



**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE  
STATE OF CALIFORNIA**

**FILED**  
01/11/19  
04:59 PM

Order Instituting Rulemaking to Consider  
Revisions to Electric Rule 20 and Related  
Matters.

Rulemaking 17-05-010

**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), PACIFIC GAS AND  
ELECTRIC COMPANY (U 39-E), AND SAN DIEGO GAS & ELECTRIC COMPANY'S  
(U 902-E) COMMENTS ON SCOPING MEMO AND RULING OF ASSIGNED  
COMMISSIONER AND PROPOSAL FOR NEAR-TERM IMPROVEMENTS TO THE  
RULE 20A PROGRAM**

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Dated: **January 11, 2019**

**SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E), PACIFIC GAS AND ELECTRIC COMPANY (U 39-E), AND SAN DIEGO GAS & ELECTRIC COMPANY’s (U 902-E) comments ON SCOPING MEMO AND RULING OF ASSIGNED COMMISSIONER AND PROPOSAL FOR NEAR-TERM IMPROVEMENTS TO THE RULE 20A PROGRAM**

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COMMISSIONER AND PROPOSAL FOR NEAR-TERM IMPROVEMENTS TO THE  
RULE 20A PROGRAM**

Pursuant to the Assigned Commissioner’s Scoping Memo and Ruling, issued on November 9, 2018 (“Scoping Memo”), Southern California Edison Company (“SCE”), Pacific Gas and Electric Company (“PG&E”), and San Diego Gas & Electric Company (“SDG&E”) (together, the “Joint IOUs”) respectfully submit these comments on the Scoping Memo, which includes a proposal for near-term improvements to the Rule 20A program.

**I.  
BACKGROUND**

On May 19, 2017, the Commission issued the Order Instituting Rulemaking to Consider Revisions to Electric Rule 20 and Related Matters (“Rule 20 OIR”).<sup>1</sup> The Rule 20 OIR will review issues related to undergrounding of electric distribution lines and consider the possibility of revising the Rule 20 program<sup>2</sup> in order to “enhance the fair, efficient allocation of ratepayer funds to communities for the undergrounding of electric infrastructure in specified locations and circumstances.”<sup>3</sup>

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<sup>1</sup> R.17-05-010.

<sup>2</sup> Scoping Memo, p. 1.

<sup>3</sup> Rule 20 OIR, p. 2.

The Scoping Memo established the issues to be addressed in the Rule 20 OIR. Parties were encouraged to file comments on the issues in Section 2 of the Scoping Memo, which includes issues related to program operations (Section 2.1) and near-term improvements (Section 2.2).<sup>4</sup> Additionally, parties were asked to “develop and file proposals for improvements to the Rule 20A program that may be implemented on a near-term basis.”<sup>5</sup> The Joint IOUs respectfully submit these comments, which include a proposal for a near-term improvement to the Rule 20A program.

**A. The Rule 20A Program**

When a city or county is interested in converting their overhead power lines and other equipment to underground facilities, Rule 20 is the electric tariff that defines the policies and procedures that California’s electric utilities must follow.<sup>6</sup> In accordance with Rule 20A, SCE, PG&E, and SDG&E may replace existing overhead electric facilities with underground electric facilities, provided that: the city or county has adopted an ordinance creating an active undergrounding district(s); the project is found to be within the Commission-adopted requirements for being in the public interest; the city has sufficient allocation of Rule 20 credits to cover the cost of the project; and there are available resources to perform the work.<sup>7</sup> In instances other than those covered in Rule 20A, Rule 20B and 20C allow for conversion of overhead to underground facilities provided that other specific criteria are met and the costs to underground are paid for primarily by the applicant.<sup>8</sup>

It should be noted that historically and currently, the Rule 20A program promotes undergrounding for mainly aesthetic purposes and does not consider factors for safety and

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<sup>4</sup> Scoping Memo, p. 9.

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> See SCE’s Rule 20, Section A, sheets 1-5, PG&E’s Rule 20, Section A, sheets 1-3, and SDG&E’s Rule 20, Section A, sheets 1–3 for detailed requirements.

<sup>8</sup> See SCE’s Rule 20, Sections B and C, sheets 5-6, PG&E’s Rule 20, Section B and C, sheets 4-5, and SDG&E’s Rule 20, Sections B and C, sheets 4–5 for detailed requirements.

reliability in the Rule 20 criteria.<sup>9</sup> Undergrounding for public safety is considered by each investor-owned utility (“IOU”) as part of its overall system hardening efforts.

**B. System Hardening Efforts by the Joint IOUs**

For SCE, the primary design standard for new construction and re-construction work throughout SCE’s service area, outside of High Fire Risk Areas, is an overhead distribution system using bare conductor.<sup>10</sup> In High Fire Risk Areas, SCE plans to use covered/insulated conductors for future conductor programs to help mitigate fire risk, as appropriate.<sup>11</sup> Most of SCE’s distribution system, installed decades ago, is overhead using bare conductors, which has been an industry standard for decades and has proven to be reliable and cost effective.<sup>12</sup> SCE will continue to evaluate any additional wildfire risk mitigations as it gains new information that will inform any future determinations regarding further hardening of its infrastructure, including considering converting an existing overhead circuit to underground when an underground design is determined to be the best value and risk mitigation for customers.

PG&E’s Distribution Overhead System Hardening and Reliability Program recognizes the need to make significant new investments to the overhead distribution system to further reduce the risk of wildfire ignitions and circuit damage in the event of a wildfire.<sup>13</sup> In portions of Tier 2 and Tier 3 of High Fire Threat District (“HFTD”) areas, selected and prioritized based on a risk-informed model, the work will be risk sensitive and site-specific, which may include (1) replacing primary and secondary conductor with insulated wire to prevent ignitions associated with contact with falling trees; (2) replacing existing wood poles with more resilient poles, including non-wood poles; (3) replacing transformers and certain line equipment with models that have a lower fire risk; and (4) upgrading protective systems that detect and operate to isolate

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<sup>9</sup> See D.73078 (67 CPUC 490) and D.01-12-009.

<sup>10</sup> See SCE’s Grid Safety and Resiliency Program Application (A.18-09-002), p. 42.

<sup>11</sup> *Id.*, pp. 4-5. Where appropriate and based upon its risk-informed model, SCE may convert existing overhead circuits or circuit segments to underground.

<sup>12</sup> *Id.*, p. 42.

<sup>13</sup> See PG&E 2020 General Rate Case, A.18-12-009, PG&E- 4, Chapter 9, filed December 13, 2018.

faults.<sup>14</sup> Where appropriate and cost effective, PG&E may convert existing overhead circuits to underground.<sup>15</sup>

SDG&E's use of bare conductor wire for new installation outside of HFTDs is similar to SCE's and the bare conductor wire installations are similarly cost effective and reliable. In 2013, SDG&E started a program called the Fire Risk Mitigation Initiative ("FiRM") to fire harden the overhead electrical distribution system. The goal of the FiRM program is to address fire risk by replacing aged line elements and select conductors, poles, and equipment within the HFTD. In 2014, SDG&E received Commission approval for its Rule 20D program, which allows for conversion of existing overhead facilities to underground along public streets and roads, and on public lands and private property in more fire-prone areas where undergrounding is the preferred method to reduce fire risk and enhance reliability.

### **1. Undergrounding Costs**

Based on the experience of the Joint IOUs, an underground conversion costs significantly more to build than installing an overhead distribution system and typically has a much longer construction timeline.<sup>16</sup> The cost of undergrounding distribution lines can vary significantly depending on many factors, such as urban/rural setting, project line mileage, geology, existing underground infrastructure (*e.g.*, water, sewer, storm, gas), permitting requirements, whether communication utilities share the trenching costs, road width (work access), nearby sidewalks (to comply with the Americans with Disabilities Act), density of nearby residences and businesses, surrounding vegetation, the number of power lines involved,

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<sup>14</sup> *Id.*, p. 9-2.

<sup>15</sup> *Id.*

<sup>16</sup> Based on SCE's experience, the cost associated with replacing the existing overhead distribution system using larger bare conductor is approximately \$300,000 per circuit mile, while the cost for an underground conversion is approximately \$3 million per circuit mile (see SCE's Grid Safety and Resiliency Application (A.18-09-002), p. 53). SDG&E's average cost differential between overhead installations and underground installations is approximately 2.5 to 4 times higher for underground as compared to overhead. PG&E estimates that for the entire distribution system, undergrounding existing distribution assets costs on average three times more than building new overhead lines and may be up to ten times more depending on many various project-specific factors.

and other environmental issues. In addition, underground lines are not immune to weather damage and are vulnerable to equipment issues, lightning strikes, flooding, earthquakes, and excavation damage by a third party. Also, the estimate includes only electric utility costs, costs for telephone and cable television would add to the overall project costs. These additional considerations and the significant cost difference cannot be ignored when considering which design, overhead or underground, provides the best value and risk mitigation for customers.

**II.**  
**THE JOINT IOUs AGREE THAT ISSUES RELATED TO PROGRAM OPERATION**  
**(SECTION 2.1) SHOULD BE ADDRESSED IN THE RULE 20 PROCEEDING**

The Joint IOUs agree that the issues related to program operation, identified within Section 2.1 of the Scoping Memo, should be addressed in the Rule 20A proceeding. Section 2.1 identifies eight “Issues Related to Program Operation,” including consideration of funding allocated to Rule 20A programs, allocation of Rule 20A work credits, cost overruns, implementation of Rule 20A tariff provisions and existing restrictions, along with other aspects of program management.<sup>17</sup> The Joint IOUs are particularly interested in collaborating with parties on issues such as improvements to the allocation methodology and approach to unused allocations.

**A. Improvements to the Rule 20A Allocation Methodology**

The Joint IOUs believe there is an opportunity to modify the current allocation methodology to more fairly and equitably allocate annual Rule 20A budget to the cities and counties within each of its service territories. The current methodology included in the Rule 20 tariff is based on the number of meters, with 50 percent of the calculation based on total meters within each municipality, and 50 percent of the calculation based on “overhead” fed meters. With 50 percent of the calculation based on total meters, municipalities with mostly underground

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<sup>17</sup> Scoping Memo, pp. 4-5.

electrical facilities continue to receive a generous allocation, even though they may have few overhead lines and overhead meters eligible for Rule 20A treatment.

The scenario where a number of cities are served predominantly from underground electrical systems is common. For example, the city of Irvine is served from a predominantly underground distribution system. There are a total of 122,257 electric meters in the city of Irvine, with only 1,102 overhead-fed meters, yet the city received a 2018 annual allocation of \$102,541. In 2018, PG&E had 20 communities that have less than 18% of total meters fed from overhead lines and collectively received \$1.7M in allocations. Two of those communities are completely undergrounded yet still receive allocations due to the allocation methodology. In 2018, SDG&E had six communities with 18% or less of total meters fed from overhead lines, yet these communities collectively received nearly \$1M in allocations. These annual amounts will accumulate each year increasing the city's allocation balance, yet there may not be sufficient opportunity or eligible facilities to qualify for a Rule 20A project.

Another product of the current allocation methodology is the annual allocation to municipalities with a very small number of meters, resulting in a situation where cities and counties receive allocations but will not be able to build a sufficient balance to execute a Rule 20A project. Given the current annual budget for Rule 20A and the current allocation methodology, a number of municipalities may receive an allocation of less than \$15,000 per year. Therefore, it is not likely that many cities will be able to accumulate enough allocations for even a small Rule 20A project. To illustrate, in constant dollars, it may take these municipalities 30 years or more to accumulate enough allocations to fund a small project. In actuality, the minimal annual allocation may only fund the annual escalation on a small Rule 20A project and not provide for any appreciable gain toward the allocation balance necessary to move forward with a project. For reasons such as these, the Joint IOUs support improvements to the allocation methodology.



## **B. Additional Rule 20 Program Elements That Need Improvement**

There is also an opportunity to improve the processes and procedures for the following program elements: unused allocations; cities with inactive underground programs; utility reallocation of unused credits; and the sale or trading of credits among municipalities. The allocation of annual work credits to cities with few overhead facilities eligible for undergrounding and those with inactive programs has essentially created an environment where municipalities now “buy and sell” allocations. For example, while SCE can reallocate allocations from communities with inactive underground programs to those with active programs, it has become an increasingly complex issue to do so, and denies the city the opportunity to sell the allocations. PG&E and SDG&E have not reallocated Rule 20 work credits from communities with inactive underground programs to those with active programs given the complexity and potential inequity to cities and counties that are saving up for an undergrounding program. All of these issues around allocations affect program participation by cities and counties and the Joint IOUs fully support exploring alternatives as part of this proceeding.

### **III.**

#### **THE ISSUES IDENTIFIED IN SECTION 2.2 ARE APPROPRIATE FOR THE PROCEEDING, BUT ARE UNLIKELY TO BE RESOLVED IN THE NEAR TERM**

Section 2.2 of the Scoping Memo proposes addressing issues in the near-term related to Credit Allocations, Credit and Project Tracking, Contract Terms and Program Policies, and Potential for Program Restructuring.<sup>18</sup> While the Joint IOUs support the inclusion of these issues in the proceeding, these issues are complex and would require party collaboration on the development of any improvement proposals. Further, addressing areas such as program restructuring may require significant structural changes, and the Assigned Commissioner directed in the Scoping Memo that “(w)e will not entertain large structural changes to the

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<sup>18</sup> *Id.*, pp. 5-8.

program at this time.”<sup>19</sup> The Joint IOUs agree that these issues are appropriate for discussion in the proceeding, but think these issues are unlikely to be resolved in the near term. Therefore, considering that the issues in Section 2.2 are unlikely to be completed in the near-term, the Joint IOUs are proposing changes to the annual “Completion Report for Underground Conversion of Overhead Electric Facilities” that can be implemented in the near term.

