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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

ENERGY DIVISION

RESOLUTION E-4107
AUGUST 23, 2007

R E S O L U T I O N

Resolution E-4107. Establishment of Schedule Wi-Fi-1 and Associated Agreement to Provide Unmetered Electric Service for the Attachment of Wi-Fi Devices to Southern California Edison Company (SCE)-Owned Streetlights.

Request Granted as Modified.

By Advice Letter 2127-E Filed on May 23, 2007.

SUMMARY

This Resolution approves with modifications SCE's proposed new Schedule Wi-Fi-1 and Agreement (Form 14-764) providing Unmetered Electric Service to WiFi Internet Devices of 35 W maximum power attached to SCE-Owned Streetlights. The proposed Initialization of Service charge shall be tracked in a Memorandum Account and shown to be reasonable in an Energy Resource Recovery Account (ERRA) Application. The provision of energy under this schedule shall not be considered a Service according to Rules 15 and 16. SCE service to other customers and operation of its system shall have priority over service to WiFi devices under this schedule. Minimum voltage under Rule 2 shall not apply to this schedule.

BACKGROUND

SCE's Schedule Experimental WTR (Wireless Technology Rate) became first effective November 1999. It allows devices rated up to 700 watts (W) to be mounted on SCE facilities, and applies to "single phase service for wireless technology industries that require electric service to operate radio repeaters or similar devices that are mounted on existing SCE facilities …and are

unmetered". SCE reported that in practice however, it was not applying Schedule WTR to WiFi Internet (WiFi) devices.

Cities, counties and commercial WiFi service providers have approached SCE regarding the attachment of WiFi devices to SCE's streetlights and the powering of these devices with unmetered electric energy so that these entities can make wireless Internet service available within the communities they serve.

SCE conducted a pilot study to evaluate the feasibility of allowing the attachment of WiFi devices to SCE's streetlights. Of concern was (1) the "power quality" served to streetlights when WiFi devices were attached, (2) potential for radio frequency interference (RFI) with radios used in operating SCE's electrical system, and (3) interference with operation of other utility equipment or impact on the service to customers.

The pilot study was necessary because SCE's primary obligation is to operate and maintain its electric system, including the 615,000 owned streetlights out of a total of 780,000 in their service territory. Seventy percent of the owned streetlights are stand alone, loop fed by 120 volt circuits, where the power quality concern is greatest. The pilot was performed over a two-month period on 36 streetlights and five streetlight circuits on a 0.2 square mile area.

The results of the pilot showed that 35 watts of additional load on 50% of the streetlights, (on every other adjacent streetlight) can be accommodated without adverse impact.

Since the pilot was not inclusive of every type of WiFi equipment available on the market, SCE reserves the right to test or have tested by third parties, devices not included in the pilot, at the WiFi provider's cost. Both parties must be satisfied with the test results of a pre-service test of the devices.

Installation of WiFi devices located adjacent to any SCE private WiFi (radio frequency) network must reflect consideration of the following design options to minimize the radio frequency interference between them:

- Configure the WiFi radios to operate in different non-overlapping WiFi channels.
- Use directional antennas where applicable to direct WiFi signals away from neighboring WiFi radios.
- Deploy interference-reduction schemes.

Furthermore,

- The WiFi pilot was utility-focused and did not evaluate any customer-related issues (i.e. in-the-home Internet service). SCE does not guarantee or warrant any degree of geographical coverage or adequacy of Internet service itself.
- There is no guarantee that any next-generation technology will meet SCE's technical requirements to receive electric service from streetlights.
- There is no guarantee, depending on the network architecture and density of devices, that multiple service providers can obtain service from the same streetlight circuits.

