

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



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Order Instituting Rulemaking Regarding  
Broadband Infrastructure Deployment and to  
Support Service Providers in the State of  
California.

R.20-09-001

**COMMENTS OF SAN DIEGO GAS & ELECTRIC COMPANY (U 902 E) ON  
ASSIGNED COMMISSIONER'S RULING**

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**BEFORE THE PUBLIC UTILITIES COMMISSION  
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**I. INTRODUCTION**

Pursuant to the *Assigned Commissioner’s Ruling*, issued on August 6, 2021 (“Ruling”) and the *Email Ruling Extending Comment Deadline* of Administrative Law Judge Glegola, dated August 20, 2021, San Diego Gas & Electric Company (“SDG&E”) respectfully provides these Comments. SDG&E understands the important goal of Senate Bill 156 and the purpose of a statewide open-access middle mile in reaching underserved communities within California. However, as an Investor-Owned Utility our communications infrastructure has been developed to support the delivery of gas and electric services, therefore the questions posed in the Ruling require specialized expertise and experience which are beyond our current implementations and should be directed to telecommunications companies that provide broadband service. SDG&E is not in a position at this time to advise the Commission on areas that are in need of middle-mile access, broadband affordability issues, or capacity for broadband services, among other issues. However, SDG&E continues to actively search for the right place to support the State’s goal of providing broadband service to the areas that are unserved or underserved.

## II. COMMENTS

Question 1 in the Ruling, “Identifying Existing Middle Mile Infrastructure” asks for comments on proposed routes for the statewide open access middle mile network.<sup>1</sup> After review, SDG&E notes that while it has fiber in some locations along the proposed route, it is fiber that was installed for utility operational use and, as of the date of these comments, SDG&E does not have the ability to allow third-parties to access any dark fiber within its system. More information by the relevant stakeholders in response to the other questions posed in the Ruling, is necessary to determine whether any SDG&E facilities are in a location that would assist in connecting to a last mile provider that could serve a currently unserved or underserved area.

## III. CONCLUSION

SDG&E looks forward to learning from the Comments provided by other parties in this rulemaking and continuing to look for the best way to join the Commission in bridging the digital gap. Although these Comments are necessarily limited, SDG&E appreciates the opportunity to Comment on the Ruling and reserves the right to reply to comments of other parties as warranted.

Dated in San Diego, California, this 3rd day of September, 2021.

Respectfully submitted,

By: /s/ Erica L. Martin  
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<sup>1</sup> Ruling at 4.