

Decision **PROPOSED DECISION OF COMMISSIONER BATJER**
(Mailed 5/11/2020)

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Order Instituting Investigation into
the Creation of a Shared Database or
Statewide Census of Utility Poles and
Conduit in California.

Investigation 17-06-027

And Related Matter.

Rulemaking 17-06-028

**DECISION APPROVING TRACK 1 WORKSHOP REPORT WORK PLANS FOR
SAN DIEGO GAS & ELECTRIC COMPANY, SOUTHERN CALIFORNIA
EDISON COMPANY, PACIFIC GAS AND ELECTRIC COMPANY, AT&T, AND
FRONTIER COMMUNICATIONS OF CALIFORNIA**

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Summary

This decision approves the *Track 1 Work Plans* filed by Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, Frontier Communications, and AT&T (the five utility pole owners), but with modifications as noted throughout this decision.

This decision requires that each of the five pole owners must incorporate data glossaries with consistent meanings into their respective data portals.

The decision further orders that the five pole owners convene a working group 60 days after the issuance of this decision to reach consensus for the data elements that will use common data definitions.

This proceeding remains open.

Party Acronyms, Abbreviations, and their Meanings

AT&T (Pacific Bell Telephone Company, d/b/a AT&T California, AT&T Mobility [AT&T Mobility Wireless Operations Holdings, Inc., New Cingular Wireless PCS, LLC, and Santa Barbara Cellular Systems, Ltd] and AT&T Corp.

BVES (Bear Valley Electric Service)

CALTEL (California Association of Competitive Telecommunications Companies)

CCTA (California Cable and Telephone Association)

CTIA (CTIA Wireless Association)

CMUA (California Municipal Utility Association)

ExteNet (ExteNet Systems (CA) LLC)

Frontier (Frontier Communications of California)

ORA (Office of Ratepayer Advocates, now known as the Public Advocates Office or CalPA)

PC (PacifiCorp)

PG&E (Pacific Gas and Electric Company)

SCE (Southern California Edison Company)

Southern California Gas Company (SoCalGas)

SDG&E (San Diego Gas & Electric Company)

SED (Safety & Enforcement Division)

Verizon (Cello/MCIMetro)

1. Background

1.1. Factual Background

On June 29, 2017, the Commission issued Investigation 17-06-027 and Rulemaking 17-06-028 (OII/OIR Proceeding) in order to consider strategies for increased and non-discriminatory access to poles and conduit by competitive communications providers, the impact of such increased access on safety, and how best to ensure the integrity of the affected communications and electric supply infrastructure going forward. As part of this OII/OIR proceeding, the Commission expressed its intention to:

- Investigate how best to create a statewide pole census along with the feasibility of a data management platform that will allow stakeholders to share key pole attachment and conduit information;¹
- Consider rules that will allow broadband Internet access service (BIAS) providers to attach facilities to

¹ OII/OIR at 1.

poles and to use conduit following their classification as public utility telecommunications carriers in the FCC's 2015 *Open Internet Order*;² and

- Consider rules specific to conduit, and better pole management practices.³

SDG&E, SCE, PG&E, Frontier, and AT&T are the five pole owners who, collectively, own between 85-90% of the 6+ million electric and communication utility poles in California.⁴

1.2. Procedural Background

Based on the comments the parties made at the December 5, 2017 Prehearing Conference (PHC), on January 11, 2018, the assigned Commissioner and the assigned Administrative Law Judge issued a *Ruling Requesting Comments on Creation of Shared, Statewide Database of Utility Pole and Conduit Information*. The following parties filed and served comments: AT&T, BVES, California association of Competitive Telecommunications Companies (CALTEL), CCTA, CTIA, ExteNet, CalPA, PC, PG&E, SCE, and SoCalGas.

The Assigned Commissioner issued his *Scoping Memo and Ruling (Scoping Memo)* on August 8, 2018, setting forth the category, issues, schedules, and other

² *In re Protecting and Promoting an Open Internet*, Federal Communications Commission (FCC) Report and Order, 30 FCC Rcd. 5601 (March 2015) (*Open Internet Order*), at 478-85. The FCC later reversed the *Open Internet Order* on December 14, 2017. See *Restoring Internet Freedom*, Declaratory Ruling, Report and Order, and Order, 33 FCC Rcd. 311 (2018).

³ OII/OIR at 1.

⁴ See responses from SDG&E, SCE, PG&E, Frontier, and AT&T to the Commission's Data Request, dated January 27, 2017, which asked, among other things, that each respondent identify the number of utility poles in California that are owned either solely or jointly, or on which they lease space.

matters related to the OII Phase I Scope, allowing for collaborative workshops at which the Commission would present potential Use Cases for a pole database, initiate dialogue, and collect input and feedback to refine the Use Cases and data fields critical to defined uses.⁵

The workshops were held on November 15, 2018, January 22, and January 23, 2019. A *Workshop Report* was filed and served on February 28, 2019, that detailed the parties' efforts, recommendations and concerns. Of note, the *Workshop Report* recommended that the Commission authorize the creation of working groups that would be tasked with developing the detailed requirements based on the following three tracks for the OII Proceeding: Track 1 (Pole Data), Track 2 (Pole Attachment Data), and Track 3 (Conduit Data). Four parties (SDG&E, SCE, AT&T, and ExteNet) filed opening comments on March 29, 2019. Six parties (SCE, CCTA, CalPA, AT&T, ExteNet, and CALTEL) filed reply comments on April 19, 2019.

