

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**  
**ITEM: 6 (Rev. 1)**  
**AGENDA ID: 17972**  
**RESOLUTION E-5040**  
**January 16, 2020**

**ENERGY DIVISION**

**R E S O L U T I O N**

Resolution E-5040. Approves Pacific Gas and Electric Company's (PG&E) request for deviation from Electric Rule 20A in Accordance with General Order 96-B, Section 9.2.3.

**PROPOSED OUTCOME:**

- Approval of Pacific Gas and Electric's (PG&E's) request to deviate from Electric Rule 20A on the behalf of the City of Oakland to accommodate its proposed Rule 20A project referred to as Piedmont Pines Phase II.

**SAFETY CONSIDERATIONS:**

- There is no impact on safety.

**ESTIMATED COST:**

- The current cost estimate of the proposed Piedmont Pines Phase II Rule 20A undergrounding project is \$16,495,000 to be paid for by PG&E ratepayers.

By Advice Letter 5464-E and 5464-E-A, Filed on January 4, 2019 and March 21, 2019 respectively.

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**SUMMARY**

This Resolution approves Pacific Gas and Electric Company's (PG&E) request to deviate from Electric Tariff Rule 20A in accordance with General Order 96-B, Section 9.2.3.<sup>1</sup> PG&E requests to deviate from Rule 20A to allow the City of

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<sup>1</sup> CPUC General Order 96-B, Rule 9.2.3 ("At all times, a utility other than a telephone corporation may provide service (other than resale service) to a government agency for

*Footnote continued on next page*

Oakland (“City”) to include within the Piedmont Pines Area Underground Project Phase II (Phase II project) some ancillary streets and parcels<sup>2</sup> that do not meet the public interest criteria set forth in Rule 20A. Under Rule 20A, PG&E ratepayers will fund 100 percent of eligible project costs to underground the project. Rule 20B is an alternative tariff provision that funds 20 percent of eligible project costs and allows communities to pursue undergrounding projects that do not meet the Rule 20A public interest criteria if residents fund 80 percent of the project.<sup>3,4</sup>

## **BACKGROUND**

### **Procedural Background**

Utilities annually allocate work credits under Rule 20 to communities (cities and unincorporated areas of counties) to convert overhead electric infrastructure to underground infrastructure.

Since ratepayers contribute virtually all of the funds for Rule 20A projects through utility rates, the projects must be in the public interest by meeting one or more of the following criteria listed in the Rule 20A Tariff<sup>5</sup>:

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free, or at reduced rates and charges, or under terms and conditions otherwise deviating from its tariffs then in effect. The utility may begin such service without prior Commission approval, but the utility shall promptly submit an advice letter to the appropriate Industry Division to notify the Commission of the utility’s provision of such service and of the rates, charges, terms and conditions under which the service is provided. Although the advice letter may be effective pending disposition under General Rule 7.5.3, the Commission may determine, in an appropriate proceeding, the reasonableness of such service.”)

<sup>2</sup> According to Merriam-Webster, a parcel is as a tract or plot of land. Parcels may have one or more housing units. See: <https://www.merriam-webster.com/dictionary/parcel>.

<sup>3</sup> In Rule 20 Section B, PG&E will convert its overhead electric facilities to underground along public streets and roads or other locations mutually agreed upon when requested by the applicant under circumstances where a project does not qualify under the public interest criteria in the Rule 20A Tariff. According to Rule 20B Section 3, the project must be at a minimum 600 feet or one block and underground both sides of the street.

<sup>4</sup> Rule 20B applicants pay for up to 80 percent of the cost of Rule 20B projects.

<sup>5</sup> See PG&E’s Rule 20 Tariff: [https://www.pge.com/tariffs/tm2/pdf/ELEC\\_RULES\\_20.pdf](https://www.pge.com/tariffs/tm2/pdf/ELEC_RULES_20.pdf)

1. Such undergrounding will avoid or eliminate an unusually heavy concentration of overhead electric facilities;
2. The street or road or right-of-way is extensively used by the general public and carries a heavy volume of pedestrian or vehicular traffic;
3. The street or road or right-of-way adjoins or passes through a civic area or public recreation area or an area of unusual scenic interest to the general public; and
4. The street or road or right-of-way is considered an arterial street or major collector as defined in the Governor's Office of Planning and Research General Plan Guidelines.

Once a community has identified a project that is in the public interest and has passed a municipal resolution forming an undergrounding district, the community can initiate the project with the utility. According to the Rule 20A tariff, the designation of a project is done "in consultation with the utility" to ensure that the area designated by the community indeed qualifies under the utility tariff's provisions. To fund the project, the community may utilize its accrued annual Rule 20A work credit allocations plus borrow forward future work credit allocations for a maximum of five years from the utility.<sup>6</sup> Upon completion of undergrounding projects, the utility requests approval from the Commission during the General Rate Case to include completed projects in its rate base and recover the project costs from ratepayers.

