

# OPUC Utility Safety & Enforcement

## 2026 OJUA Spring Training

### Leon Grumbo

Electric & Telecommunications Manager  
Utility Safety, Reliability & Security Division

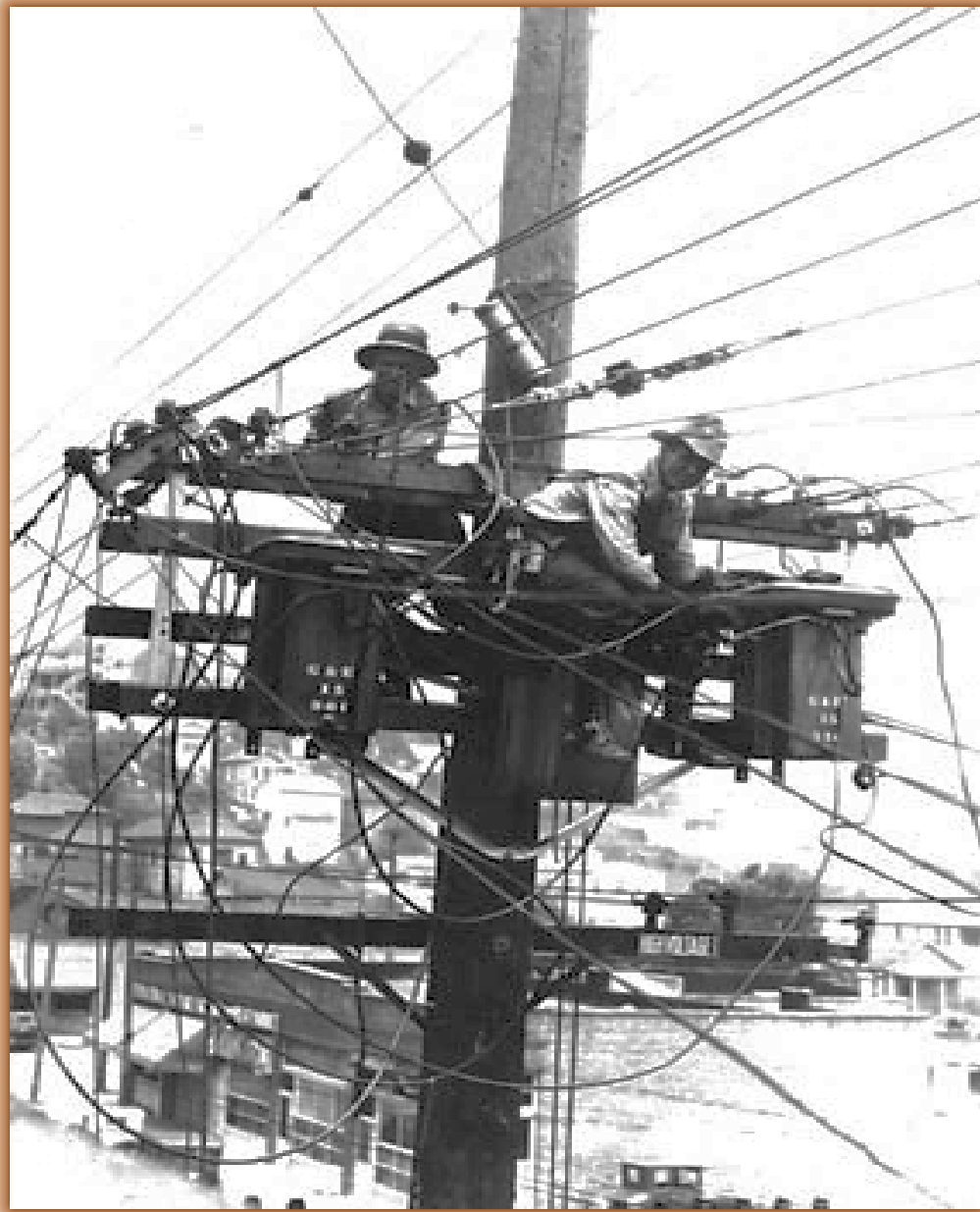
*This content reflects particular rule references and field observations and notations which are potentially subject to amendment at a future date.*

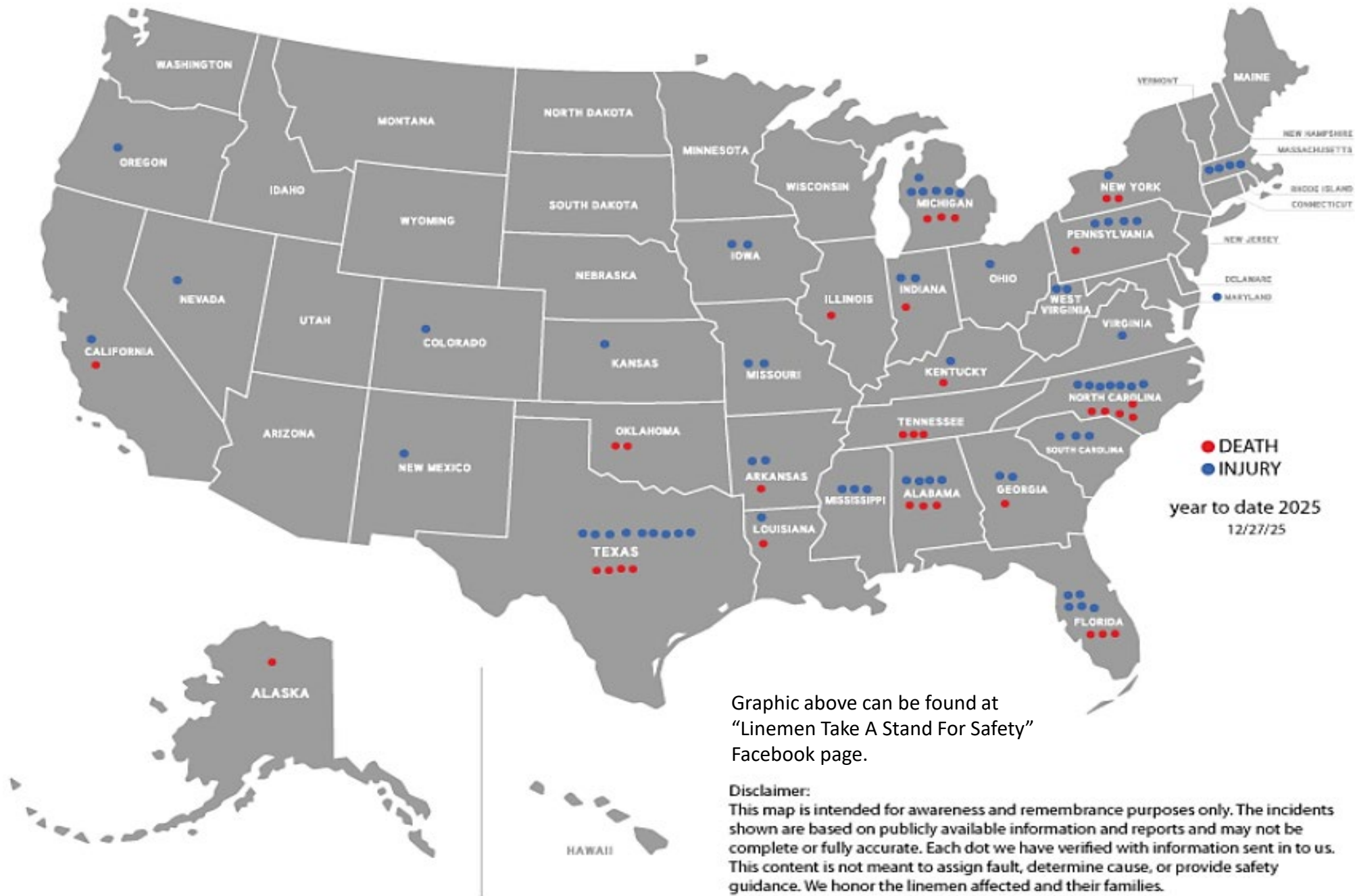


# What's the OPUC Role?

- Economic Regulation of IOU's
- Safety, Reliability and Security for Oregon IOU's, COU's and Communication Operators
- Joint-Use
- Disaster Mitigation, Emergency Preparedness, and supporting the Office of Emergency Management in the ESF2 Communications and ESF12 Energy positions
- Enforcement of Oregon Dig Safe (811) Regulations

