

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Carrier Oversight & Programs Branch**

**RESOLUTION T- 17482
June 25, 2015**

R E S O L U T I O N

Resolution T-17482. AT&T California (U-1001-C) seeks authority for retroactive deviations from the requirements of Public Utilities Code § 320 for placement of aerial distribution facilities on state designated scenic highways along California Highways 1, 9, 12, 49, 50, 89, U.S. Interstate 580 and Laureles Grade Road (Monterey County Road G20).

By Advice Letter No. 43877, Filed August, 13, 2014.

Summary

AT&T California (U-1001-C) (AT&T) filed a Tier 3 Advice Letter (AL) 43877 on August 13, 2014 requesting retroactive deviations from the requirements of Public Utilities (P.U.) Code § 320, which mandates the underground placement of all future electric and communication distribution facilities that are proposed to be placed within 1,000 feet of a state scenic highway.

In the course of a voluntary and self-initiated compliance review of its facilities records, AT&T identified 4.003 miles of distribution facilities in 17 different locations that were placed aerially in proximity to state and county-designated scenic highways between 1975 and 2006. AT&T was unable to locate records documenting that it requested and received authority from the Commission to deviate from § 320 for these facilities.

This Resolution approves AT&T's request for retroactive deviations from § 320 for all 17 locations. However, because AT&T did not obtain deviations from the Commission prior to installing these facilities as required by § 320, the Commission imposes a penalty of \$5,000 in fines for each location and a total of \$85,000 for all 17 locations. This penalty amount recognizes and balances AT&T's voluntary disclosure of these violations against its failure to obtain a deviation approval prior to installing these facilities above-ground.

Background

P.U. Code § 320 states that:

The legislature hereby declares that it is the policy of this state to achieve, whenever feasible and not inconsistent with sound environmental planning, the undergrounding of all future electric and communications distribution facilities which are proposed to be erected in proximity to any highway designated a state scenic highway pursuant to Article 2.5 (commencing with Section 260) of Chapter 2 of Division 1 of the Streets and Highways Code and which would be visible from such scenic highways if erected above ground. The commission shall prepare and adopt by December 31, 1972, a statewide plan and schedule for the undergrounding of all such utility distribution facilities in accordance with the aforesaid policy and rules of the Commission relating to the undergrounding of facilities. The commission shall coordinate its activities regarding the plan with local governments and planning commissions concerned. The commission shall require compliance with the plan upon its adoption. This section shall not apply to facilities necessary to the operation of any railroad.

In Decision (D.) 80864, dated December 16, 1972, the Commission implemented rules in compliance with § 320. The Decision adopted a plan for undergrounding all future electric and communications distribution facilities in proximity to any state scenic highways. The Decision defined “in proximity” to mean within 1,000 feet from each edge of the right of way (RoW) of the designated scenic highway. D.80864 also recognized that there could be situations where undergrounding would not be feasible or would conflict with other environmental objectives. Commission staff recommended that those situations be handled as a “deviation” from § 320 requirements, to be reviewed by and subject to the Commission’s approval, through submission of a Tier 3 AL. D.80864, Ordering Paragraph (OP) 3.B further states that “[r]espondents shall review with, and seek an expression of opinion from, the appropriate local governmental agency prior to requesting Commission authorization for deviation from the requirements of paragraph 1 of this order.”

On August 13, 2014, AT&T submitted Tier 3 AL 43877 requesting retroactive deviations from § 320 of aerial distribution facilities that it placed between 1975 and 2006, in close proximity to state and county designated scenic highways. AT&T identified 17 specific locations, totaling 4.003 miles of distribution facilities along State Highways 1, 9, 12, 50, 89, U.S. Interstate 580, and Laureles Grade Road (County Road G20, Monterey County).