On December 11, 2001, the Commission issued Decision (D.) 01-12-009 in the Rulemaking (R.) 00-01-005, which clarified that the heavy vehicular traffic criterion should be focused on arterial and major collector streets as defined by the Governor's Office of Planning and Research (OPR). The Commission added a fourth public interest criteria criterion, which states the project street, road or right-of-way must be considered an "arterial" street or "major collector" as defined in the OPR's General Plan Guidelines. According to the 2003 OPR General Plan Guidelines, an "arterial" is defined as a:

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<sup>6</sup> PG&E's allocation of Rule 20A work credits is based on a formula that allows it to distribute work credits proportionally based on the number of customer accounts (meters) in a community. See PG&E's Rule 20A §2. a and b for more details.

“Medium-speed (30-40 mph), medium-capacity (10,000-35,000 average daily trips) roadway that provides intra-community travel and access to the county-wide highway system. Access to community arterials should be provided at collector roads and local streets, but direct access from parcels to existing arterials is common.”<sup>7</sup>

Additionally, a “major collector” is defined as a:

“Relatively-low-speed (25-30 mph), relatively-low-volume (5,000-20,000 average daily trips) street that provides circulation within and between neighborhoods. Collectors usually serve short trips and are intended for collecting trips from local streets and distributing them to the arterial network.”<sup>8,9</sup>

In addition to utilizing the State’s General Plan Guidelines, the utilities commonly refer to the California Department of Transportation’s (Caltrans) California Road System maps and road functional classification data to aid their assessment of heavy traffic volume and the classification of the roads in proposed project areas.

On October 27, 2016, the Commission issued Resolution E-4752 approving PG&E’s Advice Letter (AL) 4729-E request to deviate from Rule 20A to include some ancillary streets that did not meet the public interest criteria in Rule 20A within the City of Berkeley’s Grizzly Peak Boulevard Undergrounding Project. The City of Berkeley originally formed its utility undergrounding district for the Grizzly Peak project in 1993 and the entire 7,800 linear foot project qualified for Rule 20A at the time. Following PG&E’s adoption of the revised Rule 20A Tariff in 2002 per D.01-12-009, 6,100 linear feet (78 percent) of the project area still met the Rule 20A criteria.<sup>10</sup> The Commission approved the deviation request and

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<sup>7</sup> 2003 General Plan Guidelines, page 256. For the full text of the State’s 2003 General Plan Guidelines, see: [http://opr.ca.gov/docs/General\\_Plan\\_Guidelines\\_2003.pdf](http://opr.ca.gov/docs/General_Plan_Guidelines_2003.pdf).

<sup>8</sup> Ibid, page 257.

<sup>9</sup> For more information about the State’s General Plan Guidelines, please see: <http://opr.ca.gov/planning/general-plan/>.

<sup>10</sup> None of the ancillary streets and parcels in the Grizzly Peak project (1,700 linear feet, equal to 22 percent of the project area) qualified any longer under the revised Rule 20A Tariff.

clarified that Resolution E-4752 did not set a precedent for future deviation requests.<sup>11</sup>

On May 19, 2017, the Commission opened the Rulemaking (R.) 17-05-010 to review issues related to undergrounding of electric distribution lines, and specifically to consider the revisions to the investor owned utilities (IOUs') Rule 20 programs. Among other topics, R.17-05-010 will evaluate whether the public interest criteria for Rule 20A projects should be updated.

### **Piedmont Pines Phase II Project Background**

In 1987, the Homeowner's Association for Piedmont Pines, a neighborhood in the Oakland Hills, submitted a request to place utility lines underground. The City of Oakland put the project in its queue until 2000, when the City had accumulated sufficient Rule 20A work credits to proceed with the project.

In May 2000, the City formed the utility undergrounding district for the Piedmont Pines undergrounding project consisting of approximately 15 miles of roadway and 1,350 properties out of 660 parcels. Between 2000 and 2008, the City and PG&E reduced the project scope down by 46 percent to approximately eight linear miles.<sup>12</sup> At PG&E's request, the City divided the undergrounding project into three phases to make the construction timeline more manageable. (See Attachment A for the engineer's map of the phased project area.) Piedmont Pine Phase I, which is within the blue boundaries of the map in Attachment A, was

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<sup>11</sup> Resolution E-4729 states on page 5,

"The Commission is not setting precedence by approving this requested deviation as this is a unique situation whereby both the boundaries of the [utility undergrounding district] were defined and adopted long before Rule 20A tariff was revised in 2002 and because the City [of Berkeley] assessed and the residents paid for associated costs for streetlight conversion and other public improvements associated with the underground project that did not qualify for Rule 20A funds."

<sup>12</sup> This was not part of the original record for AL 5464-E and 5464-E-A and was only introduced following comments from the City of Oakland and PPNA. PG&E affirmed this claim in a subsequent email to Staff and the information is included here only as clarification of the basic project parameters.

15,154 linear feet and cost \$13,740,062. Piedmont Pine Phase I was completed in 2014.