# 1895 to 1910 - 50% Fatality Rate, No NESC - No Safety Standards





Graphic above can be found at  
 “Linemen Take A Stand For Safety”  
 Facebook page.

**Disclaimer:**

This map is intended for awareness and remembrance purposes only. The incidents shown are based on publicly available information and reports and may not be complete or fully accurate. Each dot we have verified with information sent in to us. This content is not meant to assign fault, determine cause, or provide safety guidance. We honor the linemen affected and their families.

# Division 24 – Safety Standards

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**860-024-0010:** Every Operator shall construct, operate, and maintain electrical supply and communication lines in compliance with [NESC].

**860-024-0011:** Inspection requirements:

- 100% of system must have *Detail inspections* performed in ten years.
  - Recommended 10% per year.
  - Report to commission halfway (5 years) that 50% is complete.
    - If not at 50%, must supply plan of correction to “catch up”.
- *Detail inspections* include, but are not limited to:
  - Visual checks, pole test and treat program (for pole owners) or practical tests of all facilities, to the **“extent required to identify violations of the Commission Safety Rules (NESC + OAR Div. 24)”**

Commission can require shorter inspection interval in certain areas (HFRZ’s) or for a pattern of non-compliance.

# Division 24 – Inspection Zones

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- **860-024-0011 (2):** Each Operator of **electric supply facilities** must:
  - *“Designate an annual geographic area [...including High Fire Risk Zones...] to be inspected pursuant to subsection (1)(b) of this rule within its service territory;”*
  - Electrical supply operators must **“Provide timely notice of the designation of the annual geographic area to all Owners and Occupants.”**
    - *“The annual coverage areas for the entire program must be made **available in advance** and in **sufficient detail** to allow all Operators with facilities in that service territory to plan needed inspection and correction tasks”*
    - No requirement in the OARs for inspections to be scheduled cooperatively.
      - Traditionally Staff’s audits were planned off the geographic zones defined by **electric supply operators**, but Staff is beginning to perform Audits based off of the communication utility areas.
    - Utilities may opt for Joint-Inspection, but Staff expects each participating utilities to maintain independent copies of inspection records.

# Division 24 – Records

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- **860-024-0011 (1) (d):** *“Maintain adequate written records of policies, plans and schedules to show that inspections and corrections are being carried out in compliance with this rule and OAR 860-024-0012. Each Operator must make these records available to the Commission upon its request.”*
  - These are the records that staff will request during information requests following an audit.

# Division 24 – Correction Timeline

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## 860-024-0012

### Prioritization of Repairs by Operators of Electric Supply Facilities and Operators of Communication Facilities

- “...Imminent danger to life or property must be repaired, disconnected, or isolated by the Operator immediately after discovery.”
- **“Except as otherwise provided by this rule, the Operator must correct violations of Commission Safety Rules no later than two years after discovery.”**

**An Operator may elect to defer correction of violations of the [Rules] that pose little or no foreseeable risk of danger to life or property to correction during the next major work activity.**

- a) In no event shall a deferral under this section extend for more than **ten years** after discovery.
- b) The Operator must develop a **plan detailing how it will remedy each such violation.**
- c) If more than one Operator is affected by the deferral, all affected operators must agree to the plan. **If any affected operators do not agree to the plan, the correction of violation(s) may not be deferred.**

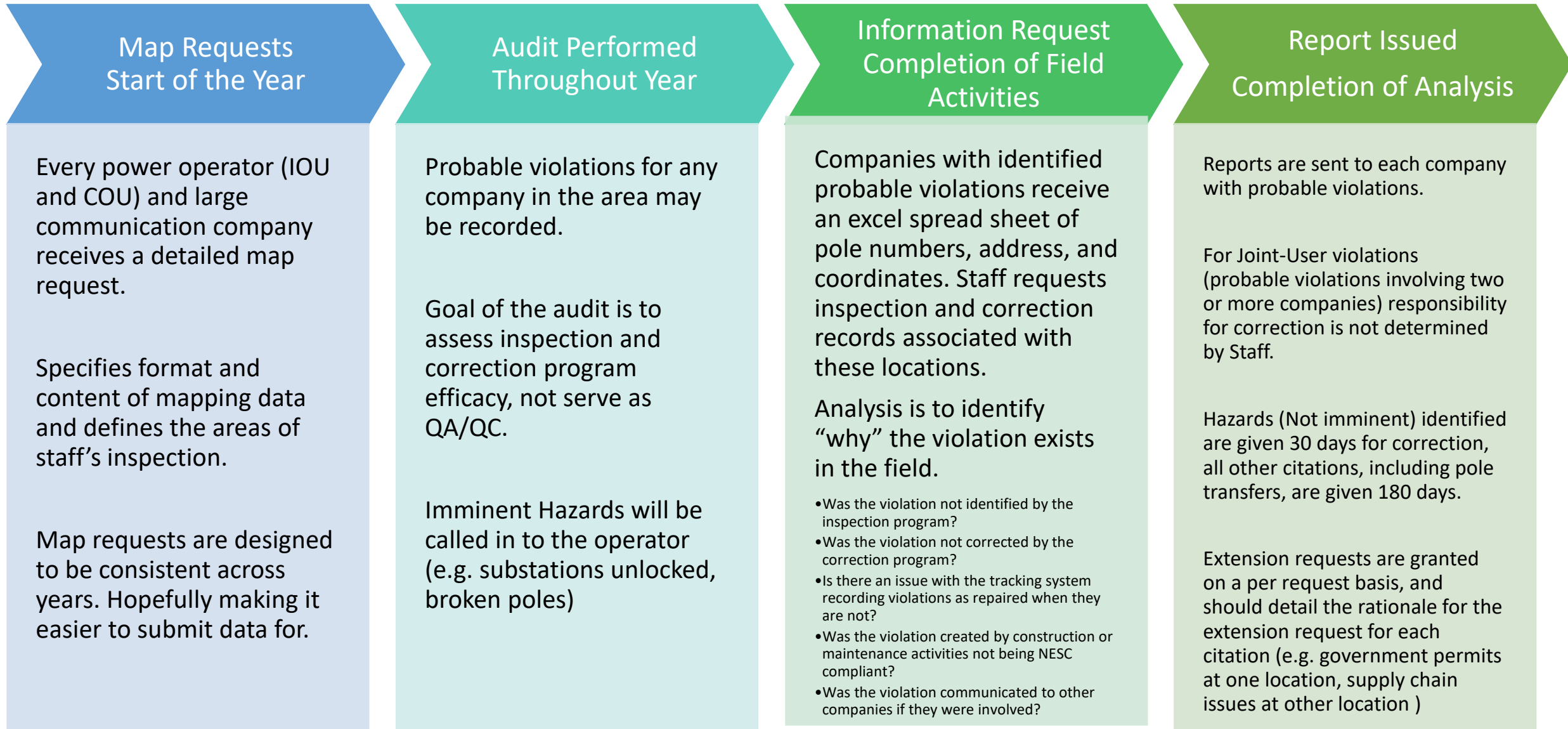
(4) After December 31, 2027, the only allowable conditions for deferrals as set forth in section (3) are as follows: **repairs that accommodate schedules for permitting issues, repairs impacted by planned public works projects, and/or repairs that cannot be performed within the two-year correction timeframe due to circumstances outside the Operator’s reasonable control.** Plans for correction for deferrals due to these conditions must be submitted to Commission Staff for review and tracking.