**IV.  
THE JOINT IOUs NEAR-TERM IMPROVEMENT PROPOSAL TO MODIFY THE  
ANNUAL COMPLETION REPORT FOR UNDERGROUND CONVERSION OF  
OVERHEAD ELECTRIC FACILITIES**

To improve the Rule 20A program in the near-term, the Joint IOUs propose modifying the annual “Completion Report for Underground Conversion of Overhead Electric Facilities” filed in March of each year. The annual report is submitted in compliance with Decisions (“D”) 73078 and 82-01-18 and is comprised of Exhibits A-E. Exhibit A provides historical program expenditure and allocation information around Rule 20A. Exhibits B through E provide expenditure data by project for completed Rule 20A (Exhibit B), 20B (Exhibit C), 20C (Exhibit D), and other undergrounding projects (Exhibit E) after all orders have been closed to plant-in-service. A copy of the 2017 annual Completion Report for Underground Conversion of Overhead Electric Facilities for each IOU is provided in Appendix A.

The Joint IOUs recommend the following changes to improve the annual completion report in the near term:

- a. Expand information on completed Rule 20A projects and overall program performance within Exhibit A, and eliminate Exhibits B-E that provide the detailed reporting of completed Rule 20B, 20C, and other undergrounding projects. Historical and forecast annual expenditures for Rule 20A, 20B and 20C projects are provided at the program level within each General Rate Case filing. It is not clear how the detailed information by project in Exhibits B-E is used, and the Joint IOUs believe

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<sup>19</sup> *Id.*, p. 9.

the resources used to prepare this data can be better utilized in preparing more meaningful and informative data around the Rule 20A program as described below.

- b. Modify the report to reflect an annual budget and expenditure-based format. The Joint IOUs propose developing a new Exhibit to include annual expenditures with detail by governmental agency and project. Variance explanations can be included to address the reasons for overruns and underruns to the annual Rule 20A budget and allocations. This format would provide additional detail and insight into the constraints and delays encountered in executing Rule 20A projects.
- c. Expand the information included in the report for completed projects. The Joint IOUs support the continued reporting of completed projects, but recommend the criteria be changed to report projects as complete when the new underground installation is energized and the existing overhead system has been removed. This approach will provide greater and timelier visibility to projects completed in the field and placed in-service within the report year, while still enabling the utility to provide an update on trailing costs in future reports. Additionally, the Joint IOUs propose collaborating with parties on the data points that are necessary to provide value to future reports.

The Joint IOUs anticipate that these changes can be made in the near-term as no tariff changes are required, nor do they impact the governmental agencies that participate in the Rule 20 programs. The Joint IOUs recommend a workshop be scheduled with Energy Division staff and the IOUs to further discuss the proposal and develop an agreed upon format and schedule for implementing these changes to the annual report in the near-term.

## **V. COST RECOVERY FOR RULE 20A PROGRAM AUDITS**

The Rule 20 OIR directed each electric utility to “file and serve a programmatic and financial audit of its administration of its Rule 20A program, conducted by an independent firm in consultation with the Commission’s Utility Audit Finance & Compliance Branch and Energy

Division.”<sup>20</sup> On August 7, 2018, the Director of Energy Division sent a letter to the IOUs providing guidance for the Rule 20A program audits. The letter approved the audit proposals served by the Joint IOUs with modifications and additions. Although the letter provides guidance to the Joint IOUs on the contracting process and the scope and issues to be addressed in the Rule 20A program audits, the Commission did not address cost recovery for the audits in the letter or the Rule 20 OIR. The Joint IOUs request that the Commission confirm, either in a revised Scoping Memo or supplemental letter from the Director of Energy Division, that the Joint IOUs can record the costs of the Rule 20A program audits to balancing accounts for cost recovery purposes.<sup>21</sup>

## VI. CONCLUSION

The Joint IOUs appreciate the opportunity to provide comments on the scope of the Rule 20 OIR and propose a near-term improvement opportunity for the Rule 20A program.

Respectfully submitted on behalf of  
Southern California Edison Company,  
Pacific Gas and Electric Company and  
San Diego Gas and Electric Company

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Date: January 11, 2019

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<sup>20</sup> Rule 20 OIR, p. 18.

<sup>21</sup> Should a balancing account appropriate for such costs not already exist, a request for Commission approval to either revise an existing regulatory account or establish a new one will be submitted.

**Appendix A**

**The Joint IOU's 2017 Annual Completion Reports for Underground Conversion of Overhead  
Electric Facilities**

March 30, 2018

Timothy Sullivan  
Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue, 4<sup>th</sup> Floor  
San Francisco, CA 94102

RE: 2017 Completion Report for Underground Conversion of Overhead Electrical Facilities

Dear Mr. Sullivan:

In compliance with Decision Numbers 73078 and 82-01-18 in Case 8209, Southern California Edison is submitting its 2017 annual completion report for underground conversion of overhead electrical facilities. This report consists of the following attachments:

Exhibit A – Report of Rule 20A conversions  
Exhibit B – 2017 Rule 20A Projects  
Exhibit C – 2017 Rule 20B Projects  
Exhibit D – 2017 Rule 20C Projects  
Exhibit E – 2017 Company Operating Projects

If you have any questions, please contact Shiela Linao at (626) 302-4506 or by electronic mail at [Shiela.Linao@sce.com](mailto:Shiela.Linao@sce.com) or Tony Mathis at (714) 973-5466 or by electronic mail at [Tony.Mathis@sce.com](mailto:Tony.Mathis@sce.com).

Sincerely,



Linda Letizia  
Manager of CPUC Revenue Requirements and Tariffs

cc:

David K. Lee, CPUC  
Ken Lewis, CPUC  
Norman Copping, League of California Cities  
Matt Cate, Executive Director Calif. State Assoc. of Counties  
Megan Lawson, Pacific Gas and Electric Company  
Andrea Samonek, Pacific Gas & Electric Company  
Megan Caulson, Sempra Utilities  
Kathryn Valdivia, San Diego Gas & Electric and Sempra Utilities

**EXHIBIT A  
REPORT OF RULE 20A CONVERSIONS**

UTILITY: SOUTHERN CALIFORNIA EDISON

REPORT YEAR ENDING: 2017

ALLOCATIONS FOR CONVERSIONS

1 Total Allocations Through Prior Years	1968-2016		\$ 1,453,987,782
2 Report Year's Allocation	2017	\$ 26,140,927	
3 Total Allocations Through Report Year	1968-2017 (1+2)		\$ 1,480,128,709

EXPENDITURES FOR CONVERSIONS

4 Total Expended For Completed Conversions	1968-2016	\$ 1,129,003,487	
5 Total Report Year Expended For Completed Conversions	2017	\$ 15,414,956	
6 Total Expended For Completed Conversions Through Report Year	1968-2017 (4+5)		\$ 1,144,418,443
7 Total Expended On Conversions Not Completed By Report Year End - 2017		\$ 51,254,823	
8 Total Expended (6+7)			\$ 1,195,673,266

TOTAL UNEXPENDED FUNDS (3-8) [1]

9 If Expenditures Are Greater Than Allocations		\$ -
10 If Allocations Are Greater Than Expenditures (One of the above, 9 or 10, will always be "0")		\$ 284,455,443

FUNDS COMMITTED

11 Total Funds Authorized To Complete Partially Completed Jobs Shown On Line 7		\$ 34,100,302
12 Funds For Jobs Not Under Construction Where U.G. Districts Have Been Formed Under Enabling Legislation		\$ 55,030,805
13 Total Committed (11 + 12)		\$ 89,131,107

ADDITIONAL FUNDS COMMITTED

14 Funds Required For Identified Projects Under Study By Active U.G. Communities As Of Report Year Ending		\$ 182,614,635
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MEMO INFORMATION

15 Advances For Specific Communities Beyond Current Allocations		\$ 35,403,455
16 Reserve Funds Held For Specific Communities For Which No Specific Current Projects Are Under Study As Of Report Year End		\$ 230,922,090
17 Expenditures To Case 9365 (Transmission Dollars Which Are Included In Total Cost Above In Line 8)		\$ 132,992,526

[1] This calculation, required by D.90-05-032, is an artificial one, since the allocation figure is unfunded and actual expenditures may vary annually and be affected by exogenous factors.

**EXHIBIT B  
ANNUAL REPORT OF OVERHEAD - UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION A PROJECTS**

COMMUNITY	PROJECT LOCATION	COMPLETED COSTS
<b><u>Los Angeles County</u></b>		
<b>Bellflower</b>	<b>Artesia Blvd/ Downey to Lakewood</b>	<b>\$ 403,352</b>
	TD212477 65326226 76200	
	TD212504 60326285 76201	
	801089862 60326285 76201	
	801436371 60326285 76201	
<b>Downey</b>	<b>Lakewood Blvd./ Imperial Hwy.-105 Fwy</b>	<b>\$ 685,315</b>
	800022744 6447-6297 46202	
	800022986 6447-6298 46203	
	N/A 6047-6213 46201	
<b>Lynwood</b>	<b>State St/Fernwood-Beechwood</b>	<b>\$ 2,282,343</b>
	TD326394 6532-6230 96204	
	TD326404 6032-6288 96207	
	800060257 4405-4913 N/A	
	800054997 8455-4917 N/A	
	801493767 N/A N/A	
	801205437 N/A N/A	
<b>Pico Rivera</b>	<b>Washington/Paramount-W.City Limits, Ph 2</b>	<b>\$ 780,340</b>
	800025262 6447-6215 56202	
	N/A 6547-6201 56200	
	800025205 6047-6215 56201	
<b>Rolling Hills Estates</b>	<b>Palo Verde Dr N/Hitching Post Dr-Montecillo Dr</b>	<b>\$ 165,373</b>
	TD351404 6544-6266 96200	
	TD351415 6144-6240 96201	
	800055016 8455-4970 N/A	
<b>Santa Monica</b>	<b>18th/20th/ Pico to Ashland Place</b>	<b>\$ 2,362,639</b>
	TD696888 N/A N/A	
<b>Unincorporated Los Angeles</b>	<b>Nogales Ph 1 - 60FWY to Colima Rd</b>	<b>\$ 1,142,554</b>
	TD907554 N/A N/A	
	TD907546 N/A N/A	
<b>Unincorporated Los Angeles</b>	<b>Nogales Ph 2 - Colima Rd to Killian</b>	<b>\$ 2,050,013</b>
	TD907562 N/A N/A	
	TD907560 N/A N/A	
	<b>Total Los Angeles County</b>	<b>\$ 9,871,929</b>
<b><u>Mono County</u></b>		
<b>Mammoth Lakes</b>	<b>Hwy 203/ Mountain Blvd East to Pole 2179741E</b>	<b>\$ (37,907)</b>
	TD939372 N/A N/A 42735	
	TD939367 N/A N/A 42735	



**EXHIBIT B  
ANNUAL REPORT OF OVERHEAD - UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION A PROJECTS**

COMMUNITY	PROJECT LOCATION	COMPLETED COSTS
	<b>Total Mono County</b>	<b>\$ (37,907)</b>
<b><u>Orange County</u></b>		
<b>Laguna Beach</b>	<b>Laguna Canyon Rd. "Big Bend"</b>	<b>\$ 1,521,948</b>
	TD1043552 6443-6216 06200	
	TD1043555 6043-6217 06201	
	801496203 N/A N/A	
	<b>Total Orange County</b>	<b>\$ 1,521,948</b>
<b><u>Riverside County</u></b>		
<b>Elsinore, Lake</b>	<b>Lakeshore Dr./ Mohr St to Chaney St</b>	<b>\$ 1,267,250</b>
	TD760689 N/A N/A	
	TD760688 N/A N/A	
	801207390 N/A N/A	
<b>Murrieta</b>	<b>Madison Ave/ Murrieta Hot Springs to Guava St</b>	<b>\$ 867,757</b>
	TD928195 N/A N/A	
	TD928190 N/A N/A	
	TD928190 N/A N/A	
<b>Unincorporated Riverside</b>	<b>Mission Blvd/Kenneth Way to Pedley Rd, Phase 1</b>	<b>\$ 1,309,415</b>
	TD362830 6430-6221 96203	
	TD362834 6030-6216 96202	
	801475619 N/A N/A	
	<b>Total Riverside County</b>	<b>\$ 3,444,422</b>
<b><u>San Bernardino County</u></b>		
<b>Apple Valley</b>	<b>Yucca Loma Rd/ Mohawk Rd to Rancherias Rd</b>	<b>\$ 614,564</b>
	TD701784 N/A N/A	
	TD701765 N/A N/A	
	<b>Total San Bernardino County</b>	<b>\$ 614,564</b>
	<b>Total Rule 20 Section A</b>	<b>\$ 15,414,956</b>

