

Genoa Ingram

From: Lee, Gary [Gary.Lee@chartercom.com]
Sent: Monday, January 07, 2008 9:23 AM
To: John Sullivan; Genoa (E-mail)
Subject: RE: Code interpretation request from OJUA

John,

My personal opinion on this matter is that if the plant is constructed after 1-1-07, longitudinal runs of cables directly attached on opposite sides of a pole are not in violation of the NESC. I think it is very clear. If the OPUC doesn't support the code, they must address it in a Commission Safety Rule. They can "interpret" the code in areas where it is unclear or silent. In this case, it is explicit.

However, some Construction Standards from pole owners' contracts state how much climbing space is required, but that is another matter.

I will raise this NESC issue at the next Standards meeting on Friday, and see where the committee takes it.

Genoa, can you print a copy of this for the group for Friday?

Thanks

Gary

-----Original Message-----

From: John Sullivan [mailto:John.Sullivan@pgn.com]
Sent: Friday, January 04, 2008 12:09 PM
To: Lee, Gary
Subject: Code interpretation request from OJUA

Gary, this is an issue that PGE is struggling with. Marne says it is not a violation and PUC safety staff says it is. Could PGE ask OJUA to review this and if a similar request hasn't been made make it to the Code interpretation committee?

I do have some quick thoughts below:

The simple existence of cables on both sides of the pole doesn't seem to me to be a direct code violation. Combined with other equipment it certainly could obstruct the space or make it more hazardous to climb the structure. You may want to get a response on this from one of the national code experts also to make sure. Found out several years ago that a number of utilities have some of the experts on retainer to answer questions like this (i.e. Pacific had arrangement with Clapp Associates). Marne wrote the McGraw Hill handbook and is a good source on what the code actually says also.

One of the things I remember from my past code courses is that almost every one of the courses

starts with the statement that "The NESC is NOT a design manual". It's a minimum compliance performance style code. This is in direct contrast to the NEC which tells electricians exactly how to design. The NESC tells us that we have to provide climbing space but tends not to tell us exactly how or for that matter exactly what design methods are or are not permitted.

Many of the code interpretation requests seem to be trying to justify an engineering or design decision by interpretations of the code. All the code interpretation can do is made a reasonable decision that something does or does not violate the minimum code rules. Therefore, it would surprise me if one of the code experts came back with an opinion that cables on both sides were always a violation. I think there are other considerations besides just the code compliance issue.

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