# NESC- Detailed Inspection & Correction Program Field Audits

- Audits are performed to ensure compliance with **OARS Division 24, 28, 300** and the **NESC**.
- COU programs audited every 3 years, IOU's range from annually to quarterly.
- Staff is starting to audit based Communication company inspection areas.
- Staff audits will typically target areas inspected **3 years prior**.
  - e.g. 2026 Audits target 2023 Areas inspected.
- OAR 860-024-0012 specifies that violations **without a plan of correction** must be corrected within 2 years. This will change after 2027.
- This method should yield a "**Clean**" area for the power company, where staff will find minimal violations present.

# Life-cycle of a program audit.



# 2025 Year In Review

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- Staff performed 29 field audits in 2025 (*26 in 2024*), resulting in 107 (*105 in 2024*) reports being issued.
  - 14 were part of address complaints made to the commission by consumers.
  - 3 were focused on vegetation management programs.
  - **90 were focused on compliance with the NESC and OAR (Oregon Administrative Rules).**
- These **NESC audits** involved 36 Operators receiving reports.
  - 1644 Probable violations of the NESC were identified by staff.

# Top 10 – By Citation Count

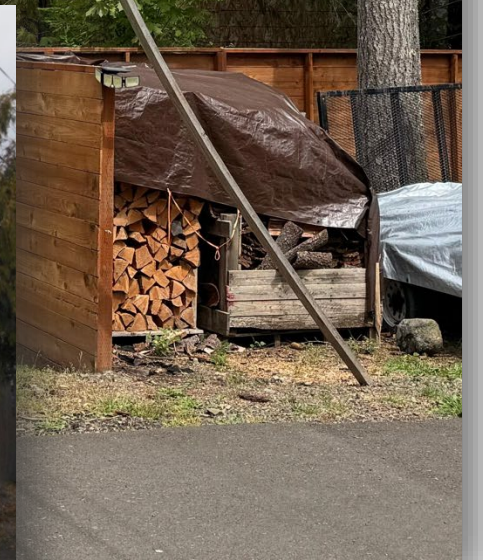
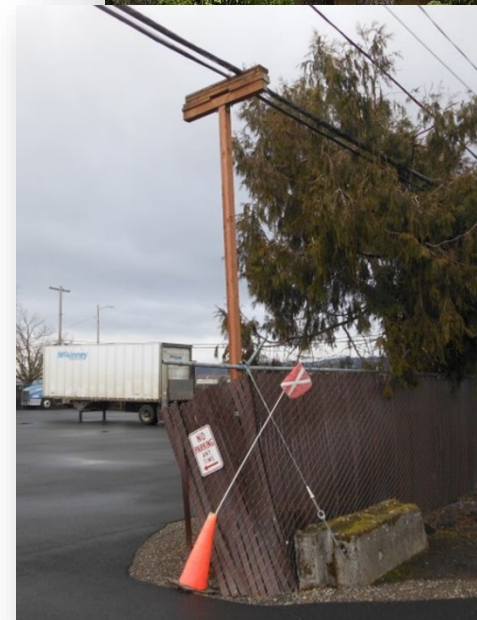
2024 Position	Citation Type	Count/ Percent
1	Surface (Road/Driveway/Sidewalk/etc.) Clearances	367
2	Inadequate attachment	253
3	Guys, insulation/bonding, markers, untrimmed tails, anchor placement	213
4	Pole Transfers (Identified in Staff Audits)	161
5	Abandoned equipment.	175
6	Communication Messenger not bonded to ground wire.	61
7	Mid Spans. Power to Comm/Comm to Comm	91
8	Deteriorated Poles/Hardware/Woodpeckers holes/Communication Pedestals	88
9	Damaged/Stolen pole grounds	57
10	Stand-off Brackets	23

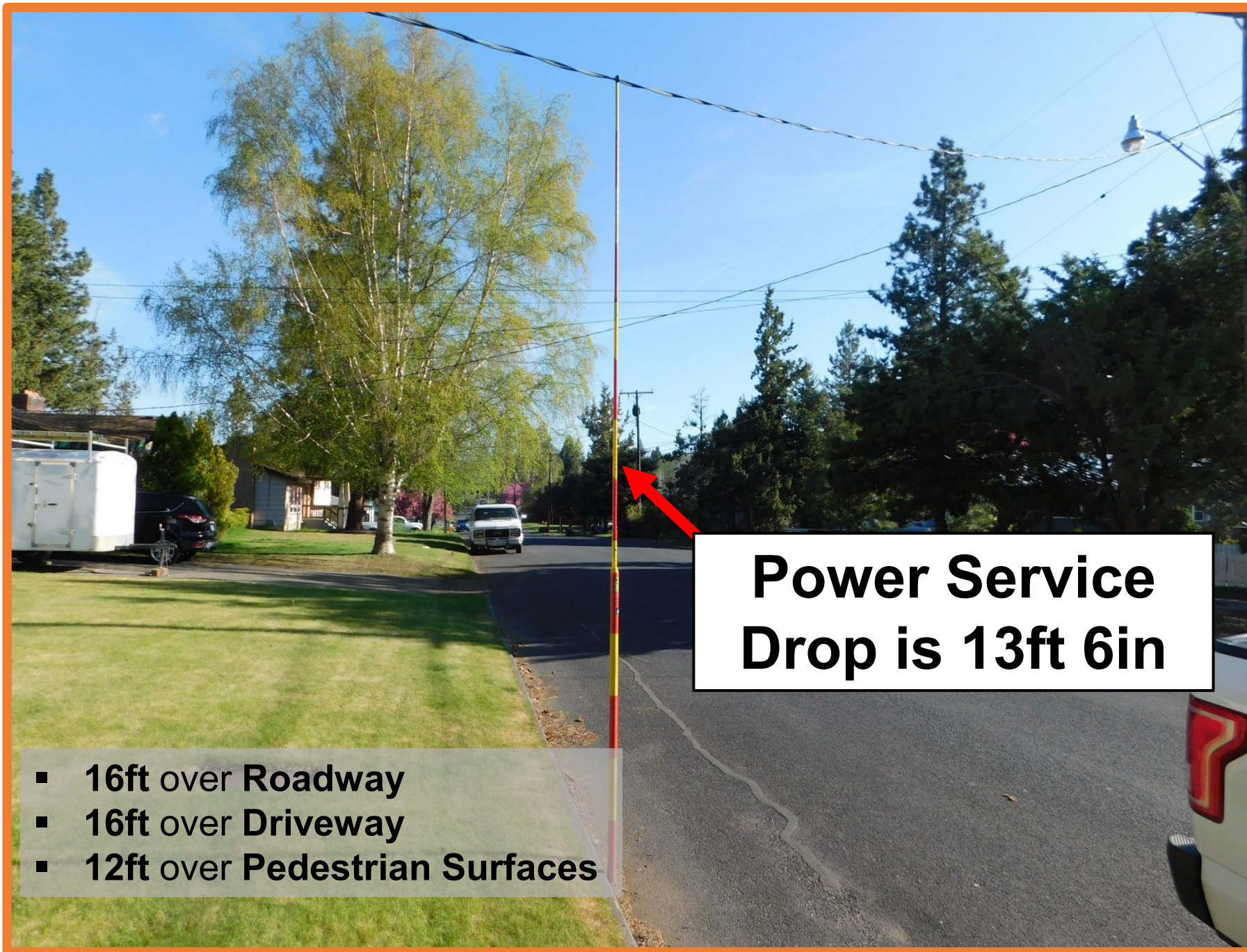
*The “Top 10 List” accounts for about 90% of citations recorded. Staff recorded 57 distinct types of violations.*