Three of the 17 locations, covering .329 miles, are on poles solely-owned by AT&T. The remaining 14 locations, covering 3.674 miles, are on jointly-used poles, shared with other utilities (generally electric utilities). AT&T states that the visual impact of the facilities placed on joint poles is minimal because these poles already have electric utility facilities placed on them. AT&T submitted this AL voluntarily, after determining from its own initiated facilities and aerial placement records review, that a retroactive § 320 deviation request was required because it was unable to locate documentation confirming that the Commission previously granted deviations for these locations.

Notice/Protests

Notice of AL No. 43877 was published in the Commission Daily Calendar on August 18, 2014. The Commission received no comments or protests to this AL.

Discussion

Overview

The Communications Division (CD) staff considered the following elements to review AT&T's request for retroactive deviations from § 320: (1) the scope of each project; (2) economic feasibility of placing these facilities underground; (3) visual and environmental impact of placing aerial facilities; and (4) local government or jurisdiction response.

In its request, AT&T does not propose to make any changes to the appearance of these facilities or make any new construction or other major repairs to these sites. AT&T estimates that the total cost of replacing all of these locations from aerial to underground is \$1,615,391.

AT&T states that the visual impact of the aerial facilities on their respective surroundings is minimal since the majority of the identified locations and their relative lengths are on joint-use poles, where other utilities have also placed aerial facilities. AT&T wants to continue using the facilities as currently constructed and asserts that the visual and environmental impact of aerial placement at the respective locations remains the same as before.

CD staff met with AT&T's representatives on October 24, 2014 and directed AT&T to contact the appropriate regional and local jurisdictional authorities for all 17 locations and obtain an "expression of opinion" as required by § 320. A summary of each site and response from appropriate local and regional jurisdictional authorities is described below, and itemized in attachment A.

Location Review and Analysis

The 17 locations identified by AT&T are placed along eight roads and highways within the state. The following paragraphs discuss each group of identified locations.

1. Highway 1 (six locations - five in Monterey County and one in San Luis Obispo County)
 - 1.1. Scope of the placements: AT&T placed a total .609 miles of aerial distribution facilities.¹ Two locations accounting for .229 miles are located on solely-owned AT&T poles, and four locations accounting for .380 miles are located on joint-use poles, with electric utility facilities also placed on these poles.
 - 1.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these aerial facilities underground is \$243,028.
 - 1.3. Visual and environmental impact: On February 23, 2015, AT&T provided CD Staff and local jurisdictions with a photo of one of the four jointly-owned lengths, which AT&T placed in 1977, 1991, 1993, and 2006 respectively. All of these are adjacent to or cross over Highway 1 in Monterey County. CD believes that the impact is minimal.
 - 1.4. Local jurisdiction response: AT&T sought an expression of opinion from CalTrans, Monterey County and San Luis Obispo County. These locations are all within the RoW of CalTrans' District 5. CalTrans did not object to the aerial placement of these facilities. AT&T received no response from Monterey County and received a "no concern" opinion from San Luis Obispo County.
2. Highway 9 (one location in Santa Clara County)
 - 2.1. Scope of the placements: A total 1.827 miles of aerial distribution facilities along Highway 9². AT&T placed these facilities in 1999 on jointly-owned poles.
 - 2.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these aerial facilities underground is \$747,044.
 - 2.3. Visual and environmental impact: CD believes that the impact is minimal.
 - 2.4. Local jurisdiction response: These facilities are located within the jurisdiction of CalTrans' District 5. CalTrans did not object to the aerial placement of these facilities. The City of Saratoga similarly did not object.
3. Highway 12 (two locations in Sonoma County)

¹ 1794' west of Cooper Place; 1385' north of Big Sur State Park; 264' north of Coast Ridge Road; 4889' south of Dolan Road; and 62230 Cabrillo Highway. The latter two locations are solely-owned by AT&T in Monterey County. Also, 948' south of Education Drive in San Luis Obispo County.

² 53' East of Congress Springs Lane in Santa Clara County.

