

Comments for CPUC Utility Pole Census and Competitive Access Order Instituting Investigation, 17-06-027

Catherine Sandoval
Associate Professor
Santa Clara University School of Law
CPUC Public Participation Hearing
May 21, 2018, San Jose, California

California Operates State Pole Safety Rules including General Order 95, per 47 USC 224, Administered by the California Public Utilities Commission. CPUC General Order 128 Governs Underground Electric and Utility Facilities.

STATE OF CALIFORNIA

RULES

FOR

Overhead Electric Line Construction



Prescribed by the
PUBLIC UTILITIES COMMISSION

OF THE

STATE OF CALIFORNIA

GENERAL ORDER No. 95

Power Line Anatomy 101

when you look at a power line? What are all those attachments, and why are they important?

The power lines that carry electricity from the substation to your home or business are called distribution lines. They are part of a system of poles, wires, transformers and other equipment used to deliver electricity.

Sometimes the power lines are buried underground. However, more frequently they are run

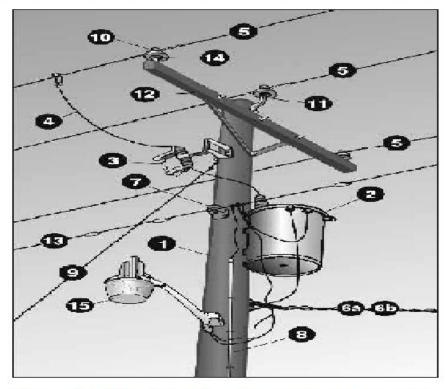
overhead.

Below is a description of the main components of an electrical distribution system.

 Utility pole: The half-ton wooden pole is the backbone of the electrical line. It is partially buried to support all of the equipment. It usually is about 40 feet in length, and typically is made from logs made of cedar, pine or fir trees.

2. Transformer: The cylindrical metal tankshaped device steps down the voltage to a level safe for delivery to the customer, either 120 or 240 volts. Many transformers have a lightning arrestor, which protects them from a strike.

3. Fused cutout: This provides overload protection. A link inside a fiberglass barrel operates the cutout, which isolates the tap from the main line.



When a loud blast is heard from a utility pole, it is the fused cutout operating.

4. Wire and clamp: This wire is secured by a clamp, and connects the main line to the transformer.

5. Primary conductor: This is the main series of wires that carries electricity from the supplier to the consumer through the distribution system. A three-phase line—typically used to serve large power

users, such as commercial and industrial accountshas three separate currentcarrying conductors. A single-phase line-which serves most homes—has just one current-carrying conductor.

6. Secondary tap (hot and neutral): This conductor carries electricity between the transformer and the consumer's electric meter.

7. Strain insulators: These ceramic objects

hold the conductors in place and insulate them. from the pole.

8. Pole ground wire: This wire is connected to a metal rod driven eight feet into the ground. Its job is to ground the system.

Guy wire: This stranded wire helps stabilize the pole. Hardware connects it to the pole and an anchor in the ground.

10. Insulators: These porcelain or rubber objects support the electric wires and prevent an undesired flow of electricity.

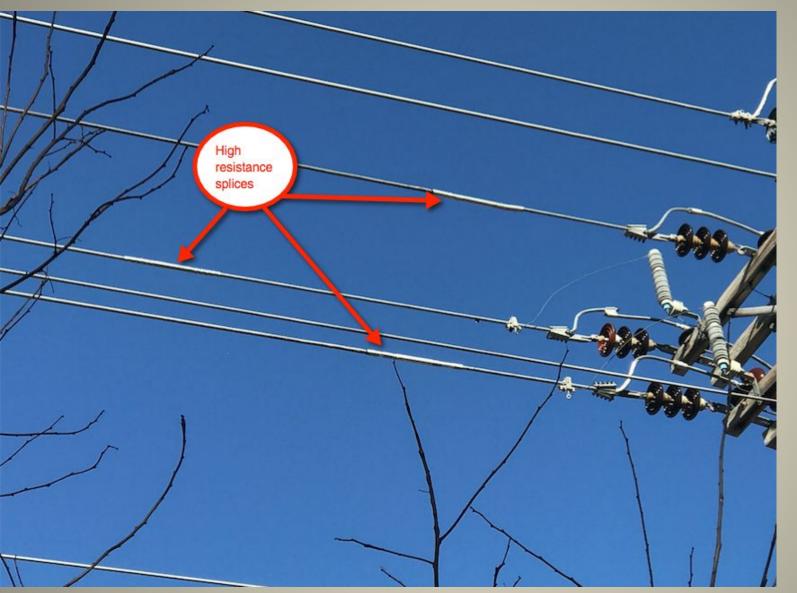
11. Pole-top pins: These support the insulators on the pole.