Following the completion of Phase I, the City requested that PG&E initiate the Phase II project once it had accumulated enough Rule 20A work credits to proceed. The Phase II project, shown in the red boundaries of the map in Attachment A, includes Chelton Drive, Darnby Drive, Carisbrook Lane, and a short segment of Skyline Boulevard. Piedmont Pines Phase II would replace 9,161 circuit feet of overhead lines serving 223 parcels at a cost of \$16,495,000.

The City anticipates that Phase III will commence after completing Phase II and the City accumulates enough Rule 20A work credits to proceed with that phase. Phase III, shown in the purple boundaries of the map in Attachment A, is estimated to cost \$14,975,842 and will underground about two miles of overhead distribution lines along the roadway as well as lateral service lines for the residents in that area. The City of Oakland currently has a Rule 20A work credit balance of \$23,757,357 and can borrow forward an additional \$8,461,280 pursuant to the Rule 20(A)(2)(c).<sup>13</sup> In the event that the actual costs of Phase II exceed the estimated cost, the City may require additional work credits to initiate the Phase III project.

### **AL 5464-E Background**

On January 4, 2019, PG&E filed Advice Letter 5464-E requesting a deviation from Electric Rule 20A citing section 9.2.3 of General Order 96-B. In AL 5464-E, PG&E specifically requests to deviate from Rule 20A to include within the City of Oakland's Piedmont Pines Phase II undergrounding project some ancillary streets and parcels that do not meet the Rule 20A Tariff's public interest criteria. PG&E acknowledged that only about 530 feet (5.79 percent) of the City of Oakland's Phase II 9,161 linear feet project would qualify under Rule 20A. PG&E found that the remaining 8,631 feet (94.21 percent) do not, based on its review of the 2018 engineering analysis provided in Attachment A of AL 5464-E.

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<sup>13</sup> This is based on a utilizing a five-year borrow per the Rule 20A Tariff based on annual work credit allocation of \$1,692,256.

According to PG&E, the streets that are in the middle of the of the Phase II project area do not meet any of the Rule 20A criteria.<sup>14</sup>

In AL 5464-E, PG&E requested the Commission to grant a deviation request for the Piedmont Pines Phase II project for two reasons. First, the City formed its undergrounding district based on the City's interpretation of the heavy traffic volume criteria in the Rule 20A Tariff dating back to 2000. Second, PG&E argued that the Commission should evaluate the eligibility of the Phase II project based on a holistic view of the grander Piedmont Pines Area Undergrounding project. PG&E asserts that 476 parcels (72 percent) of the 660 parcels in the grander project area meet the criteria for Rule 20A eligibility. Within the Phase II project, PG&E explains that there are 223 parcels and 15 of them would qualify under Rule 20A.

On March 21, 2019, at the Energy Division's request, PG&E filed a partial supplemental AL 5464-E-A to provide additional information to inform the disposition of the advice letter. This supplemental AL includes the City of Oakland's May 2000 municipal resolution forming the utility undergrounding district, the City's April 2000 Staff Memoranda recommending the adoption of the proposed utility undergrounding district for the greater Piedmont Pines undergrounding project, the scope and cost of the Phase II project, the City of Oakland's Rule 20A work credit balance, and the City of Oakland's future Rule 20A projects. Additionally, PG&E included a City of Oakland Council Agenda report from 2011 highlighting that the Phase II project was the City of Oakland's top priority undergrounding project based on its "first come, first serve" policy and proposed Rule 20A undergrounding projects.

On August 5, 2019, the Energy Division mailed Draft Resolution E-4993 which would have denied PG&E's request to deviate from Rule 20A for the unqualified streets in the Phase II Project area to parties for comment. PG&E did not file comments on Draft Resolution E-4993 that denied their deviation request. Comments were filed by August 28, 2019 and replies were filed on September 5, 2019. The PPNA, the City of Oakland and State Senator Nancy Skinner's Office

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<sup>14</sup> This is shown in the map in Attachment A of AL 5464-E and Attachment A of the instant resolution as the solid dark grey lines within the red boundary

submitted timely comments recommending that the Commission support the deviation request and withdraw Draft Resolution E-4993. PG&E submitted reply comments echoing Senator Skinner's call to withdraw the Draft Resolution E-4993. See pages 10-12 in the Discussion for further details and Energy Division's response to the comments. On October 7, 2019, the Energy Division withdrew Draft Resolution E-4993.

## **NOTICE**

Notice of AL 5464-E was made by publication in the Commission's Daily Calendar. PG&E states that a copy of the Advice Letter was mailed and distributed in accordance with Section 4 of General Order 96-B.

## **PROTESTS AND LETTERS OF SUPPORT**

The Piedmont Pines Neighborhood Association (PPNA) sent a timely letter of support of Advice Letter 5464-E on January 14, 2019. The PPNA described three main arguments for granting a deviation for the Phase II project:

1. The Commission should consider the Piedmont Pines Area Undergrounding project as a whole;
2. At the time of Oakland's 2000 resolution, the City believed that the streets within the Phase II project area satisfied the "heavy vehicular traffic" criteria; and
3. The Chelton Drive corridor in the Phase II project area is a key access route to the East Bay Regional Parks, Roberts Regional Recreation Area and Shepard Canyon Park.

