

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

**Communications Division  
Broadband, Video and Market Branch**

**RESOLUTION T- 17750  
December 16, 2021**

**RESOLUTION**

**RESOLUTION T-17750: Approves up to \$18,066,199 from the California Advanced Services Fund for the Broadband Infrastructure Grant Account applications of Plumas Sierra Telecommunications (U-7218-C) for the Long Valley-Spring Garden, Mohawk Valley, and Southern Lassen Projects in Plumas and Lassen Counties.**

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**I. SUMMARY**

This Resolution approves grant funding in the amount of up to \$18,066,199 from the California Advanced Services Fund (CASF) Broadband Infrastructure Grant Account (Infrastructure Account) for the grant applications of Plumas-Sierra Telecommunications (PST) for the Long Valley-Spring Garden (herein after Long Valley), Mohawk Valley, and Southern Lassen Projects. Collectively, these projects will serve 164 households.

The three PST projects approved are:

<b>Project</b>	<b>Households</b>	<b>Requested Amount</b>	<b>Approved Amount</b>
Long Valley	19	\$5,016,256	\$5,016,256
Mohawk Valley	7	\$1,941,754	\$1,941,754
Southern Lassen	138	\$11,108,189	\$11,108,189

**II. BACKGROUND**

The Infrastructure Account provides grant funding to Internet service providers to build or upgrade broadband infrastructure in areas that are unserved by existing broadband providers. The CASF program was initiated in 2008, after the program was first adopted by the California Public Utilities Commission (Commission) in Decision (D.) 07-12-054 and enacted into statute pursuant to Senate Bill (SB) 1193.

On October 15, 2017, Governor Brown signed Assembly Bill (AB) 1665 (Garcia)<sup>1</sup> into law. This legislation amended the statute governing the CASF program, Public Utilities Code § 281. The Commission issued D.18-12-018 adopting the programmatic changes to the CASF. Appendix 1 of D.18-12-018 sets forth the rules, application requirements and guidelines for the CASF Infrastructure Account.

The most recent Infrastructure Account grant application deadline was May 4, 2020.<sup>2</sup>

On June 29, 2020, Governor Newsom signed AB 82 into law, amending Public Utilities Code § 281 to authorize leveraging of CASF Infrastructure grant funding to supplement the costs of broadband infrastructure already funded, in whole or in part, by the federal Rural Digital Opportunity Fund (RDOF).<sup>3</sup> In an effort to effectively utilize both state and federal funding toward meeting the CASF program goals, the Commission has deferred project applications that include areas eligible to receive RDOF for consideration until after the results of the RDOF Phase I (Auction 904) have been published.<sup>4,5</sup>

On March 10, 2021, the Commission issued D. 21-03-006, modifying data submission requirements and requiring open access for CASF projects. Revised CASF program guidelines were set forth in Appendix A of D.21-03-006.

On July 20, 2021, Governor Newsom signed historic broadband legislation to help bridge the digital divide.<sup>6</sup> Among other things, SB 156, authored by the Committee on Budget and Fiscal Review instituted several changes to the CASF program. The bill changed the definition of “unserved area” to “an area for which there is no facility-based broadband provider offering at least one tier of broadband service at speeds of at least 25 mbps downstream, 3 mbps upstream...”<sup>7</sup> However, in the interests of

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<sup>1</sup> AB 1665 is codified at Public Utilities (Pub. Util.) Code § 281.

<sup>2</sup> The Commission extended the CASF Infrastructure application deadline from April 1 to May 4, 2020, and all subsequent deadlines are moved back by five weeks due to the COVID-19 public health emergency. *See* Executive Director Letter to CASF Distribution and Service Lists, Postponement of the 2020 CASF Infrastructure Application Deadlines, March 20, 2020.

<sup>3</sup> *See* Public Utilities Code § 281(b)(1)(B)(ii).

<sup>4</sup> *See* D.21-01-003, p. 23.

<sup>5</sup> *See* March 26, 2021 “Postponement of the Deadline for Action on Pending CASF Infrastructure Applications and the Deadline for Submitting 2021 CASF Infrastructure Applications” Letter to CASF Service and Distribution Lists, available at <https://www.cpuc.ca.gov/casf/>.

<sup>6</sup> <https://www.gov.ca.gov/2021/07/20/governor-newsom-signs-historic-broadband-legislation-to-help-bridge-digital-divide/>.

<sup>7</sup> *See* Pub. Util. Code Sec. 281(b)(1)(B)(ii)(I).

administrative efficiency and to ensure proper notice to project applicants, the Commission will use the standard of 6 mbps downstream and 1 mbps upstream to determine eligibility for funding for project applications submitted in 2020.

