



**FILED**

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ALJ/KWZ/bx1 5/28/2020

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

Joint Application by Logan Parent, LLC,  
and LogMeIn, Inc. for Approval  
Pursuant to Public Utilities Code  
Section 854 of the Transfer of Control of  
GetGo Communications LLC (U7241C),  
Grasshopper Group, LLC (U7197C), and  
Jive Communications, Inc. (U7360C).

Application 20-01-005

**E-MAIL RULING REQUESTING  
ADDITIONAL INFORMATION**

Dated May 28, 2020, at San Francisco, California.

/s/ CAMILLE WATTS-ZAGHA

Camille Watts-Zagha  
Administrative Law Judge

**From:** Watts-Zagha, Camille <[Camille.WattsZagha@cpuc.ca.gov](mailto:Camille.WattsZagha@cpuc.ca.gov)>

**Sent:** Thursday, May 28, 2020 4:51 PM

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**Subject:** A.20-01-005: Email Ruling Requesting Additional Information

**To the service list of Application (A.) 20-01-005:**

By email ruling of May 12, 2020, Logan Parent, LLC (Logan Parent), LogMeIn, Inc. (LogMeIn), GetGo Communications LLC (GetGo Communications”), Grasshopper Group, LLC (“Grasshopper”), and Jive Communications, Inc. (“Jive”) (collectively, “Joint Applicants”) were directed to take several actions. Among the directives was the requirement to file, in this docket, a revised sworn declaration attesting that the gross annual California revenues of Logan Parent, LLC and LogMeIn, Inc. do not exceed \$500 million. The Joint Applicants filed a timely response on May 21, 2020. Attachment 1 to the Joint Applicants’ response contains the required attestation as regards Logan Parent, LLC. However, Attachment 2, regarding LogMeIn, Inc. does not contain the required attestation. Instead, the attestation includes only the annual gross California revenues of the regulated operations of LogMeIn, Inc.

Pub. Util. Code § 854(a) requires Commission authorization before any person or corporation may “merge, acquire, or control ....either directly or indirectly any public utility organized and doing business in this state...” The purpose of this and related code sections is to enable the Commission, before any transfer of

public utility authority is consummated, to review the proposal and to take such action, as a condition of the transfer, as the public interest may require.

Pub. Util. Code § 854(b) applies to transactions where one of the utilities has gross annual California revenues exceeding \$500 million. Pub. Util.

Code § 854(c) applies to transactions where any of the parties to the transaction have gross annual California revenues exceeding \$500 million. Pub. Util.

Code § 854(c) is distinct from Pub. Util. Code § 854(b) in its reference to any transacting entities, whether public utilities or not. In their application at 3, the Joint Applicants mistakenly equate subsections (b) and (c). We have also reviewed LogMeIn's annual and quarterly filings with the United States Securities and Exchange Commission (SEC). These filings are not specific to California and insufficient for the purpose of making the necessary statutory determination.

Based on the information provided to-date, we are unable to render a determination on the applicability to this transaction of Pub. Util. Code § 854(c). We allow Joint Applicants' a final opportunity to provide the information required to proceed with consideration of the application.

1. No later than June 5, 2020, Logan Parent, LLC must file, in this docket, a revised sworn declaration providing the amount of LogMeIn, Inc.'s gross annual California revenues in each year 2018 and 2019.
2. The filing pursuant to the preceding paragraph 1 shall be titled, "Response to ALJ Ruling Requesting Additional Information."

**IT IS SO RULED.**

**The Docket Office Shall Formally File This Ruling.**

**Camille Watts-Zagha**  
Administrative Law Judge  
California Public Utilities Commission  
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