# Inadequate vertical clearance of wires, conductors and equipment above ground, roadways, rail or water surfaces.

**NESC Rule Number: 232, Table 232-1**

*We do not want to have the public attempting to correct these violations.*





## **Vertical road clearances:**

Measured from the **lowest section in the span over a drivable surface.**

**Power Service Drop is 13ft 6in**

- **16ft over Roadway**
- **16ft over Driveway**
- **12ft over Pedestrian Surfaces**



## **Pedestrian clearances:**

Measured from the **lowest section in the span over a pedestrian surface.**

- **16ft over Roadway**
- **16ft over Driveway**
- **12ft over Pedestrian Surfaces**

**Power Service Drop is 8ft 3in**

# Vertical road clearances:

Measured from the **lowest section in the span over a drivable surface.**



**Communication Drop is 12ft 9in**

- 15ft 6in over Roadway
- 15ft 6in over Driveway
- 9ft 6in over Pedestrian surfaces

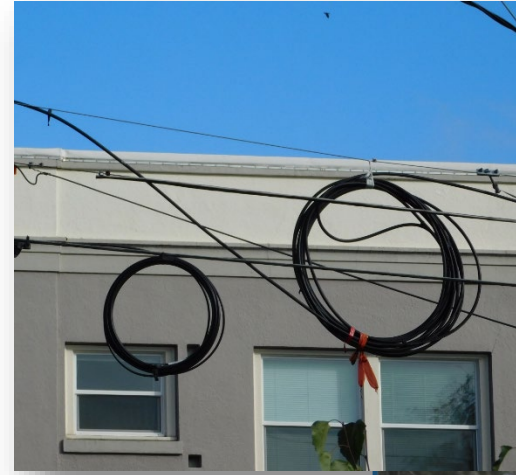
# Inadequate Overhead Attachments.

NESC Rule Numbers:

012C, 014B, 214 and 239A

*Please reference OJUA Best Practices Guide, chapter 10 for temporary aerial attachments best practices.*

[2024 OJUA Best Practices Guide.](#)



# Inadequate Overhead Attachments

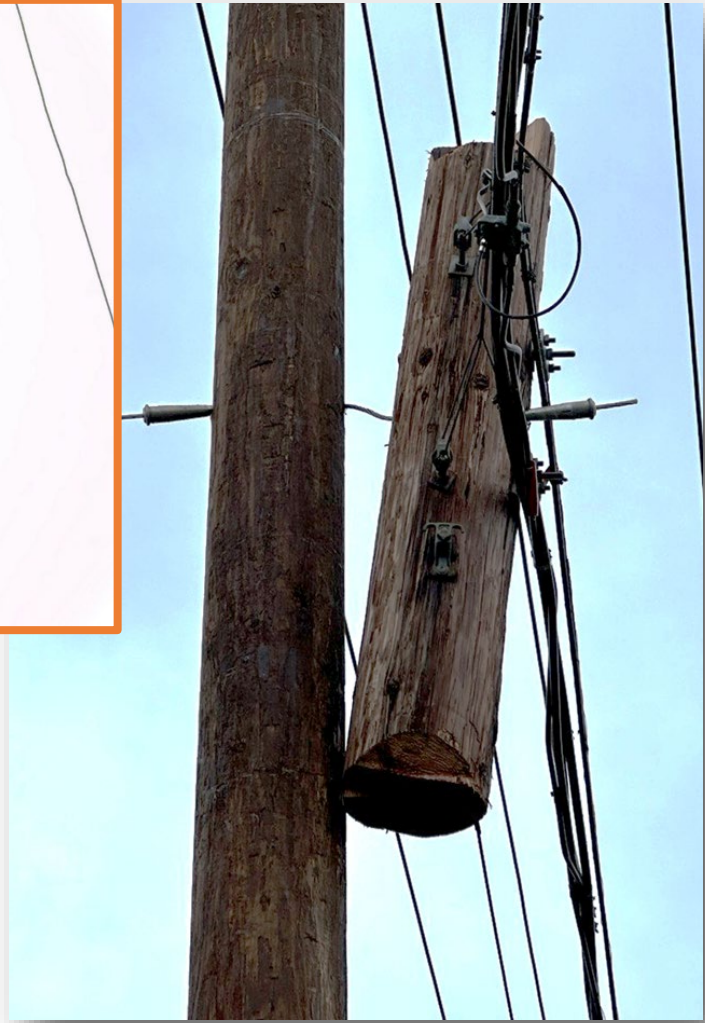
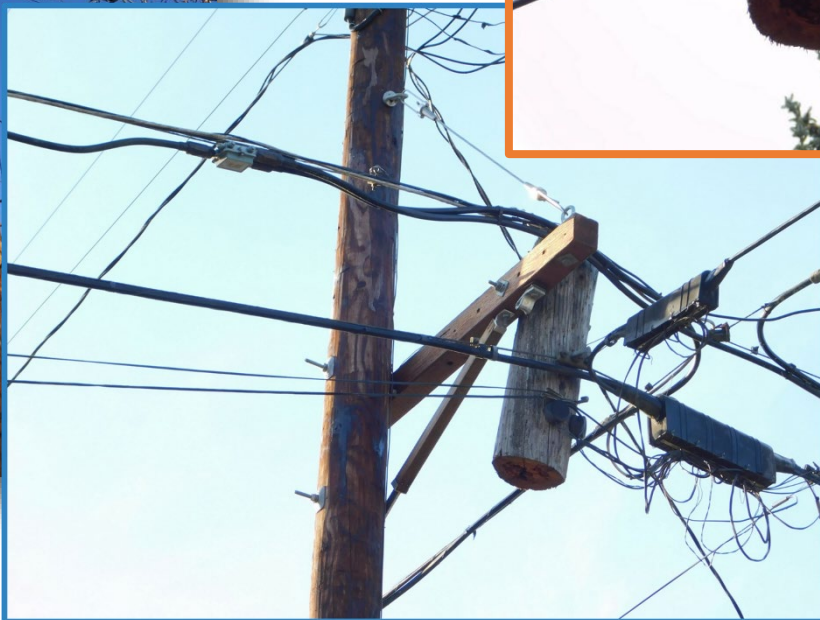


# Inadequate Overhead Attachments





# Other examples of inadequate attachment to support structure.



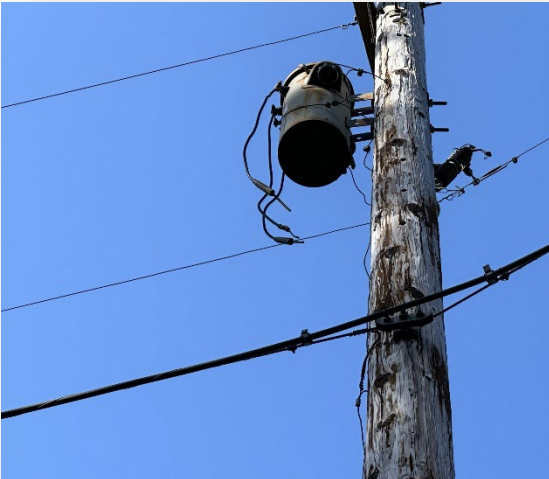


**Good examples of long-term storage**

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# Abandoned Facilities.

