

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
San Dimas, CA 91773
Phone (909) 599-3801
Fax (909) 599-3825

January 15, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 12:59 p.m. at the Committee office. Those in attendance were:

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. John Bacon	City of Los Angeles - DWP
Mr. Jaime Garcia	City of Los Angeles - DWP
Mr. Bret Plaskey	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Mr. John Vu	City of Anaheim
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Mr. David Campo	City of Lompoc
Ms. Tondra Hill	Time Warner Cable
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Jenny Silva	Committee Staff

Those attending via teleconference were:

Ms. Kay Black	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Aarize Dizon	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Richanna James	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Yvonne Johnson	AT&T Mobility
Mr. Pedro Garganera	MCI Telecommunications
Mr. Rey Lopez	Time-Warner Cable

Mr. Serrato called the meeting to order at 12:59 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior

meeting minutes of November 2019. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened up the discussion to CPUC activity and inquired the group if there are updates on this item. Mr. Williams stated there will be a workshop on the database on January 28th and 29th in San Francisco. There will be presentations from the major IOU pole owners. There will be a workshop report, everybody will have time to comment, and wait for the ALJ ruling. Mr. Serrato thanked Mr. Williams for the update.

Agenda Item 3 – Item 1665: Attachment after Denial – Make Ready Rearrangement (9/18/19)

– Mr. Serrato opened the discussion to Attachment after Denial – Make Ready Rearrangement. Mr. Brown stated SCE identified a few attachments after SCE denied JPAs. SCE do not allow other members to rearrange their Trans Tel (TTC) attachments equipment. Mr. Serrato asked Mr. Brown if SCE addressed the issue with the member. Mr. Brown replied that SCE did address the issue. Mr. Serrato asked if SCE would like to leave this item number open. Mr. Brown replied that we could close the item, however, we may reopen the item number should the issue arise again. Mr. Serrato replied he will close this item officially at the next Admin Board meeting.

Agenda Item 4 – Item 1658: Environmental Issues (from Admin Board 1/15/2020) - Mr. Serrato opened the discussion to Environmental Issues. There were no environmental issues to report.

Agenda Item 4 – Miscellaneous – Mr. Serrato inquired if there were any miscellaneous items.

- Mr. Serrato inquired about Frontier’s new pole loading standards. Mr. Serrato read an email from one of his vendors. Mr. Plaskey replied for an existing pole, it would be 2.67, and 4.0 for a brand new pole. Mr. Plaskey added that the CPUC is currently looking at lowering the safety factor based on if you have a higher wind pressure on cylindrical surfaces. The study has not been completed therefore Frontier will use 2.67 and 4.0. If the CPUC changes the GO 95, Frontier would be able to lower the safety factor based on GO 95.

Agenda Item 5 - Review of Action Items -

- Close Item 1665 at the next Admin Board.

The meeting adjourned at 1:09 p.m. until February 19, 2020.

Angela Pranata - Committee Staff

Southern California Joint Pole Committee

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February 19, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 11:50 a.m. at the Committee office. Those in attendance were:

Ms. April DeBarge	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Mr. Jeff Williams	City of Los Angeles
Mr. John Bacon	City of Los Angeles – DWP
Mr. Jaime Garcia	City of Los Angeles - DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Aarize Dizon	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Mr. John Vu	City of Anaheim
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Tondra Hill	Time Warner Cable
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff

Those attending via teleconference were:

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Kay Black	AT&T California
Ms. Cory Crawford	AT&T California
Mr. Todd Dailey	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Mr. Minh Luong	Mobilitie, LLC
Ms. Yvonne Johnson	AT&T Mobility
Mr. Pedro Garganera	MCI Telecommunications
Mr. Glenn Leckie	Frontier Communications

Mr. Serrato called the meeting to order at 11:50 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes of January 2020. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened up the discussion to CPUC activity and inquired about the two scheduled workshops. Mr. Williams replied that the workshops were cancelled and the CPUC did not provide any reason. He added there were some internal discussions that they may want to make a decision on Track 1 before Track 2. There may be unconfirmed workshops for Track 2 in April.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. There were no environmental issues to report.

Agenda Item 4 – From SCE (W. Brown 1/27/2020) – Mr. Serrato opened the discussion to the **treatment of poles**, SCE has steel stubbed numerous of poles dating back to 2017 and the affected members may have received or will be receiving an invoice by the time we have the next meeting. Mr. Serrato inquired if SCE has an update on this subject. Mr. Brown replied that SCE will be sending out an invoice along with the JPA for poles stubbed in 2017 and 2018 with expected completed billing date of March 2020. Going forward SCE could bill this item either on quarterly or annual basis with advanced notice. Mr. Brown added that the process would be the same as the intrusive inspection’s process. Mr. Plaskey commented that Frontier would like to see the pole stubs on the JPAs and Form 44s. Ms. Pranata inquired if the members will have 15 days to review the poles. Mr. Brown replied yes. Mr. Plaskey reiterate that Frontier would like to see the metal trusses charges to come through via JPAs and Forms 44. Ms. Pranata inquired about the approximate number of poles that SCE is submitting. Ms. Black replied with an estimation of 250 poles. Ms. Black inquired about the billing that Mr. Plaskey requested. Mr. Plaskey replied that currently the intrusive inspections are billed directly to Frontier through direct invoice, not through Form 2 or Form 44. Ms. Black inquired if SCE will itemize each line of steel-stubbed poles on Form 2. Mr. Plaskey replied yes. Mr. Williams added the list of pole numbers will be attached to the Form 2. Ms. Black stated that AT&T California will expect a soft copy in an Excel file, in a format that will never change. Mr. Brown replied that he will reach out to the manager of that department and to Ms. Black and Ms. Crawford. Ms. Black stated that AT&T California had problems with PDF files. Mr. Williams suggested that the committee should work on a standardized format. Mr. Williams inquired if Ms. Black could provide the requirements. Ms. Black replied that the columns should not shift.

Mr. Serrato open the discussion to the second subject under **Agenda Item 4, removal vs purchase**. Mr. Brown stated that SCE has been receiving

purchase of interest and removal simultaneously. In some cases they are only two weeks apart. If the JPA has not been approved, SCE will deny it because SCE is going underground. However, if the JPA has reached the approval stage of 45 days and SCE has not received the Form 48, SCE will send a Form 7 notification of going underground. The cities are telling SCE to go underground, such as the city of Rialto. Mr. Williams commented that LADWP has the same problem. Ms. Hernandez requested clarification if the Form 7 denial will say that the JPA has been denied because SCE is going underground for JPA that is 45 days or older, or automatically approved. Mr. Brown replied yes. Ms. Hernandez stated that if construction has not started after 45 days, SCE can deny a JPA. Mr. Brown inquired if it would be OK to add the member to SCE's JPA if the member has been previously approved. Ms. Hernandez commented that it would be a good idea because the member is already an owner. Mr. Brown stated that he will discuss this further internally and provide an update next month.

Mr. Serrato read a question from Mr. Coffey, "Just want to clarify, if a Form 2 has exceeded 45 days, but construction has not been completed, the original Form 2 can still be denied"? Ms. Hernandez and Mr. Brown both replied yes, with valid reasons.

Agenda Item 5 – Miscellaneous –

- Mr. Serrato opened the discussion to **GO 95 Notices**. Mr. Serrato stated that he received an email from Mr. Garganera on this miscellaneous item. Mr. Garganera commented that the committee discussed this item earlier today and Mr. Brown will address this issue with the group who sent out the GO 95 notices. The notices should only be sent to the pole owners, not to the whole committee. Mr. Brown inquired if someone could forward the email to him. Ms. Hernandez replied that the email came from Ms. Monique Castro.
- Mr. Plaskey inquired if Golden State Water, Bear Valley, joined the meeting today. Mr. Plaskey reported that a question came from Ms. Duchateau of Bear Valley: if Tier 2 or Tier 3 circumvented the 45 day window. Mr. Plaskey reported that he answered no, the 45 day is still in effect. Mr. Plaskey commented he will bring up this subject again next month. Mr. Serrato asked Ms. Pranata to add this subject to next month's agenda.
- Mr. Brown opened the discussion to Do Not Bill Form 7s – do not final. SCE sent out a spreadsheet to the members but the JPAs have not been addressed by other members. Mr. Brown will send out the spreadsheet to the member's representatives and expect a response or release from the representatives.
- Mr. Serrato read a comment from Mr. Coffey, "Please let me know if this is not the correct section/forum for this question/example... We have poles within our jurisdiction that may have low hanging or cut/disconnected

communication wires, some are joint poles some are not, but they present a public safety hazard. If we remedy the issue, is this something billable through joint pole?” Ms. Crawford replied that they would have to identify the communications. Mr. Plaskey commented that it should follow the GO 95 third party notification process and is outside of this committee. If no responses, they should escalate. Mr. Serrato read another question from Mr. Coffey “How long would comm have to remedy the issues once notified?” Mr. Williams replied that it would be Rule 18 violation. Mr. Plaskey asked Mr. Coffey to send the list to Mr. Plaskey.

Agenda Item 6 – Review of Action Items -

- Mr. Brown to provide an update on billing steel stub poles.
- Ms. Black will provide SCE information needed on steel stub invoices.
- Mr. Brown will address the GO 95 notices.
- Mr. Brown will send spreadsheets containing the Do No Bill Forms 7 to member’s representatives.
- Mr. Plaskey will bring up the Tier 2/3 issue at the next meeting.

The meeting adjourned at 12:22 p.m. until March 18, 2020.

Angela Pranata - Committee Staff

Southern California Joint Pole Committee

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March 18, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 1:13 p.m. at the Committee office. Those in attendance were:

Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Those attending via teleconference were:

Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Hector Aguilera	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Aarize Dizon	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Mr. Richanna James	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Ms. Cory Crawford	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Mr. Racheal Torres	Mobilitie, LLC
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Vanstryk	City of Vernon (Petrelli Electric)
Mr. Dan Luty	Extenet Systems

Mr. Serrato called the meeting to order at 1:13 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns in regards to the prior meeting minutes of February 2020. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened up the discussion to CPUC activity and updates. Mr. Brown replied that he attends those meetings and that for Track 2 every meeting has been cancelled. He added that they are going to reach out to the new president and see if this is something that they want to move forward with in Track 2. As of now there is no other updates. Mr. Serrato stated that this item will remain open.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. There were no environmental issues to report at this time. Mr. Serrato stated that this item will remain open.

Agenda Item 4 – From SCE Steel Stub poles (W. Brown 1/27/2020) – Mr. Serrato opened the discussion to the **steel stubbed poles**. Mr. Serrato asked Mr. Brown if there were any updates. Mr. Brown stated that SCE discussed how they want to proceed with the billing of steel stubbed poles, whether or not it will be an invoice or JPA. SCE's two largest partners in this are Frontier and AT&T California. SCE met with AT&T to work out a process. SCE would like to meet with Frontier before coming back with a final process to make sure everyone is on the same page. Mr. Brown stated that this item will be tabled until the next month's Compliance meeting so SCE can meet with Frontier and come back with a proposal.

Agenda Item 5 – Miscellaneous –

- Mr. Serrato opened the discussion to Golden State Water's inquiry about the 45 day window for Tier 2 or Tier 3. Mr. Serrato asked if Golden State Water had anything to elaborate. Ms. Pranata stated that Ms. Duchateau of Golden State Water was not logged on. Mr. Serrato moved to table this item for the next month's Compliance meeting unless anyone else had anything to elaborate on this topic. No other members had anything at this time.
- Ms. Serrato opened the floor to discuss Mr. Brown's topic. Mr. Brown stated what is happening SCE is getting JPAs side by side where there is one that is a bill before and one that is a bill after. He stated that if SCE is putting bill after the SCE JPA, they are finding that the other JPA is billing before the SCE JPA. He stated that cannot happen because SCE has to turn around and add the member even though SCE's work was done prior to theirs. Mr. Brown stated that SCE is going to put a stop billing on those JPA's by sending the committee a Form 7. This is to ensure the proper JPA bills first and a correction of record does not have to be made. He added that SCE is having to make quite a few correction of records because the other member billed before SCE. Mr. Serrato stated that if the JPA was billed out of turn, then the other member should accept

the stop billing. Ms. Ortiz inquired if SCE is going to stop billing on all of those JPAs. Mr. Brown stated that it is only on the JPAs with the bill before/bill after. Ms. Ortiz stated that there are quite a lot of those JPAs. Mr. Brown stated that there are a few, but if they do not do a stop billing, then they will need to do a correction of records to all of them. Ms. Ortiz asked if SCE could put it back on the member who billed out of order and have them track their final. Mr. Brown stated that they would prefer to do that. Ms. Ortiz followed that this way it will be on the other member and not SCE. Mr. Serrato reiterated that if SCE is proposing that if a member is trying to bill before even though SCE clearly stated that they should bill after, then SCE wants the SCJPC to stop their billing. He then asked how SCE knew they were billing before them. Mr. Brown stated that SCE got a memo back telling them to add the company to the JPA. Ms. Hernandez asked Ms. Ortiz what she was proposing. Ms. Ortiz asked that if the member who billed out of order can be the one who does a correction of records for their final that billed incorrectly. Ms. Hernandez stated that this could be done on the JPAs that already final billed, but what Mr. Brown was stating was if SCE returns a JPA stating that it needs to final first, that they will also be issuing a Form 7 to stop billing at that time. Ms. Hernandez asked Mr. Brown if this was correct. Ms. Ortiz stated that Mr. Brown stated that he is receiving memos on some of the JPAs. Mr. Serrato asked, wouldn't that mean that the first JPA, the one that was out of turn already final billed and the Form 7 to stop billing would be after the fact and not effective. Ms. Ortiz stated that unless they do both, by having the member who billed out of order retract it and if it has not final billed, SCE can send a Form 7 for those. Mr. Brown agreed that he was talking about the ones that have not final billed and if they were final billed then SCE can reach out that member and have them do the correction of record. Ms. DeBarge stated that SCE has tried to in the past have the other member do a correction of records, but most of the time SCE has to do a rush on it because there is a memo involved or SCE is trying to bill something. In the case where a JPA has final billed and SCE is asking the member to create a creation of records, but if SCE creates the correction of records, Ms. DeBarge asked Mr. Brown if SCE adds a penalty for creating the JPA on their behalf. She further stated that what she has seen in the past, SCE has sent the Form 7 asking for a correction or records to be created, explaining why and to be done within however many days, if not SCE will create a JPA on the members behalf, and bill it with a penalty. She asked the members if this sounded familiar to anyone else. Ms. Ortiz stated did not sound familiar to her, and possibly Ms. DeBarge was talking about the 18.1D's. Ms. DeBarge asked if Ms. Ortiz stated 18.1E. Ms. Ortiz stated it is the one that another member bills on behalf of another, the administrative fee. Mr. Brown stated it was the 18.1F. Ms. DeBarge stated that it is Item 14. Ms. Hernandez agreed that it is Item 14, but that she has seen the Form 7's asking the other member to final

bill their JPA and if not it will be done under 18.1F. Ms. Ortiz stated that Item 14A does state failure to final including correction of records.

Ms. DeBarge asked Mr. Brown that prior to the final process if SCE receives finals before they final bill. She was unsure at what point SCE would send a Form 7 do not final to the committee. Mr. Brown stated that SCE does not necessarily see the JPA's before. He told the SCE team that whenever they see a bill before/bill after to send a Form 7 to the committee if the JPA has not final billed, telling them not to final it until the correct JPA is billed first. Ms. DeBarge stated that the committee will not bill the other members JPA until a Form 7 ok to bill is submitted. Ms. DeBarge stated that she and Mr. Brown will discuss this further offline.

- Mr. Brown stated that SCE is also receiving finals where they never received a copy of the JPA, coming from the same company. What SCE is going to do on those is not to pay the invoice until they get a chance to review it. If pole loading fails, it must be addressed. SCE suggest that people send everybody the JPA's. Mr. Serrato did a reaffirmation of what the proper routine is, to make sure to send everyone their JPAs, and in turn they have the right to not pay the invoice especially for a final bill received where previous documentation was never received. Mr. Brown agreed, and stated that it is like SCE not sending a JPA for a pole replacement and they get a Section 7.13 charge. To SCE it is the same because they did not receive the JPA, and there should be some kind of penalty. He stated that when he looked at the JPA there are several 18.1D's on it. Ms. Ortiz asked if it showed 18.1D for all except for the originator. Mr. Brown agreed that it was like that. Ms. Hernandez stated that those JPAs are very suspicious. Mr. Brown stated that if SCE goes out there to pole load and it fails, then that member will be responsible for all parties, the same as a Section 7.13. Mr. Serrato stated that if Crown Castle is doing this, to please send him examples. Mr. Brown agreed he would send samples.
- Ms. Black opened to the pole card database for LADWP. She stated that LADWP's lobby has been closed to everyone and they cannot go in and utilize the computer there. Mr. Bacon stated that just recently went into effect until everything blows over (COVID19). They do not want people from outside coming into the building and it is hopefully a temporary situation. Mr. Bacon wanted explanation on how detrimental this is to AT&T California or if it is something that can hold off for a couple of weeks. Ms. Black stated it is very detrimental for AT&T California because it stops their bills. Utilities are all required within 15 days to respond to another utility. They either have to provide a way to access, like LADWP has, or they need to provide the information to the requester. Ms. Black was requesting accommodation through this time until they are able to go back in to the LADWP lobby to get it. Mr. Bacon stated that AT&T California will not be able to get everything that they want because of staffing at

LADWP and since they have a lot of fiber optic runs, which means a lot of poles, information, and mapping checks. Mr. Bacon requested that if AT&T California could, per week, give LADWP their top five routes with pole numbers and everything else, and maybe they can start digging through that to try and assist from there. Mr. Bacon stated otherwise he does not know how else to assist because it is a companywide lockdown. Ms. Black stated she will get a list from her contract engineers and she will send Mr. Bacon a copy so they can somehow work together. Mr. Bacon stated that he understands that AT&T California needs this information otherwise it will shut them down, so LADWP will try to divert some resources for this. He inquired if AT&T California is looking at map runs or if they are looking up pole card information. Ms. Black stated it's mostly the pole cards. She stated there is a screen added to the new database that is now has the information that old database used to show, which included who was on the pole, height of attachment, and the LADWP'S JPAs in progress. Mr. Bacon stated that LADWP currently switched over to a new GIS program. The old LADWP sheets are going to be changing dramatically and Mr. Bacon stated he has access to both. Mr. Bacon asked AT&T California to give him a list of however many poles on their top five priorities that they need the pole cards for, and they will work to get them how every many as they can.

- Ms. DeBarge asked Mr. Brown if he wanted to talk about the issues SCE is having in which they are also not able to go into their facilities to access their paper documents. Ms. DeBarge stated that SCE is limiting access to buildings and all their employees are not allowed access into their buildings. Mr. Brown stated that SCE is working at a slower pace because they are all working from home and are not allowed back into the office. Members will still be getting their stuff back, but SCE may be running across the time line. Ms. Black was unsure if the other utilities knew, but that SCE allows access through SPIDA to get pole information so there is no hold up. Ms. DeBarge stated that anything sent to jpa@sce.com asking for things that may be on paper, it may take SCE some time to get that information because it would be up to a supervisor to go into the building to retrieve and scan it and get back to you because, though the inboxes are being manned, but this out of office at this time.

Agenda Item 6 – Review of Action Items/JPA Alerts -

- Mr. Brown to get with Frontier to discuss billing for steel stub poles.
- Mr. Serrato reminded members that SCE discussed that they will find a way to remedy/block finals that should have billed after.
- Mr. Serrato reminded members about sending the Form 2 to all the parties involved. Members should not be receiving the final bill at the end without previously receiving a Form 2. SCE will not pay the final invoice due to not receiving the documentation. Mr. Brown stated that

- there are also a couple of companies that will not pay their invoice which will hold back a lot of money for SCE.
- Mr. Serrato stated that all of their offices are either closed or will be closed, so some things will take a while to process. Submit requests and people will get to them when they can.

The meeting adjourned at 1:39 p.m. until April 15, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

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April 15, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 11:05 a.m. via teleconference. **Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Jaime Garcia	City of Los Angeles
Mr. Jeff Williams	City of Los Angeles
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. Aarize Dizon	Crown Castle NG West Inc./NewPath/CA-CLEC LLC
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Ms. Cory Crawford	AT&T California
Mr. Todd M. Dailey	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Vanstryk	City of Vernon (Petrelli Electric)
Mr. Joe Armstrong	City of Pasadena
Mr. John Vu	City of Anaheim
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 11:05 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened the discussion to CPUC activity and updates. Mr. Serrato stated that what he remembers from the last meeting minutes, Track 2 was being cancelled completely or postponed and inquired if any of the members knew anything about this, if the ongoing meetings are still happening. Mr. Williams stated that there are no meetings scheduled yet, and that it has not been cancelled, just postponed. He further stated that Mr. Mathison or Sam were going to see what the CPUC's interest was with this if it was going to continue. Mr. Williams stated he has heard nothing on this. He has a rules committee meeting on Thursday, where maybe he can get more information on this. The CPUC was still trying to push forward with the wildfire mitigation. Mr. Williams informed the members that the state now has a wildfire safety advisory board. That a lot of the CPUC safety enforcement division has been dealing with what the wildfire safety advisory board is proposing. He further stated that it may be a little while before the CPUC revisits this, probably after the state and businesses open back up. They would run fast on it if there is still the desire to have this done.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. There were no environmental issues to report at this time. Mr. Serrato stated that this item will remain open.