- 3.1. Scope of the placements: Approximately .371 miles of aerial distribution facilities along Highway 12 in two locations, placed in 1981 and 1990.³ These facilities are placed on joint-use poles.
 - 3.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these aerial facilities underground is \$148,052.
 - 3.3. Visual and environmental impact: CD believes that the impact is minimal.
 - 3.4. Local jurisdiction response: Both locations are in CalTrans District 4. CalTrans did not object to the aerial placement of these facilities. Sonoma County similarly did not object and stated that granting deviation would be acceptable as overhead lines are already in place and not solely owned by AT&T and that visual impact is insignificant.
4. Highway 49 (three locations in Sierra County)
- 4.1. Scope of the placements: Approximately .093 miles of aerial distribution facilities along Highway 49 in three locations⁴, placed in 1975 and 1999. All of the facilities are on joint-use poles.
 - 4.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these aerial facilities underground is \$37,112.
 - 4.3. Visual and environmental impact: On February 23, 2015, AT&T provided a photo of one of the three jointly-owned lengths placed in 1975. CD believes that the impact is minimal.
 - 4.4. Local jurisdiction response: The locations are within the RoW of CalTrans' District 3. CalTrans did not respond to AT&T's request for an expression of opinion. Sierra County found that the viewshed⁵ associated with these locations "does not include the areas within designated communities along the Highway as these aerial placements are outside of town, and are therefore not considered part of the scenic view."
5. Highway 50 (one location in El Dorado County)
- 5.1. Scope of the placement: Approximately .083 miles of aerial distribution facilities along Highway 50 in one location placed in 1991.⁶
 - 5.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these facilities underground is \$33,112.
 - 5.3. Visual and environmental impact: All of the facilities are on jointly-owned poles. CD believes that the impact is minimal.

³ 293' east of Oak Shadow Drive and 450' north of Glenn Oaks Road in Sonoma County.

⁴ 258' east of Lake Road; 1787' west of Cemetery Road; and 1570' west of Cemetery Road. All locations are in Sierra County.

⁵ A viewshed is a geographical area that is visible from a location. It includes all surrounding points that are in line-of-sight with that location and excludes points that are beyond the horizon or obstructed by terrain and other features (e.g., buildings, trees).

⁶ Described as east of Lovers Leap in El Dorado County.

5.4. Local jurisdiction response: The location is within the RoW of Caltrans' District 3. CalTrans did not provide a response to AT&T's request for a retroactive deviation. El Dorado County also did not respond, despite several follow-up attempts by AT&T.

6. Highway 89 (one location in El Dorado County)

6.1. Scope of the placement: Approximately .186 miles of aerial distribution facilities along Highway 89 in one location, placed in 1992.⁷ AL 43877 originally stated that all of these facilities were placed on solely-owned AT&T poles. On February 23, 2015, AT&T updated and corrected this information and stated that they were placed on joint-use poles.

6.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these aerial facilities underground is \$74,226.

6.3. Visual and environmental impact: The aerial cable length is 525 feet placed in 1992, adjacent to but not crossing over State Highway 89. CD believes that the impact is minimal.

6.4. Local jurisdiction response: The location is within the RoW of Caltrans District 3. CalTrans did not respond to AT&T's request for an expression of opinion. Additionally, El Dorado County did not respond despite several follow-up attempts by AT&T.

7. Highway 580 (one location in San Joaquin County)

7.1. Scope of the placement: Approximately .536 miles of aerial distribution facilities along Highway 580 in one location, placed in 1990.⁸ These facilities are placed on jointly-owned poles.

7.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these facilities underground is \$213,897.

7.3. Visual and environmental impact: The facilities placement is parallel to but is least 100 feet from Interstate 580 and outside of its RoW, and crosses over South Bird Road. CD believes that the impact is minimal.

7.4. Local jurisdiction response: The location is within the RoW of Caltrans' District 10. CalTrans did not respond to AT&T's request for an expression of opinion. San Joaquin County responded by expressing no objection.