SCE's proposal

SCE proposes to offer unmetered electric service to cities, counties and commercial providers of WiFi Internet service, if qualified (per Schedule Wi-Fi-1 and SCE), under the following salient conditions:

- Signed agreement and payment of charges. These are:
  - Fixed Energy charges for 25 kWh/month/device at the Schedule TC-1 (Traffic Control) rate
  - Customer Charge of $3.70/month
  - Inventory/Maintenance Charge of $2.30/month/device
  - Initialization of Service Charge of $ 8.50/device
- Maximum of 35 watts per device on every other adjacent pole.
- No WiFi devices are allowed on "nostalgic" or "ornamental" streetlights.
- WiFi devices are allowed in communication spaces of SCE's distribution poles provided SCE has exclusive right to the space. If space is owned by another utility, then a city/county or commercial WiFi provider must either establish a license agreement with the pole owner of record or join the Southern California Joint Pole Committee.
- Only SCE approved WiFi devices are allowed (interference-reduction schemes where required, power requirement).

- WiFi provider bears all costs and labor for installation of WiFi devices and modifications for continuous electric service.
- Testing of the customer's WiFi devices and associated equipment may be required to SCE's satisfaction at customer's expense.
- For devices attached to streetlights fed directly from SCE's distribution system (not "loop-fed"), General Order (G.O.) 95 applies, requiring device owners to absorb the cost of maintaining clearances around the device and of moving, removing or modifying them due to G.O. changes.
- Customer bears costs for streetlight circuit upgrade or repairs due to WiFi device installation.
- Rule 2 minimum customer service voltage is not applicable.
- All attendant upgrades to existing SCE streetlight facilities shall not be subject to Rules 15 and 16 (Distribution line and Service extensions).
- Attachments and services under Schedule Wi-Fi-1 must be permitted under existing franchise or other agreement between SCE and local jurisdiction.

SCE requested that a resolution be approved by the Commission, mainly to confirm that attachment of WiFi Internet devices to SCE's streetlights where unmetered service is provided, does not constitute a "service" for purpose of applying the provisions of Rules 15 and 16. These line and service extension rules create utility ownership and obligate the utility to maintain them. An allowance is also granted to customers of new extensions, the cost of which is placed into ratebase.

A resolution would also settle whether PUC Section 851 issues of transfer or encumbrance of utility property were involved with attaching WiFi devices.

NOTICE

Notice of AL 2127-E was made by publication in the Commission's Daily Calendar. SCE states that a copy of the Advice Letter was mailed and distributed in accordance with Section III-G of General Order 96-A.

PROTESTS

Advice Letter 2127-E was protested.

SCE's Advice Letter AL 2127-E was protested two days late by the City of Santa Clarita (CSC) and the City of Diamond Bar (CDB), both on June 14, 2007.

SCE responded to both protests on June 25, 2007.

City of Santa Clarita Protest

CSC's protest raised the following issues:

Public Right of Way:

CSC is concerned that commercial WiFi provider obtain the permission by the CSC to install WiFi devices in the right of way prior to installation. It also seeks clarification of Schedule Wi-Fi-1, Special Condition 4 and Section 12 of the Agreement.

Initialization-of-Service Charge:

CSC questions the rationale for the $ 8.55 charge since Section 7 of the Agreement makes the customer responsible for providing most of the information the charge is designed for. Considering the large number of devices usually installed, the economy of scale should result in lower costs.

Abandonment of Devices:

CSC would like contract language to safeguard against abandonment of WiFi devices in case the customer is dissolved or otherwise unable to fulfill the contract. CSC wants SCE to remove such devices immediately.

City of Diamond Bar Protest

Approved Devices:

CDB would like SCE to provide an updated, public itemized list of approved WiFi devices under this Schedule Wi-Fi-1.

Pole Access Disputes:

CDC would like clear, effective and fair procedures for pole access disputes.

Priority rights:

CDC would like municipal agencies to have priority/right of first refusal pole access.

Startup costs:

CDC believes that due to the large number of devices to be installed, the startup costs to be excessive.

SCE's Responses to Protests

SCE points out that tariff Wi-Fi-1 is proposed in response to Commissioners' and numerous cities' requests. The guiding principles are (1) economic indifference to ratepayers and shareholders, (2) successful operation of any WiFi installation is the responsibility of the provider (customer), and (3) service under this tariff is secondary to and shall not interfere with the safe and reliable streetlight service.