**EXHIBIT C  
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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
<b><u>Kern County</u></b>			
Delano	<b>Trct : 6326A, Albany St. &amp; Granite Ln.</b>	\$ 59,846	\$ 143,347
	TD893840 N/A N/A		
	TD893849 N/A N/A		
<b>Total Kern County</b>		<b>\$ 59,846</b>	<b>\$ 143,347</b>
<b><u>Kings County</u></b>			
Hanford	<b>Xstrt : Hwy 43/ Lacey Blvd</b>	\$ 533,147	\$ 453,404
	TD1016342 N/A N/A		
	TD1016341 N/A N/A		
<b>Total Kings County</b>		<b>\$ 533,147</b>	<b>\$ 453,404</b>
<b><u>Los Angeles County</u></b>			
Hidden Hills	<b>Xstrt : Round Meadow/Wingfield/ Clear Va</b>	\$ 141,754	\$ 163,336
	TD428014 N/A N/A		
	TD428264 N/A N/A		
	TD203165 N/A N/A		
	TD396331 N/A N/A		
Malibu	<b>Xstrt : Malibu Knolls Rd E/O View Dr</b>	\$ 46,133	\$ 51,225
	TD676541 N/A N/A		
	TD676540 N/A N/A		
Norwalk	<b>Norwalk &amp; Telegraph</b> 800024394 6047-7108 67102	\$ 79,124	\$ -
Norwalk	<b>Varloc : Orr And Day</b>	\$ 1,143,140	\$ 1,868
	TD657221 N/A N/A		
	TD657207 N/A N/A		
Palmdale	<b>10Th St W/Ave O04</b>	\$ 65,861	\$ 169,083
	800018216 6636-7130 77153		
Palmdale	<b>40Th St And Ave Q</b> 800055427 8458-5903 N/A	\$ 4,347	\$ -
Palmdale	<b>Xstrt : Avenue S, 41St To 45Th St E</b>	\$ 264,269	\$ 56,960
	TD831394 N/A N/A		
	TD832385 N/A N/A		
<b>Total Los Angeles County</b>		<b>\$ 1,744,628</b>	<b>\$ 442,473</b>
<b><u>Mono County</u></b>			
Mammoth Lakes	<b>Xstrt : Mountain Blvd</b>	\$ 452,156	\$ 458,429
	TD673818 N/A N/A		
	TD886097 N/A N/A		

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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	<b>Total Mono County</b>	<b>\$ 452,156</b>	<b>\$ 458,429</b>
<b><u>Orange County</u></b>			
<b>Anaheim</b>	<b>Ball Rd To Crescent</b> 800427602 N/A N/A	<b>\$ 80,789</b>	<b>\$ 111,644</b>
<b>Brea</b>	<b>Trct : 17296: Central Ave / Site Dr</b> TD973355 N/A N/A TD781280 N/A N/A	<b>\$ 224,102</b>	<b>\$ 412,369</b>
<b>Buena Park</b>	<b>Trct : 17765: Stanton Ave</b> TD938763 N/A N/A TD938764 N/A N/A	<b>\$ 182,720</b>	<b>\$ 209,179</b>
<b>Buena Park</b>	<b>Trct : 17789; Rostrata Ave R20B</b> TD1081875 N/A N/A TD1081879 N/A N/A	<b>\$ 69,898</b>	<b>\$ 86,353</b>
<b>Costa Mesa</b>	<b>Sunflower - Ts Fairview Sub</b> 800063408 5821-5018 N/A	<b>\$ (324)</b>	<b>\$ 154,473</b>
<b>Fountain Valley</b>	<b>11488 Slater Ave</b> TD983522 N/A N/A TD1034447 N/A N/A	<b>\$ 170,686</b>	<b>\$ 144,518</b>
<b>Irvine</b>	<b>O St</b> TD787714 N/A N/A	<b>\$ 157,570</b>	<b>\$ -</b>
<b>Irvine</b>	<b>Bake Parkway And Lake Forest</b> 800061363 4805-5806 N/A	<b>\$ 91,404</b>	<b>\$ -</b>
<b>Irvine</b>	<b>Sand Canyon Grade Separation</b> 800445587 N/A N/A 800383756 N/A N/A	<b>\$ 27,953</b>	<b>\$ 58,693</b>
<b>Irvine</b>	<b>Trct : 17008 Irvine Blvd Bosque To Modje</b> TD940227 N/A N/A TD940222 N/A N/A	<b>\$ 199,748</b>	<b>\$ 463,896</b>
<b>Irvine</b>	<b>Trct : 17283; Ridge Valley (Irvine To Tr</b> TD784005 N/A N/A TD784007 N/A N/A	<b>\$ 539,532</b>	<b>\$ 622,365</b>
<b>Irvine</b>	<b>Trct : R20B - 8Th St / Ridge Valley - Fi</b> TD1144320 N/A N/A TD1144321 N/A N/A	<b>\$ 91,693</b>	<b>\$ 157,450</b>
<b>Irvine</b>	<b>Xstrt : Edinger And Parkside</b> TD1085702 N/A N/A	<b>\$ 103,420</b>	<b>\$ 175,233</b>

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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	TD1085700 N/A N/A		
Irvine	Xstrt : Ridge Valley - Trabuco To Nightm TD1056572 N/A N/A TD1056566 N/A N/A	\$ (232,568)	\$ 1,050,000
Laguna Beach	Sunset Ridge/Ledroit 800020469 6443-7174 E7190	\$ 49,018	\$ 32,796
Laguna Beach	Xstrt : Ruby St, Catalina, Ruby Pl. Radd TD608755 N/A N/A TD608759 N/A N/A	\$ 506,813	\$ 289,313
<b>Total Orange County</b>		<b>\$ 2,262,453</b>	<b>\$ 3,968,280</b>
<b><u>Riverside County</u></b>			
Corona	Xstrt : Masters/Nelson TD203039 6634-7186 77196	\$ 1,940	\$ 35,984
Desert Hot Springs	62851 Dillon Rd TD743839 N/A N/A TD743854 N/A N/A	\$ 166,815	\$ 162,647
Eastvale	Trct : 29997: Chandler St ( R20 B) TD865113 N/A N/A TD865115 N/A N/A	\$ 64,089	\$ 374,309
Eastvale	Trct : Tr:31492; Archibald N/O Schleis TD570101 N/A N/A TD570103 N/A N/A	\$ 2,087	\$ -
Eastvale	Trct : 34014: Scholar Way / Schliesman(R) TD867666 N/A N/A TD808682 N/A N/A	\$ 33,023	\$ -
Jurupa Valley	Trct : 33461; Bellegrave Ave TD734082 N/A N/A TD734080 N/A N/A	\$ 26,872	\$ -
Jurupa Valley	Trct : 31644/31644-1 - Bellegrave/Etiwan TD814385 N/A N/A TD814383 N/A N/A	\$ 93,303	\$ 340,373
Menifee	Xstrt : Zeiders Road And Scott Rd TD761933 N/A N/A TD761932 N/A N/A	\$ 128,684	\$ 289,439
Moreno Valley	24901 San Michele TD1110534 N/A N/A	\$ 120,601	\$ 126,839

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<b>COMMUNITY</b>	<b>PROJECT LOCATION</b>	<b>UTILITY</b>	<b>OTHERS</b>
	TD1110533 N/A N/A		
<b>Moreno Valley</b>	<b>Varloc : Cactus Ave Between Lasselle St</b> TD573649 N/A N/A TD573648 N/A N/A	\$ (124,074)	\$ 78,009
<b>Moreno Valley</b>	<b>Xstrt : Nandina Ave And Indian St</b> TD577732 N/A N/A TD577733 N/A N/A	\$ 342,942	\$ 678,886
<b>Moreno Valley</b>	<b>Xstrt : Indian From Iris To Krameria</b> TD776115 N/A N/A TD776116 N/A N/A	\$ 419,754	\$ 613,707
<b>Moreno Valley</b>	<b>Xstrt : Nason St From Cactus Av To Fir A</b> TD646170 N/A N/A TD646169 N/A N/A	\$ 309,888	\$ 607,486
<b>Moreno Valley</b>	<b>Xstrt : Perris Blvd &amp; Nandina Ave</b> TD576487 N/A N/A TD576489 N/A N/A	\$ 76,514	\$ 278,851
<b>Murrieta</b>	<b>Los Alamos Rd</b> 800321171 8456-5901 N/A	\$ 19,707	\$ 6,305
<b>Murrieta</b>	<b>25500 Madison Ave</b> TD1106481 N/A N/A TD1106482 N/A N/A	\$ 124,839	\$ 258,391
<b>Murrieta</b>	<b>Trct : 32290-1; Leon Rd (R20B)</b> TD1100620 N/A N/A TD1100609 N/A N/A	\$ 194,809	\$ 74,627
<b>Perris</b>	<b>278 Markham Ave</b> TD1021418 N/A N/A TD1021412 N/A N/A 801291213 N/A N/A	\$ 186,472	\$ 240,639
<b>Perris</b>	<b>4120 Indian Ave</b> TD1105278 N/A N/A TD1105273 N/A N/A	\$ 419,452	\$ 1,589,377
<b>Perris</b>	<b>Grove View Rd &amp; Perris Blvd</b> 800055195 8456-4923 N/A	\$ 1,839	\$ 29,665
<b>Rancho Mirage</b>	<b>Xstrt : Country Club &amp; Kersten</b> TD277780 6879-7152 87122 TD277779 6079-7135 87121	\$ 386,482	\$ 198,592
<b>Rancho Mirage</b>	<b>Bob Hope / Ramon</b>	\$ 133,007	\$ 243,440

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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	800038294 6879-7126 67117		
Riverside	<b>20 Iowa Ave</b> TD1046610 N/A N/A TD1072504 N/A N/A	\$ 54,478	\$ 103,397
San Jacinto	<b>Ramona &amp; Sanderson</b> 800055253 8456-5915 N/A	\$ 5,167	\$ -
San Jacinto	<b>State St N/O Ramona Expwy</b> 800034735 6677-7106 J7122	\$ 48,510	\$ -
Temecula	<b>Trct : 36568: Pujol St / First St (R20B)</b> TD1015030 N/A N/A TD1015031 N/A N/A	\$ 181,572	\$ 132,400
Temecula	<b>Trct : Tr:31597; Via Puebla/Monte Verde</b> TD1041808 N/A N/A TD1041807 6677-7106 J7122	\$ 231,554	\$ 668,686
Unincorporated Riverside	<b>68Th &amp; Wineville</b> 800028675 6634-7131 67107 800055247 8456-5909 N/A	\$ 88,666	\$ 226,730
Wildomar	<b>Xstrt : Palomar St / Catt Rd Rule 20B</b> TD884304 N/A N/A TD884308 N/A N/A	\$ 211,219	\$ 489,380
<b>Total Riverside County</b>		<b>\$ 3,950,210</b>	<b>\$ 7,848,159</b>
<b><u>San Bernardino County</u></b>			
Apple Valley	<b>Tussing Ranch Road</b> 800055191 8456-4905 N/A	\$ 4,138	\$ 30,963
Chino	<b>17127 Pomona Rincon Rd</b> TD838102 N/A N/A TD838101 N/A N/A	\$ 58,649	\$ -
Chino	<b>Trct : 16419: Hellman Ave (R20 B)</b> TD1007674 N/A N/A TD1007675 N/A N/A	\$ 110,852	\$ 172,831
Chino	<b>Xstrt : Remington And Flight</b> TD974914 N/A N/A TD974916 N/A N/A	\$ 153,846	763,462
Fontana	<b>5885 Sierra Ave</b> TD1078939 N/A N/A	\$ 285,162	442,256

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<b>COMMUNITY</b>	<b>PROJECT LOCATION</b>	<b>UTILITY</b>	<b>OTHERS</b>
	TD1055492 N/A N/A		
<b>Fontana</b>	<b>10885 Citrus</b>	<b>\$ 224,561</b>	<b>345,592</b>
	TD1143207 N/A N/A		
	TD1143206 N/A N/A		
<b>Fontana</b>	<b>15750 Jurupa Ave</b>	<b>\$ 76,473</b>	<b>(31,293)</b>
	TD1019484 N/A N/A		
	TD1019483 N/A N/A		
<b>Fontana</b>	<b>Almeria &amp;Arrow</b>	<b>\$ 14,209</b>	<b>3,938</b>
	TD601946 N/A N/A		
<b>Fontana</b>	<b>Trct : 18963 N/W/C Valley Blvd./Juniper</b>	<b>\$ 3,299</b>	<b>\$ -</b>
	800699647 N/A N/A		
	TD398090 N/A N/A		
	TD558343 N/A N/A		
<b>Highland</b>	<b>5Th St, E/O Hwy 30</b>	<b>\$ 32,008</b>	<b>\$ 175,974</b>
	800014925 6631-7159 77146		
<b>Ontario</b>	<b>Trct : Haven Ave / Schaefer</b>	<b>\$ 181,848</b>	<b>\$ 231,306</b>
	TD818887 N/A N/A		
	TD818891 N/A N/A		
<b>Ontario</b>	<b>Xstr : Archibald And Edison</b>	<b>\$ 125,518</b>	<b>\$ (1,095)</b>
	TD753483 N/A N/A		
	TD753482 N/A N/A		
<b>Ontario</b>	<b>Xstr : Archibald &amp; Jurupa</b>	<b>\$ 176,402</b>	<b>\$ 97,530</b>
	TD608947 N/A N/A		
	TD595397 N/A N/A		
<b>Ontario</b>	<b>Xstr : Archibald &amp; Jurupa</b>	<b>\$ 28,483</b>	<b>\$ 24,738</b>
	800055998 9597-6511 N/A		
	800055568 8460-4954 N/A		
	801141504 N/A N/A		
<b>Ontario</b>	<b>Xstr : Belmont St &amp; Mildred St</b>	<b>\$ 170,105</b>	<b>\$ 182,381</b>
	TD1068331 8460-4954 N/A		
	TD1064273 9597-6511 N/A		
<b>Rancho Cucamonga</b>	<b>Trct : 18122: East Avenue</b>	<b>\$ 241,084</b>	<b>\$ 172,473</b>
	TD803033 N/A N/A		
	TD803032 N/A N/A		
<b>Rancho Cucamonga</b>	<b>Trct : Madrone Ave (R20 &amp; S/L)</b>	<b>\$ 116,516</b>	<b>\$ 91,093</b>
	TD1028673 N/A N/A		
	TD1028670 N/A N/A		