Advice Letters 5464-E and 5464-E-A were not protested.

## **DISCUSSION**

PG&E's ALs 5464-E and 5464-E-A are approved for the reasons discussed below.

*At the time of its 2000 Municipal Resolution, Oakland Believed that the Streets within the Piedmont Pines Area Undergrounding Project Met the Rule 20A Heavy Vehicular Traffic Criterion.*

PG&E explains that the City believed that it made a reasonable interpretation of the term "heavily travelled streets" based on traffic counts and relied on this



interpretation of the Rule 20A tariff rules back in 2000 when it initiated the Piedmont Pines Project.<sup>15</sup> The City of Oakland's April 2000 City Council Agenda Report in Attachment B of AL 5464-E-A provided in supplemental AL 5464-E-A explains that PG&E and Pacific Bell (now AT&T) qualified 40 percent of the greater Piedmont Pines project for Rule 20A funding while the remaining 60 percent failed to qualify. However, the City of Oakland staff disagreed with PG&E and found that the project "qualified on the basis of "heavy volume of vehicular traffic" in accordance with the City's Traffic Engineering general practice."<sup>16</sup> In support of this qualification, the City recorded 754 daily vehicular trips for the Phase II project area in a 1998 traffic study.<sup>17</sup> The City Staff further wrote in the April 2000 report that it "expects that the CPUC's final say on this street will be in the City's favor." The City subsequently formed the undergrounding district in May 2000.

PG&E acknowledges that in 2001, the Commission clarified that the heavy vehicular traffic criterion should be focused on arterial and major collector streets which have a minimum of 5,000 vehicular trips per day. However, the undergrounding district was already formed by this point.

PG&E's deviation request puts the Commission in a difficult position. The Rule 20A tariff prescribes how municipalities should consult the utility on whether a proposed undergrounding project meets the public interest criteria. It is the job of the utility - not the City - to interpret the tariff. In this case PG&E clearly said no to the project in 2000. Oakland disagreed with PG&E's interpretation and pursued the project.

Nonetheless, since the City of Oakland believed it made a good faith interpretation of the program rules at the time of forming the undergrounding

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<sup>15</sup> PG&E mentions in AL 5464-E that the City of Oakland's Traffic Engineering and Ordinance No. 7769 C.M.S., concluded that all the streets that make up the Piedmont Pines Area Undergrounding Project area had a "heavy volume of vehicular traffic".

<sup>16</sup> According to the April 2000 Council Agenda Report, "heavy volume of vehicular traffic" is interpreted as "a minimum of 7.1 vehicular trips per residence per day on a street not designated as a collector or arterial street in the City's General Plan."

<sup>17</sup> The City of Oakland recorded 5,279 vehicle trips in 1998 over the course of the week they deployed traffic counters and determined that there was an average of 754 vehicle trips per day specifically in the Phase II project area.

district and PG&E now supports the project, the Commission finds that a deviation from the current rules to be warranted.

***The Commission Should Consider the Piedmont Pines Area Undergrounding Project as a Whole.***

PG&E argues that since the Phase II project was formed as part of a whole project inclusive of all three phases in 2000, that the Commission should consider the eligibility of the entire project rather than its components. In the City of Oakland's April 2000 Council Agenda Report, the City of Oakland disagreed with PG&E and Pacific Bell and deemed that the majority of the streets in the proposed Piedmont Pines qualified under their interpretation of the rules.

PG&E's argument is not compelling, as specified above, because PG&E and Pacific Bell found that 40 percent of the greater Piedmont Pines project qualified for Rule 20A funding while the remaining 60 percent failed to qualify.

Furthermore, approving the project on this basis could result in an unintended precedent for other communities which are involved in consultations with utilities regarding Rule 20A project criteria. The Commission grants the deviation only for the reasons stated previously.

**Response to Comments on Former Draft Resolution E-4993**

***PG&E's Reply to Comments***

PG&E agreed with State Senator Skinner's office that the Commission should withdraw Draft Resolution E-4993 from the consent agenda. Specifically, PG&E referenced the City's claim that streets in the Piedmont Pines utility undergrounding district fall within High Fire Hazard Zones. PG&E noted that Rule 20A funds are not currently authorized to be used for fire hardening efforts, but this issue is subject to re-evaluation in the ongoing Rule 20A OIR.