8. Laureles Grade Road (County Route G20, two locations in Monterey County)

8.1. Scope of the placements: Approximately .298 miles of aerial distribution facilities along Laureles Grade Road in two locations.⁹ AT&T placed facilities on 0.100

⁷ 525' west of Fallen Leaf Road in El Dorado County.

⁸ South Bird Road, 322' north of Interstate Highway 580 in San Joaquin County.

⁹ 569' south of Sundance Lane and Oak Glen Drive – 99' east of County Road G20 in Monterey County.

miles of jointly-use poles in 2005, and placed facilities on 198 miles of solely-owned poles in 1997.

- 8.2. Economic feasibility of undergrounding: AT&T estimates that the cost to replace these facilities underground is \$118,920.
- 8.3. Visual and environmental impact: CD believes that the impact is minimal.
- 8.4. Local jurisdiction response: Monterey County responded by expressing no objection to AT&T's deviation request, for either location.

In summary, for each of the identified locations and aerial placements within, local and jurisdictional authorities either responded with support, no objection, no comments or did not respond to AT&T's request for an expression of opinion. No local or jurisdictional authority expressed opposition to AT&T's aerial placement of these facilities. Additionally, there is no evidence of any filed complaint related to the visibility of the facilities for any of the 17 locations. Finally, 14 of these locations also have electric facilities, so there would not be a significant environmental impact or improvement by requiring AT&T to place said facilities underground. Accordingly, CD recommends approval of AT&T's retroactive deviation request for all 17 locations.

Violations of P.U. Code § 320 and Fines

In the course of the review, CalTrans' Landscape Architecture Program stated to AT&T that it does not support the process of requesting retroactive deviations for evaluating visual intrusions on officially designated Scenic Highways, further stating that it is available to collaborate with AT&T to clarify the process and to determine an appropriate course of action to review aerial installation and identify appropriate mitigation, if needed, in such cases. CD agrees, and recommends that AT&T should – for all future P.U. Code § 320 deviation requests – include CalTrans' Landscape Architecture Program, in addition to the respective CalTrans jurisdictional district, in its list of local and jurisdictional authorities to be contacted when submitting such requests.

CD also is concerned with AT&T's failure to timely file for § 320 deviations and believes the company should be penalized for seeking deviations after the facilities have been installed. The Commission has the discretion to impose penalties for violations of P. U. Codes, which includes monetary fines ranging from \$500 to \$50,000 per offense.¹⁰ Each violation constitutes a separate and distinct offense, and continuing violations are cumulative.¹¹ In D.98-12-075¹², the Commission concluded that “disregarding a

¹⁰ P.U. Code § 2107: Any public utility that violates or fails to comply with any provision...or requirement of the commission...is subject to a penalty of not less than five hundred dollars (\$500) nor more than fifty thousand dollars (\$50,000) for each offense.

¹¹ P.U. Code § 2108: Every violation of the provisions of this part or of any part of any order, decision, decree, rule, direction, demand, or requirement of the commission, by any corporation or person is a separate and distinct offense, and in case of a continuing violation each day's continuance thereof shall be a separate and distinct offense. And P.

statutory or Commission directive, regardless of the effects on the public, will be accorded a high level of severity." P.U. Code § 702 states that "Every public utility shall obey and comply with every order, decision, direction, or rule made or prescribed by the Commission in the matters specified in this part, or any other matter in any way relating to or affecting its business as a public utility, and shall do anything necessary or proper to secure compliance therewith by all of its officers, agents and employees." As such, the Commission finds that AT&T is in violation of § 320.

Fines Determination

In AL 43877, AT&T determined that overhead distribution facilities were placed after 1972 when Decision 80864 was issued and therefore these facilities are subject to § 320. Because AT&T could not confirm that it received prior Commission authorization to deviate from the requirements of § 320, the Commission finds AT&T in violation of § 320. In considering the request for a deviation, CD Staff believes that prudent practice requires that all public utilities take reasonable steps to ensure timely compliance with Commission directives. This includes being aware of applicable laws and regulations regarding telecommunication carriers.

