

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Rail Safety Division
Rail Transit Safety Branch**

**Resolution ST-272
July 16, 2026**

R E S O L U T I O N

Resolution ST-272. Second Resolution Granting the Orange County Transportation Authority a Variance to General Order 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4 Conductors passing supply poles and unattached thereto.

PROPOSED OUTCOME:

- Approval of the requested variance for 3 additional locations with clearances not meeting the specific requirements of General Order 95.

SAFETY CONSIDERATIONS:

- This resolution considers the safety and security of the public and employees who might be affected by the Orange County Transportation Authority OC Streetcar system. The variance is mitigated by adoption of mitigations as discussed herein.

ESTIMATED COST:

- There are no costs associated with this resolution.
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SUMMARY

This resolution approves the Orange County Transportation Authority's (OCTA) second request to deviate from the clearance requirements of General Order 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4, to permit the installation of 3 additional overhead catenary system poles with reduced clearance to pre-existing communication lines provided that the communication lines remain protected by a cable protection barrier, on the Orange County Streetcar system project currently under construction. The first request for the same relief was for the original 41 locations in

conflict and was approved by the Commission in Resolution ST-254. This deviation will allow the installation of 3 additional overhead catenary system poles closer to telecommunications facilities on nearby poles than is allowed by General Order 95, without compromising safety.

BACKGROUND

The Orange County Transportation Authority (OCTA) is the county transportation commission, responsible for planning, funding, and implementing transit and other transportation, capital projects within Orange County. OCTA is constructing a streetcar system consisting of 4.15 miles of track between the Santa Ana Regional Transportation Center in the city of Santa Ana and a new streetcar station to be located at the Harbor Boulevard/Westminster Avenue intersection in the City of Garden Grove. It will be a new electrified rail service with a 750 Volt overhead catenary system (OCS). Revenue service date is currently targeted for March 2027. As noted in Commission Resolution ST-191, approving the Safety Certification Plan for the system, it will be known as the Orange County Streetcar (OC Streetcar) system.

The west half of the project is in the former Pacific Electric Railway (PE) right-of-way (ROW). The PE ROW does not have existing overhead utilities running parallel to or within the ROW.

The east half of the project runs in mixed traffic lanes on Santa Ana Blvd, 4th Street, and Mortimer Street. Santa Ana Boulevard, outside of the downtown underground utility district, has existing overhead utilities on both sides of the street in and above the narrow grassy strip between the street curb and sidewalk on the west side of the street. Both the existing utilities poles and OCS poles need to be located within that space between the street curb and sidewalk.

By letter dated April 17, 2026, OCTA requested a deviation from the requirements of General Order (GO) 95, Section III, Table 1, Case 8, Column B and from Section VIII, Rule 84.4-D4, Conductors Passing Supply Poles and Unattached Thereto, which require 22.5 inches of separation between existing communications cables and the OCS poles for the OC Streetcar Project (15 inches of separation if the OCS pole is within 10 feet of the pole on which the communications cables are supported).

OCTA advertised the OC Streetcar Project for Construction in December 2017 believing the design was fully compliant with CPUC General Orders. However, in late 2020, it came to OCTA's attention that there is a clearance issue between the communications cables attached to the existing utility poles and the planned OCS pole locations within the

narrow strip in the eastern segment of the OC Streetcar Project along Santa Ana Boulevard.

When OCTA brought the initial issue to the Rail Safety Division's Rail Transit Safety Branch (RTSB), RTSB contacted the CPUC's Safety and Enforcement Division Electric Safety and Reliability Branch (ESRB) to consult and referred OCTA to discuss potential acceptable mitigations with ERSB. Staff requested that OCTA measure the height and position of the existing overhead (OH) electrical and communication wires and offsets to their OCS poles throughout the corridor. At the time, OCTA confirmed that 41 OCS poles did not comply with the above noted GO 95 clearance requirements.

Based on the information that OCTA provided and the field observations RTSB Staff conducted, RTSB Staff supported the variance request of Resolution ST-254 for Commission approval. The Commission approved Resolution ST-254 granting a clearance variance to the aforementioned 41 pole locations on December 5, 2024. After constructing the OCS, OCTA discovered additional locations requiring mitigation measures to become compliant. Of those additional locations, OCTA is requesting a variance for 3 pole locations that are unable to comply fully with the clearance requirements of GO 95 Section VIII, Rule 84.4-D4.

In the affected portion of the project, OCS poles will be holding the span wires that lead and meetup in the middle of the street, holding the contact wire that supplies power to the streetcar at a height of 19.5-feet. GO 95, Section VIII, Rule 84.4-D4 considers clearance as being the distance from the centerline of the OCS pole to the passing communication wire. The current clearances for the 3 noncompliant OCS poles from the communication wires are 21-inches, 16-inches, and 4-inches with no mitigations. GO 95 Section VIII, Rule 84.4-D4 requires a clearance of 22.5-inches.

DISCUSSION

The discussion below follows the same approach and analysis used in the previously mentioned Commission-approved Resolution ST-254.

OCTA Proposed Solution

OCTA met with the affected utilities between spring 2025 and spring 2026 to discuss options to modify the existing overhead lines or the proposed OCS to comply with GO 95. OCTA also met with the five utility companies that have cables on these poles; they are Southern California Edison (SCE) Crown Castle, Verizon, AT+T, and Time Warner-Spectrum-Charter (TWSC), to discuss the available options. The latter two companies

own the majority of the OH communications lines attached to these poles. There are no other utilities using these poles. Based on OCTA's calculations and field verifications, OCTA concluded that it was not feasible to install additional cantilever arms on the existing wood poles in order to meet the clearances required between the communications cables and the OCS poles without overloading the existing wood poles. Additionally, it would be cost and schedule prohibitive to replace the existing wood poles or to underground the existing overhead utilities at this stage of the project.

