



Promoting Safety in Operations

Oregon Joint Utilities Association Annual Meeting

Letha Tawney, Chair
Oregon Public Utility Commission
October 3, 2025

PUC Overview

Economic regulator of investor-owned utilities (IOUs)

- Electric – PGE, PacifiCorp, and Idaho Power
- Natural Gas – NW Natural, Cascade, and Avista
- Select telecom and small water companies

Safety oversight for all utilities, including consumer-owned utilities

- Cooperatives
- Municipalities
- Peoples' Utility Districts

Our **mission** is to ensure Oregonians have access to **safe, reliable and fairly priced** utility services that advance **state policy** and promote the **public interest**.

We use an **inclusive process** to evaluate differing viewpoints and visions of the public interest and arrive at **balanced, well-reasoned, independent decisions** supported by fact and law.

Roles of the Safety Division

- Inspection and Maintenance
- Safety Policies and Regulations
- Incident Investigation
- Education and Training
- Cybersecurity

- Safety-Related Activities
 - Inspect utility rights of way, both above ground and below to ensure compliance with NESC, PHMSA, and OAR codes.
 - Review and approve utility safety and wildfire mitigation plans
 - Act as liaison between energy and telecom utilities and Office of Emergency Management
 - Coordinate with utilities, communities, and other gov't agencies during wildfire season and weather events

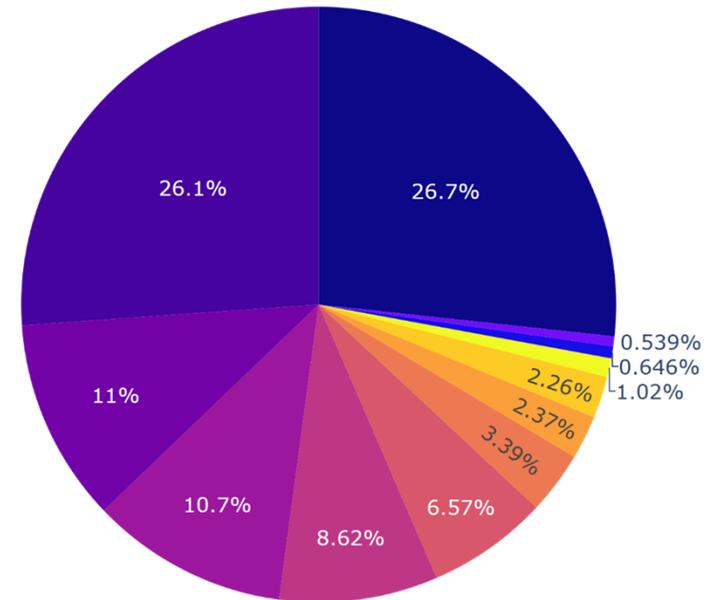
2024 Year In Review

- Staff performed 26 field audits in 2024 (*22 in 2023*), resulting in 105 (*109 in 2023*) reports being issued.
 - 20 were part of addressing complaints made by consumers.
 - 5 were focused on vegetation management programs.
 - **80 were focused on compliance with the NESC and OARs (Oregon Administrative Rules).**
- These **NESC audits** involved 36 Companies receiving reports.
 - 1857 Probable violations of the NESC were identified by staff.
 - 382 (roughly 20%) of these involved two or more companies (Joint Use).
 - *1893 probable violations were identified in 2023, so this represents a 1.9% decrease.*

What is Safety Staff Finding?

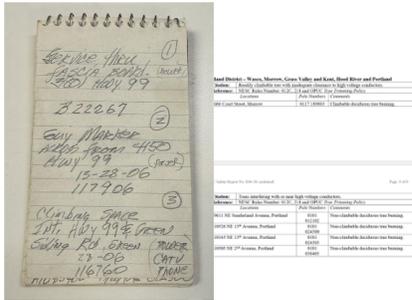
Staff has adjusted its citation classification to more closely align with OJUA code abbreviations.

