary issues identified in Preliminary Scoping Memo, Section 4.1 above, will likely require further refinements; and each of those issue will also likely require different types and degrees of public participation. Therefore, we delegate to the assigned Commissioner and ALJ to further focus and refine the preliminary scope and proceeding schedule, as necessary to promote the efficient and fair resolution of the rulemaking and do so in the Assigned Commissioner’s Scoping Memo and Ruling or a later ruling.

This rulemaking proceeding will conform to the statutory case management deadline for quasi-legislative matters set forth in Section 1701.5. It is our intention to resolve all relevant issues within 36 months of the date this OIR is adopted.

In using the authority granted in Section 1701.5(b) to set a time longer than 18 months, we considered the number and complexity of the tasks and the need to coordinate with multiple other proceedings. In addition, there may be workshops in this proceeding. Notice of such potential workshops will be posted on the Commission’s Daily Calendar and will inform the public if a

---

<sup>23</sup> Rule 7.2(b) states the assigned Commissioner has the discretion not to set a prehearing conference in a quasi-legislative proceeding. Therefore, this OIR leaves such determination to the assigned Commissioner.

decision maker or an advisor to a Commissioner may be present at those meetings or workshops. Parties should check the Daily Calendar and mind notices from the service list regularly for such notices

**5. Order Instituting Rulemaking Category; *Ex Parte* Communications; and Need for Hearing**

The Commission's Rules require that an OIR preliminarily determine the category of the proceeding. As a preliminary matter, we determine that this proceeding is quasi-legislative because our consideration and approval of this matter would establish rules affecting a class of regulated utilities. Accordingly, *ex parte* communications are permitted without restriction or reporting requirement pursuant to Article 8 of the Rules.

The Commission's Rules require that an order instituting rulemaking preliminarily determine the need for hearing. We anticipate many of these issues can be addressed by filed comments or in public meetings or workshops. Therefore, we preliminarily determine that no hearings will be needed.

Any person who objects to the preliminary categorization of this rulemaking or to the preliminary hearing determination shall state their objections in comments on the OIR. After considering the comments, the assigned Commissioner will issue a Scoping Memo and Ruling, that makes final determinations of the categorization and need for hearing, subject to appeal as specified in Rule 7.6.

**6. Comment on the Order Instituting Rulemaking**

This OIR solicits comment on the OIR, including the preliminary issues and schedule identified in Preliminary Scoping Memo, Section 4 above, and the preliminary categorization and hearing need determinations, Section 5 above. In addition, comments on the OIR must also address the following:

- Are the proposed GO 95 changes presented by SCE, on behalf of the Rules Committee, reasonable? If not why? Discuss your response.
- Whether there are additional issues that should be included in the scope of this proceeding; and
- The appropriate prioritization or sequencing of topics and activities that should be handled in this proceeding leading to Commission decision(s).

Initial comments shall be filed and served no later than 30 days after issuance of this OIR. Reply comments shall be filed and served within 15 days of the deadline to file opening comments. The Commission will consider parties' comments to identify areas that need clarification and may consider the addition of specific issues or questions related to the items described in Section 3.1 on the scope of this proceeding, pursuant to the guidance set forth herein. We direct parties to limit their comments to the specific issues set forth in this OIR as well as to objections to the preliminary determinations. Comments are limited to no more than 20 pages per party, with replies limited to no more than 15 pages per party.

#### **7. Respondents to the OIR**

Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service, and PacifiCorp d/b/a Pacific Power are named as respondents to this proceeding. The telecommunications carriers identified in Appendix 1 are also named as respondents to this Rulemaking.

#### **8. Service List for the Order Instituting Rulemaking**

This OIR shall be served to all respondents. Also, in the interest of broad notice, this OIR will be served on the official service lists for the following proceeding:

- R.15-05-006
- R.17-10-010
- R.18-04-019
- R.18-12-005
- R.18-10-007
- R.20-07-013
- A.20-06-012
- A.21-05-011
- A.22-05-013

This OIR will be served on following state and local agencies:

- California Air Resources Board
- California Energy Commission
- California Independent System Operator
- California Infrastructure and Economic Development Bank
- California Native American Heritage Commission and the tribal contacts list maintained by the Native American Heritage Commission
- California Office of Emergency Services
- California Office of Research and Planning
- California State Association of Counties
- League of California Cities
- Office of Energy Infrastructure Safety
- Rural County Representatives of California
- State Board of Forestry and Fire Protection

Service of the OIR does not confer party status or place any person who has received such service on the official service list for this proceeding, other than respondents. Instructions for obtaining party status or being placed on the official service list are given below.

Addition to the official service list is governed by Rule 1.9(f).

Respondents are parties to the proceeding (*see* Rule 1.4(d)).

Any person will be added to the “Information Only” category of the official service list upon request, for electronic service of all documents in the proceeding, and should do so promptly to ensure timely service of comments and other documents and correspondence in the proceeding. (*See* Rule 1.9(f).) The request must be sent to the Commission’s Process Office by e-mail ([Process\\_Office@cpuc.ca.gov](mailto:Process_Office@cpuc.ca.gov)) or letter (Process Office, California Public Utilities Commission, 505 Van Ness Avenue, San Francisco, CA 94102). Please include the Docket Number of this Rulemaking in the request.