12. Crossarm and braces: This is the horizontal piece on the pole that makes the structure look like a cross. It holds the insulators, and keeps the lines on a threephase line from touching one another. It usually is made of the same wood as the pole.

13. Main line neutral conductor: This wire is the neutral conductor in a distribution circuit.

14. Insulator pins: These support the insulators on the crossarm.

15. Security light: Although not on all power poles, a dusk-to-dawn light is visible on many power poles.



The CPUC identified vegetation management, electric conductors (wires), and splices as the most frequent causes of utility-involved fires

CPUC Wildfire and Utility Infrastructure En Banc, January 2018

Electric Line Splice

SAFETY, RESILIENCY, AND MAINTENANCE ISSUES, Dangling wires, Campbell, CA (Issue repaired, 2016), photo by Catherine Sandoval



Joint Use Pole with Dangling Wire, Campbell, CA Pole Replaced with PEG pole, Nov. 2016, photo by Catherine Sandoval



"Buddy Pole," created by PG&E when new utility pole planted to replace leaning pole, Nov. 2016, Campbell CA.

Photo by Catherine Sandoval, Nov. 2016

Buddy Pole still in place with Telecom lines attached, May 2018



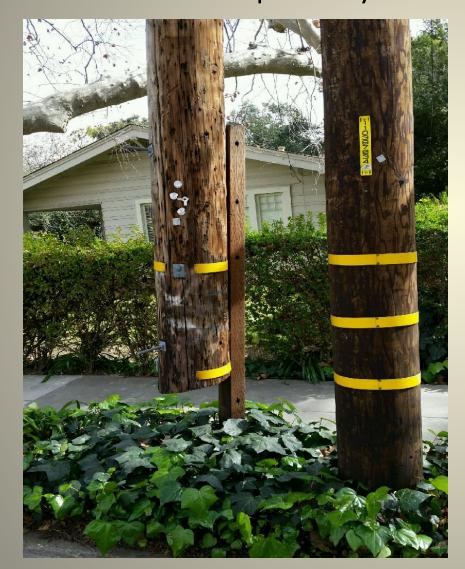


Leaning Pole,
Campbell, CA
Photo taken in 2016
by Catherine Sandoval

Pole still leaning, May 2018



Pole with Bottom cut off, Propped by Wooden Post, San Jose, California, Willow Glen Neighborhood, February 2018, photo by Christopher Klapperich, February 2018. Buddy pole removed by March 2018, photo by Catherine Sandoval.





Top of braced Buddy Poles with Bottom cut off, Held up by Wooden Post, San Jose, California, Willow Glen Neighborhood, February 2018. Photo by Christopher Klapperich

Climbing Space to Electric Facilities Obstructed

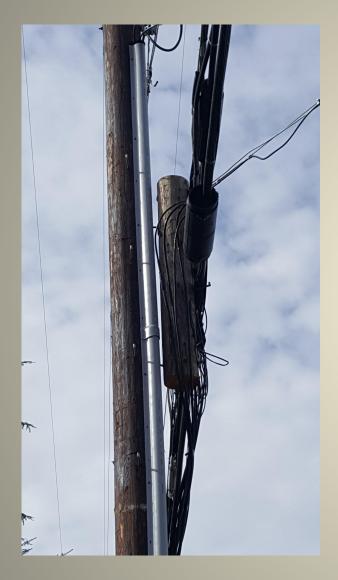
Buddy Pole removed by March 2018, climbing space still obstructed