***Discussion***

While undergrounding can be an attractive wildfire mitigation tool, Rule 20 is not currently a wildfire mitigation program. As such, the Commission is not considering wildfire risk mitigation in its decision to grant PG&E's deviation request nor is it setting precedent for future deviation requests from Rule 20A. PG&E was correct that the Rule 20A program criteria do not include wildfire mitigation. It is true that streets in the Piedmont Pines utility undergrounding district fall within High Fire Hazard Zones. PG&E has a wildfire mitigation plan, adopted in D.19-05-037 in response to SB 901. The wildfire mitigation plans

are the more appropriate venue for considering undergrounding for the purposes of wildfire mitigation risk.<sup>18</sup> In that plan, PG&E describes system hardening as one strategy for wildfire mitigation risk reduction. PG&E has not identified any undergrounding activities as part of its Wildfire Mitigation Plan update.<sup>19</sup>

## **COMMENTS**

The PPNA and the City of Oakland filed timely comments on December 13, 2019 and December 16, 2019 respectively and expressed their support for Draft Resolution E-5040.

## **FINDINGS**

1. Under Rule 20A, the Commission requires the utilities to allocate a certain amount of work credits each year to all communities serve for undergrounding projects.

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<sup>18</sup> D. 19-05-037 states with respect to PG&E's system hardening program that undergrounding would only be considered in "rare cases":

"Under this program, PG&E proposes replacing bare overhead conductor with covered conductor, replacing some infrastructure with equipment identified by the California Department of Forestry and Fire Protection (CAL FIRE) as low fire risk, upgrading or replacing transformers to operate with more fire-resistant fluids, installing more resilient poles to increase pole strength and fire resistance, and in rare cases, undergrounding. PG&E's ultimate goal is to upgrade approximately 7,100 circuit miles in Tier 2 and Tier 3 HFTD areas, with a goal of upgrading 150 of those circuit miles in 2019. PG&E suggests that its system hardening proposal would result in a full rebuild of the overhead distribution system. PG&E intends these activities to increase the overall strength of its electric distribution system, replace aging assets, and reduce risk from external factors, such as vegetation or animals contacting lines and "line slap" resulting from high winds that may cause lines to slap together and generate sparks." (p. 13-14)

<sup>19</sup> PG&E "Community Wildfire Safety Program", Wildfire Mitigation Plan update, September 17, 2019.

[https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News\\_Room/NewsUpdates/2019/PGE%20Wildfire%20Mitigation%20Plan%20Update\\_201909010.pdf](https://www.cpuc.ca.gov/uploadedFiles/CPUCWebsite/Content/News_Room/NewsUpdates/2019/PGE%20Wildfire%20Mitigation%20Plan%20Update_201909010.pdf)

2. Communities can utilize work credit allocations that are banked and borrowed forward up to five years to fund undergrounding projects.
3. Projects must meet one or more of four public interest criteria listed in PG&E's Rule 20A Tariff for them to qualify under Rule 20A.
4. In 2001, the Commission clarified that the heavy vehicular traffic criterion should be focused on arterial and major collector streets in D.01-12-009 and added a fourth criterion to Rule 20A to this effect.
5. According to the Governor's Office of Planning and Research General Plan Guidelines, major collectors and arterials accommodate a minimum of 5,000 and 10,000 vehicle trips per day respectively.
6. In May 2000, the City of Oakland formed the Piedmont Pines utility undergrounding district project consisting of approximately 15 miles of roadway and 1,350 properties.
7. At PG&E's request, the City of Oakland divided the Piedmont Pines undergrounding project into three phases of approximately equal size.
8. Piedmont Pine Phase I was completed in 2014 and it undergrounded 2.87 miles of overhead distribution facilities at a cost of \$13,740,062.
9. The Phase II project is to replace 1.74 miles of overhead lines and is estimated to cost \$16,495,000.
10. Phase III is estimated to cost \$14,975,842 and will underground about two miles of overhead distribution lines along the roadway as well as lateral service lines for the residents in that area.
11. The City of Oakland currently has a work credit balance of \$23,757,357 and can utilize an additional \$8,461,280 pursuant to the Rule 20(A)(2)(c).
12. On January 4, 2019, PG&E filed Advice Letter (AL) 5464-E requesting a deviation from Electric Rule 20A citing section 9.2.3 of General Order 96-B.
13. PG&E acknowledged in AL 5464-E that the City of Oakland's 2018 engineering analysis showed that about 530 feet (5.79 percent) of the Phase II project meet the Rule 20A criteria while the remaining 8,631 feet do not.
14. PG&E requested the Commission to approve the deviation for Piedmont Pines area undergrounding project, because the City staff found that the project met the Rule 20A heavy vehicular traffic criterion based what City staff believed was a good faith interpretation of heavy traffic volume.
15. On January 14, 2019, the Piedmont Pines Neighborhood Association sent a letter of support for Advice Letter 5464-E.

16. On March 21, 2019, PG&E filed a partial supplemental AL 5464-E-A at the Energy Division's request to provide additional information to inform the disposition of the advice letter.
17. The City of Oakland determined in a 1998 traffic study that there was an average of 754 vehicle trips per day in what is now the Phase II project area.

Therefore it is ordered that:

1. PG&E's request to deviate from Rule 20A for the City's Phase II of the Piedmont Pines Area Underground Project is approved.
2. PG&E Advice Letter 5464-E and Advice Letter 5464-E-A are approved.