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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
Redlands	400 Nevada St 800025392 6631-7155 77132	\$ 79,542	\$ 165,302
Redlands	1300 California St TD921315 N/A N/A TD921312 N/A N/A	\$ 252,533	\$ 165,759
Redlands	1374 N Orange St TD708821 N/A N/A TD708819 N/A N/A	\$ 190,317	\$ 97,634
Redlands	Trct : 16627: San Bernardino W/O Judson TD871869 N/A N/A TD871867 N/A N/A	\$ 118,219	\$ 11,020
Redlands	Xstrt : Lugonia Ave/Bryn Mawr Ave TD978539 6631-7180 87112 TD978540 6231-7192 87113	\$ 74,849	\$ 571,938
San Bernardino	Xstrt : U Street & Victoria Ave TD802516 N/A N/A TD981518 N/A N/A	\$ 137,363	\$ 73,075
Victorville	73 Aerospace TD1175141 N/A N/A TD1175140 N/A N/A	\$ 137,524	\$ 217,015
<b>Total San Bernardino County</b>		<b>\$ 2,993,500</b>	<b>\$ 4,003,892</b>
<b><u>Santa Barbara</u></b>			
Santa Barbara	1965 Eucalyptus Hill TD969216 N/A N/A TD1063606 N/A N/A	\$ 111,829	\$ 105,742
<b>Total Santa Barbara County</b>		<b>\$ 111,829</b>	<b>\$ 105,742</b>
<b><u>Tulare County</u></b>			
Visalia	Varloc : Shirk & Walnut TD984347 N/A N/A TD984912 N/A N/A	\$ 163,363	\$ 605,125
Visalia	Varloc : Shirk & Walnut 801225092 N/A N/A 801225617 N/A N/A	\$ 7,407	\$ 31,431
<b>Total Tulare County</b>		<b>\$ 170,770</b>	<b>\$ 636,556</b>



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COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
<b><u>Ventura County</u></b>			
Thousand Oaks	Varloc : Thousand Oaks Blvd. (Duesenberg TD596281 N/A N/A TD596282 N/A N/A)	\$ 422,714	\$ 3,043,757
	<b>Total Ventura County</b>	<b><u>\$ 422,714</u></b>	<b><u>\$ 3,043,757</u></b>
	<b>Total Rule 20 Section B</b>	<b><u>\$ 12,701,254</u></b>	<b><u>\$ 21,104,039</u></b>

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ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
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RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
<b><u>Kern County</u></b>			
Delano	<b>1980 Cecil</b>	\$ (32,088)	\$ 83,571
	TD1125169      N/A      N/A		
	TD1125170      N/A      N/A		
Unincorporated Kern	<b>170th / Holiday - Rosamond</b>	\$ (0)	\$ 34,722
	801429225      N/A      N/A		
<b>Total Kern County</b>		<b>\$ (32,088)</b>	<b>\$ 118,293</b>
<b><u>Kings County</u></b>			
Hanford	<b>Xstrct : S/S Lacey Blvd/ W/O 12Th Ave</b>	\$ 65,228	\$ 205,740
	TD980308      N/A      N/A		
	TD980307      N/A      N/A		
<b>Total Kings County</b>		<b>\$ 65,228</b>	<b>\$ 205,740</b>
<b><u>Los Angeles County</u></b>			
Agoura Hills	<b>31619 Lobo Canyon Rd</b>	\$ 31,503	\$ 67,947
	800026656    6135-7251    67214		
	800084230    6535-7280    67123		
	800026409    6635-1442    61121		
Agoura Hills	<b>27489 Agoura Rd</b>	\$ (106,252)	\$ 380,937
	TD956309      N/A      N/A		
	TD956308      N/A      N/A		
Azusa	<b>Sierra Madre Ave.</b>	\$ -	\$ 249,949
	TD545516      N/A      N/A		
Carson	<b>Trct : East Carson 425 E Carson</b>	\$ 13,088	\$ 240,023
	TD788118      N/A      N/A		
	TD788117      N/A      N/A		
Carson	<b>Trct : 65157; Meyler Street</b>	\$ 3,701	\$ 19,703
	TD973015      N/A      N/A		
	TD973014      N/A      N/A		
Claremont	<b>Trct : 72078: Baseline Rd / Mountain Rd</b>	\$ 4,827	\$ 14,096
	TD763033      N/A      N/A		
	TD763035      N/A      N/A		
Claremont	<b>Trct : 72539: Baseline Rd / Mountain Ave</b>	\$ 7,200	\$ 9,299
	TD1131336      N/A      N/A		
	TD1131338      N/A      N/A		
Gardena	<b>Trct : 72535; 1600 W. Artesia Blvd</b>	\$ 62,708	\$ 278,923
	TD930337      N/A      N/A		
	TD930336      N/A      N/A		

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<b>COMMUNITY</b>	<b>PROJECT LOCATION</b>	<b>UTILITY</b>	<b>OTHERS</b>
Glendora	<b>Xstrt : Barranca/Rr Crossing</b>	\$ (21,185)	\$ 139,885
	TD905148 N/A N/A		
	TD905147 N/A N/A		
Glendora	<b>Trct : 66608-Sierra Madre/Yucca Ridge</b>	\$ 23,693	\$ -
	TD905845 N/A N/A		
Inglewood	<b>Trct : 11604 Aviation Blvd</b>	\$ 153,945	\$ 174,544
	TD935973 N/A N/A		
	TD935971 N/A N/A		
Malibu	<b>3600 Sweetwater Canyon Dr</b>	\$ (20,101)	\$ 73,045
	TD641222 N/A N/A		
	TD696190 N/A N/A		
Malibu	<b>3810 Latigo Canyon</b>	\$ (1,450)	\$ 26,902
	TD641222 N/A N/A		
	TD696190 N/A N/A		
Malibu	<b>5700 Sea View Dr</b>	\$ (20,577)	\$ 71,846
	TD996229 N/A N/A		
	TD996230 N/A N/A		
Malibu	<b>5731 Busch Dr</b>	\$ 214	\$ -
	TD726716 N/A N/A		
	TD726715 N/A N/A		
Malibu	<b>6201 Murphy Way</b>	\$ (2,200)	\$ 17,481
	TD444381 6635-7250 7207		
	TD444378 6235-7218 7206		
Malibu	<b>22141 Pacific Coast Highway</b>	\$ (3,722)	\$ 12,178
	TD692007 N/A N/A		
	TD691375 N/A N/A		
Palmdale	<b>1210 E Palmdale Blvd</b>	\$ (6,307)	\$ 82,068
	TD1048578 N/A N/A		
	TD1047111 N/A N/A		
Palmdale	<b>Xstrt : Avenue Q10 &amp; 10Th St E</b>	\$ (10,805)	\$ 47,142
	TD222596 N/A N/A		
	TD222596 6536-7219 N/A		
Pasadena	<b>Xstrt : Colorado Blvd. X/O Quigley Ave.</b>	\$ 23,655	\$ 80,481
	TD324850 N/A N/A		
	TD324923 N/A N/A		
Pomona	<b>1846 N Garey Ave</b>	\$ (34,709)	\$ 285,419
	TD719089 N/A N/A		
	TD675926 N/A N/A		
San Dimas	<b>Lone Hill / Gladstone</b>	\$ 1,974	\$ 194,216

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RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	800014190 6426-7239 67205 800014495 6026-7236 67204		
<b>San Gabriel</b>	<b>28406 Sand Canyon Rd</b> TD909197 N/A N/A TD909196 N/A N/A	<b>\$ (5,321)</b>	<b>\$ 145,306</b>
<b>Santa Clarita</b>	<b>24790 Valley St</b> TD399160 N/A N/A	<b>\$ 606</b>	<b>\$ -</b>
<b>Santa Clarita</b>	<b>27734 Sand Canyon Rd</b> TD1254425 N/A N/A TD1254424 N/A N/A	<b>\$ 1,644</b>	<b>\$ 3,154</b>
<b>Santa Clarita</b>	<b>Trct : 72626 - Mission Walk - R20C</b> TD1139171 N/A N/A TD1139170 N/A N/A	<b>\$ 88,110</b>	<b>\$ 146,689</b>
<b>Santa Clarita</b>	<b>Xstr : Railroad Ave. &amp; 9Th St.</b> TD1139690 N/A N/A TD1139691 N/A N/A	<b>\$ 1,656</b>	<b>\$ 256,606</b>
<b>Unincorporated Los Angeles</b>	<b>10426 S Normandie Ave</b> TD467128 N/A N/A TD467127 N/A N/A	<b>\$ 2,761</b>	<b>\$ 146,720</b>
<b>Unincorporated Los Angeles</b>	<b>Xstr : Bundy And Exposition</b> TD572594 N/A N/A TD572593 N/A N/A	<b>\$ 39,235</b>	<b>\$ 55,870</b>
<b>West Hollywood</b>	<b>Trct : 5681; 7302 Santa Monica Blvd</b> TD938550 N/A N/A TD938528 N/A N/A	<b>\$ 47,583</b>	<b>\$ 131,601</b>
<b>West Hollywood</b>	<b>Trct : 5681; 7302 Santa Monica Blvd</b> TD1055906 N/A N/A TD1055907 N/A N/A	<b>\$ 31,693</b>	<b>\$ 80,766</b>
<b>West Hollywood</b>	<b>Trct : 9040 W. Sunset Blvd.</b> TD958076 N/A N/A TD958067 N/A N/A	<b>\$ (11,702)</b>	<b>\$ 55,063</b>
	<b>Total Los Angeles County</b>	<b>\$ 295,465</b>	<b>\$ 3,487,858</b>
<b><u>Orange County</u></b>			
<b>Buena Park</b>	<b>6190 Auto Center Dr ,Ped</b> TD1112317 N/A N/A TD1112318 N/A N/A	<b>\$ 1,123</b>	<b>\$ 27,234</b>
<b>Buena Park</b>	<b>8761 Knott</b>	<b>\$ 7,528</b>	<b>\$ 4,305</b>

**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	TD1049180    N/A    N/A		
	TD1049179    N/A    N/A		
<b>Buena Park</b>	<b>Trct : 17765: Orangethorpe &amp; Indiana</b>	<b>\$    46,331</b>	<b>\$    50,045</b>
	TD944693    N/A    N/A		
	TD944696    N/A    N/A		
<b>Costa Mesa</b>	<b>2100 Canyon Drive</b>	<b>\$    12,307</b>	<b>\$    88,955</b>
	800025066   6433-7257   47209		
	800025066   6433-7257   47209		
<b>Costa Mesa</b>	<b>Trct : 17998; 133-139 E. 21St Street</b>	<b>\$    (8,432)</b>	<b>\$    89,505</b>
	TD1137130    N/A    N/A		
	TD1137129    N/A    N/A		
<b>Costa Mesa</b>	<b>Trct : 17921; 535-545 Bernard St</b>	<b>\$        595</b>	<b>\$    66,428</b>
	TD1145387    N/A    N/A		
	TD1145386    N/A    N/A		
<b>Costa Mesa</b>	<b>Xstr: Monrovia Avenue @ Newhall Street</b>	<b>\$        2,830</b>	<b>\$    34,744</b>
	TD484650    N/A    N/A		
<b>Fullerton</b>	<b>Trct : Santa Fe Avenue</b>	<b>\$    73,344</b>	<b>\$    390,284</b>
	TD801587    N/A    N/A		
	TD801586    N/A    N/A		
<b>Garden Grove</b>	<b>Trct : 8641 Garden Grove Blvd</b>	<b>\$        3,704</b>	<b>\$    42,526</b>
	TD1132234    N/A    N/A		
	TD1132235    N/A    N/A		
<b>Irvine</b>	<b>Xstr: Nightmist &amp; Sand Canyon</b>	<b>\$    19,680</b>	<b>\$    90,765</b>
	TD555544    N/A    N/A		
	TD558301    N/A    N/A		
<b>Irvine</b>	<b>Xstr : Nightmist, E/O Sand Canyon</b>	<b>\$        5,391</b>	<b>\$    581,111</b>
	TD555402    N/A    N/A		
	TD555409    N/A    N/A		
<b>La Habra</b>	<b>Xstr : Euclid And Whittier Blvd</b>	<b>\$    14,751</b>	<b>\$    56,289</b>
	TD1087293    N/A    N/A		
	TD1091611    N/A    N/A		
<b>Placentia</b>	<b>Xstr : Lakerview / Vortex</b>	<b>\$    (71,399)</b>	<b>\$    522,432</b>
	TD539226    N/A    N/A		
	TD539229    N/A    N/A		