Responses to City of Santa Clarita's protest

Public Right of Way:

SCE refers to Section 11 of the Agreement which requires a Licensee or Pole User to sign an Agreement and be solely responsible to secure any rights and permissions for placement and use of the customer's equipment on or over private property or the public right of way. The city can grant permission to a third party WiFi service provider as it deems appropriate under the circumstances.

Initialization-of-Service Charges:

See the response to the City of Diamond Bar protest.

Abandonment of Devices:

SCE refers to the Agreement which makes the customer responsible for the removal of abandoned equipment. SCE can pursue legal action for customers still in business and failing to remove such equipment. Otherwise SCE believes that the cities are responsible for removal of equipment of insolvent customers, consistent with the principle of cost indifference to ratepayers or shareholders and because the WiFi service is to the benefit of the citizens and visitors of the city. SCE proposes that the cities satisfy themselves as to the technical capability and financial and credit worthiness of third party providers applying for permits or licenses to install WiFi systems. Posting of a bond to the city would also be an option.

Responses to City of Diamond Bar's protest

Approved Devices:

Consistent with the guiding principals for cost indifference SCE rejects the affirmative obligation to test new devices and list approved devices on a public list, but will make such information available upon request.

Pole Access Disputes:
For cost reasons, SCE intends to make device attachments available on a first come first served basis. Since prior city permits, such as Conditional Use Permits are presumably required, the cities will likely select their preferred provider and limit the disputes for attachments of devices.

Priority Rights:
SCE responds that by way of granting permits the cities may in effect exercise their first right of refusal to attach devices to streetlights.
SCE desires the Commission's express acknowledgement when approving this AL as to the priority duty of SCE to provide safe and reliable electric service to its customers, including those served through its streetlight systems, over any WiFi provider (City or commercial). This is important because of the same frequency band of SCE system operating radios and Commission-encouraged Advanced Metering Initiative (AMI) and the space potentially needed later on the light poles. Cooperation with WiFi service providers on best utilization of unlicensed frequency channels should be a condition of the proposed tariff.

Initialization-of-Service (Start-up) Costs:
SCE rejects both cities' protests to the $ 8.55 Initialization charge claiming that it pays the cost for processing and tracking of each device and entry into SCE's mapping system, without profit.

DISCUSSION

The Energy Division has reviewed the Advice Letter with attached Schedule Wi-Fi-1 (Attachment A to the Agreement), the Agreement for Unmetered Electric Service to Wi-Fi Devices Attached to SCE-Owned Streetlight Facilities (Agreement) Form 14-764, and Attachments B and C to the Agreement, the protests and SCE's response to the protests, SCE's comments to the draft resolution and responses to data requests.

Public Right of Way
We agree with SCE that Section 11 of the Agreement (Form 14-764) is sufficient notification to the customer that he/she is obligated to secure any public rights of way use permit. SCE's comment to the protests points out that license and pole use agreements are covered under General Order (G.O.) 69-C and therefore not filed with the Commission. However, SCE should delete the last sentence in Section 11 of the agreement because it is a repetition of Section 12.

Abandonment of Devices
Considering the cost involved for SCE and ratepayers to be responsible for removal of abandoned devices we agree with SCE. Cities should satisfy themselves as to the technical capabilities, financial status and creditworthiness of third party WiFi providers applying for permits or licenses to install and operate devices within their jurisdictions. A bond by the customer to the city could indeed pay for removal of abandoned devices by the city. No change to the agreement is warranted in this regard.

Approved Devices
For cost considerations we agree with SCE that maintaining a public list of approved WiFi devices is not warranted since SCE is willing to provide this information upon request. SCE has no obligation to affirmatively test devices for eventual use by WiFi providers.

Pole Access Disputes
This tariff is for energy supply only. Separate pole access or license agreements are required for attachment of devices to streetlights and power poles. All attachments of WiFi devices on or over public rights of way require permission or a license by local jurisdictions whose priorities will minimize disputes over access. A Pole Access agreement is separate from an electric service agreement such as Agreement (Form14-764) which is part of this AL.