Agenda Item 4 – From SCE Steel Stub poles (W. Brown 1/27/2020) – Mr. Serrato opened the discussion to the **steel stubbed poles**. Mr. Serrato believed they found a conclusion last time and asked Mr. Brown if was correct, and that SCE was going to meet with Frontier to work something out. Mr. Brown stated that they still need to get with Frontier. He stated that that SCE got together with AT&T California and worked something out with them, but now they need to work with Frontier. Mr. Brown let Mr. Plaskey know that he would try and schedule something with him and Ryan to work on the process. Mr. Plaskey inquired if this was regarding the pole stubbing. Mr. Brown confirmed yes. Mr. Plaskey stated that he brought this up to Albert and Oscar, and that they would also like to be on a call as well. Mr. Plaskey told Mr. Brown to let him know when he is available so he can get Albert and Oscar to join. Mr. Serrato asked if they should leave the item on Compliance to get an update next time, or if they should close it out. Mr. Brown asked Mr. Plaskey how he felt about closing it, because Mr. Brown was good with closing it at this point. Mr. Plaskey stated that if it just a two-member issue, they can take it offline instead of tying up the committee. Mr. Serrato stated that this item will be removed.

Agenda Item 5 – Miscellaneous –

- Mr. Serrato opened the discussion to Golden State Water's inquiry about the 45-day window for Tier 2/Tier 3. Mr. Serrato asked Mr. Plaskey if this was still something of concern. Mr. Plaskey stated that this was an issue brought to him by Golden State Water. Mr. Plaskey stated that Golden

State Water reached out to him asking if the 45 days were a hard-set rule and he let them know he would bring it up. Golden State water was not logged on. Mr. Plaskey stated they could table this item for the next month's Compliance meeting and if Golden State Water is not on then, it can be removed. Mr. Brown stated that he had a concern on this. He stated that the members agreed with SCE that the Tier 2/Tier 3 would be identified and if they could be addressed in a 15-day window then they would, and if they couldn't then they just couldn't. Mr. Brown stated SCE identifies those in the subject because they like to expedite those, especially the Tier 3, which they don't have many left of, but they do have Tier 2s. SCE would like to expedite those and he would like Golden State Water to hear that message. Mr. Serrato stated that they would look at this again next month.

- Ms. Serrato opened the floor to clarification on providing a copy of a JPA or Form 48 during the permit process due to push back from Cal Trans, asked by AT&T California. Ms. Pranata stated that this was from an email Ms. Crawford sent. Ms. Black stated that this is the issue that Artemio was having with the Cal Trans job where they would not give AT&T California the permit until they gave them the JPA paperwork. Ms. Crawford opened that it predates her about the Form 2 and Form 48 being considered proprietary, how they cannot be presented to a municipality if they demand a copy of the service order records from somebody to do a pole transfer/removal. She stated that she does not understand why it is proprietary because she has looked over the Form 2 and Form 48 and does not see anything proprietary that would prevent them from showing/providing a copy to Cal Trans or whomever as proof that AT&T California is allowed to work on and pull that pole. She would like to talk about this with the members so she can understand why it is proprietary. Ms. Hernandez stated that she is getting requests on approved JPA's on poles that are existing and the JPA was final billed years ago in which she cannot find the JPAs to send them. She does not know where/why this was started, but when she sends her permitting guys a copy of the pole records showing they are owners on the pole giving them the right to work. She has not heard back whether this has worked or not. When it's been existing for years, they do not have an approved JPA to give to them. Ms. Crawford asked what if they did have a JPA, the communication around AT&T California, which could be perceived incorrectly, is that they are not allowed to present a copy of the Form 2 or Form 48 because it is considered private. She wants to understand if this is true because it doesn't make sense to her when she looks at the information on the Form 2 or Form 48. Mr. Serrato stated that he thinks what makes the forms confidential is that these forms exist and originate in the Routine Handbook, which is stamped as confidential to the members only, which is written in the by-laws. He stated that if they could add some verbiage in which a copy of the Form 2 could be provided, that would make it easier for Crown Castle as well. Mr. Brown stated that the message SCE was given was that it is

proprietary information as well. They do not provide the JPA to anyone. SCE must provide information when they get permits as well. They give the JPA number, the responsible party to remove the pole, and the party contact information, whenever they are trying to get the permit. Ms. Crawford asked if they could open to adding to the Routine Handbook or the rules and guidelines that if on demand, they are to provide a copy of the JPA or Form 48. Mr. Serrato stated that next time they have Routine Revision if they could add a bullet point to propose verbiage. Mr. Williams stated that they have gone over and over this with Cal Trans and they ask why they need this because the information will confuse Cal Trans. They will not know what they are looking at and when they ask what they really need, Cal Trans cannot answer why they want the information. Ms. Crawford stated that this would be another obstacle for them to have to break down in their push back for permits is to show it to them and then to see what their next obstacle will be. Ms. Crawford stated that otherwise it seems like they are trying to hide something. Mr. Armstrong stated that they will not know what they are looking, which will create other questions and then that potentially gets into Authorized Costs. This will create a potential where they would have to give them the handbook. Ms. Crawford stated that she does not see anything about Authorized Costs on the Form 2 or Form 48, that it shows the location of the pole, the parties on the pole, and the driver on this date to go to do work. Mr. Armstrong stated they will ask what is a 7.1, what is an 18.D. Ms. Crawford stated that this is internal information that could be overcome. Mr. Serrato stated that Crown Castle would get creative with writing a letter stating that they are members of the committee and they are authorized to do the work, stating the pole numbers they are concerned about and the space they will be in. He further stated that some jurisdictions or parties accept the letter. Mr. Serrato stated that if there could be a standardized letter all the members are using coming directly from the SCJPC that does not have all the extra information that would make them ask a bunch of questions, he believes that would work out. A letter that all the members could agree authorizes all of them and they could all back it up. Mr. Williams they could add a copy of the pole card showing they are member on the pole from SCJPC. Mr. Brown stated that in some cases they are not members because they are trying to purchase. Mr. Brown stated that they have told them who the responsible party, but sometimes field conditions may change and the responsible party to PTD may also change. He stated then they would have to send them a copy of the Form 7 along with everything else which they do not do, which is why they must be careful what road they go down. Mr. Williams stated that when Cal Trans started this process 10 years ago the members told them no. Once they start looking at the JPA they will see item numbers, ½ of 1, and start asking the meaning of these things and that leads to them asking about everything. Mr. Williams stated that Mr. Serrato's idea of a standardized letter would be the best for the members. Ms. Crawford stated that a space to put the pole information would be

needed, otherwise it would just be a letter, they would need a way to differentiate between Pole A vs. Pole B. Mr. Williams agreed and that they could have the letterhead be from the SCJPC. They could make a standardized letter with a spot to paste the pole information. Mr. Bacon stated that it could have a list of all the active members in the SCJPC. Ms. Crawford proposed they try showing a copy of the Form 48 the next couple demands they get for it and if it starts going down the path of trying to get a copy of the Routine Handbook, they back off and give a copy of the letter. Mr. Bacon agreed. Mr. Brown stated that he constantly gets calls asking if members are authorized to get on their pole. Ms. Crawford stated that it seems like they are trying to hide something when they are not. Mr. Williams asked what happens if you are not an owner of a pole but a tenant, so they will not get the Form 48 copy. Mr. Williams stated that a letter is the route they should be going rather than start giving them copies of the Form 2 or Form 48, because when they stop, they will ask what happened. Mr. Brown stated that he gets the calls asking if SCE approves attachments and he stated that they do not approve until they do the necessary research, if the Form 48 is available and they are approved to get on, then SCE allows it. Mr. Williams confirmed AT&T California is not providing the Form 48. Ms. Crawford stated that no but that they want to know if they can provide a copy of the Form 48 or Form 2, that the letter would be fine, but it would take two months to get written and approved by an attorney. AT&T California is getting stopped now. Mr. Bacon stated that the timeline between applying for a permit and actually getting the Form 48 will not do them any good, because they need to attach now, but by the time they have everything it is already several months later, which is where the letter comes in. Mr. Bacon got a call from the BOE (Board of Equalization), which is doing the same thing as Cal Trans in asking. He stated they are trying to avoid people just attaching to the pole without having to go through the SCJPC in giving the proper paperwork before they submit the permit. Mr. Bacon agreed that they should format a letter so that they have a blanket policy, showing that information is none of their business, but letting them know who can conduct business on the pole. Mr. Brown stated that Cal Trans' concern is SCE's concern because their concern is buddy poles. This is because the buddy poles are not being addressed in a timely manner, which is stopping SCE from getting permit. Mr. Brown in return must go back and explain the process, and then they start giving SCE permits one by one, but they are trying to get blanket permits, which is very difficult. That this all revolves around the buddy poles. Ms. Crawford stated that one part of Cal Trans not communicating with the other because they are hitting AT&T California with 15-day completions to remove buddy poles. From the time a new pole is placed they want AT&T California to do the transfer and remove the old pole within 15 days. AT&T California is telling Cal Trans that they are the obstacle for getting permits processed. Mr. Brown stated that SCE is going down the same road as well where Cal Trans is telling them it needs to be

out in 15 days. Mr. Brown is telling them there is no way it can be out in 15 days because once SCE removes the pole it takes them 30 days to prepare the paperwork to even prepare to notify the member. Once they can iron out a time to give them when the pole will be out of the ground, for example six months, Cal Trans will be ok with it and after six months they start to have issues. Mr. Brown stated that the only time it is out in 15 days is if the party has agreed to pull the pole and replace the pole. If they are the ones to PTD then the pole will not be in the ground. Mr. Brown stated that SCE proposes this on simple transfers, but they won't do it on risers. Or they will do a same hole set with an SOP. Ms. Crawford stated that they are saying the same thing with same hole set. Mr. Serrato asked if the members have any action items for this. Ms. Crawford stated she did regarding providing a copy of the Form 48. Mr. Serrato stated that this would have to be for Routine Revision. Mr. Serrato stated that he could draft a copy of what a proposed letter might look like to continue the conversation on this, and it would be open to changes. Mr. Brown stated that if AT&T California has a meeting set with Cal Trans, he asked to be invited so they can both talk about the process regarding the 15 days. Ms. Crawford stated that they went to AT&T California's structure access person that meets with the state who agreed to have a meeting. Cal Trans wants them to share their process on their timeline so they can find efficiencies for AT&T California. Ms. Crawford told Cal Trans they are not doing that. AT&T California does not need anyone telling them how to do things better. The meeting is still going on because Cal Trans can make their lives difficult. Ms. Crawford stated that she will reach out to Victoria Canair, who is hosting the meeting, to see if she can invite SCE so they are a united front on this.

Agenda Item 6 – Review of Action Items/JPA Alerts -

- Mr. Brown is to get with Frontier to discuss billing for steel stub poles. The bullet item will be removed from miscellaneous.
- The members are going to circle back with Golden State Water regarding the 45-day timeouts when they arrive next time.
- Mr. Serrato is going to propose a draft letter to be discussed about getting permits from Cal Trans.
- Ms. Crawford will bring up approving providing copies of forms to outside parties in the next Routine Revision meeting.

The meeting adjourned at 11:31 a.m. until May 20, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee

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May 20, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, at 3:00 p.m. via teleconference. **Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Mr. Aarize Dizon	Crown Castle NG West Inc.
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Mr. Todd M. Dailey	AT&T California
Ms. Tara Andrews	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Vanstryk	City of Vernon (Petrelli Electric)
Mr. Racheal Torres	Mobilitie, LLC
Mr. Pedro Garganera	MCI Metro ATS/MCI Telecommunications
Ms. Linda McLean	Extenet Systems
Ms. Angela Pranata	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 3:00 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened the discussion to CPUC activity and updates. Mr. Serrato

stated that a communication came through that forwarded to the membership by Ms. Pranata. It stated that the CPUC president issued a proposed decision on the pole database OII docket that adopts the track one pole database solution. Mr. Serrato stated that major pole owners are to make electronic access with 10 key datapoints, to be made available within one year. He stated that one member has two years to adopt this. He further stated the CPUC staff gets to access these databases remotely, which he believes they already do. Those attached will be able to access electronically as well. Mr. Serrato asked if any members had any comments or anything else to add. He stated that opening comments were due Monday, June 1 and official replies due by Monday, June 8. Mr. Brown stated that about a year ago, Mr. Williams brought up if the members would be opposed to providing access to the committee records only for cable tv. He stated he knew it was talked about, but he did not remember what the answer was. Mr. Bacon did not recall this conversation either. Mr. Bacon stated that his concerns were that it would be costly to get all the information for them and that if they have all LADWP's pole information they would know where all their switches and everything else was. LADWP's does not give out all that information for protection and terrorist attacks. Mr. Brown stated this is something SCE has been talking about internally, that there is only so much information they are going to give. He stated that most of what they are going to give is in SPIDA anyway. Mr. Plaskey stated that everything at the SCJPC as well at the north is all proprietary, but if the CPUC mandates that it be made public he does not know what leverage they would have from a SCJPC perspective. Frontier has their own company views about this. The only information from the SCJPC perspective is the information on the pole card which is grade and space and who owns it. It will have to be something that they order the SCJPC to do before grade and space and ownership is provided. Ms. Pranata stated that according to the list sent by the CPUC, the SCJPC does not have much of the data they want. The SCJPC has addresses, but not GIS, they have pole length, class, joint owners, but they do not have other items that they want. Mr. Plaskey stated that the OII is much higher than what the SCJPC data. He further stated that what they are asking from the 10 bullet points is from the five major companies (see attached) and for AT&T California and Frontier from a comm perspective and SCE from power, and in the north it is affecting PG&E as well. If the CPUC orders it, he does not know what recourse there would be from an SCJPC perspective. Mr. Plaskey stated that most of that information Frontier can provide except for grade and space and ownership, are the only two pieces of information that they do not have in their systems. It is the only piece that the SCJPC can provide that Frontier can't because they do not house the information anywhere. Ms. Pranata stated that it is possible to restrict the access, for example if they want a third party to look at the SCJPC database, they would need to program a different type of pole search so they cannot view the entire pole records, just what they need. It would need to be programed by the web programmer. Mr. Plaskey stated that they would have to see. The CPUC seems to be looking for all the information to come from the five members, not the SCJPC, so it may be a moot issue here. He stated they may force Frontier, AT&T, and SCE to provide the information. He stated that

there is a lot of information in the OII that wasn't discussed at all in the proceedings that they threw out of the blue, and that it is too early to worry about it from an SCJPC perspective. The only thing the SCJPC has that Frontier doesn't is the grade and space and pole owner information. Mr. Brown stated that for this, maybe restricted access could be the answer. Mr. Plaskey stated that all the other information is redundant. He stated that there is a lot of different questions, like if Frontier should provide pole ownership information for members who that are not part of the OII. For example, letting them know that Crown Castle is on a pole, but they are not part of the OII, if that is something the CPUC can even make them do. Mr. Plaskey stated that from an SCJPC perspective he did not see a reason for them to reply. Ms. Pranata stated she did not see anything, that she could read it again or send it to the attorney. Mr. Plaskey stated that the impacted members already have their attorneys looking at it and there is no need to send it to the attorney. Mr. Bacon stated that the SCJPC is the records keeper of their documents and the onus is on them to provide the documents not the SCJPC. The information is theirs individually. Mr. Plaskey stated that he believes that they do not need to provide a response back at this time, and it is too early to know what is going to be mandated.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. He stated that here members would have the opportunity to talk about their current working situation due to the global health situation. He asked if anyone had anything about how their company is going to conduct business right now if it has not been stated before. Mr. Brown stated that SCE is taking a deep dive at looking at working from home that it may become a permanent thing. They are seeing if it is feasible even when they can go back to the office. SCE is taking the initiative to scan all their documents. He stated weeks ago SCE sent thousands of JPAs over to a scanning company. Everything will be scanned, and they will no longer have any paper. Mr. Brown stated that the COVID has opened their eyes to many things, making them look at the way they do work different. Ms. Pranata stated that the SCJPC still has a lot of boxes to scan. She stated that their first phase is done, where before COVID19 they gave them 10 to 15 boxes, which have been completed. They are waiting for the SCJPC to give them more boxes. Ms. Pranata needs to go into the office and look at the boxes, since they have some documents that are double sided and it costs more to scan those documents. She will have to separate and sort the boxes before giving them to the scanning company. Mr. Brown stated that SCE gave their scanning company 220 boxes of just SCE stuff, not including their foreign or FAA's.

Mr. Serrato stated the Crown Castle is also analyzing their working situation and will not be returning to the office at least September first. It will be a while for them at home if they do return.

Ms. Black stated they are all pretty much working from home. They created a committee called Return to Work, which will evaluate the situation based on what the state and CDC says. They were told they would be at home for a while.

Mr. Bacon stated that the only thing he misses coffee talk and really didn't have anything else to add.

Agenda Item 4 – Miscellaneous –

- Mr. Serrato opened the discussion to Golden State Water's inquiry about the 45-day window for Tier 2/Tier 3. Mr. Plaskey asked if Golden State water was still on. Ms. Pranata checked and it looked like Ms. DuCheteau was not on. Mr. Plaskey he stated he brought this up since Ms. DuCheteau asked him about the 45 day window. He stated that last month it was discussed that if Golden State Water was not on at the next month's meeting to discuss this, then the bullet point would be removed from the miscellaneous until they want to bring it up again.
- Mr. Serrato opened to the standard letter discussed for the members to use at the SCJPC level he was going to present, stating that they are following a routine handbook and they rights to attach according to certain parameters. Mr. Serrato did not complete the letter and stated this could be tabled until next month.
- Mr. Brown stated that in regards to Cal Trans, that the members should start preparing themselves. He stated that in the south and north they are forming meetings to strategize and stick together to oppose Cal Trans. Cal Trans proposal is, for example if SCE goes out to top a pole, they want the pole out in 15 days. In the south and north they are getting together to make a committee to approach Cal Trans and tell them it is not doable. Mr. Plaskey stated that he was not aware and to make sure he was added. Mr. Bacon requested this be forwarded to LADWP as well because it was catastrophic and just an impossible dream. Ms. Hernandez requested that Mr. Brown send that to Ms. Pranata so she can send it out to everyone. Mr. Plaskey asked if Cal Trans was talking about holding up permits if they are not getting out of the way. Mr. Brown stated that was what they were talking about. Mr. Plaskey stated that they probably all need to be involved in that conversation, otherwise it will bring all their businesses to a halt.
- Mr. Brown opened to if SCE has a joint anchor and then their tenant comes out and sets their own anchor. They then remove whomever SCE is joint with and attach them to their new anchor in the ground, probably to satisfy GO 95. SCE does not want to take up the legal responsibility of their tenant removing somebody from one anchor and putting them on an anchor unless the members had no issue with that. Mr. Plaskey stated that the only one that should be removing anchors is a member no tenants. Mr. Plaskey stated that Frontier does not expect tenants to be moving anything. Mr. Bacon stated that their tenants are not allowed to attach to their anchors. LADWP never kept a record on the type of helix down in the ground, so they cannot give them an accurate wind loading calculation off the anchor in the ground. Years ago, LADWP decided to anyone from sharing or doing a 50/50 with their anchors, and that they have to put in their own anchor. Mr. Bacon stated that relocating an anchor is an

absolute not. Mr. Plaskey stated that Frontier also did not keep track of their anchor sizes before. Nobody should be attaching to anchors without approval and should not be relocating down guys to another anchor without proper authorization. Mr. Brown stated he would pass them back this information. Mr. Plaskey stated that if it is any of Frontiers tenants in their territory to let him know. Mr. Brown stated it was not Frontier's tenant but SCE's tenant in which they want to give them directions that they should not be doing that.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Serrato is going finish a draft letter to provide to members to secure permits from Cal Trans.
- Mr. Brown was going to forward meeting information to Ms. Pranata about opposing Cal Trans directions. Ms. Pranata is to forward this invitation to all the members.
- Mr. Brown is to get back to his tenant in regards to the discussion about relocating anchors.

The meeting adjourned at 3:23 p.m. until June 17, 2020.

Anali Spencer - Committee Staff

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

05/11/20
11:11 AM

May 11, 2020

Agenda ID #18426
Quasi-Legislative

TO PARTIES OF RECORD IN INVESTIGATION 17-06-027, RULEMAKING 17-06-028:

This is the proposed decision of Commissioner Batjer. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's June 11, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ ANNE E. SIMON

Anne E. Simon
Chief Administrative Law Judge

AES:mph
Attachment

Decision **PROPOSED DECISION OF COMMISSIONER BATJER**
(Mailed 5/11/2020)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation into
the Creation of a Shared Database or
Statewide Census of Utility Poles and
Conduit in California.

Investigation 17-06-027

And Related Matter.