On June 4, 2019, the ALJ issued his *Ruling Approving Recommendations/Next Steps from the Southern California Edison Workshop Report for Workshops Held on November 15, 2018 and January 22-23, 2019 (Ruling)*. In response to party comments to the Workshop Report, the *Ruling* clarified that the working groups could operate on the assumption that pole and conduit data access by service area rather than a statewide or centralized database meets this OII's goals.

⁵ The assigned Commissioner was Michael Picker but following his retirement the proceeding was reassigned to the Commission's new president, Marybel Batjer.

In conformity with the *Ruling*, the parties established a Track 1 working group, and workshops were held in August and September of 2019. On October 2, 2019, SCE filed the *Track 1 Workshop Report for Workshops Held August 13-14, 2019 and September 6, 2019 (Track 1 Workshop Report)*. Four parties (CalPA, AT&T, ExteNet, and SDG&E) filed opening comments on October 22, 2019. Six parties (CalPA, SCE, ExteNet, CCTA, SDG&E, and AT&T) filed reply comments on November 1, 2019.

On February 6, 2020, the Assigned Commissioner issued her *Amended Scoping Memo and Ruling (Amended Scoping Memo)*, which identified the issues for resolution in Track I of the OII.

2. Jurisdiction

The Commission's jurisdiction over utility and communications service facilities is extensive. General Order 95 (Rules for Overhead Electrical Construction) was adopted so the Commission can "formulate, for the State of California, requirements for overhead line design, construction, and maintenance, the application of which will ensure adequate service and secure safety to persons engaged in the construction, maintenance, operation or use of overhead lines and to the public in general."⁶ General Order 128 (Rules for Construction of Underground Electric Supply and Communication System) was adopted for the Commission to promulgate "uniform requirements for underground electrical supply and communications systems,"⁷ also with the goal

⁶ General Order 95, Section I, Rule 11.

⁷ General Order 128, Section I, Rule 11.

of ensuring adequate and safe service. In addition to these two General Orders, the Commission has made it clear in Decision 10-02-034 that there are constitutional, statutory, and judicial authorities that recognize the Commission's broad jurisdiction over utilities with respect to their electrical power and communications facilities:

In later cases, courts have similarly held that matters such as the location, construction and maintenance of telephone lines and electric power poles are matters of state concern, not municipal affairs. (*See, e.g., Pacific Tel. & Tel. Co. v. City and County of San Francisco* (1959) 51 Cal.2d 766, 768; *Modesto Irrigation District v. City of Modesto* (1962) 210 Cal.App.2d 652, 654-655.) There can be no serious question that we have comprehensive jurisdiction over issues related to the health and safety implications of utility operations within the State of California. (*See, e.g., Cal. Const. art. XII, §§ 3 & 6; Pub. Util. Code, §§ 216, 451, 701, 702, 761, 767.5, 768, 768.5, 770, 1001, 2101 & 8001 et seq; San Diego Gas & Electric Co. v. Superior Court* (1996) 13 Cal.4th 893, 923-924.)⁸

Consistent with this mandate, the Commission opened this proceeding, in part, to consider and adopt rules requiring utility pole owners to create and maintain databases systems in a manner that will enable the Commission to effectively execute its oversight responsibility.

⁸ D.10-02-034, Slip Op at 5-6.

3. Issues Before the Commission

- I. What should be the level of detail required for the following data points that each of the five major California pole owners⁹ shall make available in electronic format as to each pole it owns:
 1. Unique identifier of pole;
 2. Pole location info (*e.g.*, GIS coordinates and/or address);
 3. High Fire Threat District and tier category;
 4. Pole length, class, and material;
 5. Pole installation date;
 6. Name of any other joint owner(s) and the percent ownership of each;
 7. Intrusive test data (*i.e.*, date of last test and test result);
 8. Number of pending attachment applications(s) and/or make-ready work (if available);
 9. Notice of any pending pole replacement/reinforcement and date (if available); and
 10. Buddy pole information (if available).
- II. How soon after the Commission adopts its OII Track 1 decision must each pole owner provide the pole data points?
- III. How will each pole owner provide Commission staff with remote electronic access to the pole data points?

⁹ The five major California pole owners are PG&E, SCE, SDG&E, AT&T, and Frontier.

4. Discussion

4.1. Database System and Access Capabilities

A review of the *Track 1 Workshop Report* reveals a varying degree of capability and specificity in record-keeping between the five pole owners. When coupled with the fact that each of the pole owners uses a different operating system to categorize and store pole information, it becomes imperative that the Commission establish certain uniform baseline requirements regarding the level of detail provided, information availability, and providing Commission staff remote access to each pole owner's database.

4.1.1. SDG&E

SDG&E states that it uses the Telecommunications Equipment Attachment Systems (TEAMS) portal to provide electronic access to pole data to Communication Infrastructure Providers (CIP). It currently does not provide a Glossary of Terms for the TEAMS portal.

With respect to the 10 proposed data fields, SDG&E states that it currently provides some of this information.

SDG&E also includes a discussion of its map displays and additional pole functionality. To obtain map information, one must submit a mapping request to SDG&E's Electronic Geographic Information System (EGIS). A non-disclosure agreement must be in effect before the request can be fulfilled. A typical map will cover approximately one street block and may have as much as 10-12 facilities per map.