In assessing an appropriate penalty for AT&T's failure to comply with § 320, CD Staff considered the directives of D.98-12-075:

1. Severity of the Offense

To determine the severity of the violation, CD staff considered: 1) physical harm; 2) economic harm; 3) harm to the regulatory process; and 4) number of scope of violations.

- Physical harm: Based on the responses from the local governments and authorities, the Commission did not find in any of the locations that the aerial facilities significantly impaired the aesthetics of their surroundings;
- Economic harm: AT&T would have had to appropriate funds for underground placement to ensure compliance prior to construction of facilities in each of the 17 locations. Since each one of these facilities contributes to revenue generation, failure to comply with statute gave AT&T a competitive advantage;
- Harm to the regulatory process: There is no evidence that AT&T previously filed a deviation request for any of these locations. Failure to demonstrate compliance with Commission rules harms the regulatory process; and

U. Code § 2105: All penalties accruing under this part shall be cumulative, and a suit for the recovery of one penalty shall not be a bar to or affect the recovery of any other penalty or forfeiture or be a bar to any criminal prosecution against any public utility, or any officer, director, agent, or employee thereof, or any other corporation or person, or to the exercise by the commission of its power to punish for contempt.

¹² Rulemaking to Establish Rules for Enforcement of the Standards of Conduct Governing Relationships Between Energy Utilities and Their Affiliates Adopted By the Commission. April 9, 1998.

- The number and scope of violations: AT&T request includes 17 locations over approximately four miles of overhead infrastructure for which it failed to locate compliance record.

2. Conduct of the Utility

AT&T initiated the compliance review process for its facilities subject to the provisions of § 320, updated its methods and procedures and established a training program for staff to ensure ongoing compliance with § 320, and voluntarily disclosed the information to the Commission.

3. Financial Resources of the Utility

AT&T is the largest telecommunications carrier in California and has the ability to pay the fine recommended by CD Staff. The fine should not hamper AT&T's ability to provide safe, reliable, reasonably-priced telecommunication services to its subscribers.

4. The Role of Precedent

The Commission is not aware of any prior AT&T violations of § 320. CD Staff did not find any prior violations of § 320 committed by AT&T. However, the Commission has in the past fined Verizon California Inc. (Verizon) for violating § 320 and imposed a fine of \$5,000 per violation.¹³ CD staff recommends a similar amount of fine for each violation for AT&T.

5. Totality of Circumstances in Furtherance of the Public Interest

In D.98-12-075,¹⁴ the Commission also held that a fine level should be set such that it effectively deters further unlawful conduct, while being specifically tailored to the unique facts of the case. The facts that mitigate the degree or wrongdoing are balanced with those that aggravate the level of wrongdoing.

For this deviation request, CD staff finds that AT&T failed to comply with Commission statutes, rules and regulations governing the construction of overhead communications facilities along scenic highways in all of the listed locations prior to seeking retroactive deviations. This includes § 320, and D.80864. CD staff agrees that such facts should be considered in assigning the amount of monetary fine to each offense.

In consideration of these factors and the underlying facts, CD staff recommends a fine of \$5,000 per offense, consistent with prior Commission resolutions. Therefore, the total recommended fine for the 17 violations of § 320 is \$85,000. AT&T should pay this amount, in full, within 30 days from the effective date of this Resolution. Payment should be made payable to the California Public Utilities Commission (CPUC), and be remitted to the CPUC's Fiscal Office, 3rd Floor, Room 3000, 505 Van Ness Avenue, CA,

¹³ CPUC Resolutions T-17261 issued June 23, 2011, and T-17397 issued August 15, 2013.

¹⁴ D.2.b. Fines

94102-3298. The Resolution number and fine amount should be noted in the memo section of the check, and a copy of the transmittal shall be provided to the Director of CD concurrently. The Commission has reviewed this penalty recommendation and finds that it is reasonable.