NESC Rule Numbers:  
012C and 214B3



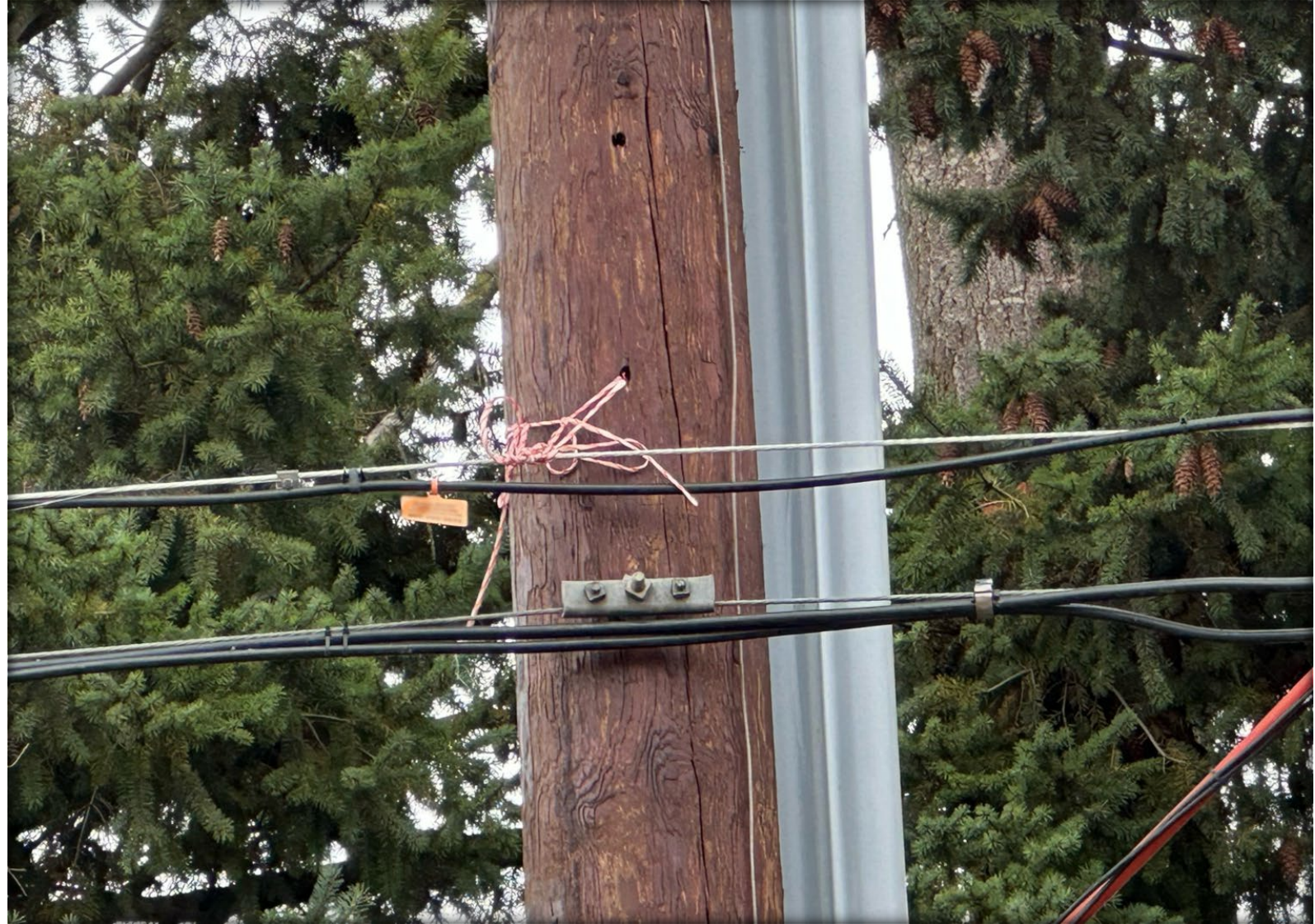
Facilities laying on the ground are considered a tripping hazard and will have a 30-day correction timeframe.