Internet Power
Equipment on "Peg"
at angle on Pole,
Los Gatos, CA

Photo by Catherine Sandoval, March 2018





Peg on Pole with telecom wires attached, Campbell, CA

Photo by Catherine Sandoval January 2018 Peg of Old Utility Pole Tied to Utility Pole by Rope, Large Telecom Wire Coil, Electric Climbing Space Obstructed, San Jose, CA, Willow Glen Neighborhood, March 2018, Photos by Catherine Sandoval



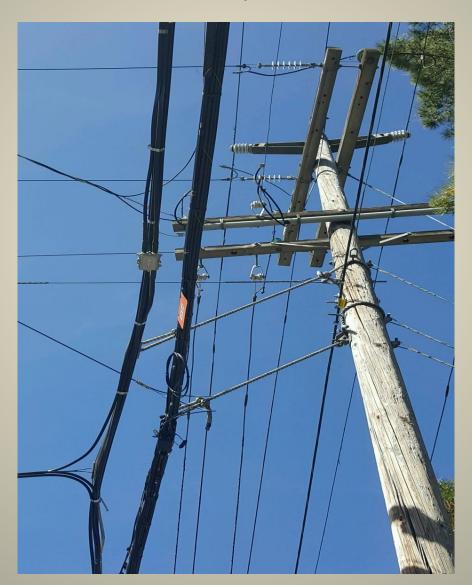


Telecom Remote Facilities linked to Conduit Taped to Joint Use Electric/Communication Utility Pole,
San Jose, CA, Willow Glen Neighborhood
March 2018, Photos by Catherine Sandoval



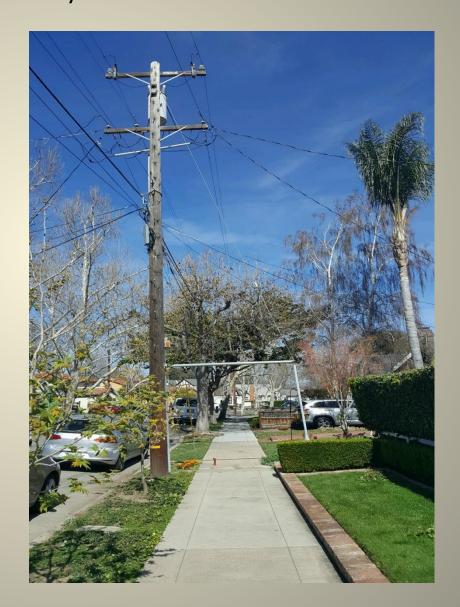


SAFETY, RESILIENCY, AND COMPETITION Issues, Telecom wires tied by Rope to Pole, Electric Climbing Space Obstructed, San Jose, CA, Willow Glen Neighborhood, March 2018, Photos by Catherine Sandoval



SAFETY, RESILIENCY, AND COMPETITION Issues, Telecom wires tied by Rope to Pole, Electric Climbing Space Obstructed, San Jose, CA, Willow Glen Neighborhood, March 2018, Photos by Catherine Sandoval





Large Telecom facility attached to pole McLaughlin Ave, San Jose, CA, Bonita-24th Neighborhood Photo by Catherine Sandoval May 2018