SDG&E believes it can utilize existing licensing to overlay pole locations on a Google Maps view with TEAMS to show a mapping display of pole location. The information look-up screen in TEAMS could be modified to allow

the user to enter in a pole number, address, or latitude/longitude coordinate and then the screen could display the desired area. The user would then have the ability zoom in or zoom out and navigate around the mapping display area.

4.1.2. SCE

SCE uses a SPIDAMin access portal to provide available pole information to qualified third parties. The SPIDAMin portal includes a geo-spatial map that allows the user to select a specific pole and view the available information associated with it. While pole information can be viewed, it cannot be exported.

SCE states that a Glossary of Terms is being considered.

4.1.3. PG&E

PG&E utilizes a Web Portal User Interface that allows registered users the ability to log into the PG&E Joint Use Map Portal (JUMP) system to access information related to PG&E-owned and joint-owned pole data, including pole information on-line, geo-spatial maps to help locate the selected poles (either by street address, pole number, latitude/longitude, or pole intent number), and the capability to copy, save, and/or print any information obtained via the PG&E JUMP Web Portal. A sample of the pole fields that JUMP currently displays includes: pole class; pole height; pole species; SAP equipment identification number¹⁰; pole install date; circuit voltage; last inspection date; pole

¹⁰ SAP stands for Systems, Applications & Products in Data Processing, and is shorthand for SAP SE's suite of products, which tracks physical assets of utilities. In this context, it is used as a Distribution Pole Identification Number.

Each utility uses a unique version of SAP or similar programs attuned to their system and needs.

circumference; effective circumference; pole work status; visit date; inspection type; test issues; ground level shell average; below ground shell average; wood strength; and inspection result.

PG&E states that it is working on a Glossary of Terms.

4.1.4. Frontier

Frontier states that it does not currently have an accessible portal or electronic pole database system that combines all the identified elements into one place. Instead, requested data is spread across multiple databases: Frontier Outside plant Geographic System (FROG System) and Varasset System (both internal), and NCJPA/ SCJPC (both in the external FRIEND database).

4.1.5. AT&T

AT&T states it is enhancing its Joint Pole Management Tracking System (JPMTS) to add fields for the Track One attributes not currently included, as well as synchronizing multiple data sources by matching pole records where data are available. AT&T hopes these efforts will enable presentation of poles on a map and increase the likelihood of matching AT&T pole records with three respective investor-own utility records.

4.2. Level of detail required for the 10 data points

4.2.1. Unique Identifier of Pole

SDG&E states it utilizes a unique pole number for each pole, which is tagged in the field and associated with the pole record in its database. A CIP can loop up pole information by inserting the pole number into TEAMS. If the entire number is not known, entering a partial number will bring up a list of all possible pole numbers similar to the number entered.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently does not have a unique pole identifier system.

Frontier states this information is accessible in its FROG System. Pole numbers are used to identify and retrieve information.

AT&T states the pole identifier system is a work in progress as internal data sources are linked in order to determine which will be considered the primary.

4.2.1.1. Discussion

Each pole owner should be required to maintain a unique identifier for each of its poles. That should include, at a minimum, and by each service territory, a pole number and address (either street or some other easily identifiable address system).

Geospatial maps shall be utilized to help locate a selected pole. This information shall be accessible via their data portals.

4.2.2. Pole Location Information

SDG&E states that once the desired pole is selected, the user is taken to the Pole Information Screen where the address and Latitude/Longitude Coordinates are located on TEAMS.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E currently lacks precise and reliable pole location information.

Frontier states this information is accessible in its FROG System, a database where poles and assets, including latitude and longitude coordinates, can be searched on a map.

AT&T states that limited latitude and longitude data are available.

4.2.2.1. Discussion

Each of the five pole owners must have, at a minimum, a Geographic Information System (GIS) accessible to attachers, pole owners, and Commission staff which includes the latitude/longitude coordinate, address (if available), and service territory for locating their poles. This information shall be accessible via their data portals.

4.2.3. High Fire-Threat District and Tier Category

In the past, SDG&E said it would share what is in the High-Risk Fire Area (HRFA) and the Fire Threat Zone (FTZ). But with the inception of the CPUC's High Fire Threat Districts (HFTD), SDG&E updated the information in SAP to represent HFTD Tier 2 or Tier 3. SDG&E has not updated the Field Name in TEAMS to reflect the tiers, but the data is currently shown.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make high fire threat district and tier category information available in SPIDAMin.

PG&E states that it reports this attribute in the Support Structure Data provided in JUMP.

Frontier states this information is accessible through its FROG System with the use of overlaid shapes.

AT&T states this information is tied to the pole location information, with fire threat zones indicated on a map.

4.2.3.1. Discussion

In Decision 17-12-024,¹¹ the Commission added a new High Fire-Threat District category to General Order 95, which includes three types of HFTD areas:

- **Zone 1** consists of Tier 1 High Hazard Zones (“HHZs”) on the map of Tree Mortality HHZs prepared jointly by the United States Forest Service and the California Department of Forestry and Fire Protection (“CAL FIRE”). Tier 1 HHZs are in direct proximity to communities, roads, and utility lines, and represent a direct threat to public safety.
- **Tier 2** consists of areas on the California Public Utilities Commission’s Fire-Threat Map (“CPUC Fire-Threat Map”) where there is an elevated risk for destructive utility-associated wildfires.
- **Tier 3** consists of areas on the CPUC Fire-Threat Map where there is an extreme risk for destructive utility-associated wildfires.