Priority rights
The matter of priorities for cities over commercial WiFi providers is analyzed above.

SCE states that safe and reliable electric service to its other customers, including those served through its streetlight circuits, has priority over any WiFi provider (City or commercial) service under this tariff. We agree.

Consistent with this premise SCE may require WiFi service providers to cooperate with SCE to best utilize unlicensed frequency channels as a condition of the proposed tariff. A statement that use of attachment space for SCE's equipment serving other customers has preference over use by WiFi devices should be included in the tariff and agreement, unless stated in other agreements (pole access, license).

Charges

Initialization of Service charge:

There is no record on the cost for this service under the proposed tariff and similar Schedules WTR and TC-1 do not require such a charge for the purpose stated. Schedule WTR does include a charge of $ 6.79 for a lock and spare fuse though, but they are not required under the proposed schedule. We agree with CSC that this charge appears to cover the collection of the same information the customer provides under Section 7 of the Agreement. SCE also states that the monthly Customer charge (discussed below) is designed to recover "…costs…to setting up service…" SCE's comments did not disclose the amount of the comparable Initialization charge it levies by the unfiled pole attachment agreement under Schedule WTR. We therefore approve SCE's proposed one-time Initialization of Service charge of $ 8.55/device, subject to establishing a Memorandum Account to record its costs and showing the reasonableness in the Energy Resource Recovery Account (ERRA) Application to be filed in April 2008 or 2009. A clear description of the costs included in the Initialization of service charge and in the monthly Customer charge shall be presented at that time. Adjustments to the Initialization charge with interest would then occur to cover shortfall or flow excess revenue back to Wi-Fi customers. The Preliminary statements shall be revised and the proposed Wi-Fi-1 tariff supplemented to incorporate this provision. Any license or pole attachment agreement shall not include duplicate Initialization charges.

Customer charge:

The monthly charge of $3.70/month has not been specifically protested. The charge seems reasonable compared with the customer charge of $8.32/month in Schedule WTR. The customer charge is per account only, as shown in the proposed tariff, not per device, as SCE's response to the Data Request (DR) of August 15, 2007 erroneously shows.

Inventory/Maintenance charge:

In response to the DR, SCE referred to an approved AL 1809-E of July 2004, which requested a $ 7.69/device/month inspection charge for mileage and labor cost, and making the experimental Schedule WTR permanent. This charge was then included in the distribution rate of subject schedule and provides a record for the proposed charge in Schedule Wi-Fi-1. The lower proposed $2.30/device/month reflects the economy of scale of the much larger number of Wi-Fi devices installed on one account compared to wireless technology devices under Schedule WTR. The requirement in Section 7 of the Agreement (Form 14-

764), for the Customer to furnish quarterly updated inventories of the installed devices, results in lower SCE administrative costs, which are also reflected in the charge. In light of SCE's explanation and assurance that it does not intend to make a profit on the charge, we approve the proposed monthly Inventory/Maintenance cost.

Energy Division staff editorial comments and clarification requests

Applicability:
The proposed Schedule WiFi-1 and existing Schedule WTR overlap in applicability. The Applicability section of Schedule WTR should therefore exclude WiFi devices on "looped" (served by 120/240 volts) streetlight facilities owned by SCE. For transparency and consistency with Schedule Wi-Fi-1 the Inspection/Monitoring charge embedded in the distribution charges of Schedule WTR should be separately shown. Also, on Form 14-687, Application and Contract for Electric Service for Schedule WTR, Paragraph 2, the word "Experimental" should be deleted.

The Applicability section of Schedule WiFi-1 should qualify "… for every two adjacent poles on the same (looped) circuit …", and since commercial providers are not necessarily local, the words "…in their respective communities." should be changed to "…the communities they serve …" The ineligibility sentence should be corrected to read "…customer becomes ineligible for service on streetlight circuits under …"

Timed Auxiliary Power (TAP) Adaptors are not applicable because of the 24/7 operation of the WiFi devices. This should be clarified in the tariff.

