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Make Your Safety Manual Your Own

By R. Bruce Wright

One of the topics I often discuss when visiting our systems is their safety manual, starting with the basic question, "Do you have a safety manual?" While most, if not all, distribution systems have something they use as a safety manual these days, after seeing a sampling of them it is obvious that their quality varies widely. At Synebar Solutions, we believe that your safety manual should be a tool that you and your employees are both completely familiar with, *and actually use* in the daily execution of your work plans. In order meet this goal, your safety manual should be a unique document, tailored to your specific goals and values, reflecting the specific techniques, rules and procedures that you expect all your system's employees to follow on all jobs. While some of the manuals that I see are excellent, all too often others are not. Manuals in this second group tend fit into a pair of common types, each with its own set of problems.

Occasionally, we find a system still using what is little more than a haphazard collection of formal Board of Directors' resolutions, board policies and work rules that together are referred to as a "Safety Manual." Most Board members are committed individuals who work hard to ensure the success of their systems. However, it is equally true that most Board members are not power system professionals, coming instead from diverse backgrounds including farming, banking, running small businesses and many other important and complex occupations, most of which, however, have provided them with little or no technical knowledge of your actual operations. In reality, most of them have learned what do they know about electricity as a result of serving on your Board. (That's called BoD OJT.) As a result, the accumulated collection of policies they have passed over the years, even under the guidance of your management staff, are unlikely to be close to complete in describing the safety issues pertaining to all of the elements of the many complex tasks that make up a day's work in power distribution. While some of these policies should be included with or incorporated into a safety manual, by themselves they are often woefully incomplete. Happily, we don't find this situation very often anymore.

Much more commonly, we find systems using a standardized, "off the shelf" manual, perhaps something like the APPA Safety Manual, as their safety manual. This is certainly better than using only BoD policies, since these manuals are usually created by professionals and vetted by their organizations for both correctness and completeness. But these manuals too have some weaknesses when they are just taken "as is," adopted intact and put in the hands of your workers to be used as a reference book. They are usually lengthy and exhaustive, since they have to cover anything and everything a system might do. As a result they may well devote many pages to issues that don't apply to your work.

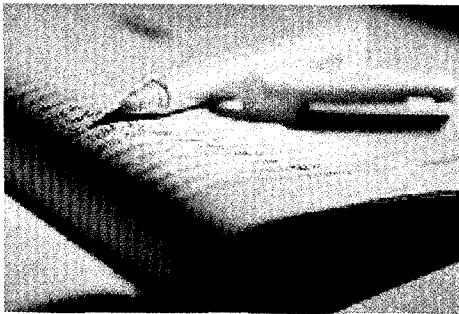
Here's an example of what I mean. Some years ago I was visiting a cooperative where my contact advised that they used the APPA manual. He reached back and handed me his copy from the shelf behind him. As an experiment, I set the binder on edge and let it fall open wherever chance led. It fell open to the section on ladders, which I skimmed through (since I knew what it said) and then I said, "How interesting. It says here that



wooden ladders should never be painted, but protected instead with a clear coating so that cracks won't be concealed. How do you deal with that on your wooden ladders?" Of course, the answer quickly came back that they don't use any wooden ladders. Then I said, "Gee, it says here that aluminum ladders should never be used near any electrical lines. How do you make sure yours aren't ever used near power lines?" Of course, the answer was that they don't even own any aluminum ladders. My next question was simply, "So, why then are you wasting your employees' time asking them to read about ladders you don't even have?"

I hope this makes my point. Standard industry manuals are exhaustive because the writers must anticipate any and all possible exposures that any and all distribution systems anywhere and everywhere might ever encounter, including things that most systems will never, ever run into! Clearly, if you give your workers this type of manual, chock full of advice on hazards they are never going to see, they are going to at best be put off by the extra reading and at worst be deterred from using the manual at all. They know clearly what their jobs entail. *They want and need* information only on they are asked to do; *they don't want and don't need* information on things they won't ever have to do. That's why we believe a good safety manual should be a unique document, tailored to your specific goals and values, reflecting your specific techniques, rules and procedures. Only by balancing thoroughness with specifics will you be able provide a manual that you can reasonably expect your workers to know intimately, and follow rigorously, in all their work.

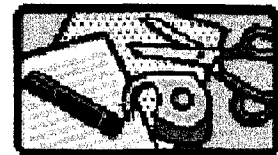
If you are presently using a standard, "off the shelf" manual, you may be wondering how you get from that to the type of manual described here. Some state associations have tried to develop such manuals from the ground up for their members. This is a challenging task, and few efforts have made it all the way to completion, in part because even within a single state there are usually significant variations among distributions systems. Size, exposure, choice of tools and materials and work policies are some of the issues that vary from company to company. But don't give up hope!