Each of the five pole owners shall utilize the zone and tier definitions to identify the tiers where each of its poles are located. This information shall be accessible via their data portals.

4.2.4. Pole length, class, and material

SDG&E says it shares pole characteristics such as the Pole Class, Pole Height (Length), and Material on the General Information tab of its portal.

¹¹ Decision Adopting Regulations to Enhance Fire Safety in the High Fire-Threat District.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E's JUMP program tracks its pole attributes information.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS as follows: there is a field that reflects the total length of a pole; class will match ANSI standard as specified by the pole manufacturer for each pole; and for material, wood type is not specified or currently tracked, but AT&T anticipates that all poles will be Southern Pine for the foreseeable future.

4.2.4.1.1. Discussion

Each of the five pole owners shall be able to identify each of its poles by class, height, species, material, circumference, and latest pole loading information. This information shall be accessible via their data portals.

4.2.5. Pole Installation Date

SDG&E does not currently provide this information on TEAMS but instead shares the Startup Date, *i.e.*, the date the pole was originally installed. But if a pole was changed out, this date would not reflect the installation date of the replacement pole. SDG&E states it plans to create a field below the Startup Date on the General Information tab to create a new field called "Date Last Replaced."

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that its JUMP program tracks the pole install date.

Frontier states this information is accessible through its FROG System.

AT&T states this information exists in JPMTS and is indicated by the year of installation, and not by month or day.

4.2.5.1. Discussion

Each of the five pole owners shall maintain records of the year each pole was installed. These records shall be accessible via their data portals.

4.2.6. Name of any other joint owners and the percent ownership of each

SDG&E states it solely owns its poles and does not belong to any Joint Pole Associations. SDG&E attaches to both AT&T-owned and SCE-owned poles. In these instances, SDG&E is a tenant on the pole, rather than a co-owner of the pole.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible through its external databases NCJPA and SCJPC.

AT&T states this information exists in JPMTS.

4.2.6.1. Discussion

If it is not already in their possession, each pole owner shall be able to retrieve this information from the Joint Pole Association/Committee (JPA/C). From the issuance of this decision onward, each of the five pole owners shall maintain joint pole ownership information and make that information accessible via their data portals.

4.2.7. Intrusive test data

Under its general information tab, SDG&E states it shares the date of the last intrusive test, the type of test, and the percent remaining strength result.

SCE states that it provides this information to qualifying third parties via SCE's pole information portal, SPIDAMin.

PG&E states that it makes this data available in JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this information is tracked outside of JPMTS today and is not easily accessible. It is working to add this data field.

4.2.7.1. Discussion

Each of the five pole owners shall maintain records of the last intrusive test, the type of test, the results of the test, and what corrective action has been or will be taken. This information shall be accessible via their data portals.

4.2.8. Number of pending attachment applications

SDG&E states that it does not share this information at present but in the future proposes to add a tab to the Pole Information Screen called "Pending App."

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make number of pending attachment applications information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its FAR tracker, which houses all current and pending tenant attachment information.

AT&T states it is working to add the data fields and to update the process going forward with the Structure Access Project Management Tool application.

4.2.8.1. Discussion

Each of the five pole owners shall maintain these records, which shall also identify the number and date of each attachment application, and pole loading information, if any.

4.2.9. Notice of any pending pole replacement/reinforcement and date

SDG&E states that it does not share this information at present but proposes to add field in the General Information Tab. The added field will be Pending Replacement, Pending Reinforcement, and Replace/Reinforce Required Date, that date being when the replacement or reinforcement is due according to the Corrective Maintenance Record.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. SCE's IT department plans to work collaboratively with SPIDA Web LLC technicians to develop new interface solutions to make pending pole replacement information available in SPIDAMin.

PG&E states it will be able to provide this information through JUMP.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS but is not typically populated.

4.2.9.1. Discussion

Each of the five pole owners shall maintain these records, which shall also describe the reasons for the replacement or reinforcement, the proposed scope of

work, and estimated date for completion. This information shall be accessible via their data portals.

4.2.10. Buddy pole information

SDG&E states that it does not share this information at present but hopes to incorporate pole transfer information to SAP and to share the information through the TEAMS portal.

SCE states that it does not provide this information to qualifying third parties via SCE's pole information portal, SPIDAMin. It has a limited amount of buddy pole information which is retained in a spreadsheet, not in SCE's work management system SAP.

PG&E states that while it tracks Buddy Poles, the ability to automatically pull the information and place into JUMP will require further exploration and development.

Frontier states this information is accessible in its Varasset System.

AT&T states this field exists in JPMTS.

4.2.10.1. Discussion

Since each of the five pole owners maintains this information, it should not be an impediment for each of them to place it in their respective data portals. To the extent a pole owner claims confidentiality, it shall be up to that owner to file a motion and follow the requirements for claiming confidentiality that are contained in General Order 66-D.

Finally, if a pole owner wishes to dispose of a buddy pole and transfer equipment to a new pole, this information shall be included in the data portal for each buddy pole, and include the date of removal.