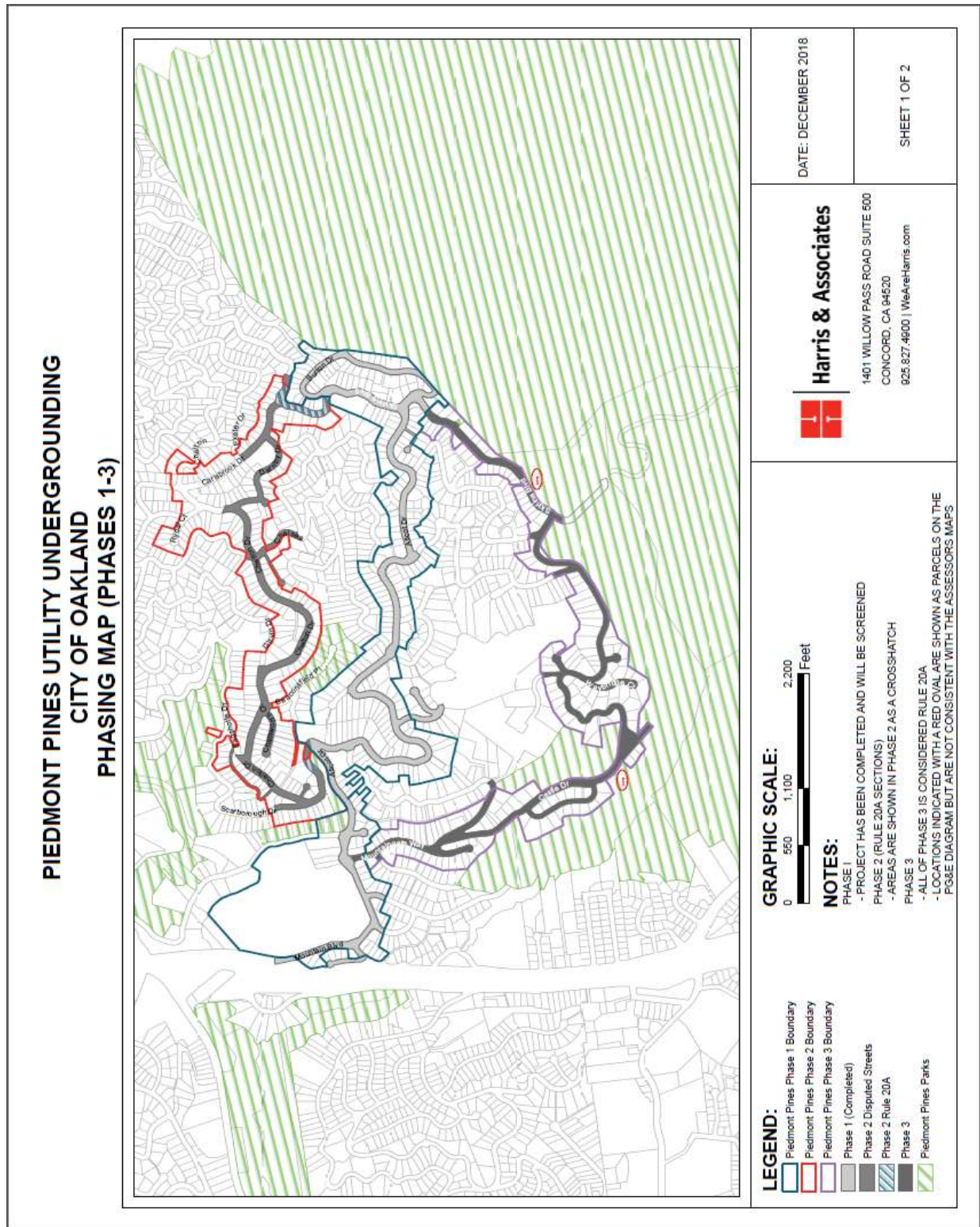
This Resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on January 16, 2020; the following Commissioners voting favorably thereon:

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ALICE STEBBINS  
Executive Director