Persons who file responsive comments to this OIR become parties to the proceeding (*see* Rule 1.4(a)(2)) and will be added to the “Parties” category of the official service list upon such filing. To assure service of comments and other documents and correspondence in advance of obtaining party status, persons should promptly request addition to the “Information Only” category as described above; they will be removed from that category upon obtaining party status.

This proceeding will follow the electronic service protocol set forth in Rule 1.10, with one exception, such that all parties are excused from the Rule 1.10 requirement to serve on the ALJ both an electronic and a paper copy of filed or serviced documents. Therefore, when serving documents on Commissioners, their personal advisors, and the ALJ, whether they are on the official service list or not, **all parties to this proceeding shall serve documents and pleadings using electronic mail only, transmitted no later than 5:00 p.m. on the date scheduled for service to occur.**

**Parties must not send hard copies of documents to the assigned ALJ, or the assigned Commissioner, or their personal advisors, unless specifically instructed to do so.**

**9. Subscription of Service**

Persons may monitor the proceeding by subscribing to receive electronic copies of documents in this proceeding that are published on the Commission’s website. There is no need to be on the official service list to use the subscription service. Instructions for enrolling in the subscription service are available on the Commission’s website at: <http://subscribecpuc.cpuc.ca.gov/>

**10. Intervenor Compensation for the Order Instituting Rulemaking**

Intervenor compensation is permitted in this rulemaking proceeding. Any party that expects to claim intervenor compensation for its participation in this rulemaking must file a timely notice of intent to claim intervenor compensation. (See Rule 17.1(a).) Intervenor compensation rules are governed by Section 1801 et seq. of the Pub. Util. Code. Parties new to participating in Commission proceedings may contact the Commission’s Public Advisor.

**11. Public Advisor**

Any person or entity interested in participating in this rulemaking who is unfamiliar with the Commission’s procedures should contact the Commission’s Public Advisor in San Francisco at (415) 703-2074 or (866) 849-8390, or email [public.advisor@cpuc.ca.gov](mailto:public.advisor@cpuc.ca.gov). The TTY number is (866) 836-7825.

**O R D E R**

**IT IS ORDERED** that:

1. The petition to adopt, amend, or repeal a regulation pursuant to Public Utilities (Pub. Util.) Code Section 1708.5, which opened Petition 24-03-014, filed on March 18, 2024, by Southern California Edison Company, on behalf of the

General Order 95/128 Rules Committee, to consider proposed changes to the Commission's General Order 95, is granted.

2. This Order Instituting Rulemaking is adopted pursuant to Rule 6.1 of the Commission's Rules of Practice and Procedure.

3. The preliminary categorization is quasi-legislative.

4. The preliminary determination is that hearings are not needed.

5. The preliminary scope of issues is as stated above in Section 4.1 and adopted.

6. The preliminary schedule of issues is as stated above in Section 4.2 and adopted; and the schedule for the remainder of the proceeding shall be adopted in the Assigned Commissioner's Scoping Memo and Ruling.

7. The resolution date for this proceeding is 36 months from the issuance date of this Order Instituting Rulemaking.

8. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service, PacifiCorp d/b/a Pacific Power and the telecommunications carriers of last resort identified in Appendix 1 of this order are respondents to this Order Instituting Rulemaking.

9. Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Liberty Utilities (CalPeco Electric) LLC, Bear Valley Electric Service, PacifiCorp d/b/a Pacific Power, and the telecommunications carriers of last resort identified in Appendix 1 of this order shall, and any other person may, file comments responding to this Order Instituting Rulemaking within 30 days of the date of issuance of this Order Instituting Rulemaking. Reply comments are due within 15 days of the deadline

to file opening comments. Comments shall be limited to no more than 20 pages per party, with replies limited to no more than 15 pages per party.

10. The Executive Director will cause this Order Instituting Rulemaking to be served on all respondents and on the service lists for the following Commission proceedings: (1) R.15-05-006; (2) R.17-10-010 (3) R.18-04-019; (4) R.18-12-005; (5) R.18-10-007; (6) R.20-07-013; (7) A.20-06-012; (8) A.21-05-011; (9) A.22-05-013.

11. In addition, the Executive Director will cause this Order Instituting Rulemaking to be served on the following agencies:

- California Air Resources Board
- California Energy Commission
- California Independent System Operator
- California Infrastructure and Economic Development Bank
- California Native American Heritage Commission and the tribal contacts list maintained by the Native American Heritage Commission
- California Office of Emergency Services
- California Office of Research and Planning
- California State Association of Counties
- League of California Cities
- Office of Energy Infrastructure Safety
- Rural County Representatives of California
- State Board of Forestry and Fire Protection

12. Any party that expects to claim intervenor compensation for its participation in this Rulemaking must file its notice of intent to claim intervenor compensation within 30 days after the issuance of the Scoping Memo and Ruling. (See Rule 17.1(a)(2).)

13. Petition 24-03-014 is closed.

This order is effective today.

Dated October 17, 2024, at Sacramento, California

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

MATTHEW BAKER

Commissioners