5. Timeline for delivery of pole data points

The three IOUs (PG&E, SCE, and SDG&E) state they have existing portals or are developing portals in progress. They contemplate electronic access to the 10 data elements utilizing their portals within one year of the Commission's Track 1 decision, with the exception of SCE and the buddy pole information, which SCE estimates could be made available in SPIDAMin within 18-24 months of the Track 1 decision.

AT&T and Frontier have not yet developed portals but have, instead, identified work plans which address how they would meet the Track 1 goals. AT&T has proposed a two-part approach for accessing pole data. First is Release 1, which is an internal solution accessed by authorized AT&T employees based on their responsibilities. The authorized employee would retrieve the data based on an authorized request following current information request guidelines. AT&T would then send the results in CSV format via e-mail. The second is Release 2 wherein the data would be accessed by authorized persons (such as authorized applicants and Commission staff) via public-facing web portal after establishing an authorized account. AT&T estimates that Release 1 would be implemented in one year, and Release 2 would be implemented one year after Release 1.

Frontier identified three different data sharing solutions. The first is called the manual process, in which it will manually compile the 10 data sets required by this decision from its four databases identified above and then e mail the information to the requesting entity within 24 hours. The second is called database portal simple query. This solution does not currently exist, but Frontier

contemplates creating an external data portal that has a simple query field to search by pole, or multiple poles. The third is database portal GIS, which also does not currently exist. Frontier envisions an external data portal that uses GIS technology similar to the IOU solutions in which pole or polygons can be queried. Frontier estimates that the first solution will take approximately six months to implement, solution two will take approximately 18 months, and solution three will take approximately four years from the Track 1 decision.

5.1.1. Discussion

The Commission finds that it is reasonable for the five pole owners to deliver the pole data points covered by this decision within one year of this decision's issuance. For AT&T, it must have Release 1 and Release 2 completed within one year of this decision's issuance. For Frontier, we will expect it to have its database portal equipped with a functional simple query operational within one year of this decision's issuance, and the database portal GIS operational within two years from the date of this decision's issuance. It is important that the 10 data points are accessible by the same time frame in order to provide authorized persons and Commission staff access to the widest possible information regarding the 6+ million poles in California.

5.2. How to provide Commission staff with remote electronic access to pole data points

There are two options for providing Commission staff with remote electronic access to pole data information. One option is that Commission staff is given an account and protected password in order to log on to a pole owner's account and another option is an Application Programming Interface (API) provided by the utility that enables direct data transfer into the Commission's

data systems. The Commission will require that the pole owners offer remote access to their databases with log-in credentials through their web portals. This does not foreclose on further enhancements of Commission access to the five pole owners' databases. Further developments, such as a Web-based API, or other interfaces for transferring data from carriers/IOUs to the Commission, may be proposed and required in the future by the Commission. Such further developments shall be harmonized with actions taken in related proceedings, such as the WMP efforts spearheaded by Wildfire Safety Division.

5.3. The Need for a Glossary of Terms

None of the five pole owners utilizes a Glossary of Terms. While we acknowledge that certain of the five pole owners state that a data glossary is under consideration, the fact remains that, at present, no data glossary currently exists, either used by an individual pole owner or consistently among two or more pole owners. This is a situation that the Commission finds troubling. If persons, including the Commission staff, access a pole owner's data portals, they may come across terms that are, at worst, undefined or, at best, defined differently depending on which website has been accessed. The potential for differing interpretations of data terms could make it difficult for persons, including Commission staff, to gain a consistent understanding of the terms that each of the five pole owners utilize in their data collection operations.

The Commission requires that the five pole owners strive for uniformity of meanings. It is critical that each pole owner identify and document the data fields in the data portal, which shall include a description, data format, data field type, and other metadata that will enable users to understand and use the data.

All data portals shall come equipped with data glossaries where terms are defined. To achieve that end, the Commission finds it will be beneficial for the five pole owners to convene a working group to reach a consensus recommendation for consistent data glossaries, with emphasis on achieving consistency of data elements and data definitions, that does not contradict any active definitions in General Orders.

This working group shall coordinate development of this proceeding's pole data elements and data definitions with the Wildfire Safety Division's implementation of their data strategy for Wildfire Mitigation Plans, including common WMP data taxonomies and schema. Nothing in this proceeding is intended to override or conflict with the WSD's data strategy or implementation of that strategy.

6. Comments on Proposed Decision

The proposed decision of President Batjer in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission's Rules of Practice and Procedure. Comments were filed on June 1, 2020 by AT&T and Frontier, CCTA, SDG&E, the Public Advocates Office (Cal PA), SCE, ExteNet, and Sonic, and reply comments were filed on June 8, 2020 by AT&T and Frontier, CCTA, SDG&E, Cal PA, SED, SCE, ExteNet, Sonic, PG&E, Verizon, and TURN.

AT&T and Frontier

Frontier asserts that the timeline for providing external portal availability is too expedited given Frontier's current capabilities. Compliance would be expensive and would not yield the work needed to create this interim database

portal. Frontier maintains that it will require more than two years to make such a portal operational.

With respect to Data Points 1 and 2 (unique pole identified and location), AT&T and Frontier request that pole address be included with the pole location data point rather than the pole identifier data point in order to avoid unnecessary duplication.

As for the pole location three-dimensional capabilities for locating poles, AT&T and Frontier are concerned that there is no further guidance regarding the meaning of this term. Without a better understanding, AT&T and Frontier claim that cannot determine how, when, or even whether the data referenced by this term could be included in their databases. They request that further discussion of “three-dimensional capability” be conducted in additional workshops or be addressed in Track 2.