Special Condition 6:
See above regarding TAP Adaptors.

Special Condition 16:
To clarify the monthly varying calculation of the energy charges, the entire text of Schedule TC-1, Special Condition 3 needs to be included. Since reference to TC-1 is made, the unit "$/kWh/Meter/Day" needs to be clarified in that schedule. "Meter/day" is unnecessary and confusing.

Agreement (Form14-764):
Citation B; change "…in their respective communities…" to "…the communities they serve …" for the same reason stated above.
Citation C; should delete redundant "…desiring to participate in SCE's WiFi-1 …"
Terms and Conditions 5; should read "WiFi Service Grouping" and "All services to customer equipment in a city or unincorporated area of a county are grouped in a specific account for proper billing and accounting…… unmetered service"
Terms and Condition7; since the accounts are separated by cities, it should read "…verifies the number and locations of all Equipment in each city …"
Terms and Conditions 8; "…otherwise…" should be deleted because the rates for WiFi-1 are included in the Schedule.
Terms and Conditions 9; should delete repetitions "Customer will provide a complete and accurate inventory and other information as required in Attachment C" and "auditing or devices" and "… not required with meter reads…" and "…otherwise…"
Terms and Conditions 11; should delete "…distribution poles…" because they are not subject to this Schedule.

Attachment B:
The "WATTS" line should be titled "Nameplate rating (Watts)" and there should be lines to enter the requested amps, volts, average consumption (kWh) information. Hours of operation, photo control and efficiency information are inapplicable or unnecessary information for this application. On the table correct "Annual" to "Quarterly" because SCE requires the customer to complete the inventory quarterly. TOT# (Total number of devices per streetlight pole) and SA# (Service Account number) should be spelled out. The TOT# is unnecessary because only one device will be on a pole.

COMMENTS

Public Utilities Code section 311(g) (1) provides that this resolution must be served on all parties and subject to at least 30 days public review and comment prior to a vote of the Commission. Section 311(g) (2) provides that this 30-day period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on July 24, 2007, and is scheduled for a vote on August 23, 2007.

On August 9, 2007 SCE commented to the Draft Resolution as follows:

Energy Division Editorial Comments
SCE will incorporate the requested changes in the proposed tariff Wi-Fi-1 and existing tariff WTR.

Initialization of Service and Inventory/Maintenance Charges
SCE maintains that these charges are necessary to keep the ratepayers and shareholders financially indifferent, which is a guiding principal of the proposed tariff and requests to record the two charges in a memorandum account because of the limited experience with the actual costs of these activities. The reasonableness would be shown in the annual Energy Resource Recovery Account (ERRA) Application filed in April 2008 or 2009. The charges would then be adjusted to account for over or under collection with interest.
a) SCE explains that the Initialization of Service Charge under Schedule Wi-Fi-1 differs from Schedules WTR and TC-1 because it is for labor associate with 1) entering data into SCE's facility mapping system for each individual streetlight; and 2) setting-up a service account for groups of devices. Devices are connected via TAP devices to confirm energy usage. It is anticipated that 150-200 devices at a time would be installed and thus entered for an account. WTR establishes an account for each device and comparable Initialization charges are "captured in a separate pole licensing agreement". Since these devices are installed under General Order 69-C, the pole licensing agreements are not subject to filing with the Commission. The unfiled "license" or "pole agreement" referenced in Section 11 of the proposedWi-Fi-1 agreement will not have an Initialization of Service Charge.

b) SCE explains that for Schedule WTR they provide a spare fuse and lock paid for by the Initialization charge, where the customer provides such for Schedule Wi-Fi-1.

c) SCE explains that Schedule WTR includes inspection charges in the distribution rate component, but Schedule Wi-Fi-1 proposes monthly Inventory/Maintenance charges instead.

The Energy Division Staff responses to SCE's comments and responses to Data Requests are incorporated in the Discussion Section above.