**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION C PROJECTS**

<b>COMMUNITY</b>	<b>PROJECT LOCATION</b>	<b>UTILITY</b>	<b>OTHERS</b>
<b>Santa Ana</b>	<b>Trct : 17774 - 1206-1310 N Harbor</b> TD1088888    N/A    N/A TD1088890    N/A    N/A	<b>\$    48,973</b>	<b>\$    104,744</b>
<b>Westminster</b>	<b>Trct : 17766; N/S Maple E/O Willow Ln(R2)</b> TD1037726    N/A    N/A TD1037728    N/A    N/A	<b>\$    23,470</b>	<b>\$    162,713</b>
<b>Yorba Linda</b>	<b>Trct : 17547; Yorba Linda 2</b> TD912438    N/A    N/A	<b>\$    29,433</b>	<b>\$            -</b>
<b>Yorba Linda</b>	<b>Trct: 17608; 5050, 5072, 5112 Richfield</b> TD993108    N/A    N/A TD993096    N/A    N/A	<b>\$    (63,214)</b>	<b>\$    311,282</b>
<b>Total Orange County</b>		<b>\$    146,417</b>	<b>\$    2,623,362</b>
<b><u>Riverside County</u></b>			
<b>Cathedral City</b>	<b>Trct : 67500 Carey Road</b> TD1010129    N/A    N/A TD1010151    N/A    N/A	<b>\$    41,019</b>	<b>\$    220,257</b>
<b>Corona</b>	<b>200 River Rd</b> TD934392    N/A    N/A TD934393    N/A    N/A	<b>\$    56,888</b>	<b>\$    75,767</b>
<b>Corona</b>	<b>910 W Ontario Ave</b> TD1128051    N/A    N/A TD1128052    N/A    N/A	<b>\$    31,878</b>	<b>\$    97,716</b>
<b>Corona</b>	<b>Trct : 36355; Foothill Parkway / State R</b> TD1024840    N/A    N/A TD1024844    N/A    N/A	<b>\$    138,027</b>	<b>\$    349,485</b>
<b>Corona</b>	<b>Trct : 36533; Laurel Canyon Rd</b> TD1053041    N/A    N/A TD1053091    N/A    N/A 6179-7204    77200	<b>\$    85,947</b>	<b>\$    111,685</b>
<b>Desert Hot Springs</b>	<b>64635 Dillon</b> TD1135595    N/A    N/A TD1135594    N/A    N/A	<b>\$    (526)</b>	<b>\$    146,701</b>
<b>Hemet</b>	<b>42021 E Florida Ave,</b> TD207815    N/A    N/A TD207814    N/A    N/A	<b>\$    45,652</b>	<b>\$    148,772</b>
<b>Lake Elsinore</b>	<b>18625 Dexter Ave</b> TD1136357    N/A    N/A TD1136356    N/A    N/A	<b>\$    21,514</b>	<b>\$    79,154</b>

**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
Loma Linda	<b>10342 Mountain View</b> TD883349    N/A    N/A TD881705    N/A    N/A	\$    (16,909)	\$    61,538
Moreno Valley	<b>Trct : Tr: Edgemont Ave</b> TD1159577    N/A    N/A TD1159582    N/A    N/A	\$    (40,108)	\$    163,994
Moreno Valley	<b>Xstrt : Jfk &amp; Perris</b> TD950484    N/A    N/A TD950483    N/A    N/A	\$    63,020	\$    137,603
Moreno Valley	<b>Xstrt : Perris Blvd E/S 600' S/O Jfk</b> TD1077670    N/A    N/A TD1077671    N/A    N/A	\$    31,663	\$    62,938
Palm Springs	<b>196 W Vereda Sur</b> TD712884    N/A    N/A	\$    20,729	\$            -
Palm Springs	<b>Trct : Calle Palo Fierro &amp; Twin Palms Dr</b> TD871261    N/A    N/A TD871241    N/A    N/A	\$    79,521	\$    89,498
Palm Springs	<b>Trct : Tramway Rd</b> TD901243    N/A    N/A TD901245    N/A    N/A	\$    2,912	\$    455,759
Perris	<b>278 Markham Ave</b> TD1151686    N/A    N/A TD1151685    N/A    N/A	\$    (257,557)	\$    651,184
Unincorporated Riverside	<b>S/S Country Club E/O John L. Sinn Rd, Rancho M</b> TD266468    6179-7221    87209 TD266537    6579-7202    87210	\$    (9,333)	\$    68,879
<b>Total Riverside County</b>		<b>\$    294,338</b>	<b>\$    2,920,932</b>
<b><u>San Bernardino County</u></b>			
Chino	<b>4603 Chino Ave</b> TD1064006    N/A    N/A TD1064007    N/A    N/A	\$    45,225	\$    186,230
Chino	<b>Trct : 18956: Riverside Dr / Cypress Ave</b> TD985214    N/A    N/A TD985217    N/A    N/A	\$    (62,253)	\$    438,710
Chino	<b>Trct : Mountain Ave/Edison Ave</b> TD599088    N/A    N/A TD599087    N/A    N/A	\$    4,567	\$    61,863
Chino Hills	<b>Monte Vista/Chino Hills</b> 800029990    N/A    N/A 800055256    N/A    N/A	\$    1,542	\$    23,377

**EXHIBIT D**  
**ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS**  
**COMPLETED IN 2017**  
**RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
Colton	<b>Xstrt : Laurel St Brige E/O Pennsylvania</b> TD680471    N/A    N/A TD680627    N/A    N/A	\$    (4,488)	\$    161,749
Fontana	<b>5565 Sierra</b> TD909399    N/A    N/A TD909398    N/A    N/A	\$    (47,422)	\$    281,332
Fontana	<b>10973 Catawba Ave</b> TD1123198    N/A    N/A TD1123185    N/A    N/A	\$    (1,519)	\$    375,559
Fontana	<b>11127 Catawba Ave</b> TD919381    N/A    N/A TD919380    N/A    N/A	\$    14,812	\$    41,366
Fontana	<b>15411 Foothill</b> TD917017    N/A    N/A TD919802    N/A    N/A	\$    30,214	\$    611,169
Fontana	<b>15801 Santa Ana</b> TD968890    N/A    N/A TD1000345    N/A    N/A	\$    10,130	\$    121,643
Fontana	<b>15996 Jurupa Ave</b> TD919395    N/A    N/A TD919396    N/A    N/A	\$    (12,707)	\$    197,781
Fontana	<b>Trct : 18657: Juniper Ave/Walnut St</b> TD851398    N/A    N/A TD851397    N/A    N/A	\$    21,923	\$    100,399
Fontana	<b>Baseline &amp; Oleander</b> TD379208    6630-7209    97216 TD303277    6230-7206    97217	\$    39,065	\$    129,928
Fontana	<b>Cypress Ave &amp; Boyle Ave</b> TD339618    N/A    N/A TD339617    N/A    N/A	\$    7,814	\$    110,453
Fontana	<b>Trct : 19375 - 9972 Juniper Ave (R20C)</b> TD843766    N/A    N/A TD843765    N/A    N/A	\$    133,495	\$    341,414
Fontana	<b>Varloc : 17409 &amp; 17455 Valley Blvd</b> TD1070441    N/A    N/A TD1073057    N/A    N/A	\$    (15,862)	\$    134,095
Fontana	<b>Xstrt : Merril And Lilac</b> TD936435    N/A    N/A TD936434    N/A    N/A	\$    324	\$    789,689



**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
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RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
Fontana	<b>Xstrt : Nec Sierra Ave &amp; Sierra Lakes Pk</b>	\$ 65,586	\$ 128,234
	TD1050417    N/A    N/A    42352		
	TD1080378    N/A    N/A    42705		
Loma Linda	<b>10342 Mountain View</b>	\$ (18,875)	\$ 45,227
	TD881705    N/A    N/A		
	TD88349    N/A    N/A		
Loma Linda	<b>11370 Anderson St</b>	\$ 129,392	\$ 215,499
	TD1017940    N/A    N/A		
	TD1124632    N/A    N/A		
Loma Linda	<b>26001 Redlands Blvd</b>	\$ (67,822)	\$ 599,890
	TD925280    N/A    N/A		
	TD822460    N/A    N/A		
Menifee	<b>25283 Sherman Rd</b>	\$ 6,067	\$ 330,402
	TD672561    N/A    N/A		
	TD825764    N/A    N/A		
	TD825766    N/A    N/A		
Menifee	<b>Old Newport Rd</b>	\$ 22,617	\$ -
	801161258    N/A    N/A		
Ontario	<b>Trct : 18888: 4Th St/Haven Ave (Joint R2</b>	\$ (48,459)	\$ 206,353
	TD812208    6434-7295    57222		
	TD812210    N/A    N/A		
Ontario	<b>Trct : 18909: Philadelphia/Cucamonga (R2</b>	\$ (85,209)	\$ 409,451
	TD811783    N/A    N/A		
	TD811784    N/A    N/A		
Ontario	<b>Xstrt : E Mission Blvd &amp; S Hellman Ave</b>	\$ 46,974	\$ 226,800
	TD812208    6434-7295    57222		
	TD812210    N/A    N/A		
Rancho Cucamonga	<b>10740 4Th St (4Th And Utica)</b>	\$ 39,468	\$ 40,720
	800028655    6134-7234    67207		
	800055549    8460-4938    N/A		
Rancho Cucamonga	<b>12455 Arrow Rte</b>	\$ (61,657)	\$ 407,594
	TD843376    N/A    N/A		
	TD843375    N/A    N/A		
Redlands	<b>105 Tennessee St</b>	\$ (11,409)	\$ 58,852
	TD1087352    N/A    N/A		
	TD953255    N/A    N/A		
Redlands	<b>Trct : 18969; Redlands Street/E. Highlan</b>	\$ (13,999)	\$ 39,500
	TD1009295    N/A    N/A		

**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
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RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	TD914777      N/A      N/A		
<b>Rialto</b>	<b>Xstrt : Baseline Ave, Between Maple And</b> TD938721      N/A      N/A TD938722      N/A      N/A	<b>\$      52,569</b>	<b>\$    399,298</b>
<b>Rialto</b>	<b>Xstrt : San Bernardino And Riverside</b> TD996788      N/A      N/A TD996787      N/A      N/A	<b>\$    (12,455)</b>	<b>\$      37,112</b>
<b>San Bernardino</b>	<b>Trct: Cajon Blvd</b> TD969989      N/A      N/A TD969988      N/A      N/A	<b>\$      26,667</b>	<b>\$      92,863</b>
<b>Upland</b>	<b>Trct : 18951: S/E Corner Central/11Th (R</b> TD1019173      N/A      N/A TD1092857      N/A      N/A	<b>\$      56,294</b>	<b>\$    206,745</b>
<b>Upland</b>	<b>Xstrt: Foothill W/O Central N/S</b> TD641980      N/A      N/A TD711234      N/A      N/A	<b>\$      11,977</b>	<b>\$      11,281</b>
<b>Victorville</b>	<b>14610 Palmdale Rd</b> TD1103551      N/A      N/A TD1103550      N/A      N/A	<b>\$      3,156</b>	<b>\$    238,441</b>
<b>Total San Bernardino County</b>		<b>\$    305,743</b>	<b>\$ 7,801,018</b>
<b><u>Santa Barbara County</u></b>			
<b>Carpenteria</b>	<b>2020 Lillingston Canyon Rd</b> TD1040538      N/A      N/A TD1044600      N/A      N/A	<b>\$      9,262</b>	<b>\$      9,885</b>
<b>Santa Barbara</b>	<b>3 Rosemary Ln</b> TD1040505      N/A      N/A TD1040207      N/A      N/A	<b>\$      606</b>	<b>\$    33,065</b>
<b>Santa Barbara</b>	<b>100 W Mason St</b> TD1191963      N/A      N/A TD1192019      N/A      N/A	<b>\$      8,223</b>	<b>\$    74,518</b>
<b>Santa Barbara</b>	<b>272 Dawlish Pl</b> TD1041964      N/A      N/A TD1076732      N/A      N/A 800661376      N/A      N/A	<b>\$    69,864</b>	<b>\$    87,330</b>
<b>Santa Barbara</b>	<b>917 Paseo Ferrelo</b> TD885852      N/A      N/A TD885851      N/A      N/A	<b>\$    (1,475)</b>	<b>\$    22,437</b>

**EXHIBIT D  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SECTION C PROJECTS**

<b>COMMUNITY</b>	<b>PROJECT LOCATION</b>	<b>UTILITY</b>	<b>OTHERS</b>
Santa Barbara	<b>1013 Barger Canyon</b>	\$ 2,928	\$ 4,948
	TD978922 N/A N/A		
	TD978921 N/A N/A		
Santa Barbara	<b>1121 Cima Linda Ln</b>	\$ (9,897)	\$ 39,488
	TD1107506 N/A N/A		
	TD1103746 N/A N/A		
Santa Barbara	<b>1646 Franceschi Rd</b>	\$ 7,327	\$ 1,325
	TD988607 N/A N/A		
	TD988759 N/A N/A		
Santa Barbara	<b>1830 Mission Ridge Rd</b>	\$ 7,638	\$ 66,860
	TD1107506 N/A N/A		
	TD1103746 N/A N/A		
<b>Total Santa Barbara County</b>		<b>\$ 94,476</b>	<b>\$ 339,855</b>
<b><u>Tulare County</u></b>			
Lindsay	<b>Xstr : Maple Avenue &amp; Alameda Street</b>	\$ (1,840)	\$ 48,160
	TD1198080 N/A N/A		
	TD1106450 N/A N/A		
Porterville	<b>Xstr West/Edison</b>	\$ 82,680	\$ -
	TD181156 6051-7260 77209		
	TD181157 6451-7247 77210		
Tulare	<b>Xstr : Mooney Blvd &amp; Prosperity Ave.</b>	\$ (29,707)	\$ 69,713
	TD1135449 N/A N/A		
	TD1154533 N/A N/A		
Visalia	<b>Xstr : Demaree And Goshen</b>	\$ 83,332	\$ 265,210
	TD830765 N/A N/A		
	TD830764 N/A N/A		
<b>Total Tulare County</b>		<b>\$ 134,465</b>	<b>\$ 383,083</b>
<b><u>Ventura County</u></b>			
Oxnard	<b>Trct : Terraza - Carmelita Ct N/O E 1St</b>	\$ (2,638)	\$ 151,383
	TD888922 N/A N/A		
	TD888924 N/A N/A		
Simi Valley	<b>Xstr : 4370 Eve Rd</b>	\$ 139,430	\$ 209,055
	TD419554 N/A N/A		
	TD976623 N/A N/A		
Unincorporated Ventura	<b>368 Upperlake Rd - Lake Sherwood</b>	\$ (4,349)	\$ 81,336
	TD889954 N/A N/A		
	TD889953 N/A N/A		

**EXHIBIT D**  
**ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS**  
**COMPLETED IN 2017**  
**RULE 20, SECTION C PROJECTS**

COMMUNITY	PROJECT LOCATION	UTILITY	OTHERS
	Total Ventura County	<u>\$ 132,443</u>	<u>\$ 441,773</u>
	Total Rule 20 Section C	<u>\$ 1,436,487</u>	<u>\$ 18,321,913</u>

EXHIBIT E  
ANNUAL REPORT OF OVERHEAD TO UNDERGROUND CONVERSIONS  
COMPLETED IN 2017  
RULE 20, SCE COMPANY OPERATING PROJECTS

COMMUNITY	PROJECT LOCATION	COMPLETED COSTS
<u>Orange County</u>		
Anaheim	Lincoln Ave/Dale Ave	\$ 3,664,156
	TD591615 6448-7401 07400	
	TD591620 6048-7401 07400	
	801004807 6048-7401 07400	
	<b>Total Orange County</b>	<b>\$ 3,664,156</b>
	<b>Total SCE Overhead to Underground Conversions</b>	<b>\$ 3,664,156</b>





Erik B. Jacobson  
Director  
Regulatory Relations

Pacific Gas and Electric Company  
77 Beale St., Mail Code B23A  
P.O. Box 770000  
San Francisco, CA 94177

Tel.: 415-973-4464  
Fax: 415.973.-1448

March 30, 2018

Alice Stebbins, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue, 5<sup>th</sup> Floor  
San Francisco, CA 94102

**Subject: PG&E's 2017 Electric Rule 20 Underground Conversion Report**

Dear Ms. Stebbins:

In accordance with Ordering Paragraph 7 of Decision 73078 in Case 8209, Pacific Gas and Electric Company is submitting a full report of its overhead to underground conversion projects completed in 2017. Also included, you will find a list and description of each finished project by Rule 20A, 20B, and 20C. This report is prepared in accordance with the standard format.