**Another  
example of  
abandoned  
facilities.**

# Communication messengers not bonded to pole ground.

NESC Rule Number:  
097G



# Pole Vertical (C.W.S.Z)

**NESC Rule Number:  
235C1, Table 235-5,  
238E, Table 238-1**

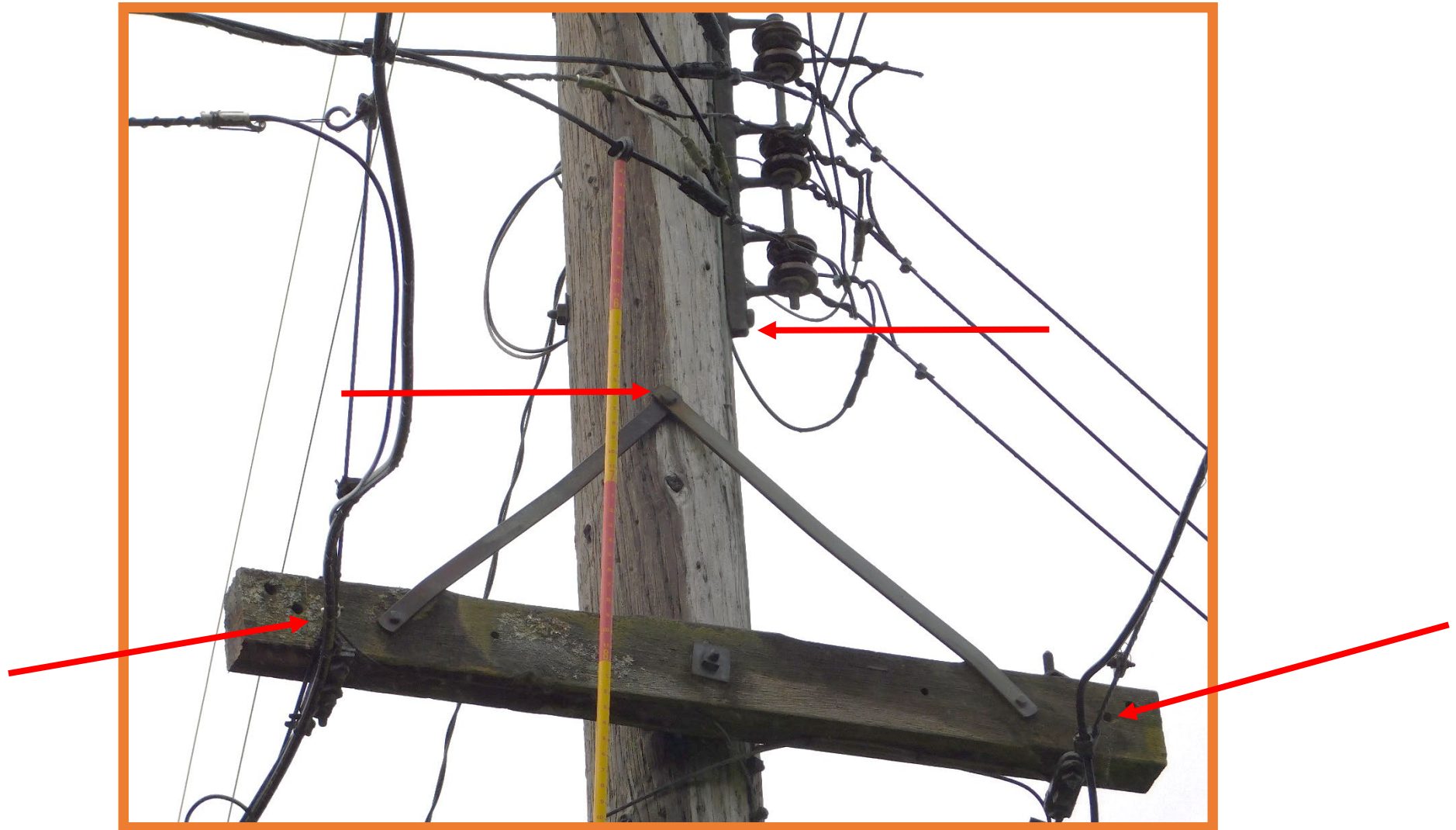


# Communication Worker Safety Zone

Communication worker's head has potential to make contact with energized power supply cables.



Needs a 40-inch separation between power supply cables and equipment and communication cable and equipment.



**Communication crossarm and braces are encroaching the CWSZ.  
All communication attachments on this crossarm are in violation.**

# Pole Transfers

**NESC Rule Number:  
214A5, 214B3, 234B**

**and**

**OAR 860-028-0120**



# Pole Transfers

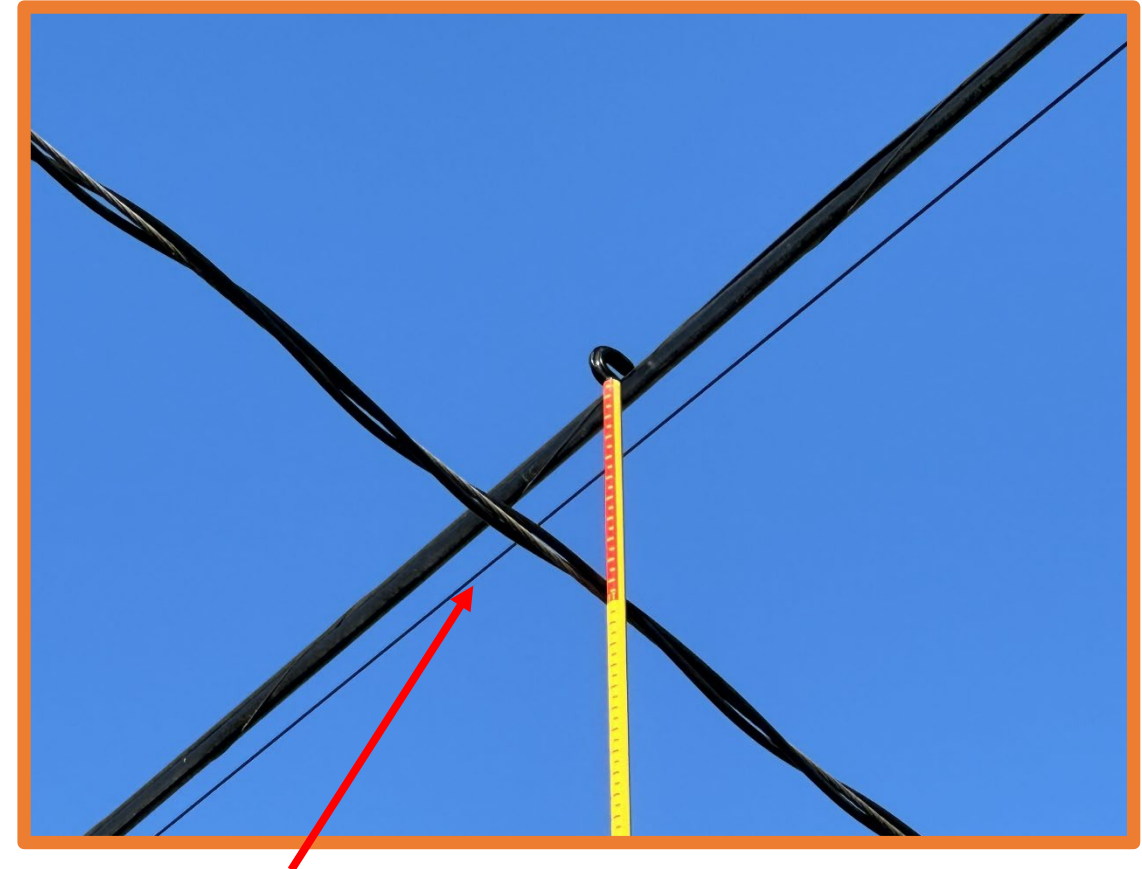
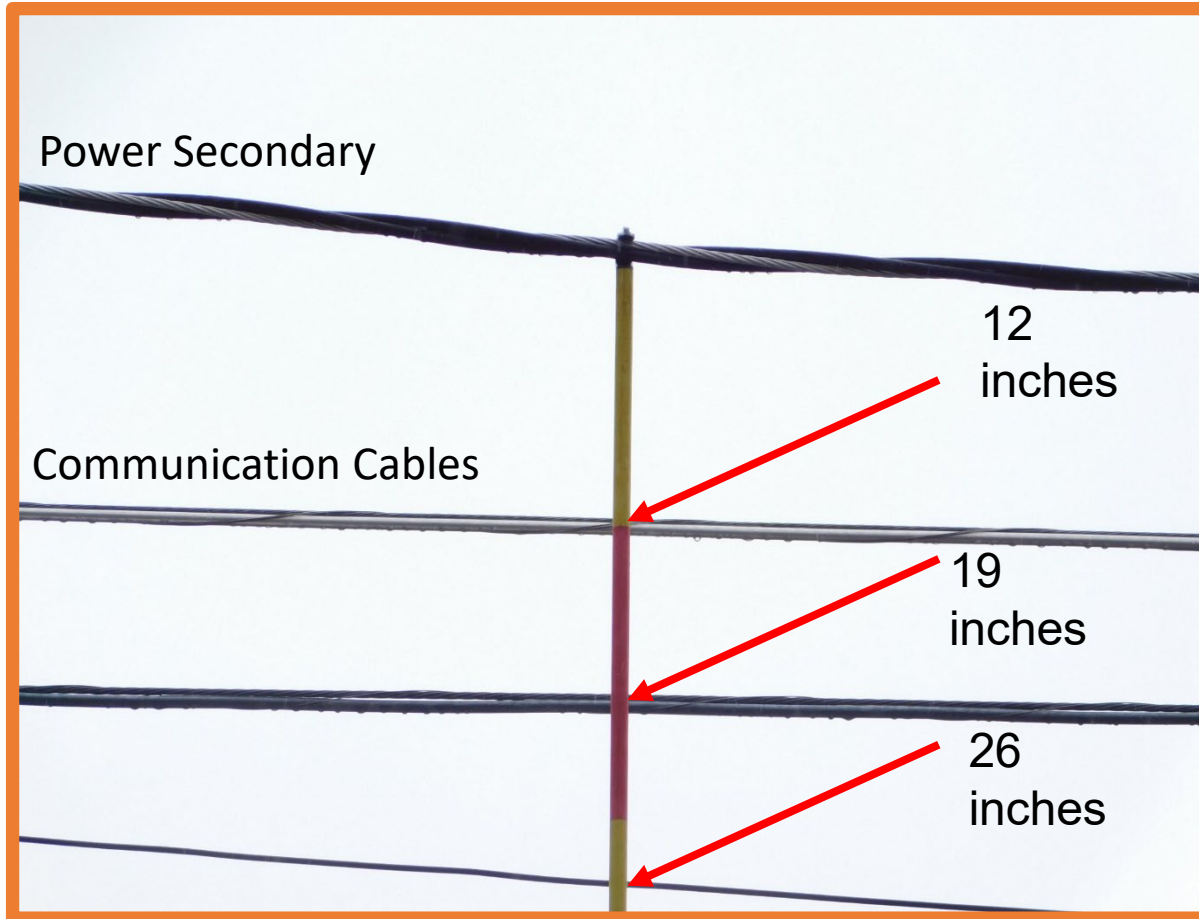