Rulemaking 17-06-028

**DECISION APPROVING TRACK 1 WORKSHOP REPORT WORK PLANS FOR
SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS
COMPANY, PACIFIC GAS AND ELECTRIC COMPANY, AT&T, AND
FRONTIER COMMUNICATIONS OF CALIFORNIA**

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**DECISION APPROVING TRACK 1 WORKSHOP REPORT WORK
PLANS FOR SAN DIEGO GAS AND ELECTRIC COMPANY, SOUTHERN
CALIFORNIA GAS COMPANY, PACIFIC GAS AND ELECTRIC COMPANY,
AT&T, AND FRONTIER COMMUNICATIONS OF CALIFORNIA**

Summary

This decision approves the *Track 1 Work Plans* filed by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T (the five utility pole owners), but with modifications as noted throughout this decision.

This decision requires that each of the five pole owners must incorporate data glossaries with consistent meanings into their respective data portals.

The decision further orders that the five pole owners convene a working group 60 days after the issuance of this decision to reach consensus for the data elements that will use common data definitions.

This proceeding remains open.

Party Acronyms, Abbreviations, and their Meanings

AT&T (Pacific Bell Telephone Company, d/b/a AT&T California, AT&T Mobility [AT&T Mobility Wireless Operations Holdings, Inc., New Cingular Wireless PCS, LLC, and Santa Barbara Cellular Systems, Ltd] and AT&T Corp.

BVES (Bear Valley Electric Service)

CALTEL (California Association of Competitive Telecommunications Companies)

CCTA (California Cable and Telephone Association)

CTIA (CTIA Wireless Association)

CMUA (California Municipal Utility Association)

ExteNet (ExteNet Systems (CA) LLC)

Frontier (Frontier Communications of California)

ORA (Office of Ratepayer Advocates, now known as the Public Advocates Office or CalPA)

PC (PacifiCorp)

PG&E (Pacific Gas and Electric Company)

SCE (Southern California Edison Company)

SDG&E (San Diego Gas & Electric Company)

SED (Safety & Enforcement Division)

Verizon (Cello/MCIMetro)

1. Background

1.1. Factual Background

On June 29, 2017, the Commission issued Investigation 17-06-027 and Rulemaking 17-06-028 (OII/OIR Proceeding) in order to consider strategies for increased and non-discriminatory access to poles and conduit by competitive communications providers, the impact of such increased access on safety, and how best to ensure the integrity of the affected communications and electric supply infrastructure going forward. As part of this OII/OIR proceeding, the Commission expressed its intention to:

- Investigate how best to create a statewide pole census along with the feasibility of a data management platform that will allow stakeholders to share key pole attachment and conduit information;¹
- Consider rules that will allow broadband Internet access service (BIAS) providers to attach facilities to poles and to use conduit following their classification as

¹ OII/OIR proceeding at 1.

public utility telecommunications carriers in the FCC's 2015 *Open Internet Order*;² and

- Consider rules specific to conduit, and better pole management practices.³

SDG&E, SCE, PG&E, Frontier, and AT&T are the five pole owners who, collectively, own between 85-90% of the 6+ million electric and communication utility poles in California.⁴

1.2. Procedural Background

Based on the comments the parties made at the December 5, 2017 Prehearing Conference (PHC), on January 11, 2018, the assigned Commissioner and the assigned Administrative Law Judge issued a *Ruling Requesting Comments on Creation of Shared, Statewide Database of Utility Pole and Conduit Information*. The following parties filed and served comments: AT&T, BVES, California association of Competitive Telecommunications Companies (CALTEL), CCTA, CTIA, ExteNet, CalPA, PC, PG&E, SCE, and SoCalGas

The Assigned Commissioner issued his *Scoping Memo and Ruling (Scoping Memo)* on August 8, 2018, setting forth the category, issues, schedules, and other matters related to the OII Phase I Scope, allowing for collaborative workshops at which the Commission would present potential Use Cases for a pole database,

² *In re Protecting and Promoting an Open Internet*, Federal Communications Commission (FCC) Report and Order, 30 FCC Rcd 5601 (March 2015) (*Open Internet Order*), at 478-85. The FCC later reversed the *Open Internet Order* on December 14, 2017.

³ OII/OIR proceeding at 1.

⁴ See responses from SDG&E, SCE, PG&E, Frontier, and AT&T to the Commission's Data Request, dated January 27, 2017, which asked, among other things, that each respondent identify the number of utility poles in California that are owned either solely or jointly, or on which they lease space.

initiate dialogue, and collect input and feedback to refine the Use Cases and data fields critical to defined uses.⁵

The workshops were held on November 15, 2018, January 22, and January 23, 2019. A *Workshop Report* was filed and served on February 28, 2019, that detailed the parties' efforts, recommendations and concerns. Of note, the *Workshop Report* recommended that the Commission authorize the creation of working groups that would be tasked with developing the detailed requirements based on the following three tracks for the OII Proceeding: Track 1 (Pole Data), Track 2 (Pole Attachment Data), and Track 3 (Conduit Data). Four parties (SDG&E, SCE, AT&T, and ExteNet) filed opening comments on March 29, 2019. Six parties (SCE, CCTA, CalPA, AT&T, ExteNet, and CALTEL) filed reply comments on April 19, 2019.

On June 4, 2019, the ALJ issued his *Ruling Approving Recommendations/Next Steps from the Southern California Edison Workshop Report for Workshops Held on November 15, 2018 and January 22-23, 2019 (Ruling)*. In response to party comments to the Workshop Report, the *Ruling* clarified that the working groups could operate on the assumption that pole and conduit data access by service area rather than a statewide or centralized database meets this OII's goals.

In conformity with the *Ruling*, the parties established a Track 1 working group, and workshops were held in August and September of 2019. On October 2, 2019, SCE filed the *Track 1 Workshop Report for Workshops Held August 13-14, 2019 and September 6, 2019 (Track 1 Workshop Report)*. Four parties (CalPA, AT&T, ExteNet, and SDG&E) filed opening comments on October 22, 2019. Six parties

⁵ The assigned Commissioner was Michael Picker but following his retirement the proceeding was reassigned to the Commission's new president, Marybel Batjer.

(CalPA, SCE, ExteNet, CCTA, SDG&E, and AT&T) filed reply comments on November 1, 2019.

On February 6, 2020, the Assigned Commissioner issued her *Amended Scoping Memo and Ruling (Amended Scoping Memo)*, which identified the issues for resolution in Track I of the OII.

2. Jurisdiction

The Commission's jurisdiction over utility and communications service facilities is extensive. General Order 95 (Rules for Overhead Electrical Construction) was adopted so the Commission can "formulate, for the State of California, requirements for overhead line design, construction, and maintenance, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general."⁶ General Order 128 (Rules for Construction of Underground Electric Supply and Communication System) was adopted for the Commission to promulgate "uniform requirements for underground electrical supply and communications systems,"⁷ also with the goal of ensuring adequate and safe service. In addition to these two General Orders, the Commission has made it clear in Decision 10-02-034 that there are constitutional, statutory, and judicial authorities that recognize the Commission's broad jurisdiction over utilities with respect to their electrical power and communications facilities:

In later cases, courts have similarly held that matters such as the location, construction and maintenance of telephone lines and electric power poles are matters of state concern, not municipal affairs. (*See, e.g., Pacific Tel. & Tel. Co. v. City and*

⁶ Section I.

⁷ Section I.

County of San Francisco (1959) 51 Cal.2d 766, 768; *Modesto Irrigation District v. City of Modesto* (1962) 210 Cal.App.2d 652, 654-655.) There can be no serious question that we have comprehensive jurisdiction over issues related to the health and safety implications of utility operations within the State of California. (See, e.g., Cal. Const. art. XII, §§ 3 & 6; Pub. Util. Code, §§ 216, 451, 701, 702, 761, 767.5, 768, 768.5, 770, 1001, 2101 & 8001 *et seq.*; *San Diego Gas & Electric Co. v. Superior Court* (1996) 13 Cal.4th 893, 923-924.)⁸

Consistent with this mandate, the Commission opened this proceeding, in part, to consider and adopt rules requiring utility pole owners to create and maintain databases systems in a manner that will enable the Commission to effectively execute its oversight responsibility.

3. Issues Before the Commission

- I. What should be the level of detail required for the following data points that each of the five major California pole owners⁹ shall make available in electronic format as to each pole it owns:
 1. Unique identifier of pole;
 2. Pole location info (e.g., GIS coordinates and/or address);
 3. High Fire Threat District and tier category;
 4. Pole length, class, and material;
 5. Pole installation date;
 6. Name of any other joint owner(s) and the percent ownership of each;
 7. Intrusive test data (i.e., date of last test and test result);
 8. Number of pending attachment applications(s) and/or make-ready work (if available);

⁸ Slip Op at 5-6.

⁹ The five major California pole owners are PG&E, SCE, SDG&E, AT&T, and Frontier.

9. Notice of any pending pole replacement/reinforcement and date (if available); and
 10. Buddy pole info (if available).
- II. How soon after the Commission adopts its OII Track 1 decision must each pole owner provide the pole data points?
 - III. How will each pole owner provide Commission staff with remote electronic access to the pole data points?

4. Discussion

4.1. Database System and Access Capabilities

A review of the *Track 1 Workshop Report* reveals a varying degree of capability and specificity in record-keeping between the five pole owners. When coupled with the fact that each of the pole owners uses a different operating system to categorize and store pole information, it becomes imperative that the Commission establish certain uniform baseline requirements regarding the level of detail provided, information availability, and providing Commission staff remote access to each pole owner's database.

4.1.1. SDG&E

SDG&E states that it uses the Telecommunications Equipment Attachment Systems (TEAMS) portal to provide electronic access to pole data to Communication Infrastructure Providers (CIP). It currently does not provide a Glossary of Terms for the TEAMS portal.

With respect to the 10 proposed data fields, SDG&E states that it currently provides some of this information.

SDG&E also includes a discussion of its map displays and additional pole functionality. To obtain map information, one must submit a mapping request to SDG&E's Electronic Geographic Information System (EGIS). A non-disclosure agreement must be in effect before the request can be fulfilled. A typical map will

cover approximately one street block and may have as much as 10-12 facilities per map.

SDG&E believes it can utilize existing licensing to overlay pole locations on a Google Maps view with TEAMS to show a mapping display of pole location. The information look-up screen in TEAMS could be modified to allow the user to enter in a pole number, address, or latitude/longitude coordinate and then the screen could display the desired area. The user would then have the ability zoom in or zoom out and navigate around the mapping display area.

4.1.2. SCE

SCE uses a SPIDAMin access portal to provide available pole information to qualified third parties. The SPIDAMin portal includes a geo-spatial map that allows the user to select a specific pole and view the available information associated with it. While pole information can be viewed, it cannot be exported.

SCE states that a Glossary of Terms is being considered.

4.1.3. PG&E

PG&E utilizes a Web Portal User Interface that allows registered users the ability to log into the PG&E Joint Use Map Portal (JUMP) system to access information related to PG&E-owned and joint-owned pole data, including pole information on-line, geo-spatial maps to help locate the selected poles (either by street address, pole number, latitude/longitude, or pole intent number), and the capability to copy, save, and/or print any information obtained via the PG&E JUMP Web Portal. A sample of the pole fields that JUMP currently displays includes: pole class; pole height; pole species; SAP equipment identification

number¹⁰; pole install date; circuit voltage; last inspection date; pole circumference; effective circumference; pole work status; visit date; inspection type; test issues; ground level shell average; below ground shell average; wood strength; and inspection result.

PG&E states that it is working on a Glossary of Terms.

4.1.4. Frontier

Frontier states that it does not currently have an accessible portal or electronic pole database system that combines all the identified elements into one place. Instead, requested data is spread across multiple databases: Frontier Outside plant Geographic System (FROG System) and Varasset System (both internal), and NCJPA/ SCJPC (both in the external FRIEND database).

4.1.5. AT&T

AT&T states it is enhancing its Joint Pole Management Tracking System (JPMTS) to add fields for the Track One attributes not currently included, as well as synchronizing multiple data sources by matching pole records where data are available. AT&T hopes these efforts will enable presentation of poles on a map and increase the likelihood of matching AT&T pole records with three respective investor-own utility records.

4.2. Level of detail required for the 10 data points

4.2.1. Unique Identifier of Pole

SDG&E states it utilizes a unique pole number for each pole, which is tagged in the field and associated with the pole record in its database. A CIP can

¹⁰ SAP stands for Systems, Applications & Products in Data Processing, and is shorthand for SAP SE's suite of products, which tracks physical assets of utilities. In this context, it is used as a Distribution Pole Identification Number.

Each utility uses a unique version of SAP or similar programs attuned to their system and needs.

loop up pole information by inserting the pole number into TEAMS. If the entire number is not known, entering a partial number will bring up a list of all possible pole numbers similar to the number entered.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently does not have a unique pole identifier system.

Frontier states this information is accessible in its FROG System. Pole numbers are used to identify and retrieve information.

AT&T states the pole identifier system is a work in progress as internal data sources are linked in order to determine which will be considered the primary.

4.2.1.1. Discussion

Each pole owner should be required to maintain a unique identifier for each of its poles. That should include, at a minimum, and by each service territory, a pole number and address (either street or some other easily identifiable address system).

Geospatial maps shall be utilized to help locate a selected pole.

4.2.2. Pole Location Information

SDG&E states that once the desired pole is selected, the user is taken to the Pole Information Screen where the address and Latitude/Longitude Coordinates are located on TEAMS.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently lacks precise and reliable pole location information.

Frontier states this information is accessible in its FROG System, a database where poles and assets, including latitude and longitude coordinates, can be searched on a map.

AT&T states that limited latitude and longitude data are available.

4.2.2.1. Discussion

Each of the five pole owners must have, at a minimum, a Geographic Information System (GIS) accessible to attachers, pole owners, and Commission staff which includes the address, service territory, latitude/longitude coordinates, and three-dimensional capabilities for locating their poles.

4.2.3. High Fire-Threat District and Tier Category

In the past, SDG&E said it would share what is in the High-Risk Fire Area (HRFA) and the Fire Threat Zone (FTZ). But with the inception of the CPUC's High Fire Threat Districts (HFTD), SDG&E updated the information in SAP to represent HFTD Tier 2 or Tier 3. SDG&E has not updated the Field Name in TEAMS to reflect the tiers, but the data is currently shown.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make high fire threat district and tier category information available in SPIDAMin.

PG&E states that it reports this attribute in the Support Structure Data provided in JUMP.

Frontier states this information is accessible through its FROG System with the use of overlaid shapes.

AT&T states this information is tied to the pole location information, with fire threat zones indicated on a map.

4.2.3.1. Discussion

In Decision 17-12-024,¹¹ the Commission added a new High Fire-Threat District category to General Order 95, which includes three types of HFTD areas:

- **Zone 1** consists of Tier 1 High Hazard Zones (“HHZs”) on the map of Tree Mortality HHZs prepared jointly by the United States Forest Service and the California Department of Forestry and Fire Protection (“CAL FIRE”). Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and represent a direct threat to public safety.
- **Tier 2** consists of areas on the California Public Utilities Commission’s Fire-Threat Map (“CPUC Fire-Threat Map”) where there is an elevated risk for destructive utility-associated wildfires.
- **Tier 3** consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires.

Each of the five pole owners shall utilize the zone and tier definitions to identify the tiers where each of its poles are located.

4.2.4. Pole length, class, and material

SDG&E says it shares pole characteristics such as the Pole Class, Pole Height (Length), and Material on the General Information tab of its portal.

SCE states that it provides this information to qualifying third parties via SCE’s pole information portal, SPIDAMin.

PG&E’s JUMP program tracks its pole attributes information.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS as follows: there is a field that reflects the total length of a pole; class will match ANSI standard as specified

¹¹ Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District.

by the pole manufacturer for each pole; and for material, wood type is not specified or currently tracked, but AT&T anticipates that all poles will be Southern Pine for the foreseeable future.

4.2.4.1.1. Discussion

Each of the five pole owners shall be able to identify each of its poles by class, height, species, material, circumference, latest pole loading information, and circuit voltage. This information shall be accessible via their data portals.

4.2.5. Pole Installation Date

SDG&E does not currently provide this information on TEAMS but instead shares the Startup Date, *i.e.*, the date the pole was originally installed. But if a pole was changed out, this date would not reflect the installation date of the replacement pole. SDG&E states it plans to create a field below the Startup Date on the General Information tab to create a new field called "Date Last Replaced."

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that its JUMP program tracks the pole install date.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS and is indicated by the year of installation, and not by month or day.

4.2.5.1. Discussion

Each of the five pole owners shall maintain records of the year each pole was installed. These records shall be accessible via their data portals.

4.2.6. Name of any other joint owners and the percent ownership of each

SDG&E states it solely owns its poles and does not belong to any Joint Pole Associations. SDG&E does not attach to AT&T or SCE owned poles.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible through its external databases NCJPA and SCJPC.

AT&T states this information exists in JPMTS.

4.2.6.1. Discussion

If it is not already in their possession, each pole owner shall be able to retrieve this information from the Joint Pole Association/Committee (JPA/C). From the issuance of this decision onward, each of the five pole owners shall maintain joint pole ownership information and make that information accessible via their data portals.

4.2.7. Intrusive test data

Under its general information tab, SDG&E states it shares the date of the last intrusive test, the type of test, and the percent remaining strength result.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that it makes this data available in JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this information is tracked outside of JPMTS today and is not easily accessible. It is working to add this data field.

4.2.7.1. Discussion

Each of the five pole owners shall maintain records of the last intrusive test, the type of test, the results of the test, and what corrective action has been or will be taken.

4.2.8. Number of pending attachment applications

SDG&E states that it does not share this information at present but in the future proposes to add a tab to the Pole Information Screen called “Pending App.”

SCE states that it does not provide this information to qualifying third parties via SCE’s pole information portal, SPIDAMin. SCE’s IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make number of pending attachment applications information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its FAR tracker, which houses all current and pending tenant attachment information.

AT&T states it is working to add the data fields and to update the process going forward with the Structure Access Project Management Tool application.

4.2.8.1. Discussion

Each of the five pole owners shall maintain these records, which shall also identify each person (name, address, contact information) who has applied for an attachment application, the date of the attachment application, the pole loading information submitted with the application, and a link to the application.

4.2.9. Notice of any pending pole replacement/reinforcement and date

SDG&E states that it does not share this information at present but proposes to add field in the General Information Tab. The added field will be Pending Replacement, Pending Reinforcement, and Replace/Reinforce Required Date, that date being when the replacement or reinforcement is due according to the Corrective Maintenance Record.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make pending pole replacement information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS but is not typically populated.

4.2.9.1. Discussion

Each of the five pole owners shall maintain these records, which shall also describe the reasons for the replacement or reinforcement, the proposed scope of work, and estimated date for completion.

4.2.10. Buddy pole information

SDG&E states that it does not share this information at present but hopes to incorporate pole transfer information to SAP and to share the information through the TEAMS portal.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. It has a limited amount of buddy pole information which is retained in a spreadsheet, not in SCE's work management system SAP.

PG&E states that while it tracks Buddy Poles, the ability to automatically pull the information and place into JUMP will require further exploration and development.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS.

4.2.10.1. Discussion

Since each of the five pole owners maintains this information, it should not be an impediment for each of them to place it in their respective data portals. To the extent a pole owner claims confidentiality, it shall be up to that owner to file a motion and follow the requirements for claiming confidentiality that are contained in General Order 66-D.

Finally, if a pole owner wishes to dispose of a buddy pole and transfer equipment to a new pole, this information shall be included in the data portal for each buddy pole, and include the date of removal.

5. Timeline for delivery of pole data points

The three IOUs (PG&E, SCE, and SDG&E) state they have existing portals or are developing portals in progress. They contemplate electronic access to the 10 data elements utilizing their portals within one year of the Commission's Track 1 decision, with the exception of SCE and the buddy pole information, which SCE estimates could be made available in SPIDAMin within 18-24 months of the Track 1 decision.

AT&T and Frontier have not yet developed portals but have, instead, identified work plans which address how they would meet the Track 1 goals. AT&T has proposed a two-part approach for accessing pole data. First is Release 1, which is an internal solution accessed by authorized AT&T employees based on their responsibilities. The authorized employee would retrieve the data based on an authorized request following current information request guidelines. AT&T would then send the results in CSV format via e-mail. The second is Release 2 wherein the data would be accessed by authorized persons (such as authorized applicants and Commission staff) via public-facing web portal after establishing an authorized account. AT&T estimates that Release 1 would be

implemented in one year, and Release 2 would be implemented one year after Release 1.

Frontier identified three different data sharing solutions. The first is called the manual process, in which it will manually compile the 10 data sets required by this decision from its four databases identified above and then e mail the information to the requesting entity within 24 hours. The second is called database portal simple query. This solution does not currently exist, but Frontier contemplates creating an external data portal that has a simple query field to search by pole, or multiple poles. The third is database portal GIS, which also does not currently exist. Frontier envisions an external data portal that uses GIS technology similar to the IOU solutions in which pole or polygons can be queried. Frontier estimates that the first solution will take approximately six months to implement, solution two will take approximately 18 months, and solution three will take approximately four years from the Track 1 decision.