In addition, please note that in the April 3, 2017 filing of its 2016 report, PG&E noted that it would be conducting a review of the historical allocations and expenditures for the Rule 20A program since its inception and that PG&E would supplement or revise the report as needed. As a result of the review, in the 2017 report PG&E is implementing a revision (true-up) of lines 1 and 4 carried forward from, respectively, lines 3 and 6 on the 2016 Report in order to align these totals with communities' cumulative allocation and completion totals through December 31, 2016.

If you have any questions, please contact Andrea Miller, Rule 20A Program Manager, at (925) 270-2719.

Sincerely,

A handwritten signature in black ink, appearing to read 'Erik B. Jacobson', written in a cursive style.

Erik B. Jacobson  
Director, Regulatory Relations

cc: David Lee – [david.lee@cpuc.ca.gov](mailto:david.lee@cpuc.ca.gov)  
Energy Division Central Files - [EnergyDivisionCentralFiles@cpuc.ca.gov](mailto:EnergyDivisionCentralFiles@cpuc.ca.gov)  
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DeAnn Baker, Director, Legislative Affairs  
California State Association of Counties  
1100 K Street, Suite 101  
Sacramento, CA 95814

Attachment



**REPORT OF RULE 20A CONVERSIONS**

UTILITY: Pacific Gas and Electric Company

YEAR ENDING 2017

**ALLOCATIONS FOR CONVERSION**

1a Prior Year line 3 balance carry-forward - Total Allocations (1968-2016) *	2,060,232,682
1b Allocation True-Up *	<u>-82,521</u>
1c Adjusted Total Allocations (1968-2016) *	2,060,150,161
2 Report Year's Allocation (2017)	<u>41,300,000</u>
3 Total Allocations Through Report Year 1968-2017 (1+2) ***	<u>2,101,450,161</u>

**EXPENDITURES FOR CONVERSIONS**

4a Prior Year line 6 balance carry-forward - Total Ex- pended for Completed Conversions (1968-2016) *	1,427,676,133
4b Completion True-Up *	<u>-70,245,623</u>
4c Adjusted Total Expended For Completed Conversions (1968-2016) *	1,357,430,509
5 Total Report Year Expended for Completed Conversions (2017)	<u>56,567,937</u>
6 Total Expended for Completed Conversions Through Report Year (1968-2017) (4+5) ***	<u>1,413,998,446</u>
7 Total Expended on Conversions Not Completed by Report Year-End (2017)	<u>67,249,754</u>
8 Total Expended (6+7)	<u>1,481,248,200</u>

**TOTAL UNEXPENDED FUNDS (3 - 8)**

9 If Expenditures are Greater than Allocations	<u>0</u>
10 If Allocations are Greater Than Expenditures (One of the above, 9 or 10 will always be "0")	<u>620,201,961</u>

**FUNDS COMMITTED**

11 Total funds Authorized to Complete Partially completed Jobs Shown on Line 7	<u>44,121,828</u>
12 Funds for Jobs Not Under Construction where U.G. districts have been formed Under enabling Legislation	<u>325,118,417</u>
13 Total Committed (11 + 12)	<u>369,240,245</u>

**ADDITIONAL FUNDS COMMITTED**

14 Funds Required for Identified Projects Under Study by Active U.G. communities as of Report Year Ending 12/31/2008	<u>no longer used**</u>
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**MEMO INFORMATION**

15 Advance for Specific Communities Beyond Current Allocations	<u>126,334,353</u>
16 Reserve Funds Held for Specific Communities for Which No Specific Current Projects are Under Study as of Report Year-End	<u>445,021,725</u>
17 Expenditures to Case 9365 (Transmission)	<u>no longer used**</u>

\* The Total Allocations and Total Expended for Completed Conversions are carried forward year over year; for example the Total Allocations (line 1) and Total Expended for Completed Conversions (line 4) in this report are from lines 3 and 6, respectively, on the 2016 Report. As a result of a review of these figures, for the 2017 Report PG&E is implementing a one-time revision (true-up) of lines 1 and 4 carried forward from, respectively, lines 3 and 6 on the 2016 Report in order to align these totals with communities' cumulative allocation and completion totals through 12/31/2016.

\*\* no longer used as of 12/31/2008

\*\*\* Cumulative total through Report Year-End agrees to PG&E Work Credit Ledger.

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION A PROJECTS - MAT 30A**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>START YEAR</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>
<b><u>Alameda</u></b>				
OAKLAND	PIEDMONT PINES PH 1	2008	30618097	\$13,740,062
UNION CITY	MISSION/DECOTO RD	2008	30616111	\$2,549,344
			<b>Subtotal</b>	<b>\$16,289,406</b>
<b><u>Contra Costa</u></b>				
MORAGA	MORAGA RD	2015	31160902	\$1,434,612
RICHMOND	MACDONALD AVE	2008	30631393	\$4,335,386
			<b>Subtotal</b>	<b>\$5,769,998</b>
<b><u>Kern</u></b>				
BAKERSFIELD	CALLOWAY DR	2010	30764510	\$3,425,179
			<b>Subtotal</b>	<b>\$3,425,179</b>
<b><u>Merced</u></b>				
MERCED COUNTY	WALNUT AVE, WINTON	2008	30616106	\$4,247,348
			<b>Subtotal</b>	<b>\$4,247,348</b>
<b><u>Nevada</u></b>				
NEVADA COUNTY	COMBIE RD PH 2	2008	30616100	\$2,938,686
			<b>Subtotal</b>	<b>\$2,938,686</b>
<b><u>San Francisco</u></b>				
SAN FRANCISCO	3RD ST LIGHT RAIL PH 2	2001	30211896	\$1,579 *
SAN FRANCISCO	TEXAS/19TH ST	2001	30222281	-\$5,428 *
SAN FRANCISCO	DOLORES ST PH 1	2001	30222282	\$14,493 *
SAN FRANCISCO	MISSION ST	2001	30223376	\$15,047 *
SAN FRANCISCO	SAN BRUNO 2 PH 1	2001	30223377	\$15,529 *
SAN FRANCISCO	SAN BRUNO 2 PH 2	2002	30242967	\$12,573 *
SAN FRANCISCO	MID-24th	2002	30249353	\$32,402 *
SAN FRANCISCO	CORBETT 1B	2002	30249355	\$6,702 *
SAN FRANCISCO	BROAD/RANDOLPH	2002	30249357	\$115,429 *
SAN FRANCISCO	COURTLAND CONNECT - DIST. #339 - F	2002	30249359	\$81,991 *
SAN FRANCISCO	MID LAKE	2002	30249629	\$10,245 *
SAN FRANCISCO	MID-FOLSOM ST - DIST. #350 - PH 1	2002	30249631	\$88,016 *
SAN FRANCISCO	LIBERTY HILL - DIST. #329 - PH 1	2002	30250174	\$28,234 *
SAN FRANCISCO	DOLORES ST 2	2002	30250175	\$12,623 *
SAN FRANCISCO	LAIDLEY ST - DIST. #330 - PH 2	2002	30278150	\$38,364 *
SAN FRANCISCO	OAK ST	2003	30297408	\$90,704 *
SAN FRANCISCO	9TH & 10TH AVE/ORTEGA CABLING	2003	30303305	\$101,627 *
SAN FRANCISCO	OCTAVIA ST	2003	30314814	-\$12,312 *
SAN FRANCISCO	BANKS/CHAPMAN	2003	30333103	\$10,972 *
SAN FRANCISCO	LIBERTY HILL 2	2003	30334696	\$8,639 *
SAN FRANCISCO	DOLORES ST 3	2003	30334698	\$16,042 *
SAN FRANCISCO	COURTLAND CONNECT - DIST. #339 - F	2003	30334699	\$35,533 *
SAN FRANCISCO	CORBETT AVE - DIST. #311 - PH 2	2003	30334782	\$53,489 *
SAN FRANCISCO	MID-FOLSOM ST	2003	30334783	\$86,612 *
SAN FRANCISCO	OAKDALE/PALOU 1	2003	30334785	-\$38,007 *
SAN FRANCISCO	25TH ST	2003	30334789	-\$1,149 *
SAN FRANCISCO	FLINT/16TH ST	2003	30334790	\$8,402 *
SAN FRANCISCO	LINCOLN WAY 5	2003	30334792	\$33,313 *
SAN FRANCISCO	TARAVAL - DIST. #346 - PH 2	2004	30383452	\$274,970 *
SAN FRANCISCO	OCEAN AVE - DIST. #338 - PH 4	2004	30400280	\$51,019 *
SAN FRANCISCO	DUBOCE/CHURCH - DIST. #324	2004	30410006	\$43,513 *
SAN FRANCISCO	DUNCAN/NEWBURG - DIST. #332	2004	30410007	\$31,589 *
			<b>Subtotal</b>	<b>\$1,262,755</b>
<b><u>San Joaquin</u></b>				
SAN JOAQUIN COUNTY	LOWER SACRAMENTO	2010	30771373	\$7,303,864
			<b>Subtotal</b>	<b>\$7,303,864</b>
<b><u>Santa Clara</u></b>				
LOS ALTOS	FIRST ST PH 2	2012	30899980	\$1,630,968

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION A PROJECTS - MAT 30A**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>START YEAR</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>
MORGAN HILL	MONTEREY ROAD	2008	30618077	\$2,372,459
SAN JOSE	PARK & NAGLEE	2007	30575460	\$28,665 *
SAN JOSE	CAMDEN AVE	2008	30647467	\$29,127 *
SANTA CLARA COUNTY	CAMDEN AVE	2008	30647467	\$10,773 *
SUNNYVALE	FAIR OAKS AVE	2009	30721972	\$4,906,621
			<b><i>Subtotal</i></b>	<b><i>\$8,978,613</i></b>
<b><u>Stanislaus</u></b>				
OAKDALE	SOUTH YOSEMITE AVE	2014	31059557	\$1,735,839
			<b><i>Subtotal</i></b>	<b><i>\$1,735,839</i></b>
<b><u>Yuba</u></b>				
YUBA COUNTY	OLIVEHURST AVE	2012	30959427	\$4,616,250
			<b><i>Subtotal</i></b>	<b><i>\$4,616,250</i></b>
			<b><i>TOTAL</i></b>	<b><i>\$56,567,937</i></b>

\* Project reported on previous years' report. Inclusion in the 2017 report due to a subsequent adjustment.