**Inadequate vertical mid-span clearance between power supply conductors and communication cables.**

**NESC Rule Number:  
235C2b(1)(a) and  
Exception 1 and  
233C1, Table 233-1**



**NESC Rule Number: 235C2b(1)(a)**  
**Example of three Communication Cables that are less than 30 inches to Power Secondary Mid-Span on the same structure.**



**NESC Rule Number: 233C1, Table 233-1**  
**Power Service Drop is less than 24 inches to Communication Cables Mid-Span on different supporting structures.**

**Old pole butts  
not removed.**

**NESC Rule Number:  
214A5, 214B3**



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# Old pole butts not removed



# Anchor guys.

**NESC Rule Numbers:**  
**012C, 092C, 214A,**  
**215C2, 217C1, 235,**  
**279A, and Table 235-6**

*Please reference OJUA Best Practices Guide, chapter 1 for use of guying and anchors.*

[2024 OJUA Best Practices Guide](#)







## Untrimmed guy tails

NESC Rule Number 012C



## Inadequate guy installation

NESC Rule Number 012C and 214A

**Anchor guys shall be effectively bonded or insulated**

NESC Rule Number 092C, 215C2, and 279A



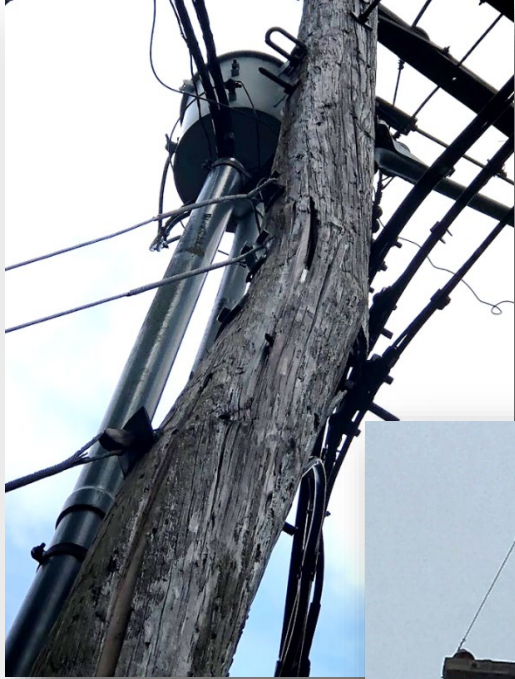
# Deteriorated or Damaged Poles, Crossarms & Hardware.

**NESC Rules: 214, 252, 260B, 261A2, 261D and OAR 860-024-0011**

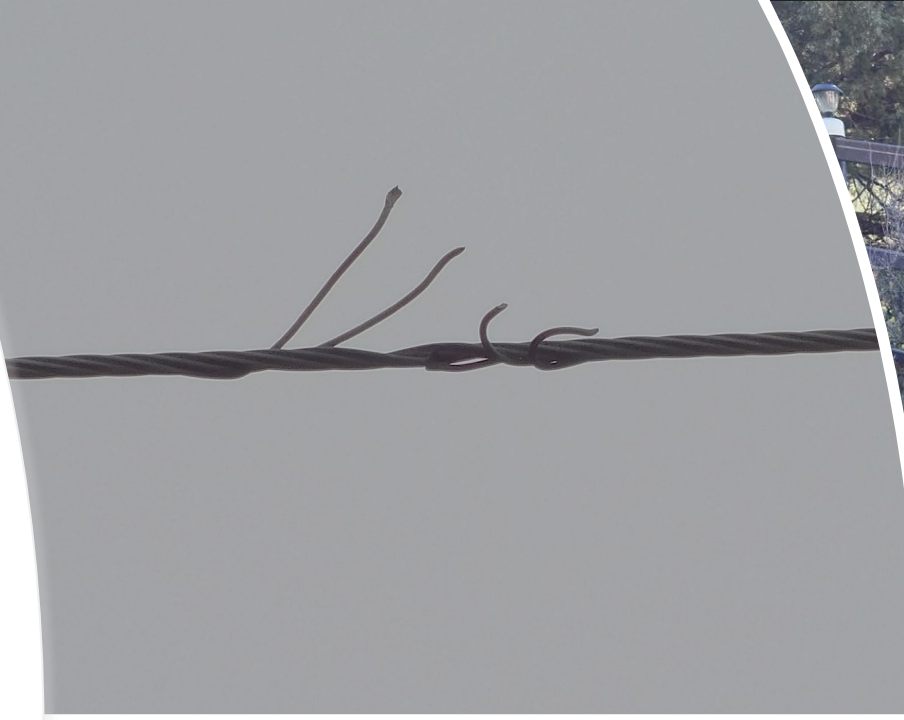
Tenth most cited type of violation in Oregon.



# Deteriorated or Damaged Poles, Crossarms & Hardware



**Examples of  
Deteriorated or  
Damaged Hardware**



# Other situations of note.



# “Emergency” Ground Laid Communication Facilities

NESC Rules: 014, 230A2d, 311C



# What's new in the right of way?



# Pole mounted EV Chargers



# Veg. Management Program Field Audits

- NESC relatively quiet on vegetation clearances.
- Audits performed to ensure compliance with **OAR 860-024-0016**, vegetation clearance rules, **OAR 860-300** including trim scheduling and mitigation procedures in the utility's WMP.
- Performed in COU service territories "*as Staff scheduling allows*", and annually in IOU territories.
- May be performed alongside NESC/Inspection Program Audit.
- Primarily attempts to ascertain **total system** compliance with minimum vegetation clearance to conductors.