Safety Considerations

It is the carrier's responsibility to adhere to all Commission rules, decisions, General Orders and statutes including P.U. Code § 451 to "furnish and maintain such adequate, efficient, just, and reasonable service, instrumentalities, equipment, and facilities, including telephone facilities, as defined in § 54.1 of the Civil Code, as are necessary to promote the safety, health, comfort, and convenience of its patrons, employees, and the public." Further, General Order 95, Rule 31.1 requires "electrical supply and communications systems [to] be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service." Although P.U. Code § 320 principally addresses sound environmental and planning policy, the failure of AT&T to comply with § 320 can be considered a safety issue, to the extent that rules are violated.

COMMENTS

In compliance with P.U. Code § 311(g), the Commission emailed a notice letter on May 22, 2015, informing all parties on service list for the resolution T-17482 of the availability of this resolution for public comments at the Commission's website www.cpuc.ca.gov. The notice letter also informed parties that the final conformed resolution adopted by the Commission will be posted and available at this same website. The Commission received no comments addressing this resolution.

Findings and Conclusions

1. AT&T California (AT&T) filed a Tier 3 Advice Letter (AL) 43877 on August 13, 2014, requesting retroactive deviations from the requirements of Public Utilities (P.U.) Code § 320.
2. P.U. Code § 320 mandates the underground placement of all future electric and communication distribution facilities that are proposed to be erected in proximity to any highway designated a state scenic highway.
3. Commission Decision (D.) 80864 implemented rules for undergrounding distribution facilities in compliance with P.U. Code § 320.

4. In AL 43877, AT&T stated that in the course of a voluntary and self-initiated compliance review of its records and facilities, it identified approximately 4.003 miles of distribution facilities in 17 locations along several State Highways, a U.S. Interstate Highway, and a County Road that were placed above-ground between 1975 and 2006.
5. Aerial distribution facilities in 14 of the 17 identified locations add up to 3.674 miles and are placed on joint-use poles, and the remaining 3 locations add up to .329 miles and are placed on poles owned solely by AT&T.
6. In AL 43877, AT&T stated that it was unable to locate records documenting that it requested and received authority from the Commission to deviate from the requirements of P.U. Code § 320.
7. AT&T estimates the total cost of replacing these locations from aerial to underground is \$1,615,391.
8. The Communications Division (CD) staff directed AT&T to contact the appropriate regional and local jurisdictional authorities for each location and obtain an expression of opinion as required by P.U. Code § 320.
9. No local or jurisdictional authority expressed opposition to AT&T's aerial placement of distribution facilities.
10. CD recommends approval of AT&T's retroactive deviation request for all 17 locations.
11. CalTrans' Landscape Architecture Program stated that it is available to collaborate with AT&T to clarify the process and to determine an appropriate course of action to review aerial installation and identify appropriate mitigation. Therefore, AT&T should – for all future P.U. Code § 320 deviation requests – include CalTrans' Landscape Architecture Program in its list of local and jurisdictional authorities to be contacted when submitting such requests.
12. The Commission has the discretion to impose penalties for violations of P. U. Codes, which includes monetary fines ranging from \$500 to \$50,000 per offense.
13. The Commission finds that AT&T has violated the requirements of P. U. Code § 320 by placing aerial distribution facilities without first obtaining a deviation approval.
14. CD recommends a fine of \$5,000 per offense consistent with prior Commission resolutions. Since AT&T seeks retroactive deviations for 17 locations, the total fine amount is \$85,000.