With respect to Data Point 8 (number of pending attachment applications if available), AT&T and Frontier are not aware of any substantial reason to include these additional data. In their view, one only needs to know the number of applications pending to determine whether pending attachments will exhaust current pole capacity. Further, their claim the requirements to link pole loading information and the entire application will create significant technical challenges making them not feasible with the timeframes proposed by the decision. Finally, they assert that the attacher’s name and contact information, and other data in the pole application are confidential and proprietary.

As to the searchability requirement, AT&T and Frontier request that the establishment of appropriate search capabilities be addressed in the working groups required by the proposed decision.

Extenet

Extenet suggests the following modifications: clarify that attachers must have access to data through the database portals; require pole owners to immediately make available pole data that is maintained in electronic format; and require pole owner databases to allow searches of multiple poles.

SCE

With respect to Sections 4.2.1. and 4.2.1.1. (unique pole identified), not every pole has a corresponding street address and suggest that this information only be provided if available.

With respect to Sections 4.2.1. and 4.2.1.1. (pole location information), SCE questions the need for the three-dimensional capabilities for locating poles as this requirement was not contemplated in the Track 1 Report. SCE suggests that this requirement be changed so that utilities can provide either a 2-D or 3-D map.

With respect to Section 4.2.3. and 4.2.3.1. (High Fire Threat District and Tier Category), the requirement of adding a special identifier for poles that are located only in Zone 1 of the HFTD and outside Tiers 2 or 3 go beyond the rules set forth in GO 95. Thus, SCE suggests that 4.2.2.1. be revised to only require the poles presented in each pole owner's respective public database include special designations if located in Tier 2 or Tier 3 of the HFTD.

With respect to Section 4.2.4. and 4.2.4.1. (pole length, class, and material), SCE states that pole loading and circuit voltage data were not vetted in the

Track 1 workshops, nor were these two items included in the list of 10 data points in either the Workshop Report the ALJ Ruling approving the recommendations and next steps, or the Amended Scoping Memo and Ruling. Instead, SCE claims these items were intended for discussion in Track 2 of this proceeding. Finally, SCE asks that the references to latest pole loading information and circuit voltage be stricken because they are unclear and taken up in Track 2.

SCE asks Section 4.2.6.1. be revised to exempt SDG&E since it is not a member of the SCJPA or the NCJPA.

SCE asks that references to corrective action in Section 4.2.7.1. be removed because correction action is addressed in Section 4.2.9.

With respect to Section 4.2.8. and 4.2.8.1. (number of pending attachment applications), SCE asks that the Commission eliminate the additional detailed information requested as it is proprietary and requests for such information is handled by Section V of the Commission's ROW Rules.

With respect to Section 4.2.9. and 4.2.9.1. (notice of pending pole replacement/reinforcement and date), SCE requests that this be revised to eliminate the requirement "the reasons for the replacement/reinforcement and the proposed scope of work" in Data Point 9 as it is ambiguous as to its meaning and is immaterial to an attacher's decision to apply or not apply for attachment.

With respect to Section 4.1.10 and 4.2.10.1 (buddy pole information), SCE asks that it be deleted as it has no bearing on pole attachment requests submitted to a pole owner, and that any requirement for such information be deferred to Track 2.

Because of additional requirements that this decision proposes to adopt, SCE request that its timeline for delivery of pole data points be extended to up to 18 months.

SDG&E

SDG&E requests that the three-dimensional capabilities for locating poles be removed or clarified as it was never discussed nor requested by the parties.

SDG&E disputes the statement in Section 4.2.6 of the proposed decision that states “SDG&E does not attach to AT&T or SCE owned poles.” SDG&E states it attaches to both AT&T-owned and SCE-owned poles. In both circumstances, SDG&E states it is a tenant on the pole rather than a co-owner of the pole. As for data requirements set forth in Section 4.2.8.1. of the decision, SDG&E claims that these additional data requirements have not been explored to determine the feasibility of providing this information or what additional costs would be required.

SED

SED makes the following seven recommendations: First, all pole databases should include map interface search and data export functionalities with access for authorized users. Second, pole attributes in Data point 4 should include pole grad of construction to address the strength requirements of the pole pursuant to GO 95. Third, Data point 6 should include the names of joint pole attachers in addition to joint owners. Fourth, Data point 8 should include current attachment information in addition to identifying pending attachments. Fifth, the timeline of Commission staff access to data portals should not interfere with existing electronic access, and should reflect pole owners’ existing database capabilities

by including mid-term meet and confer meetings with Frontier and AT&T. Sixth, if buddy pole data is not currently available, pole owners should make it available within two years from the issuance of the Track 1 decision. Seventh, SDE should be included in the working group convened to develop consistent glossaries of data terms.

Sonic

Sonic asks for clarification on two points: first, the CLECs, other pole attachers, Commission staff, and all other authorized users should have access to the pole owners' data portals and the data accessed through those portals. Second, the relevant data for all 10 data elements should be made available via the pole owners' data portals.

Where the Commission has deemed it relevant and necessary, clarifications and edits have been made to the decision to reflect some of the party comments.

Cal PA

Cal PA has requested additions to the Findings of Fact, Conclusions, of Law, and Ordering Paragraphs. Those changes have been made with some modifications to reflect the changes that have been made to the text of the decision.