- **Mids pans and Surface clearances were the largest category of violation.** (496 Citations)
- **71.1% of these 496 citations were related to clearance over a surface.** (Road crossings, etc.).
- **Second largest category was Abandoned Equipment and Inadequate Attachments.** (485 Citations)
- **Split roughly even between abandoned equipment (43.7%) and inadequately attached. (36.5%).**
 - Staff worked with OJUA to include examples of proper attachment methods in new Standards manual (See OJUA Best Practices Guide – Chapter 10)



PUC Audit Tools Have Matured

Vintage Audits through 2008



2018-2020 Audit Processes Evolved with Single Person Audits



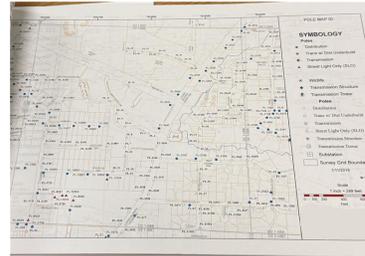
2022 Initial Development of Electronic Capture of Vegetation Audits and Incorporated Vegetation Audits along with NESCA Audits



2024 Handheld Tools including Routing Tracks Utilized and Effectiveness Measure in Draft Form



2010s Vegetation Audit Approach Questioned Due to Concerns regarding "Sampling"



2021 Began Requesting Electronic Records from Utilities

2023 All Vegetation Audits Performed Using Handheld Tools & Location Tracks Trial Developed

What's new in 2025

Lead Equipment Audits



- Staff is identifying and recording lead cables in the field.
- These locations do not have to be involved in another probable violation.
- Staff is comparing these field observations with supplied lead equipment maps.

What's new in 2025

Staff is investigating more complaints received by Consumer Services.

- This is resulting in more reports being issued.
- Leading cause of Consumer complaints lately has been unrepaired storm damage.



What's new in 2025

- Staff is now requesting photographic evidence of corrections.
- Photos should be taken ideally in the same manner as Staff's violation photos (angle, coverage).
- Measuring devices included in image, or measurements provided, to verify proper clearances are achieved.



OJUA Roles and Responsibilities w/ OPUC

- Pole and Attachment Oversight
- Member Services
- Standards and Training
- Coordination and Communication
- Operational Efficiency



Continuing to Deliver Value for Communities

- Increase Value to Customers
 - Leverage assets, processes, and relationships
 - Discord between utilities will ultimately drive up costs for Oregon utility customers
- Prioritize proactive cooperation
 - Need to identify and resolve utility conflicts ahead of time
 - Engage and educate local gov'ts about NESC and how local actions impact utility ROWs and code compliance

Safety and Remediation Reminders

- OAR 860-024-0011 – Operators of electric supply facilities and communication facilities must:
 - (1)(b) conduct detailed inspections of its overhead facilities to identify violations of the Commission Safety Rules
 - (A) The maximum interval between detailed inspections is ten years... During the fifth year of the inspection cycle, the operator must (i) Report the Commission that 50% or more of its total facilities have been inspected; or (ii) Report to the Commission and provide a plan for Commission approval of how the operator is going to inspect the remainder within the next five years.

Safety and Remediation Reminders

- OAR 860-024-0012 – Prioritization of Repairs by Operators
 - (2) Except when provided a waiver by the PUC, the operator must correct violations of Commission Safety Rules no later than two years after discovery
 - (4) **After December 31, 2027**, the allowable conditions for repair deferrals narrow significantly and plans for correction deferrals **must be submitted to Commission Staff for review and tracking.**

Safety and Remediation Reminders

- OAR 860-024-0018 – High Fire Risk Zone Safety Standards
 - (1) Operators of electric facilities must, in HFRZs, remove or de-energize permanently out of service or abandoned electrical equipment as determined by the Operator during fire season.
 - (2) Utility supply conductors shall not be attached to trees and should only be attached to poles and structures designed to meet the strength and loading requirements of the NESC. **Compliance must be achieved prior to December 31, 2027.**

Approaching/Evolving Challenges

- Electrification
 - Increased demand and more complicated power flows will stress distribution systems
- Reliability, Wildfire Mitigation and Liability
 - Tremendous interest in utilities operating reliably and safely while avoiding damaging wildfire ignitions



Approaching/Evolving Challenges



- Broadband Expansion
 - More attachments on more poles in more rural areas
 - Small utilities are likely to be more impacted than in the past
- Advanced Technology Integration (5G and beyond)
 - Increased and more varied set of asset owners touching equipment

PUC Takeaways

- The end of 2027 is fast approaching and utilities need to invest in speeding up corrections
- Proactive cooperation is essential to meeting utility challenges
- Education and outreach can help improve utility relations with local governments
- Advanced technology can assist with utilities tracking compliance issues and resolutions
 - PUC can assist with providing necessary data