**ATTACHMENT A**  
Piedmont Pines Project Phasing Map

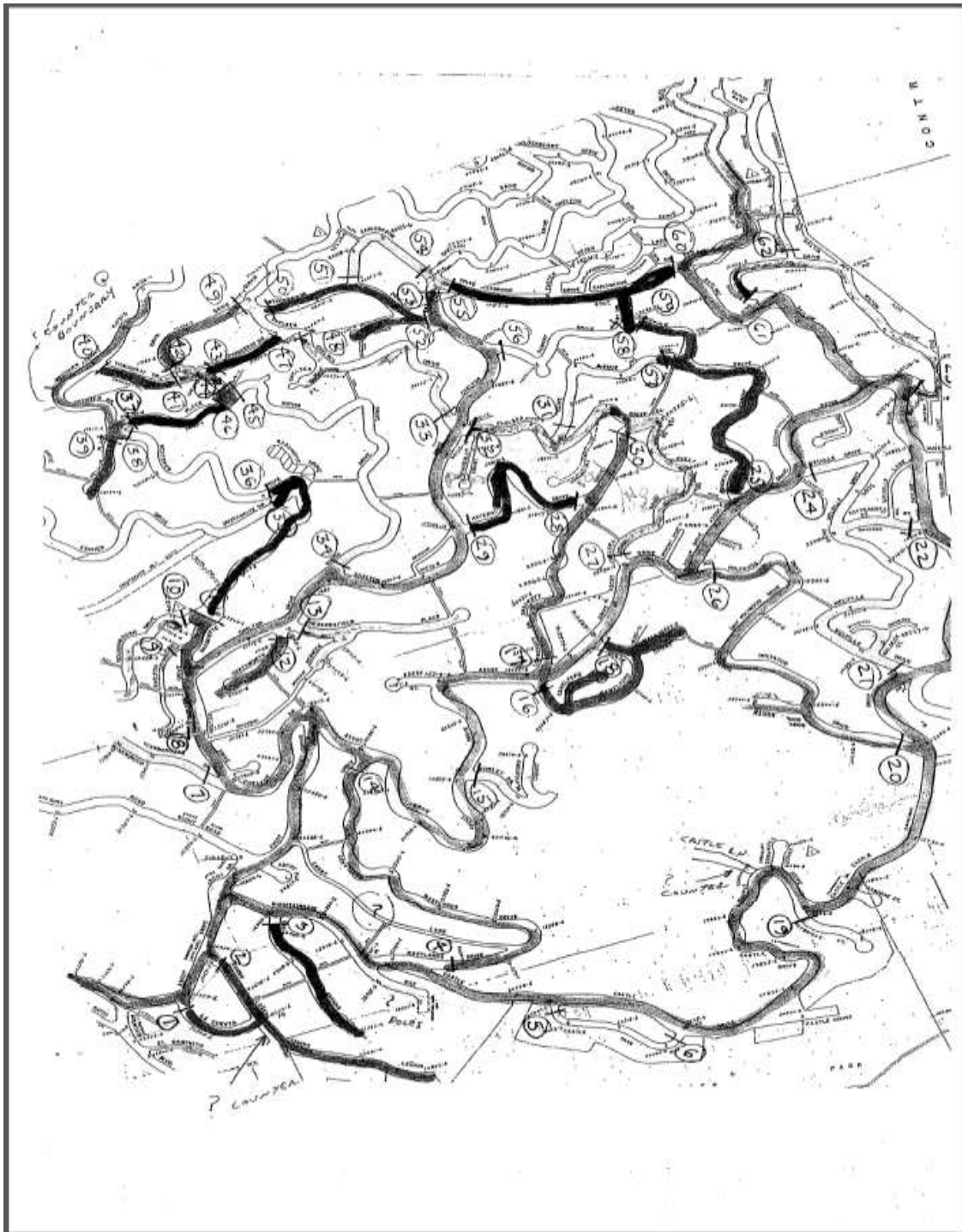




**ATTACHMENT B**

City of Oakland October 1998 Piedmont Pines Traffic Study

B1. Traffic Count Location Map



B2. Traffic Count Data

*prepared 10/28/98*

PIEDMONT PINES

LOCATION	STREET NAME	DATE COUNTER INSTALLED	DATE COUNTER REMOVED	NUMBER OF VEHICLES	DISTANCE FROM CORNER
1	La Cuesta	8/11/98	8/18/98	1635	110' in
2	Camino Lenada	"	"	1335	20' in
3	Las Aromas	"	"	1236	70' in
4	Mastlands Drive	"	"	707	50' in
5	Castle Park Way	"	"	990	25' in
6	Castle Park Way	"	"	582	20' in
7	Scarborough Dr.	8/18/98	8/25/98	1115	150' in
8	Chelton Lane	"	"	848	20' in
9	Chelton Lane	"	"	371	35' in
10	Scarborough Dr.	"	"	262	165' in
11	Bagshotte Dr.	"	"	1635	20' in
12	Chatsworth Ct.	"	"	1507	30' in
13	Beaconsfield Pl.	8/25/98	9/1/98	456	90' in
14	Mastlands Drive	"	"	839	100' in
15	Morley Drive	"	"	1287	35' in
16	Camelford Pl.	"	"	765	35' in
17	Longcroft Dr.	"	"	1204	155' in
18	Camelford Pl.	"	"	731	105' in
19	Weybridge Ct.	9/1/98	9/8/98	416	175' in
20	Holyrood Dr.	"	"	964	265' in
21	Melville Dr.	"	"	1045	75' in
22	Totterdell Dr.	9/8/98	9/15/98	440	100' in
23	Wilton Drive	9/1/98	9/15/98	3112	140' in
24	Melville Dr.	9/8/98	9/15/98	1300	120' in
25	Longwalk Drive	"	"	747	120' in
26	Holyrood Dr.	9/15/98	9/22/98	1998	110' in
27	Chelsea Dr.	"	"	860	195' in
28	Haverhill Dr.	"	"	433	140' in
29	Haverhill Dr.	"	"	745	120' in
30	Longcroft Dr.	"	"	235	60' in
31	Clive Ave.	"	"	1124	210' in
32	Chelsea Dr.	9/22/98	9/29/98	3768	50' in
33	Chelsea Dr.	"	"	1870	65' in
34	Girvin Dr.	"	"	1776	40' in
35	Escher Dr.	"	"	298	55' in
36	Westover Dr.	"	"	1203	65' in
37	Pelham Pl.	"	"	437	55' in
38	Westover Dr.	9/29/98	10/6/98	804	60' in
39	Pelham Pl.	"	"	483	30' in
40	Thackeray Dr.	"	"	1961	20' in
41	Thackeray Dr.	"	"	1329	60' in
42	Girvin Dr.	"	"	1124	60' in
43	Thackeray Dr.	"	"	762	25' in
44	Girvin Dr.	10/6/98	10/13/98	1064	60' in