5.1.1. Discussion

The Commission finds that it is reasonable for the five pole owners to deliver the pole data points covered by this decision within one year of this decision's issuance. For AT&T, it must have Release 1 and Release 2 completed within one year of this decision's issuance. For Frontier, we will expect it to have its database portal equipped with a functional simple query operational within one year of this decision's issuance, and the database portal GIS operational within two years from the date of this decision's issuance. It is important that the 10 data points are accessible by the same time frame in order to provide authorized persons and Commission staff access to the widest possible information regarding the 6+ million poles in California.

5.2. How to provide Commission staff with remote electronic access to pole data points

There are two options for providing Commission staff with remote electronic access to pole data information. One option is that Commission staff is given an account and protected password in order to log on to a pole owner's account and another option is an Application Programming Interface (API) provided by the utility that enables direct data transfer into the Commission's data systems. The Commission will require that the pole owners offer remote access to their databases with log-in credentials through their web portals. This does not foreclose on further enhancements of Commission access to the five pole owners' databases. Further developments, such as a Web-based API, or other interfaces for transferring data from carriers/IOUs to the Commission, may be proposed and required in the future by the Commission. Such further developments shall be harmonized with actions taken in related proceedings, such as the WMP efforts spearheaded by Wildfire Safety Division.

5.3. The Need for a Glossary of Terms

None of the five pole owners utilizes a Glossary of Terms. While we acknowledge that certain of the five pole owners state that a data glossary is under consideration, the fact remains that, at present, no data glossary currently exists, either used by an individual pole owner or consistently among two or more pole owners. This is a situation that the Commission finds troubling. If persons, including the Commission staff, access a pole owner's data portals, they may come across terms that are, at worst, undefined or, at best, defined differently depending on which website has been accessed. The potential for differing interpretations of data terms could make it difficult for persons,

including Commission staff, to gain a consistent understanding of the terms that each of the five pole owners utilize in their data collection operations.

The Commission requires that the five pole owners strive for uniformity of meanings. It is critical that each pole owner identify and document the data fields in the data portal, which shall include a description, data format, data field type, and other metadata that will enable users to understand and use the data. All data portals shall come equipped with data glossaries where terms are defined. To achieve that end, the Commission finds it will be beneficial for the five pole owners to convene a working group to reach a consensus recommendation for consistent data glossaries, with emphasis on achieving consistency of data elements and data definitions, that does not contradict any active definitions in General Orders.

This working group shall coordinate development of this proceeding's pole data elements and data definitions with the Wildfire Safety Division's implementation of their data strategy for Wildfire Mitigation Plans, including common WMP data taxonomies and schema. Nothing in this proceeding is intended to override or conflict with the WSD's data strategy or implementation of that strategy.

6. Comments on Proposed Decision

The proposed decision of President Batjer in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

7. Assignment of Proceeding

Marybel Batjer is the assigned Commissioner and Robert M. Mason III is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Proposed Track 1 Work Plans have varying levels of detail for how each of the five pole owners proposes to meet the Track 1 requirement that the 10 pole data elements, discussed above in Section 4.2, be made available in electronic format.
2. The three IOUs (i.e. PG&E, SCE and SDG&E) have existing or are developing portals in progress and their work plans establish electronic access to the 10 pole data elements utilizing their portals within 1 year of a Commission Final Decision.
3. AT&T and Frontier have not yet developed portals and their work plans (AT&T's Release 1 and Frontier's Option 1) address how they would meet the Track 1 goals.
4. AT&T's Release 1 would establish electronic access to the 10 pole data elements by email within one business day, within one year of a Commission Final Decision.
5. AT&T's Release 2 would implement an external web portal to Track 1 data one year after Release 1.
6. Frontier's Work Plan includes three pole data sharing solutions identified as Option 1, Option 2, and Option 3.
7. Frontier's Option 1 commits to a manual process to send Track 1 data elements by email within 24 hours, within one year of a Commission Final Decision.

8. Frontier's Option 2 entitled 'Database Portal Simple Query' would provide an external data portal within 18 months after a Commission Final Decision.

9. Frontier's Option 3 entitled 'Database Portal GIS' would provide a GIS portal within four years of a Commission Final Decision.

10. Each of the pole owners has disparate databases and other sources of information for the 10 pole data points for allowing access to information through a secure portal.

Conclusions of Law

1. It is reasonable for the five pole owners to provide pole and conduit data access by service area in order to meet the goals of this Order Instituting Investigation.

2. It is in the public interest to adopt the Proposed Track 1 Work Plans, with the refinements identified in the body of this decision, Sections 4.2-5.2, and Ordering Paragraphs.

3. There is no need for an evidentiary hearing regarding the matters addressed by this decision.

4. It is reasonable to require that the five pole owners to file and serve their Track 1 Work Plans to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters.

5. It is reasonable to conclude that initial electronic access to the pole data shall still be required one year from the date of this decision.

6. It is reasonable to require that the five pole owners develop a Glossary of Terms that consistent of uniform definitions.

7. It is reasonable to conclude that Commission staff be given complete, unrestricted remote access to data in each pole owner's data portal.

O R D E R**IT IS ORDERED** that:

1. The *Track 1 Work Plans* filed by San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas and Electric Company, AT&T, and Frontier Communications of California are approved as modified in Ordering Paragraph 2.

2. The *Track 1 Work Plans* are modified as follows:

- (a) The five pole owners (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, Frontier Communications and AT&T) must each incorporate a data glossary into their respective data portals. The purpose of the data glossary is to identify and document the data fields provided in the data portal, including short description, data format, data field type, and other metadata that will enable users to understand and use the data. All portals shall include Data Glossaries and we require the pole owners shall make sure that wherever feasible, their terms in these glossaries mean the same thing. No terms in any of these Data Glossaries shall contradict terms as defined in the Commission's General Orders.
- (b) The five pole owners must convene a working group to reach a consensus recommendation for the data elements that will use common data definitions.
- (c) The 5 pole owners must reach agreement on the definitions of the terms in the data glossary, working in groups to determine what they currently define as the same and what they define differently.

Examples include:

Pole Loading: All Parties Agree it means ____ [Parties can reference GO 95.]

Height: Some Parties Agree it means ____, but PG&E says it means ____, and SDG&E says it means ____. Parties agree to it meaning ____ or will clearly define the term.

- (d) This task will continue as the Investigation moves into Track 2.
- (e) All 10 pole datapoints of pole data for jointly and solely-owned poles shall be provided through the Data Portals unless the datapoints are specifically allowed to be 'if available' AND are not available. Data for the ten data fields must be searchable and exportable as machine readable data and through the web-based interactive portal.
- (f) The five Pole Owners must convene a working group to develop a consensus recommendation for the method to be used for sharing or synchronizing data for the ten key data elements related to joint-owned poles with the other joint pole owner(s).
- (g) AT&T is required to implement an Electronic Access to Pole Data Portal by one year from the issuance of this decision, and Frontier is required to do so by two years from the date of this decision. This includes similar web-based data portals offered currently by SDG&E through TEAMS.
- (h) All 10 pole datapoints must be searchable by two years from the issuance of this decision via the pole owners Data Portals, including by pole number, latitude/longitude or Address location.
- (i) If poles in the Data Portals do not have locational and identifying information, this capability must be implemented in some form by two years from the date of this decision without exception.

3. Within 60 days of this Decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California are ordered to file and serve their *Track 1 Workplans* to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters for review by the Energy Division (Pacific Gas and Electric Company, Southern California Edison Company, and San Diego

Gas & Electric Company) and by the Communications Division (AT&T and Frontier Communications of California).

4. Initial electronic access to the pole data of each Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California shall be available within one year from the date of this decision.

5. The Commission's staff shall be given unrestricted access to each pole owner's data portal via web portal within one year from the date of this decision, with further options to be discussed in future Tracks of this Proceeding.

6. This proceeding remains open.

This order is effective today.

Dated _____, at San Francisco, California.

Southern California Joint Pole Committee

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June 17, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 12:31 p.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Jeff Williams	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Ms. Tara Andrews	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Peter Castaneda	T-Mobile USA
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 12:31 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened the discussion to CPUC activity and updates. Mr. Serrato stated that discussed last month was the proposed decision in which the members could make comments on and reply to. He stated replies were due June 8th. He stated that some members commented, but he did not believe that the

SCJPC commented as an entity and asked the members about this. The members did not have anything to comment. Mr. Serrato stated that everything was available online for the members to review. He inquired if the members had anything to add in regards to this item. There were no comments to be added at this time.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. Mr. Serrato stated that here the members could make comments about their current work situation due to COVID 19. He asked the members if they had anything to express or make the other members aware of, they could at this time. There were no comments or concerns at this time.

Agenda Item 4 – Miscellaneous –

- Mr. Serrato opened that couple of month ago he suggested drafting up a letter to the members to get permission not specifically to Cal Trans, but to provide to other jurisdictions to let them proceed with their construction, given that they are members of the SCJPC and they follow a process that entails waiting 45 days or obtaining explicit approval. Mr. Serrato drafted a letter which he wanted to review with the members, to see if it covers everything or if they need to add or subtract anything. He asked Ms. Pranata if he could forward her the letter. Ms. Pranata stated he could email her the letter, or she could grant him presenter privilege so he could share it from his computer. Mr. Serrato stated he would email it to her so she could have a copy of the letter to distribute later on. Mr. Serrato asked the members not to worry about the formatting at this time, but rather discuss the verbiage to see if it covers what they need it to. He stated the formatting can come later with the SCJPC letter head and also decide who's contact information would be at the bottom, and perhaps talk about having a list of all the utilities that are current members. Ms. Pranata displayed the letter Mr. Serrato drafted for the members to look over (see attached). Mr. Serrato stated that it was created as basic as possible to not provide so much information. He asked the members to read through the letter and make any comments. Mr. Serrato stated that he wanted to submit this to the membership, and it could be tabled for the next month's Compliance Committee Meeting, so that the members get the chance to take a look at it. His main goal was for everyone to agree on some type of document or letter that they can provide to outside parties to explain their process without giving details about their inner operations. Mr. Brown stated that as much as the letter made sense to him, he was unable to send anything out on SCE's behalf without the attorney looking at it. Mr. Serrato stated that he understood, and they did not have to discuss the letter now. Mr. Serrato asked Ms. Pranata to distribute the letter, possibly with the Compliance Meeting Minutes, so the members can have it to review and discuss at the next month's meeting. Ms. Pranata

stated it will be sent with the meeting minutes. Ms. Black asked what was supposed to go on the first blank space in the second paragraph. Mr. Serrato stated that it should be the members name/company for all the blank lines.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Serrato stated that the members are to take a look at the draft of the letter and come back with their own comments/feedback at the next month's Compliance Committee Meeting.

The meeting adjourned at 12:38 p.m. until July 15, 2020.

Anali Spencer - Committee Staff

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

FILED

05/11/20
11:11 AM

May 11, 2020

Agenda ID #18426
Quasi-Legislative

TO PARTIES OF RECORD IN INVESTIGATION 17-06-027, RULEMAKING 17-06-028:

This is the proposed decision of Commissioner Batjer. Until and unless the Commission hears the item and votes to approve it, the proposed decision has no legal effect. This item may be heard, at the earliest, at the Commission's June 11, 2020 Business Meeting. To confirm when the item will be heard, please see the Business Meeting agenda, which is posted on the Commission's website 10 days before each Business Meeting.

Parties of record may file comments on the proposed decision as provided in Rule 14.3 of the Commission's Rules of Practice and Procedure.

/s/ ANNE E. SIMON

Anne E. Simon
Chief Administrative Law Judge

AES:mph
Attachment

Decision **PROPOSED DECISION OF COMMISSIONER BATJER**
(Mailed 5/11/2020)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation into
the Creation of a Shared Database or
Statewide Census of Utility Poles and
Conduit in California.

Investigation 17-06-027

And Related Matter.

Rulemaking 17-06-028

**DECISION APPROVING TRACK 1 WORKSHOP REPORT WORK PLANS FOR
SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA GAS
COMPANY, PACIFIC GAS AND ELECTRIC COMPANY, AT&T, AND
FRONTIER COMMUNICATIONS OF CALIFORNIA**

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**DECISION APPROVING TRACK 1 WORKSHOP REPORT WORK
PLANS FOR SAN DIEGO GAS AND ELECTRIC COMPANY, SOUTHERN
CALIFORNIA GAS COMPANY, PACIFIC GAS AND ELECTRIC COMPANY,
AT&T, AND FRONTIER COMMUNICATIONS OF CALIFORNIA**

Summary

This decision approves the *Track 1 Work Plans* filed by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T (the five utility pole owners), but with modifications as noted throughout this decision.

This decision requires that each of the five pole owners must incorporate data glossaries with consistent meanings into their respective data portals.

The decision further orders that the five pole owners convene a working group 60 days after the issuance of this decision to reach consensus for the data elements that will use common data definitions.

This proceeding remains open.

Party Acronyms, Abbreviations, and their Meanings

AT&T (Pacific Bell Telephone Company, d/b/a AT&T California, AT&T Mobility [AT&T Mobility Wireless Operations Holdings, Inc., New Cingular Wireless PCS, LLC, and Santa Barbara Cellular Systems, Ltd] and AT&T Corp.

BVES (Bear Valley Electric Service)

CALTEL (California Association of Competitive Telecommunications Companies)

CCTA (California Cable and Telephone Association)

CTIA (CTIA Wireless Association)

CMUA (California Municipal Utility Association)

ExteNet (ExteNet Systems (CA) LLC)

Frontier (Frontier Communications of California)

ORA (Office of Ratepayer Advocates, now known as the Public Advocates Office or CalPA)

PC (PacifiCorp)

PG&E (Pacific Gas and Electric Company)

SCE (Southern California Edison Company)

SDG&E (San Diego Gas & Electric Company)

SED (Safety & Enforcement Division)

Verizon (Cello/MCIMetro)

1. Background

1.1. Factual Background

On June 29, 2017, the Commission issued Investigation 17-06-027 and Rulemaking 17-06-028 (OII/OIR Proceeding) in order to consider strategies for increased and non-discriminatory access to poles and conduit by competitive communications providers, the impact of such increased access on safety, and how best to ensure the integrity of the affected communications and electric supply infrastructure going forward. As part of this OII/OIR proceeding, the Commission expressed its intention to:

- Investigate how best to create a statewide pole census along with the feasibility of a data management platform that will allow stakeholders to share key pole attachment and conduit information;¹
- Consider rules that will allow broadband Internet access service (BIAS) providers to attach facilities to poles and to use conduit following their classification as

¹ OII/OIR proceeding at 1.

public utility telecommunications carriers in the FCC's 2015 *Open Internet Order*;² and

- Consider rules specific to conduit, and better pole management practices.³

SDG&E, SCE, PG&E, Frontier, and AT&T are the five pole owners who, collectively, own between 85-90% of the 6+ million electric and communication utility poles in California.⁴

1.2. Procedural Background

Based on the comments the parties made at the December 5, 2017 Prehearing Conference (PHC), on January 11, 2018, the assigned Commissioner and the assigned Administrative Law Judge issued a *Ruling Requesting Comments on Creation of Shared, Statewide Database of Utility Pole and Conduit Information*. The following parties filed and served comments: AT&T, BVES, California association of Competitive Telecommunications Companies (CALTEL), CCTA, CTIA, ExteNet, CalPA, PC, PG&E, SCE, and SoCalGas

The Assigned Commissioner issued his *Scoping Memo and Ruling (Scoping Memo)* on August 8, 2018, setting forth the category, issues, schedules, and other matters related to the OII Phase I Scope, allowing for collaborative workshops at which the Commission would present potential Use Cases for a pole database,

² *In re Protecting and Promoting an Open Internet*, Federal Communications Commission (FCC) Report and Order, 30 FCC Rcd 5601 (March 2015) (*Open Internet Order*), at 478-85. The FCC later reversed the *Open Internet Order* on December 14, 2017.

³ OII/OIR proceeding at 1.

⁴ See responses from SDG&E, SCE, PG&E, Frontier, and AT&T to the Commission's Data Request, dated January 27, 2017, which asked, among other things, that each respondent identify the number of utility poles in California that are owned either solely or jointly, or on which they lease space.

initiate dialogue, and collect input and feedback to refine the Use Cases and data fields critical to defined uses.⁵

The workshops were held on November 15, 2018, January 22, and January 23, 2019. A *Workshop Report* was filed and served on February 28, 2019, that detailed the parties' efforts, recommendations and concerns. Of note, the *Workshop Report* recommended that the Commission authorize the creation of working groups that would be tasked with developing the detailed requirements based on the following three tracks for the OII Proceeding: Track 1 (Pole Data), Track 2 (Pole Attachment Data), and Track 3 (Conduit Data). Four parties (SDG&E, SCE, AT&T, and ExteNet) filed opening comments on March 29, 2019. Six parties (SCE, CCTA, CalPA, AT&T, ExteNet, and CALTEL) filed reply comments on April 19, 2019.

On June 4, 2019, the ALJ issued his *Ruling Approving Recommendations/Next Steps from the Southern California Edison Workshop Report for Workshops Held on November 15, 2018 and January 22-23, 2019 (Ruling)*. In response to party comments to the Workshop Report, the *Ruling* clarified that the working groups could operate on the assumption that pole and conduit data access by service area rather than a statewide or centralized database meets this OII's goals.

In conformity with the *Ruling*, the parties established a Track 1 working group, and workshops were held in August and September of 2019. On October 2, 2019, SCE filed the *Track 1 Workshop Report for Workshops Held August 13-14, 2019 and September 6, 2019 (Track 1 Workshop Report)*. Four parties (CalPA, AT&T, ExteNet, and SDG&E) filed opening comments on October 22, 2019. Six parties

⁵ The assigned Commissioner was Michael Picker but following his retirement the proceeding was reassigned to the Commission's new president, Marybel Batjer.

(CalPA, SCE, ExteNet, CCTA, SDG&E, and AT&T) filed reply comments on November 1, 2019.

On February 6, 2020, the Assigned Commissioner issued her *Amended Scoping Memo and Ruling (Amended Scoping Memo)*, which identified the issues for resolution in Track I of the OII.

2. Jurisdiction

The Commission's jurisdiction over utility and communications service facilities is extensive. General Order 95 (Rules for Overhead Electrical Construction) was adopted so the Commission can "formulate, for the State of California, requirements for overhead line design, construction, and maintenance, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general."⁶ General Order 128 (Rules for Construction of Underground Electric Supply and Communication System) was adopted for the Commission to promulgate "uniform requirements for underground electrical supply and communications systems,"⁷ also with the goal of ensuring adequate and safe service. In addition to these two General Orders, the Commission has made it clear in Decision 10-02-034 that there are constitutional, statutory, and judicial authorities that recognize the Commission's broad jurisdiction over utilities with respect to their electrical power and communications facilities:

In later cases, courts have similarly held that matters such as the location, construction and maintenance of telephone lines and electric power poles are matters of state concern, not municipal affairs. (*See, e.g., Pacific Tel. & Tel. Co. v. City and*

⁶ Section I.

⁷ Section I.

County of San Francisco (1959) 51 Cal.2d 766, 768; *Modesto Irrigation District v. City of Modesto* (1962) 210 Cal.App.2d 652, 654-655.) There can be no serious question that we have comprehensive jurisdiction over issues related to the health and safety implications of utility operations within the State of California. (See, e.g., Cal. Const. art. XII, §§ 3 & 6; Pub. Util. Code, §§ 216, 451, 701, 702, 761, 767.5, 768, 768.5, 770, 1001, 2101 & 8001 *et seq.*; *San Diego Gas & Electric Co. v. Superior Court* (1996) 13 Cal.4th 893, 923-924.)⁸

Consistent with this mandate, the Commission opened this proceeding, in part, to consider and adopt rules requiring utility pole owners to create and maintain databases systems in a manner that will enable the Commission to effectively execute its oversight responsibility.

3. Issues Before the Commission

- I. What should be the level of detail required for the following data points that each of the five major California pole owners⁹ shall make available in electronic format as to each pole it owns:
 1. Unique identifier of pole;
 2. Pole location info (e.g., GIS coordinates and/or address);
 3. High Fire Threat District and tier category;
 4. Pole length, class, and material;
 5. Pole installation date;
 6. Name of any other joint owner(s) and the percent ownership of each;
 7. Intrusive test data (i.e., date of last test and test result);
 8. Number of pending attachment applications(s) and/or make-ready work (if available);

⁸ Slip Op at 5-6.

⁹ The five major California pole owners are PG&E, SCE, SDG&E, AT&T, and Frontier.

9. Notice of any pending pole replacement/reinforcement and date (if available); and
 10. Buddy pole info (if available).
- II. How soon after the Commission adopts its OII Track 1 decision must each pole owner provide the pole data points?
 - III. How will each pole owner provide Commission staff with remote electronic access to the pole data points?

4. Discussion

4.1. Database System and Access Capabilities

A review of the *Track 1 Workshop Report* reveals a varying degree of capability and specificity in record-keeping between the five pole owners. When coupled with the fact that each of the pole owners uses a different operating system to categorize and store pole information, it becomes imperative that the Commission establish certain uniform baseline requirements regarding the level of detail provided, information availability, and providing Commission staff remote access to each pole owner's database.

4.1.1. SDG&E

SDG&E states that it uses the Telecommunications Equipment Attachment Systems (TEAMS) portal to provide electronic access to pole data to Communication Infrastructure Providers (CIP). It currently does not provide a Glossary of Terms for the TEAMS portal.