# Oregon Rules Regarding Vegetation Clearance.

## OAR Chapter 860, Division 024

### 860-024-0016 Minimum Vegetation Clearance Requirements

- ▶ Under reasonably anticipated operational conditions, an operator of electric supply facilities must maintain the following minimum clearance of vegetation from conductors:
  - ▶ Ten feet for conductors energized above 200,000 volts.
  - ▶ Seven and one-half feet for conductors energized at 50,001 through 200,000 volts.
  - ▶ Five feet for conductors at 600 through 50,000 volts
  - ▶ The five feet clearance may be reduced to three feet if the vegetation is not readily climbable.
  - ▶ Intrusion of limited small branches and new growth into this minimum clearance area is acceptable provided the vegetation does not come closer than six inches to the conductor.
  - ▶ For conductors energized below 600 volts, the vegetation must be trimmed to prevent it from causing strain or abrasion on electric conductors. Where trimming or removal of vegetation is not practical, the operator must install suitable material or device to avoid insulation damage by abrasion.

**860-028-0120 (7)** Vegetation around communications lines must not pose a foreseeable danger to the pole and electric supply operator's facilities.



# Oregon Rules Regarding Vegetation Clearance.

## OAR Chapter 860, Division 024 Cont.

### 860-024-0016(1)(b)

- ▶ (b) “**Readily climbable**” means vegetation having both of the following characteristics:
  - ▶ **A.** Low limbs, accessible from the ground and sufficiently close together so that the vegetation can be climbed by a child or average person without using a ladder or other special equipment; and
  - ▶ **B.** A main stem or major branch that would support a child or average person either within arms reach of an uninsulated energized electric line or within such proximity to the electric line that the climber could be injured by direct or indirect contact with the line.



# Oregon Rules Regarding Vegetation Clearance.

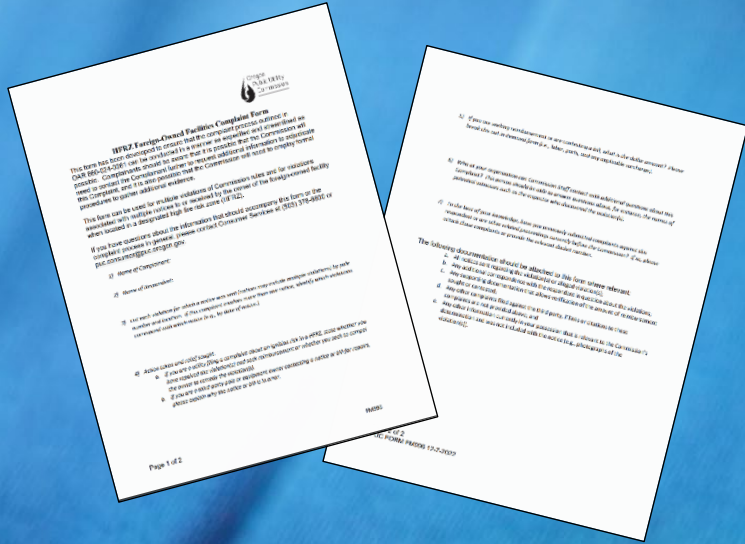
## OAR Chapter 860, Division 024 Cont.

### 860-024-0018(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 National Electrical Safety Code. This section does not apply to customer-supplied equipment at the point of delivery. Compliance with this section must be achieved prior to December 31, 2027.



# HFRZ Complaint Form



## OAR 860-024-0061 Outlines the Resolution of Violations of Commission Safety Rules in High Fire Risk Zones.

- The complaint may be filed by an Owner, Occupant, or Operator.
- Limited process; only relates to HFRZs.
- Focused occurrences. Specific to ignition risks.
- New process, subject to evolving as we learn.



# Incident Reporting

## OAR 860-024-0050



Phone: (503) 378-6964

Email reports to: [PUC.FilingCenter@state.or.us](mailto:PUC.FilingCenter@state.or.us)

Fax reports to: (503) 378-6163

Mail reports to:  
 Administrator, SRSD (Filing Center)  
 Oregon PUC  
 P.O. Box 1088  
 Salem, OR 97308-1088



### ELECTRIC AND COMMUNICATION INCIDENT REPORT

TO SAFETY DIVISION STAFF -- CONFIDENTIAL per ORS 654.720  
 Requirements and Definitions – see page 3 – OAR 860-024-0050

(Complete all fields – if unknown or not applicable, insert “n/a”)

#### Section 1 (Immediate Notice – Phone/Fax)

Time Received		For PUC Staff Only	
_____ a.m./p.m.	Date _____/_____/_____	Received By	_____

Today's Date: \_\_\_\_\_

Utility or Operator: \_\_\_\_\_ Reported By: \_\_\_\_\_

Phone Number: \_\_\_\_\_ Incident Date: \_\_\_\_\_ Time: \_\_\_\_\_ a.m./p.m.

Location of Incident – City \_\_\_\_\_ County \_\_\_\_\_ Address or Directions \_\_\_\_\_

Description of Incident: \_\_\_\_\_

If Personal Injury or Contact (Also complete Section 2)	
Name _____ Age _____ Sex: M <input type="checkbox"/> F <input type="checkbox"/>	Injury Severity: Fatal <input type="checkbox"/> *Hospital <input type="checkbox"/> *Minor Injury <input type="checkbox"/> No Injury <input type="checkbox"/>
Name _____ Age _____ Sex: M <input type="checkbox"/> F <input type="checkbox"/>	Injury Severity: Fatal <input type="checkbox"/> *Hospital <input type="checkbox"/> *Minor Injury <input type="checkbox"/> No Injury <input type="checkbox"/>
Name _____ Age _____ Sex: M <input type="checkbox"/> F <input type="checkbox"/>	Injury Severity: Fatal <input type="checkbox"/> *Hospital <input type="checkbox"/> *Minor Injury <input type="checkbox"/> No Injury <input type="checkbox"/>
Name _____ Age _____ Sex: M <input type="checkbox"/> F <input type="checkbox"/>	Injury Severity: Fatal <input type="checkbox"/> *Hospital <input type="checkbox"/> *Minor Injury <input type="checkbox"/> No Injury <input type="checkbox"/>
Facility Type: *OH <input type="checkbox"/> *UG <input type="checkbox"/> Substation <input type="checkbox"/>	Other _____ Voltage: _____
Work Related: Yes <input type="checkbox"/> No <input type="checkbox"/> Worker's Trade: _____	Employed By: _____
Utility notified of activity prior to incident: Yes <input type="checkbox"/> No <input type="checkbox"/>	

If Property Damage (over \$100,000)
Estimated amount \$ _____

If Service Outage
Date _____/_____/_____
Time Out _____ a.m./p.m.
Time In _____ a.m./p.m.
Customers Out _____
Number of Circuits _____
<b>Reportable:</b>
<ul style="list-style-type: none"> <li>Utility serving over 15,000 customers with 500 customers or more out over two hours.</li> <li>Utility serving less than 15,000 customers with 500 customers or more out over five hours.</li> </ul>
<b>Exception:</b>
<ul style="list-style-type: none"> <li>Not reportable if outage is restricted to a single feeder and outage is less than four hours.</li> </ul>

# What's below the surface? Are you calling in and getting locates?



**Know what's below.  
Call before you dig.**

**OPUC / OSHA  
Interagency  
Agreement**

<https://digsafelyoregon.com/>

# Continuing into 2026

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



Unauthorized  
Personnel on  
the Pole.





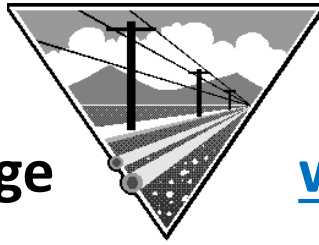
# THANK YOU



**Leon Grumbo**

Electric & Telecommunications  
Safety Manager

Commission Web Page



[www.oregon.gov/puc](http://www.oregon.gov/puc)

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