

**OCCUPATIONAL SAFETY
AND HEALTH STANDARDS BOARD**

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**FINAL STATEMENT OF REASONS**

Title 8, Division 1, Chapter 4, Subchapter 5, Article 36,
Section 2940.8 of the High Voltage Electrical Safety Orders.

The Securing of Poles During Removal Operations**MODIFICATIONS AND RESPONSE TO COMMENTS RESULTING FROM
THE 45-DAY PUBLIC COMMENT PERIOD**

There are no modifications to the information contained in the Initial Statement of Reasons.

SUMMARY AND RESPONSE TO WRITTEN AND ORAL COMMENTS**I. Written Comments:**

Mr. David Shiraishi, Area Director, Federal OSHA, Region IX, by letter dated February 20, 2013.

Comment:

Mr. Shiraishi stated that Federal OSHA has reviewed the proposal and found it to be commensurate with the federal standard.

Response:

The Board thanks Mr. Shiraishi for his comment and participation in the Board's rulemaking process.

Comment:

Mr. Terry Thedell, Sempra Energy Utilities, by letter dated February 8, 2013.

Mr. Thedell stated that Sempra Energy supports the proposed amendment to the High Voltage Electrical Safety Orders (HVESO), Section 2940.8 requiring that damaged or unstable poles or sections of poles encountered during removal operations be securely supported.

Response:

The Board thanks Mr. Thedell for his support of the proposal and participation in the Board's rulemaking process.

II. Oral Comments

There were no oral comments received at the February 21, 2013, Public Hearing in Sacramento, California.

ADDITIONAL DOCUMENTS RELIED UPON

None.

ADDITIONAL DOCUMENTS INCORPORATED BY REFERENCE

None.

DETERMINATION OF MANDATE

These regulations do not impose a mandate on local agencies or school districts as indicated in the Initial Statement of Reasons.

ALTERNATIVES CONSIDERED

No reasonable alternatives have been identified by the Board or have otherwise been identified and brought to its attention that would be more effective in carrying out the purpose for which the action is proposed, would be as effective and less burdensome to affected private persons than the proposed action, or would be more cost-effective to affected private persons and equally effective in implementing the statutory policy or other provision of law.