CCTA

CCTA provided fulsome comments with respect to pole loading data and the apparent distinction between attachment data and pole data, which this decision addresses. In its comments CCTA states: "Pole attachment applications

and pole loading information pertain to attachment data, rather than pole data.” CCTA elaborates:

CCTA and its members would have *strenuously objected* at the workshops to the inclusion of any data field beyond *a mere “yes or no”* indication of a pending attachment application because application contains confidential, commercially sensitive information. Moreover, the Proposed Decision recognizes that Track 1 data encompasses “Pole Data,” while Track 2 encompasses “Pole Attachment Data.”

Since, in CCTA’s view, pole loading is not exclusively attachment data, it should not be included in the database.

But the Commission believes that pole data and pole attachment data are appropriate as part of Track 1, with the understanding that pole attachment data may require additional considerations in Track 2. Pole loading calculations are an appropriate subject for this decision as pole loading has been a part of this proceeding from its inception. Since the original 1998 Opinion (D 98-10-058), the Commission’s Right of Way (ROW) Rules (IV.A.2.) have required Requests of Access to contain pole loading information: “Loading information, which includes grade and size of attachment, size of cable, average span length, wind loading of their equipment, vertical loading, and bending movement.” The Commission does require Safety Factor determinations which differ from other states which use the National Electric Safety Code (NESC) standards. And “design loads” are part of General Order 95 Rule 44 Safety Factor determination: “The safety factors specified in these rules are the minimum allowable ratios of

material and/or line element strengths to the effect of design loads as specified in Rule 43.”

Further, General Order 95 Rule 44.1 Safety Factors require loading calculations to be maintained for the “service life” of the pole:

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.

This proceeding has revealed California’s major communications Attachers perform pole loading calculations using advanced software (OCALC - Osmose Utilities Services O-Calc-Pro and SPIDAcac that uses Geographic Information Systems (GIS) Mapping and 3-dimensional imaging to generate pole loading calculations and the GO-95 safety factors, based on pole owner specifications. This proceeding has also revealed California’s major communication Attachers submit the information generated by the pole loading software as part of their Requests for Access as required by ROW Rule IV.A.2. Finally, California’s five major pole owners (PG&E, SCE, SDG&E, AT&T, and Frontier) all acknowledge they receive this information as part of the attachment applications.

7. Assignment of Proceeding

Marybel Batjer is the assigned Commissioner and Robert M. Mason III is the assigned Administrative Law Judge in this proceeding.

Findings of Fact

1. The Proposed Track 1 Work Plans have varying levels of detail for how each of the five pole owners proposes to meet the Track 1 requirement that the 10 pole data elements, discussed above in Section 4.2, be made available in electronic format.
2. The three IOUs (*i.e.* PG&E, SCE and SDG&E) have existing or are developing portals in progress and their work plans establish electronic access to the 10 pole data elements utilizing their portals within 1 year of a Commission Final Decision.
3. AT&T and Frontier have not yet developed portals and their work plans (AT&T's Release 1 and Frontier's Option 1) address how they would meet the Track 1 goals.
4. AT&T's Release 1 would establish electronic access to the 10 pole data elements by email within one business day, within one year of a Commission Final Decision.
5. AT&T's Release 2 would implement an external web portal to Track 1 data one year after Release 1.
6. Frontier's Work Plan includes three pole data sharing solutions identified as Option 1, Option 2, and Option 3.
7. Frontier's Option 1 commits to a manual process to send Track 1 data elements by email within 24 hours, within one year of a Commission Final Decision.
8. Frontier's Option 2 entitled 'Database Portal Simple Query' would provide an external data portal within 18 months after a Commission Final Decision.

9. Frontier's Option 3 entitled 'Database Portal GIS' would provide a GIS portal within four years of a Commission Final Decision.

10. Each of the pole owners has disparate databases and other sources of information for the 10 pole data points for allowing access to information through a secure portal.

11. Geospatial maps can help pole database users locate utility poles.

12. The IOUs have existing databases that can display information in some form to third parties through online web portals.

13. Some IOUs have online data portals that allow interested third parties to select utility poles on a geospatial map and view information related to the selected pole.

14. Database users will benefit from being able to select, view, and download information for multiple poles in a single query.

15. Some Pole Owners have or plan to have the ability to select and view multiple poles in their online data portals.

16. High Fire Threat District and Tier category should be defined as used in Decision 17-12-024.

17. The Workshop Report Filed by Southern California Edison Company for Workshops held on November 15, 2018 and January 22-23, 2019 dated February 28, 2018 identified 10 pole data elements in a Joint Parties Proposal that the Pole Owners make available in an electronic format within one year following a Commission order.

Conclusions of Law

1. It is reasonable for the five pole owners to provide pole and conduit data access by service area in order to meet the goals of this Order Instituting Investigation.
2. It is in the public interest to adopt the Proposed Track 1 Work Plans, with the refinements identified in the body of this decision, Sections 4.2-5.2, and Ordering Paragraphs.
3. There is no need for an evidentiary hearing regarding the matters addressed by this decision.
4. It is reasonable to require that the five pole owners to file and serve their Track 1 Work Plans to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters.
5. It is reasonable to conclude that initial electronic access to the pole data shall still be required one year from the date of this decision.
6. It is reasonable to require that the five pole owners develop a Glossary of Terms that consistent of uniform definitions.
7. It is reasonable for SED to participate in the Data Glossary working group.
8. It is reasonable to conclude that Commission staff be given complete, unrestricted remote access to data in each pole owner's data portal.
9. It is reasonable to require Pole Owners to develop the ability to select multiple poles in their databases.
10. It is reasonable to require Pole Owners to provide electronic access to the 10 pole data elements within 1 year of the decision.