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION B PROJECTS - MAT 10H**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>	
			<u>OTHERS*</u>	<u>TOTAL*</u>
<b><u>Alameda</u></b>				
EMERYVILLE	HERITAGE SQ-62ND ST	31248882	-\$156,007	\$272,392
LIVERMORE	TASAJARA RD	31144805	-\$390,895	\$340,357
NEWARK	8157 37521 WILLOW ST	31259004	-\$252,301	\$201,849
OAKLAND	612 18TH ST	31139300	-\$54,719	\$702,235
OAKLAND	180 4TH ST/431 MADISON ST.	31269764	-\$268,436	\$614,377
		<b>Subtotal</b>	<b>-\$1,122,358</b>	<b>\$2,131,210</b>
<b><u>Butte</u></b>				
CHICO	CACTUS AVE & EATON RD	31258784	-\$135,632	\$170,147
			<b>-\$135,632</b>	<b>\$170,147</b>
<b><u>Contra Costa</u></b>				
BAY POINT	DRIFTWOOD DR	31157675	-\$254,555	\$232,229
DANVILLE	ROSE AVE & LINDA MESA AVE	31237909	-\$252,699	\$87,819
OAKLEY	8985 LOIS LN	31028999	\$0	\$31,961
OAKLEY	4700 MAIN ST	31216685	-\$162,511	\$79,671
		<b>Subtotal</b>	<b>-\$669,765</b>	<b>\$431,680</b>
<b><u>Fresno</u></b>				
CLOVIS	BULLARD & LA VONA AVE	31168614	-\$162,060	\$45,759
FOWLER	ARMSTRONG AVE & CLAYTON AVE	31263324	-\$208,268	\$137,331
FRESNO	RODGERS & SPRUCE AVE	31138173	-\$244,121	\$119,152
FRESNO	NWC NEES AND BOND AVE	31167562	-\$137,536	\$177,627
FRESNO	ARMSTRONG AVE	31215912	-\$178,654	\$122,952
FRESNO	LEONARD & DAKOTA AVE	31279901	-\$162,968	\$85,744
FRESNO	DAKOTA AVE W/O TEMPERANCE AVE	31280429	-\$441,036	\$294,447
FRESNO	850 EAST CENTRAL AVE	31319464	-\$52,674	\$78,348
		<b>Subtotal</b>	<b>-\$1,587,317</b>	<b>\$1,061,361</b>
<b><u>Kern</u></b>				
BAKERSFIELD	WHITE LANE AND BUENA VISTA	31098249	-\$338,940	\$244,399
BAKERSFIELD	PANAMA AND ASHE	31170725	-\$207,772	\$70,875
BAKERSFIELD	MING AVE. WEST OF S. ALLEN ROAD	31280789	-\$258,893	\$133,837
BAKERSFIELD	TAFT HWY AND MOUNTAIN RIDGE DR	31286820	-\$152,058	\$50,707
		<b>Subtotal</b>	<b>-\$957,663</b>	<b>\$499,817</b>
<b><u>Monterey</u></b>				
SALINAS	SAN JUAN GRADE RD	31226484	-\$121,179	\$134,175
		<b>Subtotal</b>	<b>-\$121,179</b>	<b>\$134,175</b>
<b><u>Placer</u></b>				
GRANITE BAY	EUREKA RD	31075660	-\$160,179	\$185,713
		<b>Subtotal</b>	<b>-\$160,179</b>	<b>\$185,713</b>
<b><u>San Francisco</u></b>				
SAN FRANCISCO	801 BRANNAN ST	31036890	-\$596,023	\$764,353
SAN FRANCISCO	1 HENRY ADAMS	31099904	-\$430,013	\$742,340
SAN FRANCISCO	3RD ST, TERRY FRANCOIS BLVD, 16TH ST	31225409	-\$2,630,482	-\$191,309
		<b>Subtotal</b>	<b>-\$3,656,518</b>	<b>\$1,315,383</b>
<b><u>San Joaquin</u></b>				
LATHROP	2131 E. LOUISE AVE	31283322	-\$242,229	\$64,768
LATHROP	11800 S. HARLAN RD	31329032	-\$215,884	\$72,346
LODI	650 TAYLOR RD	31226518	-\$90,963	\$6,316
MANTECA	SUNDANCE #1, NS WOODWARD & HARVEST	31201052	-\$464,316	\$40,872
		<b>Subtotal</b>	<b>-\$1,013,391</b>	<b>\$184,303</b>
<b><u>San Luis Obispo</u></b>				
PISMO BEACH	PRICE CANYON RD & LEMOORE	31020856	-\$86,570	\$159,181
		<b>Subtotal</b>	<b>-\$86,570</b>	<b>\$159,181</b>
<b><u>San Mateo</u></b>				
DALY CITY	1635 EDGEWORTH AVE	31172991	-\$457,000	\$483,188
		<b>Subtotal</b>	<b>-\$457,000</b>	<b>\$483,188</b>
<b><u>Santa Clara</u></b>				
GILROY	200 E. 10TH ST	31150388	-\$369,266	\$178,929

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION B PROJECTS - MAT 10H**

<b>COUNTY/ COMMUNITY</b>	<b>LOCATION</b>	<b>JOB NUMBER</b>	<b>COMPLETED COSTS</b>	
			<b>OTHERS*</b>	<b>TOTAL*</b>
MOUNTAIN VIEW	RT JONES RD	30971478	-\$399,262	\$203,660
SAN JOSE	APN 685-03-002 EDNVALE AVE	31217149	-\$237,923	\$280,044
SUNNYVALE	280 N. WOLFE RD	31227179	-\$837,658	\$439,751
		<b>Subtotal</b>	-\$1,844,108	\$1,102,383
		<b>TOTAL</b>	-\$11,811,681	\$7,858,541

\* OTHERS = Customer contributions

\* TOTAL NET = PG&E cost

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION C PROJECTS - MAT 10I**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>	
			<u>OTHERS*</u>	<u>TOTAL*</u>
<b><u>Alameda</u></b>				
BERKELEY	2306 DANA ST	31256281	-\$252,085	\$332,712
BERKELEY	2001 4TH ST	31303325	-\$80,010	\$162,877
DUBLIN	CAMP PARKS, DUBLIN BLVD	31117850	-\$90,499	\$116,149
FREMONT	34653 FREMONT BLVD	31135058	-\$139,759	\$88,503
FREMONT	4325 ALDER AVE	31149481	-\$165,256	\$80,925
HAYWARD	23645 & 23653 EDEN AVE	31220756	-\$60,586	\$17,725
LIVERMORE	3134 GARDELA PLAZA	31097560	-\$142,773	-\$44,858
LIVERMORE	EAST AVE	31200328	-\$112,220	\$19,783
NEWARK	5601 MOWRY AVE	31149327	-\$126,783	\$14,238
OAKLAND	459 23RD ST	31227607	-\$234,534	\$489,939
OAKLAND	2935 TELEGRAPH AVE	31287649	-\$187,690	\$150,144
		<b>Subtotal</b>	<b>-\$1,592,194</b>	<b>\$1,428,137</b>
<b><u>Contra Costa</u></b>				
ALAMO	512 HEMME AVE	31296045	-\$36,827	\$3,326
MORAGA	1058 LARCH AVE	31303788	-\$36,065	\$12,120
RICHMOND	WESTERN DR	31207976	\$0	\$176,277
		<b>Subtotal</b>	<b>-\$72,892</b>	<b>\$191,724</b>
<b><u>Fresno</u></b>				
CLOVIS	1515 ESCALON	31213314	-\$19,521	\$26,946
FRESNO	WILLOW AVE AT SPRUCE AVE	31245890	-\$101,234	\$64,705
FRESNO	3004 BLACKSTONE	31272040	-\$52,177	\$4,218
FRESNO	2494 S. RAILROAD AVE	31272068	-\$55,471	\$109,587
REEDLEY	REED AVE & NORTH AVE	31245693	\$0	\$110,301
		<b>Subtotal</b>	<b>-\$228,403</b>	<b>\$315,756</b>
<b><u>Monterey</u></b>				
GREENFIELD	900 CHERRY AVE	31290451	-\$149,710	-\$81,168
MARINA	8TH ST	31240785	-\$190,364	\$39,656
PEBBLE BEACH	933 CORAL DR	31153987	-\$129,246	\$340
PEBBLE BEACH	953 SAND DUNES RD	31281809	-\$13,060	-\$2,753
SALINAS	105 CORRAL DE TIERRA RD	31214385	-\$42,735	\$5,053
SAND CITY	OCEAN VIEW AVE	31287131	-\$79,702	\$28,305
		<b>Subtotal</b>	<b>-\$604,817</b>	<b>-\$10,567</b>
<b><u>Napa</u></b>				
CALISTOGA	2085 MORA AVE	31239166	-\$36,245	\$14,929
		<b>Subtotal</b>	<b>-\$36,245</b>	<b>\$14,929</b>
<b><u>Nevada</u></b>				
GRASS VALLEY	18243 NORLENE WAY	31237537	-\$2,902	\$7,962
ROUGH AND READY	11157 ROUGH & READY HWY	31221188	-\$102,819	\$47,011
		<b>Subtotal</b>	<b>-\$105,721</b>	<b>\$54,973</b>
<b><u>San Benito</u></b>				
HOLLISTER	HILLCREST RD	31226872	-\$155,134	-\$60,744
		<b>Subtotal</b>	<b>-\$155,134</b>	<b>-\$60,744</b>
<b><u>San Francisco</u></b>				
SAN FRANCISCO	340 FREMONT ST	30971428	-\$172,542	\$194,501
SAN FRANCISCO	2655 BUSH ST	30978700	-\$102,272	\$161,163
SAN FRANCISCO	350 8TH ST	31007919	-\$107,926	-\$34,197
SAN FRANCISCO	815 TENNESSEE ST	31228394	-\$269,848	\$65,197
SAN FRANCISCO	160 FOLSOM ST	31229029	-\$192,880	\$14,035
		<b>Subtotal</b>	<b>-\$845,469</b>	<b>\$400,699</b>

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION C PROJECTS - MAT 10I**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>	
			<u>OTHERS*</u>	<u>TOTAL*</u>
<b><u>San Joaquin</u></b>				
LATHROP	18601 CHRISTOPER WY	31286848	-\$85,045	\$32,793
RIPON	1671 N RIPON RD	31304006	-\$124,514	-\$29,838
STOCKTON	5382 ARCH RD	31225344	-\$141,705	-\$39,351
		<b>Subtotal</b>	<b>-\$351,263</b>	<b>-\$36,396</b>
<b><u>San Luis Obispo</u></b>				
SAN MIGUEL	K ST	31247728	-\$80,446	\$967
ARROYO GRANDE	1029 ASH ST	31261029	-\$63,883	\$12,284
AVILA BEACH	250 SAN LUIS ST	31195328	-\$68,438	\$15,734
SAN LUIS OBISPO	2951 WALLACE DR	31214870	-\$62,752	\$9,575
SHELL BEACH	2526 COBURN LN	31197734	-\$74,096	\$48,601
		<b>Subtotal</b>	<b>-\$349,616</b>	<b>\$87,161</b>
<b><u>San Mateo</u></b>				
BURLINGAME	ROUTE 101	31018219	\$0	\$290,603
BURLINGAME	240 LORTON AVE (HATCH LN)	31241382	-\$248,088	\$205,210
DALY CITY	SECOND & THIRD AVE	31156486	-\$138,398	\$105,941
MENLO PARK	100,150,190 INDEPENDENCE DR	31205361	-\$159,165	\$83,843
PORTOLA VALLEY	198 PALOMA RD	31320530	-\$8,784	\$24,386
REDWOOD CITY	508 OAK PARK CT	31247868	-\$46,541	-\$25,492
SAN CARLOS	810 E SAN CARLOS AVE	31177123	-\$142,033	\$166,171
SAN GREGORIO	3300 POMPONIO CREEK RD	31177718	-\$61,465	\$23,128
SAN MATEO	220 N. BAYSHORE BLVD	31257571	-\$12,577	\$17,261
SOUTH SAN FRANCISCO	211 AIRPORT BLVD	31211223	-\$309,064	\$723,817
		<b>Subtotal</b>	<b>-\$1,126,115</b>	<b>\$1,614,868</b>
<b><u>Santa Barbara</u></b>				
SANTA MARIA	1900 BLK S. BRADLEY RD	31201212	-\$166,909	\$15,060
		<b>Subtotal</b>	<b>-\$166,909</b>	<b>\$15,060</b>
<b><u>Santa Clara</u></b>				
LOS ALTOS	453 CYPRESS DR	31282084	-\$19,176	-\$1,132
MORGAN HILL	DEL MONTE AVE	31155161	-\$186,386	\$32,954
MORGAN HILL	MISSION VIEW	31227936	-\$80,984	\$24,899
MOUNTAIN VIEW	133 & 149 FAIRCHLD DR	31107337	-\$126,881	\$89,838
MOUNTAIN VIEW	MCKELVEY PARK/PARK DR	31113742	-\$200,983	\$275,254
MOUNTAIN VIEW	1001 N. SHORELINE BLVD	31172048	-\$318,059	\$107,046
MOUNTAIN VIEW	582 HOPE ST	31211963	-\$347,847	\$157,365
MOUNTAIN VIEW	RT JONES RD	31249715	-\$108,238	\$36,530
SAN JOSE	800 WEST SAN CARLOS	31143863	-\$25,359	\$58,366
SAN JOSE	1850 STONE AVE	31197343	-\$213,128	\$90,079
SUNNYVALE	523 - 543 E HOMESTEAD RD	31131803	-\$95,922	\$67,319
SUNNYVALE	423 E. MAUDE AVE	31190993	-\$177,545	\$150,550
		<b>Subtotal</b>	<b>-\$1,900,508</b>	<b>\$1,089,068</b>
<b><u>Solano</u></b>				
BENICIA	1101 MILITARY W	31283049	-\$51,995	-\$7,189
		<b>Subtotal</b>	<b>-\$51,995</b>	<b>-\$7,189</b>

**ANNUAL REPORT OF OVERHEAD TO  
UNDERGROUND CONVERSIONS CLOSED IN 2017  
RULE 20, SECTION C PROJECTS - MAT 10I**

<u>COUNTY/ COMMUNITY</u>	<u>LOCATION</u>	<u>JOB NUMBER</u>	<u>COMPLETED COSTS</u>	
			<u>OTHERS*</u>	<u>TOTAL*</u>
<b><u>Sonoma</u></b>				
PETALUMA	511 SONOMA MOUNTAIN PKWY	31188591	-\$135,654	-\$790
SANTA ROSA	1137 CLOVER AVE	31157969	-\$71,245	\$18,267
SANTA ROSA	1931 BIWANA DR	31246222	-\$44,475	-\$5,240
SANTA ROSA	SAN MIGUEL AVE	31282833	-\$100,729	\$47,861
SONOMA	220 - 230 NEWCOMB ST	31229817	-\$133,688	\$37,772
SONOMA	18880 CARRIGER RD	31230863	-\$142,009	\$20,851
WINDSOR	6087 OLD REDWOOD HWY	31135405	-\$74,515	\$17,273
WINDSOR	8755 OLD REDWOOD HWY	31182538	-\$123,378	\$170,413
		<b><i>Subtotal</i></b>	<b>-\$825,692</b>	<b>\$306,408</b>
		<b><i>TOTAL</i></b>	<b>-\$8,412,973</b>	<b>\$5,403,886</b>

\* OTHERS = Customer contributions

\* TOTAL NET = PG&E cost







Clay Faber  
Director – Regulatory Affairs  
8330 Century Park Court; CP32F  
San Diego, CA 92123-1548

[cfaber@SempraUtilities.com](mailto:cfaber@SempraUtilities.com)

April 11, 2018

PUG 100  
C.8209

Alice Stebbins, Executive Director  
California Public Utilities Commission  
505 Van Ness Avenue  
San Francisco, CA 94102

**SUBJECT: REVISED SDG&E 2017 REPORT OF RULE 20 CONVERSIONS**

Dear Ms. Stebbins:

In accordance with Ordering Paragraph (OP) 7 of Decision 73078 in Case 8209, and OP 4 of Decision 01-12-009, San Diego Gas & Electric Company submitted its full report on its overhead to underground conversion work completed during the year 2017, including a list and description of each project, on March 30, 2018.