With respect to the 10 proposed data fields, SDG&E states that it currently provides some of this information.

SDG&E also includes a discussion of its map displays and additional pole functionality. To obtain map information, one must submit a mapping request to SDG&E's Electronic Geographic Information System (EGIS). A non-disclosure agreement must be in effect before the request can be fulfilled. A typical map will

cover approximately one street block and may have as much as 10-12 facilities per map.

SDG&E believes it can utilize existing licensing to overlay pole locations on a Google Maps view with TEAMS to show a mapping display of pole location. The information look-up screen in TEAMS could be modified to allow the user to enter in a pole number, address, or latitude/longitude coordinate and then the screen could display the desired area. The user would then have the ability zoom in or zoom out and navigate around the mapping display area.

4.1.2. SCE

SCE uses a SPIDAMin access portal to provide available pole information to qualified third parties. The SPIDAMin portal includes a geo-spatial map that allows the user to select a specific pole and view the available information associated with it. While pole information can be viewed, it cannot be exported.

SCE states that a Glossary of Terms is being considered.

4.1.3. PG&E

PG&E utilizes a Web Portal User Interface that allows registered users the ability to log into the PG&E Joint Use Map Portal (JUMP) system to access information related to PG&E-owned and joint-owned pole data, including pole information on-line, geo-spatial maps to help locate the selected poles (either by street address, pole number, latitude/longitude, or pole intent number), and the capability to copy, save, and/or print any information obtained via the PG&E JUMP Web Portal. A sample of the pole fields that JUMP currently displays includes: pole class; pole height; pole species; SAP equipment identification

number¹⁰; pole install date; circuit voltage; last inspection date; pole circumference; effective circumference; pole work status; visit date; inspection type; test issues; ground level shell average; below ground shell average; wood strength; and inspection result.

PG&E states that it is working on a Glossary of Terms.

4.1.4. Frontier

Frontier states that it does not currently have an accessible portal or electronic pole database system that combines all the identified elements into one place. Instead, requested data is spread across multiple databases: Frontier Outside plant Geographic System (FROG System) and Varasset System (both internal), and NCJPA/ SCJPC (both in the external FRIEND database).

4.1.5. AT&T

AT&T states it is enhancing its Joint Pole Management Tracking System (JPMTS) to add fields for the Track One attributes not currently included, as well as synchronizing multiple data sources by matching pole records where data are available. AT&T hopes these efforts will enable presentation of poles on a map and increase the likelihood of matching AT&T pole records with three respective investor-own utility records.

4.2. Level of detail required for the 10 data points

4.2.1. Unique Identifier of Pole

SDG&E states it utilizes a unique pole number for each pole, which is tagged in the field and associated with the pole record in its database. A CIP can

¹⁰ SAP stands for Systems, Applications & Products in Data Processing, and is shorthand for SAP SE's suite of products, which tracks physical assets of utilities. In this context, it is used as a Distribution Pole Identification Number.

Each utility uses a unique version of SAP or similar programs attuned to their system and needs.

loop up pole information by inserting the pole number into TEAMS. If the entire number is not known, entering a partial number will bring up a list of all possible pole numbers similar to the number entered.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently does not have a unique pole identifier system.

Frontier states this information is accessible in its FROG System. Pole numbers are used to identify and retrieve information.

AT&T states the pole identifier system is a work in progress as internal data sources are linked in order to determine which will be considered the primary.

4.2.1.1. Discussion

Each pole owner should be required to maintain a unique identifier for each of its poles. That should include, at a minimum, and by each service territory, a pole number and address (either street or some other easily identifiable address system).

Geospatial maps shall be utilized to help locate a selected pole.

4.2.2. Pole Location Information

SDG&E states that once the desired pole is selected, the user is taken to the Pole Information Screen where the address and Latitude/Longitude Coordinates are located on TEAMS.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently lacks precise and reliable pole location information.

Frontier states this information is accessible in its FROG System, a database where poles and assets, including latitude and longitude coordinates, can be searched on a map.

AT&T states that limited latitude and longitude data are available.

4.2.2.1. Discussion

Each of the five pole owners must have, at a minimum, a Geographic Information System (GIS) accessible to attachers, pole owners, and Commission staff which includes the address, service territory, latitude/longitude coordinates, and three-dimensional capabilities for locating their poles.

4.2.3. High Fire-Threat District and Tier Category

In the past, SDG&E said it would share what is in the High-Risk Fire Area (HRFA) and the Fire Threat Zone (FTZ). But with the inception of the CPUC's High Fire Threat Districts (HFTD), SDG&E updated the information in SAP to represent HFTD Tier 2 or Tier 3. SDG&E has not updated the Field Name in TEAMS to reflect the tiers, but the data is currently shown.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make high fire threat district and tier category information available in SPIDAMin.

PG&E states that it reports this attribute in the Support Structure Data provided in JUMP.

Frontier states this information is accessible through its FROG System with the use of overlaid shapes.

AT&T states this information is tied to the pole location information, with fire threat zones indicated on a map.

4.2.3.1. Discussion

In Decision 17-12-024,¹¹ the Commission added a new High Fire-Threat District category to General Order 95, which includes three types of HFTD areas:

- **Zone 1** consists of Tier 1 High Hazard Zones (“HHZs”) on the map of Tree Mortality HHZs prepared jointly by the United States Forest Service and the California Department of Forestry and Fire Protection (“CAL FIRE”). Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and represent a direct threat to public safety.
- **Tier 2** consists of areas on the California Public Utilities Commission’s Fire-Threat Map (“CPUC Fire-Threat Map”) where there is an elevated risk for destructive utility-associated wildfires.
- **Tier 3** consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires.

Each of the five pole owners shall utilize the zone and tier definitions to identify the tiers where each of its poles are located.

4.2.4. Pole length, class, and material

SDG&E says it shares pole characteristics such as the Pole Class, Pole Height (Length), and Material on the General Information tab of its portal.

SCE states that it provides this information to qualifying third parties via SCE’s pole information portal, SPIDAMin.

PG&E’s JUMP program tracks its pole attributes information.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS as follows: there is a field that reflects the total length of a pole; class will match ANSI standard as specified

¹¹ Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District.

by the pole manufacturer for each pole; and for material, wood type is not specified or currently tracked, but AT&T anticipates that all poles will be Southern Pine for the foreseeable future.

4.2.4.1.1. Discussion

Each of the five pole owners shall be able to identify each of its poles by class, height, species, material, circumference, latest pole loading information, and circuit voltage. This information shall be accessible via their data portals.

4.2.5. Pole Installation Date

SDG&E does not currently provide this information on TEAMS but instead shares the Startup Date, *i.e.*, the date the pole was originally installed. But if a pole was changed out, this date would not reflect the installation date of the replacement pole. SDG&E states it plans to create a field below the Startup Date on the General Information tab to create a new field called "Date Last Replaced."

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that its JUMP program tracks the pole install date.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS and is indicated by the year of installation, and not by month or day.

4.2.5.1. Discussion

Each of the five pole owners shall maintain records of the year each pole was installed. These records shall be accessible via their data portals.

4.2.6. Name of any other joint owners and the percent ownership of each

SDG&E states it solely owns its poles and does not belong to any Joint Pole Associations. SDG&E does not attach to AT&T or SCE owned poles.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible through its external databases NCJPA and SCJPC.

AT&T states this information exists in JPMTS.

4.2.6.1. Discussion

If it is not already in their possession, each pole owner shall be able to retrieve this information from the Joint Pole Association/Committee (JPA/C). From the issuance of this decision onward, each of the five pole owners shall maintain joint pole ownership information and make that information accessible via their data portals.

4.2.7. Intrusive test data

Under its general information tab, SDG&E states it shares the date of the last intrusive test, the type of test, and the percent remaining strength result.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that it makes this data available in JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this information is tracked outside of JPMTS today and is not easily accessible. It is working to add this data field.

4.2.7.1. Discussion

Each of the five pole owners shall maintain records of the last intrusive test, the type of test, the results of the test, and what corrective action has been or will be taken.

4.2.8. Number of pending attachment applications

SDG&E states that it does not share this information at present but in the future proposes to add a tab to the Pole Information Screen called “Pending App.”

SCE states that it does not provide this information to qualifying third parties via SCE’s pole information portal, SPIDAMin. SCE’s IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make number of pending attachment applications information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its FAR tracker, which houses all current and pending tenant attachment information.

AT&T states it is working to add the data fields and to update the process going forward with the Structure Access Project Management Tool application.

4.2.8.1. Discussion

Each of the five pole owners shall maintain these records, which shall also identify each person (name, address, contact information) who has applied for an attachment application, the date of the attachment application, the pole loading information submitted with the application, and a link to the application.

4.2.9. Notice of any pending pole replacement/reinforcement and date

SDG&E states that it does not share this information at present but proposes to add field in the General Information Tab. The added field will be Pending Replacement, Pending Reinforcement, and Replace/Reinforce Required Date, that date being when the replacement or reinforcement is due according to the Corrective Maintenance Record.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make pending pole replacement information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS but is not typically populated.

4.2.9.1. Discussion

Each of the five pole owners shall maintain these records, which shall also describe the reasons for the replacement or reinforcement, the proposed scope of work, and estimated date for completion.

4.2.10. Buddy pole information

SDG&E states that it does not share this information at present but hopes to incorporate pole transfer information to SAP and to share the information through the TEAMS portal.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. It has a limited amount of buddy pole information which is retained in a spreadsheet, not in SCE's work management system SAP.

PG&E states that while it tracks Buddy Poles, the ability to automatically pull the information and place into JUMP will require further exploration and development.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS.

4.2.10.1. Discussion

Since each of the five pole owners maintains this information, it should not be an impediment for each of them to place it in their respective data portals. To the extent a pole owner claims confidentiality, it shall be up to that owner to file a motion and follow the requirements for claiming confidentiality that are contained in General Order 66-D.

Finally, if a pole owner wishes to dispose of a buddy pole and transfer equipment to a new pole, this information shall be included in the data portal for each buddy pole, and include the date of removal.

5. Timeline for delivery of pole data points

The three IOUs (PG&E, SCE, and SDG&E) state they have existing portals or are developing portals in progress. They contemplate electronic access to the 10 data elements utilizing their portals within one year of the Commission's Track 1 decision, with the exception of SCE and the buddy pole information, which SCE estimates could be made available in SPIDAMin within 18-24 months of the Track 1 decision.

AT&T and Frontier have not yet developed portals but have, instead, identified work plans which address how they would meet the Track 1 goals. AT&T has proposed a two-part approach for accessing pole data. First is Release 1, which is an internal solution accessed by authorized AT&T employees based on their responsibilities. The authorized employee would retrieve the data based on an authorized request following current information request guidelines. AT&T would then send the results in CSV format via e-mail. The second is Release 2 wherein the data would be accessed by authorized persons (such as authorized applicants and Commission staff) via public-facing web portal after establishing an authorized account. AT&T estimates that Release 1 would be

implemented in one year, and Release 2 would be implemented one year after Release 1.

Frontier identified three different data sharing solutions. The first is called the manual process, in which it will manually compile the 10 data sets required by this decision from its four databases identified above and then e mail the information to the requesting entity within 24 hours. The second is called database portal simple query. This solution does not currently exist, but Frontier contemplates creating an external data portal that has a simple query field to search by pole, or multiple poles. The third is database portal GIS, which also does not currently exist. Frontier envisions an external data portal that uses GIS technology similar to the IOU solutions in which pole or polygons can be queried. Frontier estimates that the first solution will take approximately six months to implement, solution two will take approximately 18 months, and solution three will take approximately four years from the Track 1 decision.

5.1.1. Discussion

The Commission finds that it is reasonable for the five pole owners to deliver the pole data points covered by this decision within one year of this decision's issuance. For AT&T, it must have Release 1 and Release 2 completed within one year of this decision's issuance. For Frontier, we will expect it to have its database portal equipped with a functional simple query operational within one year of this decision's issuance, and the database portal GIS operational within two years from the date of this decision's issuance. It is important that the 10 data points are accessible by the same time frame in order to provide authorized persons and Commission staff access to the widest possible information regarding the 6+ million poles in California.

5.2. How to provide Commission staff with remote electronic access to pole data points

There are two options for providing Commission staff with remote electronic access to pole data information. One option is that Commission staff is given an account and protected password in order to log on to a pole owner's account and another option is an Application Programming Interface (API) provided by the utility that enables direct data transfer into the Commission's data systems. The Commission will require that the pole owners offer remote access to their databases with log-in credentials through their web portals. This does not foreclose on further enhancements of Commission access to the five pole owners' databases. Further developments, such as a Web-based API, or other interfaces for transferring data from carriers/IOUs to the Commission, may be proposed and required in the future by the Commission. Such further developments shall be harmonized with actions taken in related proceedings, such as the WMP efforts spearheaded by Wildfire Safety Division.

5.3. The Need for a Glossary of Terms

None of the five pole owners utilizes a Glossary of Terms. While we acknowledge that certain of the five pole owners state that a data glossary is under consideration, the fact remains that, at present, no data glossary currently exists, either used by an individual pole owner or consistently among two or more pole owners. This is a situation that the Commission finds troubling. If persons, including the Commission staff, access a pole owner's data portals, they may come across terms that are, at worst, undefined or, at best, defined differently depending on which website has been accessed. The potential for differing interpretations of data terms could make it difficult for persons,

including Commission staff, to gain a consistent understanding of the terms that each of the five pole owners utilize in their data collection operations.

The Commission requires that the five pole owners strive for uniformity of meanings. It is critical that each pole owner identify and document the data fields in the data portal, which shall include a description, data format, data field type, and other metadata that will enable users to understand and use the data. All data portals shall come equipped with data glossaries where terms are defined. To achieve that end, the Commission finds it will be beneficial for the five pole owners to convene a working group to reach a consensus recommendation for consistent data glossaries, with emphasis on achieving consistency of data elements and data definitions, that does not contradict any active definitions in General Orders.

This working group shall coordinate development of this proceeding's pole data elements and data definitions with the Wildfire Safety Division's implementation of their data strategy for Wildfire Mitigation Plans, including common WMP data taxonomies and schema. Nothing in this proceeding is intended to override or conflict with the WSD's data strategy or implementation of that strategy.

6. Comments on Proposed Decision

The proposed decision of President Batjer in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on _____, and reply comments were filed on _____ by _____.

7. Assignment of Proceeding

Marybel Batjer is the assigned Commissioner and Robert M. Mason III is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Proposed Track 1 Work Plans have varying levels of detail for how each of the five pole owners proposes to meet the Track 1 requirement that the 10 pole data elements, discussed above in Section 4.2, be made available in electronic format.
2. The three IOUs (i.e. PG&E, SCE and SDG&E) have existing or are developing portals in progress and their work plans establish electronic access to the 10 pole data elements utilizing their portals within 1 year of a Commission Final Decision.
3. AT&T and Frontier have not yet developed portals and their work plans (AT&T's Release 1 and Frontier's Option 1) address how they would meet the Track 1 goals.
4. AT&T's Release 1 would establish electronic access to the 10 pole data elements by email within one business day, within one year of a Commission Final Decision.
5. AT&T's Release 2 would implement an external web portal to Track 1 data one year after Release 1.
6. Frontier's Work Plan includes three pole data sharing solutions identified as Option 1, Option 2, and Option 3.
7. Frontier's Option 1 commits to a manual process to send Track 1 data elements by email within 24 hours, within one year of a Commission Final Decision.

8. Frontier's Option 2 entitled 'Database Portal Simple Query' would provide an external data portal within 18 months after a Commission Final Decision.

9. Frontier's Option 3 entitled 'Database Portal GIS' would provide a GIS portal within four years of a Commission Final Decision.

10. Each of the pole owners has disparate databases and other sources of information for the 10 pole data points for allowing access to information through a secure portal.

Conclusions of Law

1. It is reasonable for the five pole owners to provide pole and conduit data access by service area in order to meet the goals of this Order Instituting Investigation.

2. It is in the public interest to adopt the Proposed Track 1 Work Plans, with the refinements identified in the body of this decision, Sections 4.2-5.2, and Ordering Paragraphs.

3. There is no need for an evidentiary hearing regarding the matters addressed by this decision.

4. It is reasonable to require that the five pole owners to file and serve their Track 1 Work Plans to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters.

5. It is reasonable to conclude that initial electronic access to the pole data shall still be required one year from the date of this decision.

6. It is reasonable to require that the five pole owners develop a Glossary of Terms that consistent of uniform definitions.

7. It is reasonable to conclude that Commission staff be given complete, unrestricted remote access to data in each pole owner's data portal.

O R D E R**IT IS ORDERED** that:

1. The *Track 1 Work Plans* filed by San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas and Electric Company, AT&T, and Frontier Communications of California are approved as modified in Ordering Paragraph 2.

2. The *Track 1 Work Plans* are modified as follows:

- (a) The five pole owners (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, Frontier Communications and AT&T) must each incorporate a data glossary into their respective data portals. The purpose of the data glossary is to identify and document the data fields provided in the data portal, including short description, data format, data field type, and other metadata that will enable users to understand and use the data. All portals shall include Data Glossaries and we require the pole owners shall make sure that wherever feasible, their terms in these glossaries mean the same thing. No terms in any of these Data Glossaries shall contradict terms as defined in the Commission's General Orders.
- (b) The five pole owners must convene a working group to reach a consensus recommendation for the data elements that will use common data definitions.
- (c) The 5 pole owners must reach agreement on the definitions of the terms in the data glossary, working in groups to determine what they currently define as the same and what they define differently.

Examples include:

Pole Loading: All Parties Agree it means ____ [Parties can reference GO 95.]

Height: Some Parties Agree it means ____, but PG&E says it means ____, and SDG&E says it means ____. Parties agree to it meaning ____ or will clearly define the term.

- (d) This task will continue as the Investigation moves into Track 2.
- (e) All 10 pole datapoints of pole data for jointly and solely-owned poles shall be provided through the Data Portals unless the datapoints are specifically allowed to be 'if available' AND are not available. Data for the ten data fields must be searchable and exportable as machine readable data and through the web-based interactive portal.
- (f) The five Pole Owners must convene a working group to develop a consensus recommendation for the method to be used for sharing or synchronizing data for the ten key data elements related to joint-owned poles with the other joint pole owner(s).
- (g) AT&T is required to implement an Electronic Access to Pole Data Portal by one year from the issuance of this decision, and Frontier is required to do so by two years from the date of this decision. This includes similar web-based data portals offered currently by SDG&E through TEAMS.
- (h) All 10 pole datapoints must be searchable by two years from the issuance of this decision via the pole owners Data Portals, including by pole number, latitude/longitude or Address location.
- (i) If poles in the Data Portals do not have locational and identifying information, this capability must be implemented in some form by two years from the date of this decision without exception.

3. Within 60 days of this Decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California are ordered to file and serve their *Track 1 Workplans* to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters for review by the Energy Division (Pacific Gas and Electric Company, Southern California Edison Company, and San Diego

Gas & Electric Company) and by the Communications Division (AT&T and Frontier Communications of California).

4. Initial electronic access to the pole data of each Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California shall be available within one year from the date of this decision.

5. The Commission's staff shall be given unrestricted access to each pole owner's data portal via web portal within one year from the date of this decision, with further options to be discussed in future Tracks of this Proceeding.

6. This proceeding remains open.

This order is effective today.

Dated _____, at San Francisco, California.

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a member of the Southern California Joint Pole Committee (SCJPC), _____ maintains attachment rights, and the authorization to engage in construction, on distribution/communication poles with an established joint-ownership record, between other members of the SCJPC.

For distribution/communication poles in which a _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization (JPA Form 2), to the appropriate pole owners(s).

The attached list of sites includes JPA submittal dates. As per SCJPA guidelines, a JPA becomes valid after 45-days (calendar) have elapsed, from the date in which the JPA was submitted.

The SCJPC Routine Handbook is confidential, and accessible only to those members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of Crown Castle NG West with the SCJPC.

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
San Dimas, CA 91773
Phone (909) 599-3801
Fax (909) 599-3825

July 15, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 11:20 a.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Mr. Earle Carrion	Crown Castle NG West Inc.
Mr. Aarize Dizon	Crown Castle NG West Inc.
Mr. Hector Aguilera	Crown Castle NG West Inc.
Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Jeff Williams	City of Los Angeles – DWP
Mr. Jamie Garcia	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Glenn Leckie	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Mr. Todd Dailey	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Ms. Veronica Craghead	City of Banning
Mr. Racheal Torres	Mobilitie, LLC
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Ms. Mary Li	City of Anaheim
Mr. Pedro Garganera	MCI Metro ATS/MCI Telecommunications
Mr. Hugo Murillo	City of Burbank
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 11:20 a.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)
– Mr. Serrato opened the discussion to CPUC activity and updates. Mr. Serrato inquired if the members had anything to add in regards to this item. Mr. Brown stated that they are working on a glossary of terms for the CPUC. They are to meet on that today. Mr. Plaskey is involved with that as well. Mr. Plaskey stated that the CPUC has not finalized a ruling yet, and they are putting a glossary of terms and definitions, so they are all talking the same language. He stated that he has not heard anything official on the OII being finalized yet.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. Mr. Serrato stated that here the members could make comments about their current work situation due to COVID 19. He asked the members if they had anything to express or make the other members aware of, they could at this time. There were no comments or concerns at this time.