One way to develop a manual of your own is to take an existing "off the shelf" manual, maybe one you are already using, along with any specific company rules, policies and procedures that you have, and use them as a starting place. Then, by assembling your internal experts- both managers and workers- sit down and go through the material with highlighters and pens, highlighting as you go the specifics that apply to your system. At the same time you can tighten up any loose language that you find so that your rules, policies and procedures are made completely clear to anyone who may read them. Then take the highlighted bits, cut,

paste and assemble them into a new manual, discarding all the parts that don't apply to your system's work environment. At the end of the process you should find that you have a clear, concise document that is short enough to expect all employees to read, but detailed enough to provide the specific guidance workers need to do their work properly and safely. The manual can then be used as the backbone of your **new employee orientation** program, which is a topic for another day!

Good things require planning; bad things happen all by themselves!



High Voltage Safety & Overhead Power Line Acts

By Mark Barber

Editor's Note: All too often severe injuries or even fatalities are the result when employees of other companies, not in our business, are working in close proximity to power lines and make a mistake that brings them in contact with an energized conductor. Construction company employees of all types, building and sign maintenance workers, heavy equipment operators, and many others may find their work brings them near our lines. Unfortunately, when the outcomes are severe, oftentimes the power company winds up with a lawsuit, despite the fact that the NESC was met and the mistakes were made by the victim and/or the victim's employer. Sometimes they even win a verdict.

Attorney Mark Barber of the firm Hall, Booth Smith & Slover, based in Atlanta, Georgia, is an expert defense attorney who works on major cases for our program. What follows below is an excerpt from a presentation he made to a group of insurance company executives, discussing one of the defense tools available in certain states. If your state does not have a law of the type he describes you may want to see if your lobbyists can begin to put their weight behind the effort to get one enacted in your home state.



High Voltage or Overhead Power Line Acts

Many states have enacted statutes requiring notice to the electric utility prior to work being conducted near the electric lines. These statutes have various names, usually some variant of "High Voltage Safety Act" (HVSA) or "Overhead Power Line Act". These statutes typically require persons involved in construction or other work activities within a certain vicinity of power lines to give notice to the power company ahead of time. Failure to give such notice generally insulates the power company from liability as a matter of law. In some states, there are statutes regulating the movement of cranes, derricks or other structures under electric wires and upon public highways. In these states, the failure of the equipment company to comply with these statutes may insulate the power company from liability.

While the language of the various HVSA is far from uniform among the states which have enacted it, a few general principles seem to recur. The basic framework is as follows:

Whenever an entity desires to perform work within a certain defined area near an overhead power line, the entity must first notify the electric company and make suitable arrangements to ensure that operations can be conducted in safety. The typical requirement is that the person responsible for the work must notify the utility some prescribed amount of time before working within 10 feet (or some other prescribed

distance) of an uninsulated, overhead line of a certain minimum voltage (usually > 600 volts). The utility is then given some prescribed amount of time within which to make the line safe so that work can be conducted near the line. Usually, the statute includes a statement concerning which party must bear the cost of making the line safe. The line is "made safe" by either grounding the circuit, moving the line, sleeving the line with an insulator, or erecting other mechanical barriers to prevent inadvertent contact with the lines.

Most statutes provide that an entity which fails to give the proper notice required by the act can be liable to the utility in the event the lines are damaged or persons are injured. In some cases, the HVSA gives the utility a complete right of indemnity. In other cases, the statute gives the utility a complete defense to all liability. Some states hold that a utility's right of indemnification against an employer which undertakes activities in violation of the Act may be defeated by the exclusivity provisions of the Workers' Compensation Act if WC benefits are owed to the employee injured by an overhead line. Other states have held that the exclusivity provisions of the Workers' Compensation Act will not affect a utility's right of indemnification against an employer who violates the Act.

Editor's note: Remember, Mark is an attorney, which explains why that last paragraph may seem a bit complicated with legal lingo. It essentially means that some states with these acts tell the injured party's Workers' Compensation carrier to pay the claim as required by law, but forbid them from seeking reimbursement from others if the employer violated the HVSA requirements. Other states still let the WC carrier try to press a case against the power company even though their claimant is barred from doing so. So, it seems that individual states do their own thing, your results may vary, etc.

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