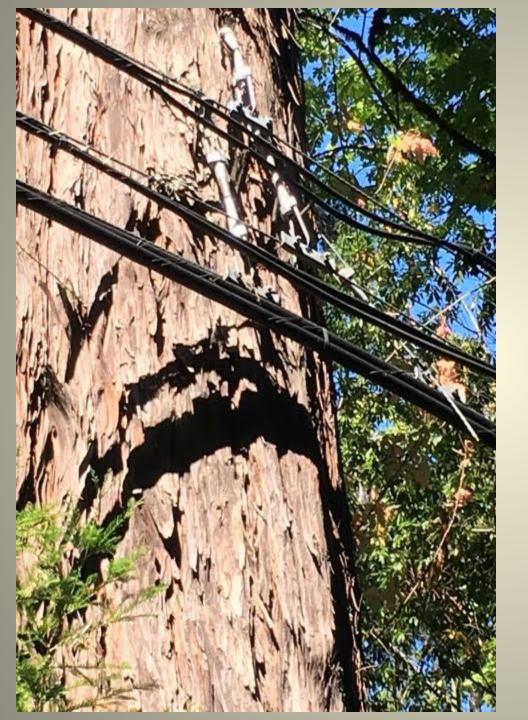




SAFETY, RESILIENCY, AND COMPETITION Issues, photo on left shows dangling wires, photo on right shows leaning Buddy Pole,
Bonita-24th Neighborhood
March 2018, Photos by Catherine Sandoval







Telecom Lines Attached to Tree, Sonoma CA

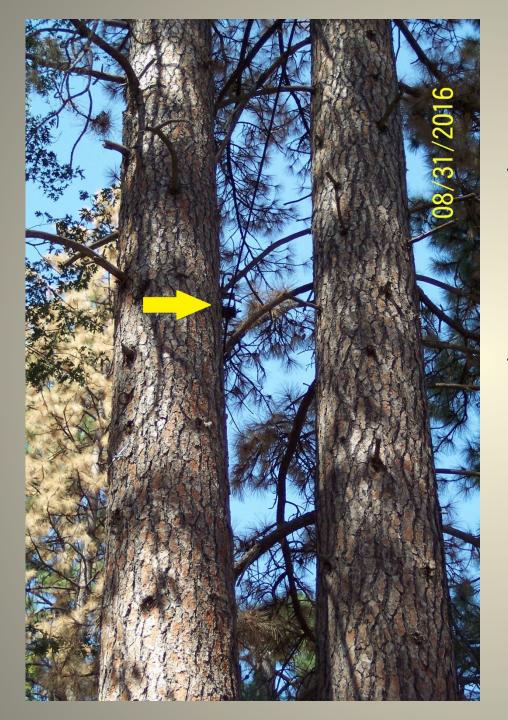
Photo by Michael Nicholls, 2018 Telecom Lines Attached to Trees, Photo on the Left, Telecom line threaded through dead tree, Sonoma CA, 2016, CPUC Ordered lines be moved to a proper utility pole.

Photo on right, Telecom lines tied to tree Felton, CA, 2016.

Photos by Catherine Sandoval







Telephone line attached to tree, Drew Meadow, CA, Next to Firefighter's Camp for 2013 Rim Fire

Tree dead or dying from bark beetle infestation in the background on the left.

Photo by Bill Johnston, 2016

CPUC Commissioner Sandoval (term served Jan. 2011-Jan. 2017) with Tuolumne County Supervisor Randy Hanvelt, standing next to low Telecom Line strung to dead and dying trees, abutting the site of the fire-fighters' campsite at Drew Meadows for the 2013 Rim Fire Trees dead or dying from bark beetle infestation in the background.

Photo by Bill Johnston, 2016





CPUC Enforcement Needed

- CPUC Resolution SED-3
 Adopted December 2016
 authorizes the CPUC Safety and Enforcement
 Division to document and fine violations of CPUC
 General Order 95
- Accountability Needed for Utility Pole Maintenance and Enforcement
- Maintenance and Enforcement Protects Public Safety, Service Reliability, and Promotes Competition

Utility Pole Census and Competitive Access OII 17-06-027

- Utility Pole Census is needed to document condition of the approximately 5.5 million Utility Poles in California.
- Utilities, Pole Attachers, and Utility Pole
 Associations are not doing sufficient or speedy
 follow-up on Utility Pole maintenance and safety
 issues.
- Poor Utility Pole Maintenance increases cost for new competitive services and delays service deployment.

Report Bad Utility Poles

- CPUC should create mechanism for the public to report bad utility poles.
- Telephone call and utility pole and wire problems can be reported today through the CPUC Call Completion Survey.
- CPUC needs to ensure swift follow-up from complaints to repairs.



Thank You!

Catherine Sandoval
Associate Professor
Santa Clara University School of Law
csandoval@scu.edu