Agenda Item 4 – Miscellaneous –

- Mr. Serrato opened that a couple of month ago they were talking about the need for a letter that the committee could agree on so it could be provided to jurisdictions so they can work on poles that they are applying to/already owners on. Last month a draft was provided for the members to read through and comment. He stated that he only received feedback from SCE, who took it to their legal to look at. He then asked the members to review the letter with SCE’s feedback (see attached), after they could comment on it. He stated that what SCE added looked good to him. The primary goal was to have this available at the SCJPC website on the internal side so the members can log in to utilize. Members would update to add their information and provide to other parties to allow them the authorization to work on poles. Mr. Bacon inquired if this is to satisfy city agencies for the cities that require them to produce a joint pole agreement, so they know they are running their AGF? units and conduits up a pole. Mr. Serrato stated that it should be able to be used for that as well, but the idea was to not provide the confidential documents that are in the Routine Handbook. This letter is to state that what is in the Routine Handbook is confidential, but that they do have authorization to do the work that they need to. Mr. Bacon stated his concern with this is that the form will become generic. He asked if there was a specification for the actual JPA number on the form. Mr. Serrato stated that if it is not on there already, they can add it. The idea is that is they should be able to provide the application number, pole numbers, and some contact information if

someone needs to verify that it's true. Mr. Brown stated that some contractors may mass produce these without any numbers to back up and make them accountable with the checklist. The city agencies are trying to keep them from not going through the right permitting process, keeping them with the check and balance. Mr. Bacon stated that he would like to see the JPA number associated with this. Mr. Williams concern about adding the JPA number is they will want to see the JPA and providing them the JPA will bring up way more questions and make them want to see the agreement. Mr. Carrion stated that they have already been asking that and have folks within the agencies outside of the committee asking for the Form 2's despite the fact that they may not understand what is on it. He is with Mr. Williams on trying to put it in such a way where they wouldn't have to provide it because it is none of their business and on their side they know that they should be operating under the rules within the handbook. He further stated that any other discussion on the point of this letter they should keep that in mind. Mr. Williams stated that was kind of his point, that if they are going to give them a JPA number then they might as well give them the JPA. Mr. Bacon asked if this becomes a standard document then this is a golden ticket for them to say they belong/say they are associated with the SCJPC and say they can attach to any pole they want. Mr. Serrato suggested if maybe they can provide a list of all the members. Mr. Van Stryk suggested adding the pole tags. Mr. Carrion stated that being a member of the committee gives them the right to be able to make attachments on utility poles in the public right of way, given the fact that they perform within the rules of the Routine Handbook. The letter is not a to be misconstrued as a golden ticket to allow them to bypass what they are supposed to do JPA wise, it is just to satisfy the outside party saying they are a member of the committee. Mr. Brown stated that as their amendment says if approved, just because they have the letter and they are part of the committee it does not give them the right to attach the pole, hence unauthorized attachments. Mr. Carrion stated this is just to tell them that they are part of this committee and they are allowed to attach on the poles, without telling them that they have a process that they are not allowed to see. They will then ask to many questions. Mr. Brown stated that they do have the right to request to attach to a pole. Mr. Carrion stated that that is as far as it should go looking at it from a perspective of someone who is not part of the committee. Mr. Bacon asked what is wrong with presenting a signed JPA to the authorities requesting it, as opposed to pulling out the letter saying they are covered. He asked if it is a timing issue. Mr. Serrato stated that as of now they are not allowed, and the other option would making would be to make it not confidential and provide anything from the Routine Handbook to any agency that requests it. He further stated that he believes there are more implications if they do go that route. Mr. Brown stated that like Mr. Williams stated, they would explain a JPA to them and if there is changes out in the field, they have to keep them abreast of the changes

with a Form 7. Mr. Brown stated that what SCE provides them is a JPA number to the poles, who the joint owners are on that pole, and who is the responsible party to PTD on the JPA, which is what they put on their permits. Mr. Bacon stated that he understands and that as members they shouldn't have to run through hurdles to attach to a pole. Mr. Bacon wanted to know how they keep the many contractors working for the cell companies from bypassing the system and using this. Mr. Van Stryk suggested adding an approval or signature line. Mr. Serrato stated that that would be two signatures needed and he doesn't think it would be efficient. Mr. Van Stryk stated that would keep us away from needing to show them the Form 2. Mr. Plaskey stated they have not had this issue and asked if they can't just have their legal team go down and talk to them saying they are a member just like all the other companies. Mr. Carrion stated they have gone that route trying to explain the JPA process and it is like talking to a brick wall. Mr. Carrion stated that this letter is not to give to other members. It is to give to the outside third party and/or government agency that is not a member and doesn't understand their process. Crown Castle has applied to do work down the street and they ask if they have permission from the pole owner, to do work on these poles. The answer is yes being part of the committee. the letter is stating this, while on the members side they know that they have an entire process to abide by to be able to attach, which is the part that they don't need to know. Mr. Brown stated that he has had the conversation with the City of Torrance, Palos Verdes and they named Crown Castle specifically, if they can attach to SCE's poles. He then goes down the road of explaining that SCE is the base owner who set the pole, but everybody who is a member of the committee has the right to attach to the pole if they are approved. Mr. Brown said that talking to the cities has worked for SCE. He stated that he gets phone calls asking if they give permission for someone to attach to the pole and he has to tell them through the JPA process once its approved they do. Mr. Carrion stated that he thinks the call is full circle after Crown Castle has tried to explain they are part of the committee and allowed to attach to the poles as joint owners and the then they call Mr. Brown to verify. He believes if the members can all agree on a document similar to the letter it will resolve this. Ms. Black stated that she supports Crown Castle and it was AT&T California that brought this up recently because it was Cal Trans that would not allow them to go in and remove a pole. She told Mr. Plaskey if Frontier is not having this happen yet, that AT&T California is going to be shut down by Cal Trans until they can prove that they have the right to go in there and remove the pole butts, and that is a problem. She stated that on the second paragraph of the letter she would not like to move forward with SCE's edits because it will then make them prove that it has been approved. She brought up not knowing why they cannot present the JPA paperwork, maybe they can redact, or maybe it is possible to present a copy of the pole card and give the JPA name. She stated they need some kind of solution, otherwise their buddy poles are

going to get out of control if they cannot do the work. Mr. Bacon stated that he agrees that they are members and they should have a member card that exonerates them from any of this. He liked the suggestion of a pole card, to give them something similar to the letter saying they are members and they shouldn't have to go through all that. Mr. Williams stated that he does not believe the letter gives them a golden ticket because they still have to follow the Routine Handbook and do a Form 2. If they don't have it, it is an illegal attachment and there will be penalties. Mr. Williams suggested maybe something can be put in the letter to state that fact. He does not see the letter as giving anybody carte blanche to do what they want because of our other processes. Mr. Van Stryk stated then they have to find the person attached and get them to take it all down, try to figure it all out, which is a lot of work. Ms. Black asked if they could determine if the pole card is something they could present, and the only problem would be on a Section 4.0 where the member is not on the pole card. She further stated that it may not help Crown Castle, but would help AT&T California on the pole removal side. Mr. Bacon stated if they can create a letter listing the members that can be sent out to any local government or anyone questioning. If they can have an official legal document saying they have the same rights as a base owner on a pole, so they don't have to go through the red tape. If they could have a certified letter to present. Mr. Serrato stated that what Mr. Bacon is describing is like the letter being presented, but with the SCJPC legal stamp on it. Mr. Williams stated that companies like the Rail Road companies and Cal Trans, that if they have a pole there and they are the base owner and someone wants to purchase interest in that pole, that if it is their right of way, then they still have to get their own right of interest. He believes that is where some of the Cal Trans conflicts are. Cal Trans is asking who is authorizing them to go in there because LADWP does not have the right to allow them to go into a Cal Trans or Railroad right of way. They may have to apply get a right of entry to get a buddy pole out there. Mr. Williams stated that has happened to LADWP with SCE on a Railroad right of way. Mr. Carrion stated that he believes that this in addition to that application for entry. The issues Crown Castle has been having is as they apply for their various permits, for example traffic control, and those are being held on the basis of, do they have permission from the "pole owner" to do work on those poles. It is not one of those they have the right to go in and do what they want, it is to be used in conjunction with all the necessary components. Mr. Williams stated that this was more in regards to Ms. Black's problem with Cal Trans. Ms. Black stated she was taking note of this to contact her right of way department. Mr. Williams stated that sometimes Cal Trans and Railroad are not good at explaining it. Ms. Black stated she plans to take this back to her right of way group. Mr. Brown stated that he brought up nine/ten months ago that they are going to start seeing Section 8.3 on the JPAs because even on government land, they are saying why SCE let someone attach to a pole on their land. SCE thinks the

other member got permission, based on the JPA, and they do not verify whether they did or didn't. He stated again that the other members will be seeing Section 8.3 on the JPAs and be responsible for getting the easement. Mr. Plaskey stated that from Frontier's perspective, however they want to word it, to get the other members on the poles, they are good with the letter. The more information they give, the more they will ask. He would shy away from giving any JPA numbers, but maybe providing a list of all the approved pole owners at the bottom of the letter. Mr. Williams stated that maybe they could quote the right of way decision, because that gives them right to go into a public right of way also Mr. Brown stated that somewhere down the line if the Track 1 is ever fulfilled, and the database becomes public, they will have that information anyway. Mr. Serrato stated that he took in all the feedback and will work on a more refined letter for next month. He asked Ms. Pranata to send the copy reviewed today to everyone so they can further digest and come with other ideas for the next Compliance Committee Meeting. Ms. Pranata confirmed that he meant to send it to the Compliance Committee members. Mr. Serrato confirmed this was correct. Mr. Serrato stated that all the members can also bring their own refined version of the letter to compare. Mr. Plaskey stated it was good with him and Mr. Brown agreed. Mr. Carrion stated that if all the SCE edits were taken out, especially when it comes to mentioning approvals, unless there is a denial, that will tend to bring up a lot more questions. If the letter does come into effect of being accessible to everyone, that is when they could have some sort of language for the members saying that it does not in any way supersede any of the processes established. Then that can give every member the warning that this is not a golden ticket to bypass any of the processes. Mr. Plaskey stated that there are penalties in place for those who are unauthorized attached and the Routine cares for that piece of it. Frontier considers everyone equal and they expect everyone to follow the rules they are following even though they don't always follow them sometimes. He further stated that Frontier supports this however it needs to be written so they can get passed the roadblock. Mr. Bacon stated LADWP also supports this as well and just wants to make sure that whoever does have the letter has the right to access the pole. What he is concerned about is putting risers in the climbing space and not putting them on stand offs, the things that can go wrong with it if they can bypass if they have a letter. He further stated that they can work around it and get a stamped letter and present it with all the members listed. Mr. Serrato stated Crown Castle appreciates this support and this letter was to protect the confidentiality of their processes. Mr. Brown suggested that if people are going to be amending that letter, to get it back to the Compliance team as early as possible so they can address the amendments. Mr. Brown would want to take it back to SCE's attorney if it does get amended. Mr. Serrato stated that the final version will have to be reviewed by everyone again and their legal before they actually deploy it.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Serrato stated that the members are to take back the current version of the letter and be prepared to further discuss the letter at the next month's Compliance Committee Meeting.

The meeting adjourned at 11:53 a.m. until July 15, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a member of the Southern California Joint Pole Committee (SCJPC), _____ maintains attachment rights, and the authorization to engage in construction, on distribution/communication poles with an established joint-ownership record, between other members of the SCJPC.

For distribution/communication poles in which a _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization (JPA Form 2), to the appropriate pole owners(s).

The attached list of sites includes JPA submittal dates. As per SCJPA guidelines, a JPA becomes valid after 45-days (calendar) have elapsed, from the date in which the JPA was submitted.

The SCJPC Routine Handbook is confidential, and accessible only to those members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of Crown Castle NG West with the SCJPC.

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To Whom it May Concern,

As a member of the Southern California Joint Pole Committee (SCJPC), _____ maintains attachment rights, if approved, ~~and the authorization to attach equipment engage in construction~~, on distribution/communication poles ~~to with an established~~ joint-ownership record, between _____ and other members of the SCJPC.

For distribution/communication poles in which ~~a~~ _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization (JPA Form 2), to the appropriate pole owners(s), which must be approved by the pole owner(s).

The attached list of sites includes JPA submittal dates. As per SCJPA guidelines, a JPA becomes valid after 45-days (calendar) have elapsed (unless there is a denial or hold), from the date in which the JPA was submitted.

Please note that ~~t~~he SCJPC Routine Handbook is confidential, and accessible only to those members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of **Crown Castle NG West** with the SCJPC.

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
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Phone (909) 599-3801
Fax (909) 599-3825

August 19, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 12:30 p.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Mr. Earle Carrion	Crown Castle NG West Inc.
Mr. Aarize Dizon	Crown Castle NG West Inc.
Ms. April DeBarge	Southern California Edison
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Jeff Williams	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Lex Treepaisan	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Mr. Todd Dailey	AT&T California
Ms. Tara Andrews	AT&T California
Mr. Ben Coffey	City of Banning
Mr. Racheal Torres	Mobilitie, LLC
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Mr. Pedro Garganera	MCI Metro ATS/MCI Telecommunications
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 12:30 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Carrion inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17) – Mr. Carrion opened the discussion to CPUC activity and updates. There were no other comments or concerns from any members at this time.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Carrion opened the discussion to Environmental Issues. Mr. Serrato stated that California is on fire right now, and it is getting hard to breathe. Mr. Carrion asked Mr. Brown about how he had mentioned something about fires and impacting their work earlier on. He asked if there was anything else Mr. Brown wanted to add to that. Mr. Brown stated they have quite a few fires, he thinks they are involved in about six fires. What he has heard that there were 120 poles in one of the fires, he did not know which one, and did not have the latest yet. He further stated with that in mind, he asked the members to be patient with SCE getting the JPAs out there because six fires going at once and it will be hard for them to handle.

Ms. Black stated she was going to bring up something in Routine Revision but stated she could open up in Compliance because it is related to fires. She stated there actually 30 fires currently in the state of California burning. From AT&T California's perspective, they would like to amend the Routine Handbook under the clause, wherever it would fit in, that if it is a fire, or some specific event, that that event name be located on the location and nature of work on every JPA for the poles that were impacted by that event. She asked if anybody would have a problem with that. Mr. Bacon asked Ms. Black to repeat. Ms. Black stated, for instance if there is some sort of an event that is causing the poles to be replaced, a fire. Mr. Bacon stated firestorm. Ms. Black agreed. Ms. Black stated Cal Fire always names these fires and there is usually a wind event name. It is usually wind event, the city, and the year. Mr. Bacon stated that they usually do it right where it started or that street. Ms. Black agreed. She stated Cal Fire has their logic on how they are naming it as well. She further stated that AT&T California, without getting into all of their finances, gets a bucket of work from Texas. She clarified that it was a bucket of money, that does not impact their normal daily business, a different bucket of money for these sorts of events. AT&T California has to track them, and they are asking if the other members can help them to do that by naming the event so that we can track it and take it back to their leadership from there. Mr. Bacon stated that LADWP kind of does that. They have a work request name, and usually when it is a catastrophic event, they will name it after that event. For example, Station Fire. It cost them a lot of money, but everything was labeled under Station Fire. That was just on the work orders on their side, but he does not know how AT&T California would be able to track that through a JPA thing. Ms. Black stated that what she is proposing would be to require that event name under the location and nature of work. Mr. Serrato asked to confirm if the event name should be taken directly from Cal Fire's designations. Ms. Black agreed. Mr. Brown stated SCE could definitely put it on there, but if it is not on there, that should not be a reason for rejection. They would make every effort to put it on there. Ms. Black stated what she will be proposing in the Routine Handbook is to amend the handbook to

make it be required. She stated she will take that up during the Routine ad hoc to see if they can get verbiage passed. Mr. Bacon stated that JPAssist could make it mandatory. Mr. Carrion stated that they would now move one and he looked forward to being part of that discussion in Routine Revision meeting and hopefully there would be a little more updates and clarity on the ongoing environmental issues next month.

Agenda Item 4 – Miscellaneous –

- Mr. Carrion opened to the draft letter regarding getting permits from Cal Trans, and other third parties not associated with the SCJPC, letter in lieu of including verbiage in the Routine Handbook regarding providing copies of forms to outside parties. He stated the draft letters had been just uploaded on the SCJPC website. Ms. Pranata asked which letter the members wanted to have presented to review on WebEx first. Mr. Serrato stated that they go in order and start with SCE's first and then Crown Castle's next since it was a response to SCE's. He asked the members if this made sense and stated that after they could go over the draft Ms. Black from AT&T California sent over. Mr. Pranata displayed SCE's letter (see attached). Mr. Brown stated that this was their amendment to the original letter that Crown Castle proposed. Mr. Serrato confirmed that this amendment was already cleared by SCE's legal. Mr. Brown stated this was correct. Mr. Bacon asked Mr. Serrato who was filling out the letter. Mr. Serrato stated it was only their internal team because it was only being requested from them, and their vendors, Mr. Carrion, Mr. Dizon, and whoever else is directly under Mr. Serrato. Mr. Bacon confirmed that LADWP does not have to submit, fill out, or sign the letter. That it is just a blanket statement from the SCJPC from SCE as long as they have the JPA number, or whatever it is that is required in there, they should be able to go and get your permits. Mr. Serrato stated yes. Mr. Carrion stated the intention of this is not interaction between members, but between members and any non-SCJPC associated third parties that need a sort of explanation as to their rights to do work on utility poles. Mr. Bacon stated he got a lot of emails on this. He believed that the BOE was requiring them to have a JPA sign off from them. So, this is good. This will help them expedite a little better and they can fill it out at will. Mr. Carrion stated this was correct. He confirmed the members were good on this edit because they wanted to bring up subsequent edits to compare, contrast, and discuss. Mr. Bacon stated that if it was easier and less to fill out to display the other one. Ms. Pranata displayed Crown Castle's letter (see attached). Mr. Carrion stated that this letter is slightly more modified from SCE's edits on the original version, with some explanations as to the reasons why certain things were struck out and removed. Crown Castle's number one goal here was to not open this up to any kind of misinterpretation on the side of those parties that are not associated with the SCJPC. Giving them indication

that there are further things that they can ask for, such as any approvals of any sort, any copies, and further communication. Crown Castle wanted to find a way to limit that. He stated that SCE and their legal department added some verbiage in there as way to cover the letter from being misused as a way to circumvent Routine procedures. In order to appease that concern, Crown Castle also drafted up a Terms of Use, which clarified that this letter would not be used by members in an effort to circumvent any established procedures. That it does not establish any rights beyond what the Routine gives each of the members. He was unsure if this would satisfy SCE's concerns, which brought on the additional edits, which have thus been struck out with Crown Castle's copy. Mr. Bacon stated that this letter brings great points he likes the protectionism if there is such a word. The only thing is, whatever one is chosen, SCE is going to have to take back to their lawyers to see if it is okay. LADWP is fine with this. He likes Crown Castle's because of things like that are included into it. His vote is for this one, since he saw it, and Edison can take a vote and the members can see where they stand with this. He is either way good with it. Mr. Carrion asked for Ms. Pranata to bring up the Terms of Use document Crown Castle drafted (see attached). Mr. Carrion stated the Terms of Use is written in sort of a legal manner, and the intention of this is that obviously that letter will be available to all committee members. But of course, in accessing that letter, this basically outlines that any member that accesses the letter for use to communicate whatever needs to be communicated with a third outside party, first that this letter, and any iterations, is only granted to us, it's only to be used to demonstrate a member's basic attachment rights through the membership of the SCJPC. And it does not supersede established purposes, nor grant additional rights beyond what is outlined in the routine handbook, and it cannot be cited to provide an alternate interpretation of the procedures of the routine. And it doesn't imply that all necessary actions to obtain attachment rights have been met. He believes that this is kind of key to what SCE was trying to achieve and that last part of it explains the confidentiality on that. He stated that Mr. Bacon was correct that SCE would like to take this to their legal, but that that this would be an attachment onto that. Mr. Bacon agreed. Mr. Brown stated that SCE is not going to approve anything that states, that they are under the impression one, that the original letter is needed for members to provide to cities, counties, whomever is asking that they have permission to get on the pole. He stated they are thinking that the pole is SCE's and that SCE gives them permission. They are not fighting that, but the letter cannot state, just because they are a member of the committee, they have the right to get on that pole. They still have to be approved to get on that pole, and unless the letter states, "if approved," then SCE cannot approve the letter. They have to be approved, and Crown Castle scratched out again, "if approved." It must state, "if approved." Just because they are a member of the committee does not