FINDINGS

1. Advice Letter 2127-E was filed by SCE on its own accord.
2. SCE conducted a pilot study to evaluate the feasibility of powering WiFi Internet devices from SCE's streetlight circuits.
3. SCE's primary obligation is to operate and maintain its electric system, including a total of 780,000 streetlights of which the 615,000 owned by SCE would be subject to this Schedule Wi-Fi-1.
4. The pilot showed that 35 watts of additional load on 50% of the streetlights (every other) on a circuit (loop) can be accommodated without adverse impact.
5. The WiFi pilot was utility-focused and did not evaluate any customer-related issues, next-generation technology or multiple WiFi service providers being supplied from the same streetlight circuit.
6. WiFi network radios located adjacent to any SCE facility with a private WiFi network have to consider measures to minimize the RFI between both parties.
7. In November 1999 SCE's Schedule Experimental WTR (Wireless Technology Rate) for unmetered service for devices rated up to 700 watts became effective.
8. Under Schedule Wi-Fi-1 SCE proposes unmetered electric service to devices of cities/counties and qualified commercial providers of WiFi Internet service on SCE owned streetlights of 25 kWh per month and device, fixed at the Schedule TC-1 (Traffic Control) energy rate.
9. SCE proposes a Customer Charge of $3.70/month / account, an Inventory/Maintenance Charge of $2.30 per month/device and an Initialization of Service Charge of $8.55/device.
10. SCE proposes that providers (Customers) bear all costs of labor and materials for installation of WiFi devices, for modifications for continuous electric service, and for testing required by SCE.
11. Rule 2 minimum customer service voltage is not applicable for the WiFi devices.

12. WiFi devices are allowed in the communication spaces of distribution poles owned by SCE, or licensed from others, or if the provider joins the Southern California Joint Pole Committee.
13. General Order 95 applies to WiFi devices fed directly from SCE's primary distribution system.
14. SCE requests that the Commission approve a resolution to confirm that unmetered service to WiFi Internet devices does not constitute a "service" under Rules 15 and 16.
15. SCE responded to protests filed two days late by the City of Santa Clarita (CSC) and the City of Diamond Bar (CDB).
16. CSC is concerned that commercial WiFi providers obtain the permission by the CSC to install WiFi devices in the right of way prior to installation.
17. CSC and CDB question the rationale for the $ 8.55 Initialization of Service charge since the customer provides most of the information under Section 7 of the Agreement.
18. CSC would like the WiFi contract language to require SCE to remove abandoned WiFi devices immediately.
19. CDB would like SCE to provide an updated, public itemized list of approved WiFi devices under this Schedule WiFi-1.
20. CDB would like clear, effective and fair procedures for pole access disputes.
21. CDB would like municipal agencies to have priority/right of first refusal pole access.
22. SCE points out that tariff WiFi-1 is proposed in response to requests by Commissioners and numerous cities.
23. SCE states the three guiding principles: (1) ratepayers and shareholders to remain economically indifferent, (2) successful operation of any WiFi installation is the responsibility of the WiFi service provider (customer), and (3) service under this tariff is secondary to and shall not interfere with safe and reliable streetlight service.
24. SCE states that it makes this tariff available as an accommodation to local governments and has not sought to make a profit on this service.
25. Section 11 of the Agreement assures cities will be notified by making a Licensee or Pole User responsible to secure any rights and permissions for placement and use of WiFi equipment on or over private property or the public right of way. The proposed schedule is for power provision only.
26. License and pole attachment agreements are governed by General Order 69-C and therefore not filed with the Commission.
27. A city can grant permission to a third party WiFi service provider as it deems appropriate under the circumstances, including preferring providers

and establishing first right of refusal in order to minimize disputes between the utility and providers/cities.