B2. Traffic Count Data (Continued)

LOCATION	STREET NAME	DATE COUNTER INSTALLED	DATE COUNTER REMOVED	NUMBER OF VEHICLES	
45	Girvin Dr.	10/6/98	10/13/98	1078	55'in
46	Peiham Pl.	"	"	534	140'in
47	Thackeray Dr.	"	"	643	70'in
48	Chelsea Dr.	"	"	781	145'in
49	Girvin Dr.	"	"	1027	105'in
50	Stockbridge Dr.	10/13/98	10/20/98	1114	100'in
51	Carlsbrook Dr.	"	"	559	70'in
52	Stockbridge Dr.	"	"	3941	20'in
53	Chelton Dr.	"	"	5279	60'in
54	Carlsbrook Dr.	"	"	1096	35'in
55	Carlsbrook Dr.	"	"	4183	40'in
56	Darnby Drive	10/20/98	10/27/98	2710	60'in
57	Clive Ave.	"	"	539	150'in
58	Darnby Drive	"	"	1541	165'in
59	Longwalk Drive	"	"	549	65'in
60	Carlsbrook Dr.	"	"	4139	60'in
* 61	Burton Drive	9/1/98	9/15/98	4902	50'in
* 62	Shirley Dr.	"	"	1952	150'in

\* Locations 23, 61, & 62 should have counters installed for the same two (2) weeks which should include the weekend of September 5 and 6.

### B3. City of Oakland Heavy Vehicular Traffic Interpretation

Sent By: City of Oakland (Y2K);

238 7415;

Apr-26-99 7:49AM;

Page 1/1

To: VICTOR LASSEY

Fax: 5411

From: I. JEEVA.

(b) A street that is being considered for inclusion in the Underground Utility District shall be deemed as "carrying heavy vehicular traffic" and therefore satisfying C.P.U.C. Rule 20A that states, "The street or road or right-of-way is extensively used by the general public and carries a heavy volume of pedestrian or vehicular traffic," if the street satisfies any one of the following criteria:

- (1) If the vehicular traffic count averages to 8 or more vehicle trips per residence per day on a street that is not designated as a collector or arterial street in the City's General Plan.
- (2) If the vehicular traffic count is at least 500 vehicles per day and averages to 8 or more vehicle trips per residence per day on a street that is designated as a collector street in the City's General Plan.
- (3) If the vehicular traffic count is at least 2,000 vehicles per day and averages to 8 or more vehicle trips per residence per day on a street that is designated as an arterial street in the City's General Plan.

(c) The following streets are hereby deemed to have satisfied C.P.U.C Rule 20A between the designated cross streets:

<u>Street Name</u>	<u>Cross Street</u>	<u>Cross Street</u>
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B4. Traffic Counter Locations and Data

Counter Locations/ STREET NAMES	Counts	Days/ Time	Homes			
Mastmanos Dr Larry Ln	3564	7	42	$\frac{3564}{7} = 509$	$\frac{509}{42} = 12.12$	
Weybridge Cr	416	7	7	$\frac{416}{7} = 59.4$	$\frac{59.4}{7} = 8.4$	
Castle Park Wy	1572	7	18	$\frac{1572}{7} = 224.5$	$\frac{224.5}{18} = 12.4$	
Morley Dr Blanchford Ct	1287	7	14	$\frac{1287}{7} = 183.8$	$\frac{183.8}{14} = 13.1$	
Camelroad Ct/Pl Mall Ct	1496	7	26	$\frac{1496}{7} = 213.5$	$\frac{213.5}{26} = 8.2$	
Schenesborough Dr	1377	7	24	$\frac{1377}{7} = 196.7$	$\frac{196.7}{24} = 8.2$	
Chelton Ln	1219	7	12	$\frac{1219}{7} = 174.1$	$\frac{174.1}{12} = 14.5$	
Holyrood Dr	6531	14	54	$\frac{6531}{14} = 466.5$	$\frac{466.5}{54} = 8.64$	
Shatsworth Ct	1507	7	17	$\frac{1507}{7} = 215.2$	$\frac{215.2}{17} = 12.6$	

**ATTACHMENT C**  
Caltrans Maps



