



Under what conditions can crews work a de energized line that was properly tagged out without EPZ grounds	Under local control of the clearance. It must be visible and accessible.
Does wind generation and solar panels fall under the LOTO rules for generation only.	Most likely not. You must determine where your line of demarkation is. You will most likely have generation and T&D.
What if you are distribution running peak shave or have three phase generators as backup?	When you mention backup, is this for generation backup (generating electric power)?
In our case no, powers our facility during an outage	In this case, that is not considered generation of electric power so (d) will not apply. 1910 Subpart S will apply for this operation.
System Operator - Does it always refer to a SCADA system or can it include a supervisor in the field, on the job?	It can include a supervisor in the field on the job as long your procedures have been developed to identify them as a System Operator.
Should a utility tag out a line for a contractor or should the utility and the contractor tag out the line?	It depends on who the clearance holder is. The clearance holder is responsible for clearing the lines.
Should a switching order allow for steps to be completed out of order for a switchman's convenience?	Not a good solid work practice. If a switching order step need to be completed differently, the switching order should stop and a new switching order should be written and approved before switching restarts.
Does OSHA consider a "Clearance", work performed to clear the lines and equipment from electrical energy?	Yes. OSHA's 1994 preamble states- The word "clearance", as used in the discussion of this paragraph, means the procedure used to deenergize lines and equipment (and hold them "clear") for the protection of employees.
Can someone other than the Clearances Holder release a Clearance?	No unless the Clearance has been transferred to a new Clearance Holder.
Can a System Operator use a log to identify each crew working on a single tag?	Yes. This is a way for the System Operator to maintain information so each crew can respectively release their Clearance. The System Operator cannot take action to restore power without the release of all Clearances on a line or equipment.
If my company does not have a System Operator can we still use a single tag system for multiple crews?	No. Each crew must use separate tags. Independent crews would not have a way of knowing the exposure status of other crews without separate tags. They must use separate tags and coordinate deenergizing and reenergizing the lines and equipment with other crews.

<p>What does OSHA mean when they require an employee to request the System Operator to deenergize a particular line or equipment?</p>	<p>A designated employee is required so that control is vested in one authority. i.e. a single designated employee is assigned the task. They are typically called the “Clearance Holder”. The “Clearance Holder” does not have to be in charge of other work performed under a Clearance, but they have to be in charge of the procedures used to “Clear” the Lines and Equipment for work to be performed deenergized.</p>
<p>Can I maintain local control of a lateral 2-span tap?</p>	<p>Yes. OSHA would not require a designated employee to request to the System Operator if the means of disconnection is accessible and visible and under the sole control of the employee in charge of the Clearance.</p>
<p>This may be premature - in 1910.269(m), does open mean the device must be visibly open to meet the conditions?</p>	<p>Industry best practices would require a visual open however some equipment cannot have a visual open point. The company must develop work rules that address controls when visual opens are not possible.</p>
<p>When we clear a line, on distribution we open and apply tags to all switches and/or jumpers that isolate the work area on our main line 3 phase system. If there is a fused radial between those switches, we do not open and tag them prior to issuing clearance to the crew. The requirement for the crew is to open any fused radials before they test and ground the cleared 3 phase line</p>	<p>If the crew is under local control they are responsible for their own clearance.</p>