O R D E R

IT IS ORDERED that:

1. The *Track 1 Work Plans* filed by San Diego Gas & Electric Company, Southern California Edison Company, Pacific Gas and Electric Company, AT&T, and Frontier Communications of California are approved as modified in Ordering Paragraph 2.

2. The *Track 1 Work Plans* are modified as follows:

- (a) The five pole owners (Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas and Electric Company, Frontier Communications and AT&T) must each incorporate a data glossary into their respective data portals. The purpose of the data glossary is to identify and document the data fields provided in the data portal, including short description, data format, data field type, and other metadata that will enable users to understand and use the data. All portals shall include Data Glossaries and we require the pole owners shall make sure that wherever feasible, their terms in these glossaries mean the same thing. No terms in any of these Data Glossaries shall contradict terms as defined in the Commission's General Orders.
- (b) The five pole owners must convene a working group to reach a consensus recommendation for the data elements that will use common data definitions.
- (c) The 5 pole owners must reach agreement on the definitions of the terms in the data glossary, working in groups to determine what they currently define as the same and what they define differently.

Examples include:

Pole Loading: All Parties Agree it means ____ [Parties can reference GO 95.]

Height: Some Parties Agree it means ___, but PG&E says it means ___, and SDG&E says it means ___. Parties agree to it meaning ___ or will clearly define the term.

- (d) This task will continue as the Investigation moves into Track 2.
- (e) All 10 pole datapoints of pole data for jointly and solely-owned poles shall be provided through the Data Portals unless the datapoints are specifically allowed to be 'if available' AND are not available. Data for the ten data fields must be searchable and exportable as machine readable data and through the web-based interactive portal. Data for the 10 pole data elements shall include the following:
 - (i) Unique identifier of pole includes, at a minimum and by each service territory, a pole number and address (either street or some other easily identifiable address system) on a Geospatial map and should be included in the database.
 - (ii) Each of the five pole owners must have, at a minimum, a Geographic Information System accessible to attachers, pole owners, and Commission staff which includes the latitude/longitude coordinates, address (if available), and service territory for locating the poles.
 - (iii) High Fire Threat District tiers where the pole is located.
 - (iv) The poles' class, height, tree species, material circumference, and latest loading information.
 - (v) The year the pole was installed.
 - (vi) Joint pole ownership information including the name of joint owners and percentage of ownership of the pole.
 - (vii) Intrusive test data including the date of last intrusive test, type of test, results of the test, and

any corrective action that has been or will be taken in response to the test.

- (viii) The number and date of each attachment application, and pole loading information, if any.
- (ix) Notice of pending pole replacement or reinforcement including the reason for the replacement or reinforcement, the proposed scope of work, and the estimated date of completion.
- (x) Information on buddy poles, including an indication of whether the pole owner wishes to remove a buddy pole and the date of removal.
- (f) The five Pole Owners must convene a working group to develop a consensus recommendation for the method to be used for sharing or synchronizing data for the ten key data elements related to joint-owned poles with the other joint pole owner(s).
- (g) AT&T is required to implement an Electronic Access to geospatial Pole Data Portal by one year from the issuance of this decision, and Frontier is required to do so by two years from the date of this decision. This includes similar web-based data portals offered currently by SDG&E through TEAMS.
- (h) All 10 pole datapoints must be searchable by two years from the issuance of this decision via the pole owners Data Portals, including by pole number, latitude/longitude or Address location.
- (i) If poles in the Data Portals do not have locational and identifying information, this capability must be implemented in some form by two years from the date of this decision without exception.
- (j) The Data Portals shall allow for selecting and viewing multiple poles on a geospatial map using polygons and multi-pole selection capabilities.

- (k) The Data Portals shall display the 10 pole data points for selected poles and allow the information to be viewed and exportable as machine readable data for at least 10 poles by one year from the date of this decision and for at least 1,00 poles by two years from the date of this decision.

3. Within 60 days of this Decision, Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California are ordered to file and serve their *Track 1 Workplans* to demonstrate compliance with this Decision's ordered modifications by Tier 2 Advice Letters for review by the Energy Division (Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company) and by the Communications Division (AT&T and Frontier Communications of California).

4. Initial electronic access to the pole data of each Pacific Gas and Electric Company, Southern California Edison Company, San Diego Gas & Electric Company, AT&T and Frontier Communications of California to the newly expanded and/or created data portal shall be available within one year from the date of this decision.

5. The Commission's staff shall be given unrestricted access to each pole owner's data portal via web portal within one year from the date of this decision, with further options to be discussed in future Tracks of this Proceeding.

6. In the next track of this proceeding, the Commission will address providing party and interested third party access to pole loading information, claims of confidentiality, whether those confidentiality claims meet the requirements of General Order 66-D, whether additional showings must be made

to satisfy General Order 66-D, whether to require a link to a redacted version of the application, and what information may properly be redacted.

7. This proceeding remains open.

This order is effective today.

Dated _____, at San Francisco, California.