give them the right to get on the pole. It gives them the right to request access on the pole, yes. It does not give them the right to just attach to the pole. Mr. Carrion stated that looking at it from the other side, "if approved" means that they want a signature asked what if they do not ever get a reply. Mr. Brown stated it is automatically approved. Mr. Carrion stated that the other party is going to ask where it says that in the Routine and ask to see the Routine. Mr. Brown stated no. Ms. Black stated that maybe they are mincing words here because she would think that a member needs to get on a pole because they need to do work. It is probably because a JPA has passed through, and either the JPA was a pole replacement, and now they have to go and move their facilities or remove a pole. Or, maybe it was a Section 4.0 JPA, where they purchased interest, and that JPA has processed all the way through to the fact that they are now an owner on the pole because the Form 2 has passed through the 45 days and now they need to attach. She asked if that is approval and does not get the problem with approval. Mr. Brown stated that approval is one, you have a signature, and/or the 45 days have elapsed. That is an automatic approval. Those are the approvals. Ms. Black asked if Crown Castle has that timeframe that has elapsed, then that is when they are going to go and touch the pole. She asked why that verbiage has to be within the letter. Mr. Brown stated that SCE does not want the city to say, SCE allowed somebody to get on the pole, and when they did not. Ms. Black stated that they have agreed because the JPA has been processed. Mr. Brown stated that if the JPA has been processed, if they submitted a JPA, and SCE approved it within the 45 days, now, they can move forward. If the 45 days has elapsed, and they have not signed it, they can move forward. Mr. Carrion asked Mr. Brown to look at it from the perspective of the city. If Crown Castle goes in there trying to get their permits, and then the city says, well did you get approval. They can present this letter. They will ask that it says that they need approval and ask to see their approval. He asked if Crown Castle is then okay to give them all the documents that are confidential with the committee. Mr. Serrato then stated they may reach out to SCE to ask if they have approval. Mr. Brown stated that they have been doing that. Mr. Carrion stated they have. With the approval part, and that is when the terms of use comes into play because that is basically stating that this letter does not give them the full right to attach just because it says that they are a member of the SCJPC. It states clearly in the Terms of Use that just because they are a member of the SCJPC, and having this letter, does not mean that all requirements, including the issuance of a JPA, that all the requirements to attach have been met. The members all know that. Mr. Brown stated that Crown Castle is saying that Terms of Use is only to be shared with the members. That is what the Terms of Use says. He further asked how would the city know. Mr. Carrion stated they do not need to know. He asked if they need to know about their approval and their process. Mr. Brown stated if they are asking for

approval not the process. Mr. Carrion stated that they are getting into the process with an approval. Mr. Brown stated that yes and if they are asking for approval. SCE is not going to grant approval just because they have a JPA. Mr. Bacon asked if the problem was liability with SCE. SCE does not want to stand behind any verbiage that states that they allowed them onto the pole, liability-wise. They live in a dangerous fire world. If it says SCE allowed them on the pole, they do not want to have any of that in the verbiage. If it is 45 days it does not matter, 45 days, signed or unsigned, it does not matter who is getting that JPA, it is going to happen. They are proceeding. If it is signed, then they proceed like Mr. Brown said. He stated that what SCE does not want to do is give any kind of verbiage that puts any liability on them. If the Form 2 is signed, if the 45 days is expired, why can't the JPA be their receipt BOE is his question. He asked if that made sense. Mr. Carrion asked that for this to be a receipt as in to provide that to the city. Mr. Bacon stated this was right. That has to be a receipt. If they bring it in there, and basically the BOE, and he believes he added discussion with BOE in L.A. anyways, they were asking if they required it. LADWP stated, yes, and they would prefer to have them go through the process of making sure that whoever is getting on that pole has the right to be on there. There are contractors everywhere running fiber, doing whatever they are doing in the madness of everybody getting wired up. He understands SCE's point. SCE's only fear is liability and saying that SCE is allowing them on the pole. If that pole, when loading, falls over Crown Castle, he stated they through it Santa Monica. It falls over. They ask who allowed them to attach or who did not. That is important. If SCE does not want to put their name on it, they do not have to. The other members have the burden of providing the BOE, that they do have the right to be on the pole. He asked if they can contact any BOE if they ask them or question it. They will let them know that, yes, they are allowed on the pole. They work it out that way. He stated LADWP would not want to put their name on it saying they were the last hurdle for them to go through to attach to that pole and have something go wrong. When they went to litigation, they do not just sue one, they sue every member that is on that pole. They all take a hit on it because that is what they do, and that is what happens. So, if they do not want to put it in words, then they can arrange it where the JPA is their receipt because that is the true receipt. Mr. Carrion stated that if they collectively decide that there is no issue providing copies of the form to cities, he does not mind having to reword the letter to make sure that it says, if approved or at the expiry of 45 days. But at the same time, they also need to collectively decide if whether or not sharing pole cards is also allowable because in some instances, a JPA would not be needed if a member is an existing owner. In order to prove that a JPA would need to have been written, but he is sure the city would then be requiring a copy of some sort of existing record that shows joint ownership. Mr. Carrion asked if the letter could say if approved asterisk;

asterisk at the bottom say, approval means the signature or 45 days has elapsed. Mr. Brown was unsure if they want to go down the road of sharing the actual JPA with them because then things changes in the field, it will be a matter of training them on how to read the JPA everything. Mr. Bacon stated exactly and that was the problem. He stated he was with Mr. Brown. That is the problem that they have because they know they are providing all that stuff, and more questions will come out. They will ask what multiple questions asking the meaning of things and if signatures are needed from everyone and if they can get the signatures from everyone. Mr. Brown agreed. It is a rabbit hole that they do not want to go down. Mr. Brown stated that when SCE get their permits, they give them the JPA number. They tell them who is going to pull the pole, and they tell them everybody that is on the pole. That is what they require from SCE for them to get a permit, They do not ask for the JPA itself, but they recognize what it is, and SCE gives them the number, and that is pretty much it. Ms. Black asked if it would be possible, to Mr. Brown, for SCE when they provide that information, the permit, that they are giving them the JPA name, and the other folks on the pole, can they at that same time say, they are granting them permission to go and do their work after words. Right then give them permission. Mr. Brown stated that with that in mind, if it is a pole replacement, and they have work to do, they need to go obtain their own permit, and that is giving the city the awareness of who is the responsible party, and that they should be getting a permit. In that scenario, he thinks it is that they want to purchase. SCE does not know who wants to purchase at the time unless there is a pending JPA. If there is a pending JPA, they can talk to SCE's permitting team, but he does not know where they would go with that, because he does not know. Ms. Black stated she is not asking SCE to do something where AT&T California does not still go follow back up and do their permits. In the case of Cal Trans, where their letters that that will follow, are in that kind of a scenario. If at that time SCE told Cal Trans that AT&T California is okay to come back around after words, then that would eliminate their problem. Mr. Brown agreed. He thinks they are telling them what is going to happen gives them that permission. SCE is telling them that they are going to do this work, and then AT&T California is going to follow them and do their work. That does open up the doors for them to get their permits because they are aware of it. When it comes to purchasing, that is a different. Right now, SCE is in trouble with government's land because so many people are attached to their poles, and they have an easement, but those attached do not have an easement, so they are coming after SCE. That is why they are so reluctant on this. Mr. Carrion is still reluctant about the, "if approved" verbiage, but he does not know if there is any way to remedy that by saying that membership of the SCJPC is above all a requirement for joint ownership. He thought that maybe they can squeeze something in here that the process within the Routine Handbook needs to be followed. But

he is reluctant about that too. Even they say that the Routine Handbook's confidential, he knows that they are going to get some guy, at some city, poking around, asking what's the routine, what's the process, how do they do that. He was hoping that the Terms of Use that states that this letter is not going to supersede any procedures that they have already established and that it does not override any of that. That that would have resolved any kind of concerns about letter being misused as a blanket statement that they can just attach onto any pole that they like. Mr. Brown agreed that they can attach by, of course, process in a JPA. He just cannot get past that not informing the city, county, whomever that they need to be approved to get on that pole. He stated that when he has to go to these meetings and tell them, they say, who was that on the pole. He tells them he does not know because they have no record of somebody being on the pole. They then ask if SCE does not know who is on their poles and he has to tell them that it is not in every case. Mr. Carrion stated that is kind of the issue though. They know that they need to be approved to be on the pole. In accordance to what is already been established in the routine, why a city needs to know that is where he is lost. Mr. Brown stated he agreed with Mr. Carrion. Mr. Carrion stated putting if approved in that letter is telling them about it. Mr. Brown stated he does not even see why the city needs a letter, but that is what they are requiring. The city already thinks they are SCE's poles. That is just because it has an E on there, and they explained the whole joint pole process. They explained everything about purchase of interest or ownership, and just because they want to purchase, and they tell the city that SCE says it is okay, but SCE never approved that. It goes back to Mr. Bacon's point; SCE will be held liable when it comes back to Malibu fires and things like that. They want to be able to approve everything. He understands that there is a JPA in the works, but for example SCE did not tell the city of Malibu that Crown Castle can get on these poles and then these poles fall over while Crown Castle was on there. Crown Castle then said they can get on there. SCE cannot go down that road. Mr. Bacon stated that they the members need to move on from this because they were using up a lot of time. A decision has to be made. They cannot strong arm SCE to sign anything or any verbiage that they do not want to. In adopting Crown Castle's, SCE might not agree to it as far as that goes. He asked what has to change and stated the system of the BOE has to change. Mr. Bacon stated to him they are members and they have the right to be there. They need to notify BOE, or BOE companies as a group, the SCJPC, that they are all in agreeance that they are members and they have a right to be there. Mr. Brown stated they do not have the right to be there and the right to apply to be there. Mr. Bacon stated he understood and thanked Mr. Brown for the correction. They have the right to apply. But that is what BOE is requiring from them. So, they need to change BOE. He thinks as a committee, or the joint pole, if they have their references, Crown Castle,

as to what BOE city agencies they need to correspond to, to say, hey as long as they submit a for example, a JPA number, that should be a blanket statement. Something in that category. Because if SCE's not going to agree to this, they certainly are not going to go and adopt Crown Castle's legal verbiage on this. If it cannot be decided, then they have to change the BOE across the board wherever they are dealing with. He motioned that they moved this to next month to discuss different avenues to take on this. Mr. Carrion was ok with this. He stated they can probably strike it and move it to next month for further discussion on alternate procedures. Ms. Spencer asked for clarification of what was BOE. Mr. Bacon stated it was Bureau of Engineering. Mr. Carrion stated that they did have a slightly alternate topic letter from Ms. Black that was more in line with issues with Cal Trans and the information that they needed. Ms. Black stated that she has two based on the dialogue that happened after she sent out the first letter. She asked Ms. Pranata to pull up the first letter (see attached). She stated that she hoped this will feel better to SCE and make them feel more comfortable with the amount of liability. What she is trying to do is make this letter some simple cookie cutter thing that refers back to these folks are the owners, based on our SCJPC agreement, all the owners can work on the pole. This was one format, and then I was asked to put a second format. She wanted to show the members the second format (see attached), and then they could start the dialogue. The second format, basically, just blankets all of the members, so it becomes a more cookie cutter type of a letter just saying that the SCJPC agreement says that owners of a pole are allowed to work on it. And lists all of the owners, or members, of the SCJPC. So, that could potentially squash Cal Trans issues. The other letter basically lines items each member of the SCJPC, and a couple of statements. It basically says, as per the SCJPC guidelines, all listed SCJPC members grant other owners' permission to work on those poles they own. She asked if this felt more comfortable. Mr. Bacon stated that they can make copies of this and spread it out to every contractor that is out there. There has to be a corresponding file record number. So there has to be a JPA number on there. Ms. Black asked if maybe a one line statement that says at the bottom, this work applies to this particular JPA. Then just list it like SCE does on their permit. They list the JPA name. Mr. Bacon stated it could if everyone is in agreeance. Ms. Pranata stated that she believed Mr. Brown had to leave for another meeting. Ms. Black stated they need SCE's feedback. Mr. Carrion stated that they could take this offline and work on it. He believes he is having a clearer idea on SCE's concerns. They could take this offline and bring it back with the next month's discussion as part of it. He knows despite this being a Cal Trans issue, it is along the same lines of what they are trying to achieve with the other letters for the BOE requirements. Ms. Black stated she will reach out to Mr. Carrion.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Carrion stated that there were no action items at this time other than moving the letter discussion over to the next month.

The meeting adjourned at 1:07 p.m. until August 19, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a member of the Southern California Joint Pole Committee (SCJPC), _____ maintains attachment rights, if approved, and the authorization to attach equipment engage in construction, on distribution/communication poles to with an established joint-ownership record, between _____ and other members of the SCJPC.

For distribution/communication poles in which ~~a~~ _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization (JPA Form 2), to the appropriate pole owners(s), which must be approved by the pole owner(s).

The attached list of sites includes JPA submittal dates. As per SCJPA guidelines, a JPA becomes valid after 45-days (calendar) have elapsed (unless there is a denial or hold), from the date in which the JPA was submitted.

Please note that tThe SCJPC Routine Handbook is confidential, and accessible only to those members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of **Crown Castle NG West** with the SCJPC.

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

The pole(s) listed on the attached permit have the following Companies listed as established Joint-Owners of record at the Southern California Joint Pole Committee (SCJPC).

Joint Owners include:

- 1.
- 2.
- 3.
- 4.

As per SCJPA guidelines, all listed Owners grant the other Owners permission to perform work on the pole(s) listed on the permit. This authorization is in accordance of the Southern California Joint Pole Committee (SCJPC) agreement.

Sincerely,

John Bacon
SCJPC President

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a ~~standing Member~~ member of the Southern California Joint Pole Committee ("SCJPC"), _____ maintains attachment rights, ~~if approved, to and the authorization to attach equipment engage in construction, attach equipment, and engage in construction,~~ on distribution/communication poles ("poles") ~~with an to with an~~ established joint-ownership record, between _____ and other ~~members~~ Members of the SCJPC.

For ~~distribution/communication~~ poles in which a _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization ("JPA Form 2"), to the appropriate pole owner(s), ~~which must be approved by the pole owner(s).~~

~~The attached list of sites includes JPA-submittal dates.~~ As per SCJPC ~~CA~~ guidelines, a JPA ~~Form 2~~ becomes valid after 45-days (calendar) have elapsed ~~(unless there is a denial or hold)~~, from the date in which the JPA ~~Form 2~~ was submitted.

~~Please note that t~~The SCJPC Routine Handbook is confidential, and accessible only to those ~~members~~ Members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of ~~Crown Castle NG West~~ with the SCJPC.

Commented [CE1]: Open to misinterpretation from non-SCJPC parties that an approval request is repeatedly required, and that *explicit* approval is mandatory.

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Commented [EC2]: "to" implies that the action of attachment establishes joint-ownership, rather than the issuance of a JPA.

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Commented [CE4]: Understood amongst Members, not pertinent to non-SCJPC parties.

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Authorization Letter Terms of Use

THIS AUTHORIZATION LETTER TERMS OF USE (the “Terms”) is made on this ____ day of ____, 2020, by and between the **Members (“Members”) of the Southern California Joint Pole Committee (“SCJPC”)**.

1. **Terms of Access.** Access to the Authorization Letter (hereinafter the “Letter”), and any iterations thereof, is granted exclusively to the Members of the SCJPC, their representatives and known associates.
2. **Description of Use.** The Letter is to be used for the purpose of demonstrating a Member’s basic attachment rights, as secured through membership with the SCJPC, to parties unassociated with the SCJPC.
3. **Limitations.** The Letter does not in any way supersede established processes, nor grant additional rights to any Member, beyond what is outlined within the SCJPC Routine Handbook (the “Routine”). The Letter may not be cited in a manner as to provide an alternate interpretation of the procedures of the Routine and does not imply that all necessary actions to obtain attachment rights have been met.
4. **Confidentiality.** Members acknowledge that the Terms herein are confidential to Members of the SCJPC and its operating staff.

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

The Southern California Joint Pole Committee (SCJPC) is made up of a group of Utility Companies, Communications Companies, and Municipalities in Southern California who hold joint equity interest in utility poles.

As per SCJPA guidelines, all listed SCJPC Members grant the other Owners permission to perform work on the pole(s) they own. The SCJPC Membership includes the following Companies:

ATC Outdoor Das, LLC	Frontier Communications
AT&T California	Golden State Water Company
AT&T Mobility	Mobilitie, LLC
CA-CLEC LLC	MCI Metro/ATS
City of Anaheim	MCI Telecommunications
City of Azusa	M-Power Communications
City of Banning	NewPath Networks
City of Burbank	Southern California Edison Company
City of Colton	Sprint Communications
City of Glendale	Sprint Nextel
City of Lompoc	T Mobile USA
City of Los Angeles	Teleport Communications America, LLC
City of Pasadena	Time Warner Cable (Spectrum)
City of Riverside	Verizon California
City of Vernon	Verizon Wireless
Crown Castle NG West., INC	XO Communications
ExTeNet Systems	

This authorization is in accordance of the Southern California Joint Pole Committee (SCJPC) agreement.

Sincerely,

John Bacon
SCJPC President

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
San Dimas, CA 91773
Phone (909) 599-3801
Fax (909) 599-3825

September 16, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 12:04 p.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Mr. Earle Carrion	Crown Castle NG West Inc.
Mr. Wayne Brown	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Lex Treepaisan	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Maria Ortiz	XO Communications
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Mr. Todd Dailey	AT&T California
Ms. Tara Andrews	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Ms. Veronica Craghead	City of Banning
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Mr. Pedro Garganera	MCI Metro ATS/MCI Telecommunications
Ms. Linda McLean	Extenet Systems
Ms. Sherri DuChateau	Bear Valley Electric Services Inc.
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 12:04 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17) – Mr. Serrato opened the discussion to CPUC activity and updates. There were no other comments or concerns from any members at this time.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. There were no other comments or concerns from any members at this time.

Agenda Item 4 – Miscellaneous –

- Mr. Serrato opened to the proposed draft letters. A few different versions were proposed, and some members expressed their issues or concerns with each of the versions. They got a better understanding of everyone's needs. He believes the way the meeting left off was to take the discussion offline and perhaps a new version would be proposed. He stated he was not involved in any offline meeting and assumes nothing happened.

Ms. Black stated what she has is related in that AT&T California keeps getting pushback from Caltrans that they are not authorized to do pole work and they were hoping that they could supply the pole card sheet that would show they are an owner. She asked the members if this was acceptable to the membership. Mr. Bacon stated that he thought they had went through the letter that they had proposed and offered some changes. He continued saying he thought that they came up with an agreeance as to some type of letter. LADWP sometimes gets the same thing from Caltrans and the BOE (Bureau of Engineering) with the city. What they have been doing is signing the Form 9 for the riser if they are going to put a riser on it. They put a LADWP signature on it and send it off to the contractor or member who needs the letter. He asked if they had a letter last month that they had proposed, he knows SCE had a problem with the wording on it, but he thought they had a letter or template ready to go. Mr. Brown stated that he does not think so that he does not know if they came to an agreement on any. Mr. Carrion stated that the biggest wall was that membership alone might be interpreted by external parties as being the only requirement to work on a pole. Whereas on Crown Castle's end they are trying to limit the amount of information given to the outside parties that membership is a requirement to have the ability to attach and engage in construction on a pole while they know on the inside that it is not the only requirement needed. Mr. Serrato stated that they are was one more draft after hearing everyone's concerns last time to be able to propose for them to all use it. By next month there should be another draft for everyone to look at. They cannot vote on it until it is in discussion, so they are still a couple of months away.

Mr. Brown went back to Ms. Black's question. He asked if AT&T California is purchasing interest on a pole, how would they show that

they are on the pole if they are not actually on the pole card. Ms. Black agreed and that this was a concern, but not the most important one because right now they cannot pull a pole butt. Their immediate issue is they cannot go out and do their work on poles they are owners on. She stated Mr. Brown brings up a good point for the purchase of interest, but she has to deal with their bigger issue first. Mr. Brown stated he understood. Mr. Carrion stated he assumes that this was an issue for those poles in which AT&T California is an existing member and is on the pole card. Ms. Black agreed that this is their biggest issue and that they would be on record. Mr. Carrion stated that in that case he does not see a problem with it because for any legal issues that do come up the pole card is their ace in their sleeve to be able to demonstrate who a legal joint owner on a pole is. He does not see any issues with being able to share pole cards if they are already existing owner on record. Mr. Serrato stated that he believes they did not want to provide a Form 2 because it is mentioned in the Routine Handbook as to be confidential, but he does not think anything about the pole card has a say and concern regarding the Routine Handbook. Mr. Brown stated he would not have a problem with it either. That is the road they are going down with the statewide database anyway is to provide a pole record with that type of information, so he does not have an issue with it. Mr. Carrion stated that there was a precedence on this with the Malibu fires, who was on these poles and pole cards were submitted. So he does not see any problem. Ms. Black thanked the members. Mr. Carrion asked if that was all the consensus needed. Mr. Serrato stated that they are going to start providing pole cards.

Mr. Bacon asked if Crown Castle could follow up on the template as far another template. He thinks it is insane that they as members have to play "Mother may I" with Caltrans or BOE or whoever it may be when they are members. They have the right to be there. They have gone through the process, and they definitely need to get a letter that covers the members. He stated he would go as far as contacting somebody higher up in Caltrans, give them a list of SCJPC members and that these members can produce their own letter to say that they are a member. That it is their pole and they have the right to be there. Maybe even go into Caltrans so they can let up on some of the pressure on this. He stated he has some Caltrans contacts. He will run this by them to see if he could get upstairs to explain that these are members that they have the right to be there. That they respect Caltrans policing to make sure that no roads or conduits are being placed by somebody who is unauthorized, but that they are members and have the right to be there. Caltrans is actually slowing them down. Ms. Black stated that Mr. Bacon brings up a great point. She had a meeting yesterday with District 7 where they have continued, yet again to deny, and AT&T California did supply a letter saying pretty much what he said. They asked for an SCE contact and they want to reach out to the SCE contact for permission.