Subsequent to filing, SDG&E further reviewed the details provided and discovered an error in line 2 of the report's summary page, *Report year's allocation (2017)*. What was previously reported as \$26,294,562 should have been \$25,047,544. This \$1,247,018 adjustment is further reflected in the calculations on line 3 (*Total allocations through report year*), line 10 (*If allocations are greater than expenditures*), and line 16 (*Expenditures to Case 9365*). The attached updated report reflects these adjustments in highlighted text.

SDG&E apologizes for the error. If you have any questions regarding this revised report, please contact Megan Caulson at (858) 654-1748.

Sincerely,

/s/ Clay Faber  
Clay Faber  
Director -- Regulatory Affairs

cc: D. Lee, CPUC  
S. Peterson, SDG&E  
Pacific Gas & Electric  
Southern California Edison  
AT&T

**REPORT OF RULE 20A CONVERSIONS**  
**UTILITY: SAN DIEGO GAS & ELECTRIC**

YEAR ENDING: **2017**

**AMENDED 2017 REPORT SUMMARY**

**ALLOCATIONS FOR CONVERSIONS**

	Corrected 2017 allocations	
1. Total allocations (1968 - 2016)		\$793,412,888
2. Report year's allocation (2017)	\$25,047,544	
3. Total allocations through report year (1968 - 2017) (1+2)		<b>\$818,460,432</b>

**EXPENDITURES FOR CONVERSIONS**

4. Total expended for completed conversions (1968-2016) (from 2016 report)	\$706,276,189	
5. Total report year expended for completed conversions (2017)	\$24,188,000	
6. Total expended for completed conversions through report year (1968-2017) (4+5)		\$730,464,189
7. Total expended on conversions not completed by report year-end (2017)	\$70,976,684	
8. Total expended (6+7)		\$801,440,873

**TOTAL UNEXPENDED FUNDS (3-8)**

9. If expenditures are greater than allocations		\$0
10. If allocations are greater than expenditures (One of the above (9 or 10) will always be -0-)		<b>\$17,019,559</b>

**FUNDS COMMITTED**

11. Total funds authorized to complete partially completed jobs shown on Line 7	\$6,550,854	
12. Funds for jobs not under construction where U.G. districts have been formed under enabling legislation	\$58,829,735	
13. Total Committed (11+12)		\$65,380,589

**ADDITIONAL FUNDS COMMITTED**

14. Funds required for identified projects under study by active U.G. Communities as of report year. *	* No longer used as of 12/31/2008	
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**MEMO INFORMATION**

15. Advance for specific communities beyond current allocations		-\$3,578,101
16. Reserve funds held for specific communities for which no specific current projects are under study as of report year-end.		<b>-\$48,361,030</b>
17. Expenditures to Case 9365 (Transmission dollars which are included in the total cost above in Line 8) *	* No longer used as of 12/31/2008	

## RULE 20A DEFINITIONS

1. Total Rule 20A funds committed by the Utility. This amount is equal to the Company's total allocation from the year of inception to prior report year.
2. This amount is the Company total for the report year Rule 20A allocation.
3. Total of Line 1 plus Line 2 which is the base for this year's report.
4. Total expended for completed conversion jobs from inception through prior report year.
5. Total expended for completed conversion jobs for the report year.
6. Total of Line 4 plus Line 5.
7. Total expended for conversion jobs not yet completed through report year.
8. Total of Line 6 plus Line 7.
9. Expenditures that are greater than allocations:  
Line 8 minus Line 3 = overexpended funds.
10. Expenditures that are less than allocations:  
Line 3 minus Line 8 = unexpended funds.
11. Total funds authorized to complete the conversion jobs reported in Item Line 7.
12. Funds committed for conversion jobs where the Underground District has been established under enabling legislation.
13. Total of Line 11 plus Line 12.
14. Additional funds committed for specific identified jobs under study by active U.G. communities as of report year-ending.\*
15. The total sum for specific aggressive communities that have expended and committed funds that exceed their report year allocation.
16. The total sum for specific communities that have not expended or committed funds equal to their report year allocation.
17. Expenditures to Case 9365 (transmission dollars which are included in Line 8 above).\*

\* Items 14 and 17 no longer used as of 12/31/2008.



**TOTAL SUMMARY  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

<u>Rule</u>	<u>Location</u>	<u>Distribution of Costs</u>
<b>20A</b>	City of Encinitas	\$3,621,569
	City of San Diego	\$12,866,268
	County of San Diego	\$7,672,344
	<b>20A TOTAL</b>	<b>\$24,160,181</b>
	Adjustments to previously reported jobs	<b>\$27,819</b>
	<b>20A GRAND TOTALS:</b>	<b>\$24,188,000</b>

**TOTAL SUMMARY  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

<u>Rule</u>	<u>Location</u>	<b>DISTRIBUTION OF COSTS</b>		
		<u>Total</u>	<u>Other</u>	<u>Utility</u>
<b>20B</b>				
	City of Carlsbad	\$1,638,063	\$657,202	\$980,861
	County of Orange	\$480,498	\$113,272	\$367,226
	City of San Marcos	\$283,690	\$99,430	\$184,260
	<b>20B TOTALS:</b>	<b>\$2,402,251</b>	<b>\$869,904</b>	<b>\$1,532,347</b>
<b>20C</b>				
	City of Dana Point	\$337,559	\$104,339	\$233,220
	City of Encinitas	\$242,781	\$84,522	\$158,259
	City of Escondido	\$21,061	\$22,898	-\$1,837
	City of Imperial Beach	\$178,130	\$132,451	\$45,679
	City of Oceanside	\$125,348	\$62,938	\$62,410
	City of San Clemente	\$42,562	\$17,349	\$25,213
	City of San Diego	\$685,257	\$469,683	\$215,574
	County of San Diego	\$25,463	\$20,910	\$4,553
	<b>20C TOTALS:</b>	<b>\$1,658,161</b>	<b>\$915,090</b>	<b>\$743,071</b>



**RULE 20A  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

**DISTRIBUTION OF ALLOCATION COSTS**

<u>Description and Location</u>	<u>City/County</u>	<u>Total Costs</u>
<b>ENCINITAS</b>		
<b>Santa Fe Dr 20 #156725</b> (Garden Rd to Evergreen Dr) Work Orders: 2950580, 2950581, 2950582, 2950583, 2950584, 2550140 Trench Footage: 5,324 No. of Services: 18 Poles Removed: 34	\$3,621,569	<b>\$3,621,569</b>
<b>SAN DIEGO</b>		
<b>Euclid Av #2 #061978</b> (Euclid Av to University) Work Orders: 2944060, 2944061, 2944062, 2944063, 2944064 Trench Footage: 11,005 No. of Services: 59 Poles Removed: 46	\$4,515,438	
<b>Mount Alifan Dr #153777</b> (Genesee Av to Mount Everest) Work Orders: 2949860, 2949861, 2949862, 2949863 Trench Footage: 1,667 No. of Services: 0 Poles Removed: 7	\$1,534,050	
<b>Altadena-Wightman-Winona #859765</b> (Altadena, El Cajon Bl to Euclid) Work Orders: 2911980, 2911981, 2911982, 2911983, 2911984, 2587340 Trench Footage: 19,708 No. of Services: 117 Poles Removed: 51	\$6,816,780	<b>\$12,866,268</b>
<b>COUNTY OF SAN DIEGO</b>		
<b>Plaza Bonita Rd #447820</b> (Btwn Bonita Mesa & Bonita Rd) Work Orders: 2833740, 2833741, 2833742, 2833743, 2806640, 2806642, 2948640, 2559030, 2559032 Trench Footage: 3,496 No. of Services: 0 Poles Removed: 14	\$6,644,978	
<b>Bear Valley Pkwy #952019</b> (Boyle to San Pasqual Vly Rd) Work Orders: 2945311, 2945312, 2945313, 2945314, 2945317 Trench Footage: 8,148 No. of Services: 9 Poles Removed: 35	\$1,027,366	<b>\$7,672,344</b>
<b>20A TOTAL:</b>		<b>\$24,160,181</b>



**RULE 20B  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

<u>Description and Location</u>	<u>Distribution of Allocation Costs</u>		
	<u>Total</u>	<u>Other</u>	<u>Utility</u>
<b>CARLSBAD</b>			
<b>El Camino Road Widening/20B</b> Tamarack Av to Chestnut Av Work Orders 2936730, 2936731	\$1,269,701	\$587,539	\$682,162
<b>Quarry Creek Ph 1 - Bridge</b> Haymar Dr Work Orders 2411820, 2411821	\$368,362	\$69,663	\$298,699
	<b>\$1,638,063</b>	<b>\$657,202</b>	<b>\$980,861</b>
<b>ORANGE COUNTY</b>			
<b>RMV PA2.1</b> West of Chiquita Canyon, RV Work Orders 2442700, 2442701	<b>\$480,498</b>	<b>\$113,272</b>	<b>\$367,226</b>
<b>SAN MARCOS</b>			
<b>Shane Park Plaza</b> W/S Rancho Santa Fe btwn Cherokee & 9th Work Orders 2936730, 2936731	<b>\$283,690</b>	<b>\$99,430</b>	<b>\$184,260</b>
<b>20B TOTALS:</b>	<b>\$2,402,251</b>	<b>\$869,904</b>	<b>\$1,532,347</b>





**RULE 20C  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

<u>Description and Location</u>	<u>Distribution of Allocation Costs</u>		
	<u>Total</u>	<u>Other</u>	<u>Utility</u>
<b>DANA POINT</b>			
<b>Prado West</b> 2 blk development, Amber Lantern & Del Prado Work Orders 2501251, 2501253	<b>\$337,559</b>	<b>\$104,339</b>	<b>\$233,220</b>
<b>ENCINITAS</b>			
<b>ABP 850 COAST, LLC</b> 850 S Coast Hwy Work Orders 2462870, 2462871	<b>\$242,781</b>	<b>\$84,522</b>	<b>\$158,259</b>
<b>ESCONDIDO</b>			
<b>City Plaza</b> 300 S Escondido Bl Work Orders 2525420, 2525421	<b>\$21,061</b>	<b>\$22,898</b>	<b>-\$1,837</b>
<b>IMPERIAL BEACH</b>			
<b>Bikeway Village</b> 536 13th St Work Orders 2358290, 2358291	<b>\$178,130</b>	<b>\$132,451</b>	<b>\$45,679</b>
<b>OCEANSIDE</b>			
<b>Avocado Rd 3 Lot Development</b> 1814 Avocado Rd Work Orders 2431100, 2431101	<b>\$8,271</b>	<b>\$5,360</b>	<b>\$2,911</b>
<b>Oceanside 10</b> Cassidy St @ Broadway St Work Orders 2400550, 2400551	<b>\$117,077</b>	<b>\$57,578</b>	<b>\$59,499</b>
	<b>\$125,348</b>	<b>\$62,938</b>	<b>\$62,410</b>
<b>SAN CLEMENTE</b>			
<b>Wessell Residence</b> 35013 Cm Capistrano Work Orders 2514410, 2514411	<b>\$27,681</b>	<b>\$13,043</b>	<b>\$14,638</b>
<b>Nicket Streetlight</b> 214 Cl Serena Work Orders 2527891, 2527892	<b>\$14,881</b>	<b>\$4,306</b>	<b>\$10,575</b>
	<b>\$42,562</b>	<b>\$17,349</b>	<b>\$25,213</b>
<b>SAN DIEGO</b>			
<b>San Diego Unified Schools/Living Lab</b> 4255 Thorn St Work Orders 2431450, 2431451	<b>\$99,197</b>	<b>\$54,292</b>	<b>\$44,905</b>



**RULE 20C  
SAN DIEGO GAS & ELECTRIC  
REPORT ON CONVERSION OF OVERHEAD TO UNDERGROUND  
ELECTRIC DISTRIBUTION FACILITIES  
YEAR 2017**

<u>Description and Location</u>	Distribution of Allocation Costs		
	<u>Total</u>	<u>Other</u>	<u>Utility</u>
<b>Marian Catholic Property Phase 1</b> 18th St & Coronado Av Work Orders 2469880, 2469881	\$215,627	\$171,505	\$44,122
<b>Broadstone North Park</b> Howard Av @ Arizona St Work Orders 2471330, 2471331	\$327,717	\$225,490	\$102,227
<b>Giusti, Ingrid</b> 7062 Vis Del Mar Av Work Orders 2923740, 2923741	\$42,716	\$18,396	\$24,320
	<b>\$685,257</b>	<b>\$469,683</b>	<b>\$215,574</b>
<b>SAN DIEGO COUNTY</b>			
<b>Nordeen Conversion</b> 3016 Old Post Rd, Fallbrook Work Orders 2503150, 2503151	\$25,463	\$20,910	\$4,553
<b>20C TOTALS</b>	<b>\$1,658,161</b>	<b>\$915,090</b>	<b>\$743,071</b>