28. A city could require a bond from the provider to pay for removal of abandoned devices by the city. Ratepayers are thus kept harmless.
29. SCE will make a list of approved WiFi devices available upon request.
30. SCE desires the Commission's express acknowledgement when approving this AL as to the priority duty of SCE to provide safe and reliable electric service to its customers over any WiFi provider (City or commercial); including WiFi providers served through its streetlight circuits.
31. There is no record supporting the proposed cost for "Initializing" the service under this tariff. Similar Schedules WTR and TC-1 do not require such a charge for the purpose stated.
32. SCE states that a comparable charge ($ 8.55) for Initialization of Service under Schedule WTR is captured in a separate pole license agreement and not in Schedule WTR. This pole license agreement is covered by G.O. 69-C and therefore not filed with the Commission.
33. SCE proposes to track the Initialization of Service costs in a Memorandum Account and justify it in the 2008 or 2009 ERRA, depending on the number of devices installed at those times.
33. Section 11 of the Agreement (Form 14-764) is sufficient notification to the WiFi provider that he/she is obligated to secure any public rights of way use permit.
34. The monthly Customer charge of $3.70/month has not been protested and seems reasonable compared with the customer charge of $8.32/month for Schedule WTR. Note that this charge is per account, as shown in the proposed tariff.
35. Approved AL 1809-E of July 2004, requested a $ 7.69/device/month inspection charge for mileage and labor cost, when making the experimental Schedule WTR permanent. This charge was then included in the distribution rate of subject schedule and provides a record for the proposed $2.30/device/month charge in Schedule Wi-Fi-1. The lower proposed reflects the economy of scale of the much larger number of Wi-Fi devices installed on one Wi-Fi-1.
36. Sections 7 and 9 of the Agreement (Form 14-764) obligate the Customer to perform or pay SCE for Inventory/Maintenance tasks, thus reducing the monthly cost to SCE, which is also reflected in the $ 2.30 charge.
37. Schedule WTR requires the customer to pay for maintenance costs exceeding SCE's normal expense.
38. SCE states that it does not intend to make a profit on the charges.

THEREFORE IT IS ORDERED THAT:

1. The request of SCE to provide unmetered electric service to WiFi devices mounted on their streetlights, as requested in Advice Letter AL 2127-E, is approved as modified.
2. The schedule and/or agreement shall state that: 1) safe and reliable electric service to SCE's other customers, including those served through its streetlight circuits, has priority over service to all WiFi providers (City or commercial) under this tariff, 2) cooperation with WiFi service providers on best utilization of unlicensed frequency channels is a condition of the proposed tariff, and 3) use of pole attachment space for SCE's equipment serving other customers has preference over use by WiFi devices.
3. SCE shall clarify that license and pole use agreements are covered by General Order 69-C.
4. SCE shall state that Rules 15 and 16 and Rule 2 with regards to minimum customer voltage do not apply to Schedule Wi-Fi-1.
5. SCE shall state that the proposed charge of $ 8.55 per Device for Initialization of Service is tracked in a Memorandum account and cost justified with regards to the monthly Inventory/Maintenance charge in the ERRA of 2008 or 2009.
6. SCE shall establish a Memorandum account to track the costs for Inventory/Maintenance of the WiFi devices and reflect this in the Preliminary Statements.
7. Any license and pole attachment agreements associated with the proposed Schedule Wi-Fi-1 shall not include charges for Initialization of Service or Inspection/Maintenance.
8. Schedule WTR shall clearly state (or exclude) its applicability to WiFi service as compared to the proposed schedule Wi-Fi-1.
9. Attachment B to the Agreement shall include lines for insertion of all information requested from the customer.
10. SCE shall clarify language in Schedules Wi-Fi-1, WTR, TC-1 and Forms 14-764 and 14-687, as provided in the Discussion in cooperation with Energy Division staff within 30 days of this resolution.

This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on August 23, 2007, the following Commissioners voting favorably thereon:

_____
Paul Clanon
Executive Director

MICHAEL R. PEEVEY
PRESIDENT
DIAN M. GRUENEICH
JOHN A. BOHN
RACHELLE B. CHONG
TIMOTHY ALAN SIMON
Commissioners