15. AT&T should pay a fine of \$85,000, in full, within 30 days from the effective date of this Resolution. Payment should be made payable to the California Public Utilities Commission (CPUC), and be remitted to the CPUC's Fiscal Office, 3rd Floor, Room 3000, 505 Van Ness Avenue, CA, 94102-3298. The Resolution number and fine amount should be noted in the memo section of the check, and a copy of the payment transmittal shall be provided to the Director of CD concurrently.
16. The Commission has reviewed CD staff's penalty recommendation and finds it is reasonable.
17. On May 22, 2015 the Commission emailed a draft of this resolution to service list for the resolution T-17482 for public comments.
18. The Commission received no comments addressing this resolution.

THEREFORE, IT IS ORDERED that:

1. AT&T's request for retroactive deviations from Public Utilities Code § 320 for a total of 4.003 miles of distribution facilities, in 17 locations within the state, as identified in AL 43877, shall be approved subject to satisfying the following conditions:

- a. AT&T shall pay a fine of \$85,000, in full, within 30 days from the effective date of this Resolution.
- b. Payment shall be made payable to the California Public Utilities Commission, and be remitted to the CPUC's Fiscal Office, 3rd Floor, Room 3000, 505 Van Ness Ave, CA, 94102-3298, The Resolution number and fine amount shall be noted in the memo section of the check.
- c. AT&T shall provide a copy of the Payment Transmittal to the Director of the Communications Division concurrently.

2. AT&T shall collaborate with the Caltrans's Landscape Architecture Program in addition to local and jurisdictional authorities for all future P. U. Code § 320 deviation requests.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on June 25, 2015. The following Commissioners approved it:

TIMOTHY J. SULLIVAN
Executive Director

Resolution T- 17482
CD/KEF

Attachment

Attachment A

Summary of AT&T's Aerial Facilities Placement (Advice Letter 43877), P.U. Code § 320 Deviation Request

Highway	Number of Locations	County	Location	Joint-Use (length = miles)	Solely-Owned (length = miles)	Estimated Cost of Underground Placement	Year of facilities Placement
Highway 1	1	Monterey	1794' West of Cooper Pl	0.157			1977
Highway 1	1	Monterey	1385' North of Big Sur State	0.066			1993
Highway 1	1	Monterey	264' North of Coast Ridge Rd	0.084			1991
Highway 1	1	Monterey	4889' South of Dolan Rd		0.118		1984
Highway 1	1	Monterey	62230 Cabrillo Hwy		0.111		1986
Highway 1	1	San Luis Obispo	948' South of Education Dr	0.073			2006
Total HW1	6			0.609	0.380	0.229	\$243,028
Highway 9	1	Santa Clara	53' East of Congress Springs Ln	1.827			1999
Total HW9	1			1.827	1.827	0.000	\$747,044
Hwy12	1	Sonoma	293' East of Oak Shadow Dr	0.178			1990
Hwy12	1	Sonoma	450' North of Glenn Oaks Rd	0.193			1981
Total HW12	2			0.371	0.371	0.000	\$148,052
Hwy49	1	Sierra	258' East of Lake Rd	0.031			1999
Hwy49	1	Sierra	1784' West of Cemetery Rd	0.025			1975
Hwy49	1	Sierra	1570' West of Cemetery Rd	0.037			1975
Total HW49	3			0.093	0.093	0.000	\$37,112
Hwy50	1	El Dorado	East of Lovers Leap	0.083			1991
Total HW50	1			0.083	0.083	0.000	\$33,112
Hwy89	1	El Dorado	525' West of Fallen Leaf Rd	0.186			1992
Total HW89	1			0.186	0.186	0.000	\$74,226
Hwy580	1	San Joaquin	S. Bird Rd - 322' North of Hwy 580	0.536			1990
Total HW580	1			0.536	0.536	0.000	\$213,897
Laureles Grade Road (G20)	1	Monterey	569' South of Sundance Ln		0.100		2005
Laureles Grade Road (G20)	1	Monterey	Oak Glen Dr - 99' East of G20	0.198			1997
Total Laureles Grade Road (G20)	2			0.298	0.198	0.100	\$118,920
Total All Projects	17			4.003	3.674	0.329	\$1,615,391