She told Mr. Brown that she had no choice and gave them his email. Mr. Brown stated it was ok and he was fine with that, that he is used to it. Ms. Black stated that they are at their wits end. If this is the case, if Mr. Brown is okay with it, she asked if they can put his name and email on all of their permit applications that have SCE as a base owner. Mr. Brown stated that she can do that and if he feels it should be somebody else, he will supply another name and contact. He stated to go ahead and send them his way right now. Ms. Black thanked Mr. Brown and asked if it needs to change to a different name to let AT&T California know because she is going to let her whole team know to put Mr. Brown's name on everything. Mr. Brown stated it was not a problem. Ms. Black thanked again. Ms. Black stated that Caltrans wants to call him or email him directly. Mr. Bacon stated that they need follow up with Caltrans as far as giving them a list of the SCJPC members, and if they do come up with a valid letterhead stamped by the SCJPC for all members that have to do work on the poles. The only thing that concerns him about this that everyone has a ton of contractors out there that are under the blanket of their JPA and the whole right to be there. He asked how do they police the contractors not replicating all that as they go through and work over the years. Mr. Serrato stated that is the same concern for any document of anyone replicating it. If they get a letter that is signed by one of their representatives, they have to assume it is real, otherwise they have to question every document out there. Mr. Bacon stated that they could be referring a phone number from anybody. They do not know who the SCE representative is. It could be the person in the next cubicle, and they give them their number. He stated to move forward and to get a template letter for all the SCJPC members and an action item. He will reach out to Caltrans and see if they can go upstairs to get this requirement straightened out or something they would be willing to accept so that they are not spending a lot of footwork trying to get permission to attach to a pole they are already a member on. He thinks that is ridiculous. Mr. Serrato thanked the committee for all of the comments.

Mr. Serrato asked if there were any other miscellaneous topics. There were none at this time.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Serrato stated that another draft letter is to be proposed next time. The parties that were concerned should work offline and come up with some sort of draft before the next month's Compliance meeting.

The meeting adjourned at 12:16 p.m. until October 21, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a member of the Southern California Joint Pole Committee (SCJPC), _____ maintains attachment rights, if approved, and the authorization to attach equipment engage in construction, on distribution/communication poles to with an established joint-ownership record, between _____ and other members of the SCJPC.

For distribution/communication poles in which ~~a~~ _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization (JPA Form 2), to the appropriate pole owners(s), which must be approved by the pole owner(s).

The attached list of sites includes JPA submittal dates. As per SCJPA guidelines, a JPA becomes valid after 45-days (calendar) have elapsed (unless there is a denial or hold), from the date in which the JPA was submitted.

Please note that tThe SCJPC Routine Handbook is confidential, and accessible only to those members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of **Crown Castle NG West** with the SCJPC.

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
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To Whom it May Concern,

The pole(s) listed on the attached permit have the following Companies listed as established Joint-Owners of record at the Southern California Joint Pole Committee (SCJPC).

Joint Owners include:

- 1.
- 2.
- 3.
- 4.

As per SCJPA guidelines, all listed Owners grant the other Owners permission to perform work on the pole(s) listed on the permit. This authorization is in accordance of the Southern California Joint Pole Committee (SCJPC) agreement.

Sincerely,

John Bacon
SCJPC President

Southern California Joint Pole Committee
279 E. Arrow Hwy, Suite 104
San Dimas, CA 91773
www.scjpc.net

To Whom it May Concern,

As a ~~standing Member~~ member of the Southern California Joint Pole Committee ("SCJPC"), _____ maintains attachment rights, ~~if approved, to and the authorization to attach equipment engage in construction, attach equipment, and engage in construction,~~ on distribution/communication poles ("poles") ~~with an to with an~~ established joint-ownership record, between _____ and other ~~members~~ Members of the SCJPC.

For ~~distribution/communication~~ poles in which a _____ is not an established joint-owner, _____ obtains joint-ownership attachment rights, with authorization for construction, through the submittal of an intent notice Form 2 Preliminary Joint Pole Authorization ("JPA Form 2"), to the appropriate pole owner(s), ~~which must be approved by the pole owner(s).~~

~~The attached list of sites includes JPA-submittal dates.~~ As per SCJPC ~~CA~~ guidelines, a JPA ~~Form 2~~ becomes valid after 45-days (calendar) have elapsed ~~(unless there is a denial or hold)~~, from the date in which the JPA ~~Form 2~~ was submitted.

~~Please note that t~~The SCJPC Routine Handbook is confidential, and accessible only to those ~~members~~ Members of the SCJPC. A letter from the SCJPC Manager of Operations is attached confirming the membership status of ~~Crown Castle NG West~~ with the SCJPC.

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Commented [CE4]: Understood amongst Members, not pertinent to non-SCJPC parties.

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Authorization Letter Terms of Use

THIS AUTHORIZATION LETTER TERMS OF USE (the “Terms”) is made on this ____ day of ____, 2020, by and between the **Members (“Members”) of the Southern California Joint Pole Committee (“SCJPC”)**.

1. **Terms of Access.** Access to the Authorization Letter (hereinafter the “Letter”), and any iterations thereof, is granted exclusively to the Members of the SCJPC, their representatives and known associates.
2. **Description of Use.** The Letter is to be used for the purpose of demonstrating a Member’s basic attachment rights, as secured through membership with the SCJPC, to parties unassociated with the SCJPC.
3. **Limitations.** The Letter does not in any way supersede established processes, nor grant additional rights to any Member, beyond what is outlined within the SCJPC Routine Handbook (the “Routine”). The Letter may not be cited in a manner as to provide an alternate interpretation of the procedures of the Routine and does not imply that all necessary actions to obtain attachment rights have been met.
4. **Confidentiality.** Members acknowledge that the Terms herein are confidential to Members of the SCJPC and its operating staff.

Southern California Joint Pole Committee
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To Whom it May Concern,

The Southern California Joint Pole Committee (SCJPC) is made up of a group of Utility Companies, Communications Companies, and Municipalities in Southern California who hold joint equity interest in utility poles.

As per SCJPA guidelines, all listed SCJPC Members grant the other Owners permission to perform work on the pole(s) they own. The SCJPC Membership includes the following Companies:

ATC Outdoor Das, LLC	Frontier Communications
AT&T California	Golden State Water Company
AT&T Mobility	Mobilitie, LLC
CA-CLEC LLC	MCI Metro/ATS
City of Anaheim	MCI Telecommunications
City of Azusa	M-Power Communications
City of Banning	NewPath Networks
City of Burbank	Southern California Edison Company
City of Colton	Sprint Communications
City of Glendale	Sprint Nextel
City of Lompoc	T Mobile USA
City of Los Angeles	Teleport Communications America, LLC
City of Pasadena	Time Warner Cable (Spectrum)
City of Riverside	Verizon California
City of Vernon	Verizon Wireless
Crown Castle NG West., INC	XO Communications
ExTeNet Systems	

This authorization is in accordance of the Southern California Joint Pole Committee (SCJPC) agreement.

Sincerely,

John Bacon
SCJPC President

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104

San Dimas, CA 91773

Phone (909) 599-3801

Fax (909) 599-3825

October 21, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 12:56 p.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Mr. Earle Carrion	Crown Castle NG West Inc.
Mr. Aarize Dizon	Crown Castle NG West Inc.
Mr. Wayne Brown	Southern California Edison
Ms. April DeBarge	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. Jeff Williams	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Lex Treepaisan	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Maria Ortiz	XO Communications
Ms. Kay Black	AT&T California
Ms. Tara Andrews	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Mr. Pedro Garganera	MCI Metro ATS/MCI Telecommunications
Ms. Sherri DuChateau	Bear Valley Electric Services Inc.
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 12:56 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no other comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened the discussion to CPUC activity and updates. There were no comments or concerns from any members at this time.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. He asked if any members had anything to make the group aware of any current working situation regarding their Covid set up or anything else related to their current environment. There were no comments or concerns from any members at this time.

Agenda Item 4 – Miscellaneous –

- Mr. Serrato opened to the proposed draft letters and stated that the way it ended last time was that it was clear that another draft was needed to be presented. They committed to having offline meeting with the parties that wanted to be involved. A meeting like that did not happen so there is no new update regarding this. This item will be tabled until the next Compliance meeting, in order for the members interested to meet offline beforehand. Mr. Serrato asked to be clear who would like to be part of the discussion to come up with the next draft. He knew that Crown Castle and SCE wanted to and asked if there was anyone else. Ms. Black stated that AT&T California would like to. She also stated that she thought Mr. Van Stryk sent a chat stating he would like to be involved. Mr. Serrato will send out an email and asked for everyone to provide a good time slot so they can meet, and he can set it up.
- Ms. Black stated she sent Ms. Pranata an email (see attached) regarding non-wood poles. After the discussion from the Administrative Board meeting, she sent an email internally and somebody sent back the new GO 95 verbiage regarding pole steps. She stated the pole in question is a non-wood pole and it is unacceptable because there are holes predrilled but there are no steps on it. She wants to confirm the way she is reading it is that the placing member should have installed steps in this case. She asked the members if everyone was in agreement. Mr. Brown stated that he is not going to agree with that until he looks at SCE's standards. Mr. Williams stated that the intent of that was, the entire thing must be read, because the intent of that was to provide provisions for if somebody wanted to install steps. The setting company is not required to install the steps. Ms. Black asked that because the holes were predrilled, that GO 95 standards are met. Mr. Williams stated yes. Ms. Black stated that since they did not order the pole, how would they know how to order steps for it from the manufacturer. How would they get the specific steps for that pole. Mr. Williams stated that whatever the manufacturer of the pole is, he is sure they sell pole steps for that, it is just a basic hardware. Ms. Black stated that the internal emails she got is that they are reading it that provisions means the steps are going to be included, provisions for

climbing a pole ascending and descending. Mr. Williams stated that it was written purposely to say provisions and not saying shall be stepped. If it had to have been stepped it would have been left the old verbiage where it said it had to be stepped. It would not have been changed to “shall include provisions for ascending and descending” because it used to say steps. This was to eliminate all the companies having to put steps, especially when they are using fall protection. Most of the time nobody wants to put the steps in there, power companies do not, because of people climbing the poles that are not supposed to be. They have that issue all the time where people are using steps to jump in people’s backyards, climbing up to take the copper off the transformers, things like that. Ms. Black stated that the good news is on the non-wood pole there are holes predrilled, they just need to figure out how to get the steps for it. She thanked the members for the dialogue. Mr. Serrato asked if they needed to revisit this next time as well because SCE had to recheck their status on this situation. Mr. Brown stated that he recalls that Sam mentioned it in the meeting that he joined here in the committee back in July that they weren’t required based on the new decision and he said that SCE would not be stepping the poles. He stated they could pull the meeting minutes up, but he was pretty sure Sam said that, but that he can follow up. He stated that the email Ms. Black sent him he forwarded it to their engineering and he has not heard back, but he will follow up with Elira and see what is going on with that. Mr. Brown stated that it looked like Mr. Van Stryk had messaged a response for Ms. Black. Mr. Serrato read the message from Mr. Van Stryk where he tells Ms. Black to look into temporary style steps that they can use. Ms. Black stated that she had already started an email with her internal people who do their ordering. She further stated they probably already know the answers, but she does not because she is not from the construction side. She thanked the members.

- Ms. Pranata asked Mr. Serrato if he wanted her to notify the committee about the subpoena update. Mr. Serrato stated yes to get it recorded in the minutes. Ms. Pranata reported she sent an email to the Operating Committee that there is a court ordered stay of litigation in place, compliance with the subpoena and demand for deposition is on hold for at least 30 days, probably much longer. This takes everything off-calendar and basically it has been postponed indefinitely. Everything is on hold according to the attorney.

Mr. Serrato asked if there were any other miscellaneous topics. There were none at this time.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Mr. Serrato stated that the members who wanted to be involved to expect an email requesting time slots in some future week to talk about the draft letter.

The meeting adjourned at 1:07 p.m. until November 18, 2020.

Anali Spencer - Committee Staff

Southern California Joint Pole Committee
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www.scjpc.net

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AT&T California	Golden State Water Company
AT&T Mobility	Mobilitie, LLC
CA-CLEC LLC	MCI Metro/ATS
City of Anaheim	MCI Telecommunications
City of Azusa	M-Power Communications
City of Banning	NewPath Networks
City of Burbank	Southern California Edison Company
City of Colton	Sprint Communications
City of Glendale	Sprint Nextel
City of Lompoc	T Mobile USA
City of Los Angeles	Teleport Communications America, LLC
City of Pasadena	Time Warner Cable (Spectrum)
City of Riverside	Verizon California
City of Vernon	Verizon Wireless
Crown Castle NG West., INC	XO Communications
ExTeNet Systems	

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Sincerely,

John Bacon
SCJPC President

Anali Spencer

From: Angela Pranata
Sent: Wednesday, October 21, 2020 12:43 PM
To: Anali Spencer
Cc: Kathleen Allen; Angela Pranata Meeting Laptop
Subject: Fw: pole steps for NON-wood poles

Follow Up Flag: Follow up
Due By: Friday, November 6, 2020 8:00 AM
Flag Status: Flagged

Categories: MTG

From: BLACK, KAY R <kb6314@att.com>
Sent: Wednesday, October 21, 2020 12:19 PM
To: Angela Pranata <angela@scjpc.net>
Subject: pole steps for NON-wood poles

Hi Angela,

Can you show this in Compliance Ad Hoc when we get to MISC please?

91.3 Stepping

A. Unless otherwise specified in this Order, pole steps used to ascend and descend joint use wood poles are not required. However, occupants on joint use wood poles are not prohibited from installing and maintaining temporary or permanent steps.

B. Unless non-climbable, joint use nonwood poles shall include provisions for ascending and descending.

C. Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

Note: Revised January 2, 1962 by Resolution No. E-1109, October 2, 2008 by Decision No. 0810017, January 21, 2015, by Decision No. 1501005, and January 16, 2020 by Decision No. 20-01-010.

Kay Black

Access-C & E West, Joint Pole Staff Support
2125 Occidental Road
Santa Rosa, CA 95403

Southern California Joint Pole Committee

279 E. Arrow Hwy., Suite 104
San Dimas, CA 91773
Phone (909) 599-3801
Fax (909) 599-3825

November 18, 2020

A meeting of the **ad hoc Compliance Committee** took place on the above date, **at 12:46 p.m. via teleconference. Those in attendance were:**

Mr. Joe Serrato	Crown Castle NG West Inc.
Mr. Earle Carrion	Crown Castle NG West Inc.
Mr. Aarize Dizon	Crown Castle NG West Inc.
Mr. Wayne Brown	Southern California Edison
Ms. Camile Bowie	Southern California Edison
Ms. Valerie Mitwasi	Southern California Edison
Mr. John Bacon	City of Los Angeles – DWP
Mr. Bret Plaskey	Frontier Communications
Mr. Lex Treepaisan	Frontier Communications
Ms. Lynn Prescott	Verizon Wireless
Ms. Yesenia Delgado	Time Warner Cable
Ms. Maria Ortiz	XO Communication/ MCI Metro ATS/MCI Telecommunications
Ms. Lupe Hernandez	Teleport Communications America, LLC
Ms. Alicia Smith	Sprint Nextel Corporation/Sprint Communications CO.L.P
Ms. Kay Black	AT&T California
Ms. Cory Crawford	AT&T California
Ms. Tara Andrews	AT&T California
Ms. Shawn Henderson	T-Mobile USA
Mr. Ben Coffey	City of Banning
Ms. Yvonne Johnson	AT&T Mobility
Mr. Nicholas Van Stryk	City of Vernon (Petrelli Electric)
Mr. Kendrew Chung	Mobilitie, LLC
Mr. Scott Lewis	Mobilitie, LLC
Ms. Angela Pranata	Committee Staff
Ms. Kathleen Allen	Committee Staff
Ms. Anali Spencer	Committee Staff

Mr. Serrato called the meeting to order at 12:46 p.m.

Agenda Item 1 – Review of prior month’s minutes – Mr. Serrato inquired if the members had any comments or concerns regarding the prior meeting minutes. There were no comments or concerns from any members.

Agenda Item 2 – Item 1630: CPUC Data Requests Updates (2/14/17)

– Mr. Serrato opened the discussion to CPUC activity and updates. There were no comments or concerns from any members at this time.

Agenda Item 3 – Item 1658: Environmental Issues (1/16/2019, moved from Admin Board on 1/15/2020) – Mr. Serrato opened the discussion to Environmental Issues. He stated that this is usually the time they can inform the rest of the members if there are any changes to their current physical working situation at the office. He stated that for Crown Castle they are aiming to get back into the office around July next year, but that things could change. This is just their current projections.

Mr. Bacon stated that LADWP had an update that Ms. Crawford, AT&T California, and everyone would appreciate. They are going to be opening up to their vendors to come in and take a look at their circuits to retrieve their pole cards for JPAs and wind loading. LADWP will be notifying all the members that occasionally go in to retrieve information. They will be allowing them to come back to the desk, with the difference being they are going to need to set up a schedule with LADWP, and they will be escorted into the building. Mr. Serrato asked if it will be similar to the set up before at the same location inside the office. Mr. Bacon stated it will be inside the office. Mr. Serrato asked Mr. Bacon to confirm if it will be the same desk, just they will need to schedule an appointment ahead of time to come in. Mr. Bacon stated yes, and he will be sending everyone a notice with the schedule and when to call. They will probably need to call a week ahead of time so that they can schedule it and that way he will know somebody will be in the office to be able to escort them to an office area that is well protected with social spacing and everything else with the COVID-19. Ms. Black asked when this will start. Mr. Bacon stated that he will try to get it done by the end of next week so he can send out notifications, but he has red tape to clear first. They do not want outsiders in the building, but he will try to get it by next week.

There were no other comments or concerns from any members at this time.

Agenda Item 4 – Item 1770: 3rd Party Inspection Notification (From Administrative Board meeting – 10/21/2020) – Mr. Serrato opened up to Third Party Inspection Notification which was just moved to Compliance. He asked who brought up this item. Ms. Hernandez stated she thinks it was the City of Pasadena because they are getting third party notifications for infractions that do not belong to them, they are being sent to all owners on record. The discussion City of Pasadena wanted to have was to only send to whomever is infracting. Mr. Serrato stated that he would agree with that, to only send it to the infracting member. He asked if City of Pasadena had any further comments. Mr. Brown stated that he does not believe they are on the call at this time. He stated that in the past, SCE used to do this, but that City of Pasadena stated they SCE was not the party this time and was unsure of who they were referring to. Mr. Serrato stated that this will stay on here for City of Pasadena to be able to speak more on it. The general message is to just notify the offending member. Ms. Hernandez

stated that she believes this needs to be brought up at the Administrative Board so that the utilities that are hiring vendors to do the inspections, to have them only send the notification to the company that is offending it. Mr. Serrato stated that next month when he does the committee updates, he will bring this up during Admin for the meeting. Ms. Black asked if they need to put something in the Routine Handbook for this. Ms. Pranata asked if the members would like to add a “JPA Alert” to the website. Ms. Hernandez stated that a “JPA Alert” would be good after Mr. Serrato brings it up at the Admin Board. Mr. Serrato stated that sounded good as well.

Agenda Item 5 – Miscellaneous –

- Mr. Serrato opened to the proposed draft letters regarding getting permits from Caltrans, basically an authorization letter. He stated that the members were supposed to meet offline to discuss the different drafts and concerns they had. He is still waiting for availability from some of the members that expressed interest. He just asked for availability a couple of days ago and is expecting to meet next week or right after Thanksgiving to discuss updates for January. He stated if anyone is interested in joining the call to email him, and he will include them on the information thread.

Mr. Bacon asked Mr. Serrato if he could send him a copy of the draft letter. Mr. Serrato stated that he is going to collect them all because there are a few different versions from different team members. He will try and find the latest drafts from everyone. The letters were displayed as part of the meeting packet. Mr. Serrato asked Ms. Pranata if this was in an easy package to send to Mr. Bacon. Ms. Pranata stated it is in the meeting packet but that there are different versions, and she was unsure of which one to send to Mr. Bacon or if she should send the entire thing. Mr. Serrato stated to send the entire thing to Mr. Bacon and to him as well for material to have during the off-cycle meeting. Ms. Pranata stated she could send that.

Mr. Serrato asked if there were any other miscellaneous topics. There were none at this time.

Agenda Item 5 – Review of Action Items/JPA Alerts -

- Crown Castle to have offline meeting with interested members regarding the draft letter.
- Mr. Serrato will announce at the next Administrative Board meeting regarding the Third-Party Notifications and who it should go to.
- Ms. Pranata to follow up with a “JPA Alert” after the Third-Party Notifications are announced at the Administrative Board meeting.

The meeting adjourned at 12:55 p.m. until January 20, 2021.

Anali Spencer - Committee Staff