OCTA analyzed the intent of the unmet GO 95 clearance requirements and assessed whether reasonable mitigations were available to accomplish the intent of assuring separation of the communications lines from OCTA's facilities. After discussions with RTSB and ESRB Staff and the utility companies, OCTA identified a protective sleeve that would cover the communications cables in areas with insufficient clearances. The protective sleeve is nonconductive, easy to install, would not add significant weight to existing pole loads, and is a product already in use in the industry by utility companies at various locations. Additionally, OCTA would cover the costs of any engineering assessments, the sleeve and other materials, and installation.

RTSB requested that OCTA obtain written concurrence from each of the affected utility companies that support the installation of a protective sleeve over their wires as a GO 95 Variance Request mitigation measure.

The communication companies and SCE have agreed to the sleeve mitigation measure proposed by OCTA. OCTA has provided written concurrences of the utility companies' support in its variance request. Additionally, since the utility companies accepted the proposed sleeve protection as mitigation measure, the installation work commenced during Fall of 2025. The protective sleeves have already been installed for 2 of the 3 affected pole locations identified in this variance request.

CPUC Staff Analysis

RTSB Staff have worked with OCTA and the ESRB Staff to assist OCTA with identifying potential solutions to the clearance issues identified as construction commenced in the OC Streetcar project. The OCS poles were placed by OC Streetcar designers within the available space between the existing SCE poles supporting electric and other utility facilities and the street curb along Santa Ana Boulevard, without recognizing the insufficient clearance between the OCS poles and communications cables attached to the nearby utility poles. When the GO 95 clearance conflict was identified, it was clear that there simply was insufficient space to accommodate the OC Streetcar OCS poles between the SCE poles and the curb while meeting the GO 95 clearance.

OCTA evaluated the possibility of replacing the poles in the conflict areas to allow a greater clearance between the poles or placement of pole crossarms on new poles to achieve compliant clearances, however the cost of and timeline involved in such a solution was prohibitive, and not within the OC Streetcar project construction budget. OCTA needed to identify other potential solutions.

In researching and evaluating potential solutions, OCTA met with the ESRB Staff to discuss potential alternatives or mitigations to reduced clearances that might be acceptable and supported by Commission Staff. OCTA also met with SCE and the affected communications companies to discuss the problem and potential solutions or mitigations they might recommend.

Discussions focused on clearing some conflict locations by relocating some of the lines up or down on the poles and adjusting OCS lines. This allowed some of the conflict locations to achieve clearance compliance. However, the consensus that developed for the remaining locations was that the best solution is for the communications companies to install insulating protective sleeves over their cables in the locations where the proximity of the OCS poles failed to meet the GO95 clearances. Such conditions would require a variance request for the reduced clearance but would not create an unsafe condition. Each utility company has done/will do the necessary work, with OCTA paying all costs. SCE has reviewed the final designs and concurs with the proposed solution and final plans.

RTSB agrees with the proposed protective sleeve mitigation and finds no evidence indicating safety is compromised by the granting of this variance to GO 95 clearance requirements as outlined above. However, to prevent any unsafe conditions from occurring in the future due to the proposed mitigation plan not performing as expected, Staff recommends at least one inspection of the installed protective sleeves be performed annually by OCTA to assure ongoing functionality.

COMMENTS

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review. Any comments are due within 20 days of the date of its mailing and publication on the Commission's website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments and will be placed on the Commission's agenda no earlier than 30 days from today. ___ comments were received.

FINDINGS AND CONCLUSIONS

1. By letter dated April 17, 2026, OCTA requested authority to deviate from the requirements of General Order 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4 Conductors Passing Supply Poles and Unattached Thereto.
2. This request for deviation applies to the 3 additional pole locations that were not previously included in the Commission-approved Resolution ST-254. The identified pole locations are as follows: 1W/118, 1W/128, 4/008.
3. OCTA proposes to mitigate any hazards of deviating from General Order 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4 by utilizing a protective sleeve over the communication wires in areas where its poles are not in compliance with GO 95 clearance requirements.
4. There is no evidence to suggest that granting this request for a variance to GO 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4 along OCTA's proposed alternative would adversely affect the level of safety of the existing utilities facilities or OCTA's OC Streetcar system that is provided with the current rule.

THEREFORE, IT IS ORDERED THAT:

1. The Orange County Transportation Authority (OCTA) is granted authority for the additional 3 Overhead Catenary System (OCS) poles to deviate from the clearance requirement of General Order 95, Section III, Table 1, Case 8, Column B and Section VIII, Rule 84.4-D4, allowing the 3 OCS poles to be built with reduced clearance to nearby overhead communications lines so long as all affected communications lines are equipped with a cable protective sleeve which the affected utility companies agreed upon.
2. The OCTA shall submit for RTSB Staff review and approval a Standard Operating Procedure specifying the procedures to periodically inspect the protective sleeves remain properly installed and in working condition, once the OC Streetcar system goes into revenue service.

3. If a communication company is to replace the cable (or add new communication facilities), this variance request would no longer apply to that communication company's cable(s) at the pole location(s) indicated, per General Order 95, Rule 32.1.
4. The OCTA shall continue to comply with General Order 95, Section III, Rule 31.4, Cooperation to Avoid Conflicts, when contemplating changes to their current OCS design.
5. This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on [DATE]; the following Commissioners voting favorably thereon:

Commissioner Signature blocks to be added
upon adoption of the resolution

Dated ____/____/____, at San Francisco, California