Further, SB 156 changed the requirements for the infrastructure that could be funded by the CASF program. Pursuant to Pub. Util. Code Sec. 281(f)(5), the Commission may only fund projects that "deploy infrastructure capable of providing broadband access at speeds of a minimum of 100 mbps downstream and 20 mbps upstream..." This is a clear legislative directive to the Commission, which the Commission must implement immediately. All infrastructure funded by the CASF program must be capable of providing broadband access at speeds of a minimum of 100 mbps downstream and 20 mbps upstream. In addition, the legislature added the requirement that each entity that receives CASF funding must report when it uses a licensed contractor or subcontractor with a contract in excess of \$25,000 for work funded by CASF and that the Commission must post this information on a monthly basis.<sup>8</sup>

Among other things, the broadband legislation also includes a \$3.25 billion statewide middle-mile plan to build, operate and maintain an open access, state-owned middle-mile network of high-capacity fiber lines that carry large amounts of data at higher speeds over longer distances between local networks.<sup>9</sup>

### III. APPLICANT REQUESTS AND NOTICE

On May 4, 2020, the Communications Division received 54 applications<sup>10</sup> for the CASF Infrastructure Account. On May 18, 2020, Staff posted the proposed project area map, census block groups (CBGs) and Zone Improvement Plan (ZIP) Codes for PST's Long Valley, Mohawk Valley and Southern Lassen Projects on the Commission's CASF

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<sup>8</sup> See Pub. Util. Code Sec. 281(1).

<sup>9</sup> <https://www.gov.ca.gov/2021/07/12/governor-newsom-legislative-leaders-announce-historic-broadband-budget-bill/>; SB 156, Chapter 112, available at [https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill\\_id=202120220SB156](https://leginfo.legislature.ca.gov/faces/billNavClient.xhtml?bill_id=202120220SB156).

<sup>10</sup> See <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/california-advanced-services-fund/casf-infrastructure-project-summaries> for project summaries and <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/california-advanced-services-fund/casf-infrastructure-grant/casf-infrastructure-approved-projects> for approved projects.

webpage<sup>11</sup> under “CASF Application Project Summaries” and sent notice regarding the project to the CASF Distribution List.<sup>12</sup>

#### IV. CONDITIONAL APPROVAL OF MIDDLE MILE COMPONENTS

Through SB 156, the legislature developed a statewide strategy to build, operate and maintain an open access, state-owned middle-mile network of high-capacity fiber lines that carry large amounts of data at higher speeds over longer distances between local networks. The middle-mile component of projects funded by the CASF Program should complement this statewide strategy. Thus, the CASF grant award for the middle-mile components of the Long Valley, Mohawk Valley and Southern Lassen Projects are conditioned on whether the Director of the California Department of Technology (CDT) finds that the middle-mile components of the projects complement the California middle-mile initiative described in SB 156.

This approval process should take place within three months from the approval of this Resolution. However, the time allowed for the CDT Director or designee to approve the middle-mile components of the Long Valley, Mohawk Valley and Southern Lassen Projects each may be extended an additional three months, or longer, by mutual agreement between the CDT Director or designee and PST. PST will send written notice of time extensions, if any, to the CD Director.

If the CDT Director or designee notifies the CD Director in writing that the CDT Director or designee approves the middle-mile component of the project, the CD Director shall, in writing, approve release of CASF funding for the middle-mile component of the project. At that time Staff may proceed with project funding activities. If the CDT Director or designee does not approve the middle-mile component of the project, CASF Program funding for the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen Projects is automatically rescinded on the date that the CD Director receives written notice that CDT did not approve the middle-mile component.

The CASF Program operates more efficiently if it is clear which projects actually are being deployed, so that funds are not encumbered for projects that will not be built. Thus, PST has 90 days from the date that the CDT Director or designee does not

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<sup>11</sup> See <https://www.cpuc.ca.gov/industries-and-topics/internet-and-phone/california-advanced-services-fund/casf-infrastructure-grant>.

<sup>12</sup> [https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc\\_public\\_website/content/utilities\\_and\\_industries/communications\\_-\\_telecommunications\\_and\\_broadband/service\\_provider\\_information/casfdistributionlist.xlsx](https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpuc_public_website/content/utilities_and_industries/communications_-_telecommunications_and_broadband/service_provider_information/casfdistributionlist.xlsx)

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approve the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen Projects to inform the CD Director by a written letter that it still plans to deploy the last-mile components of the projects, even though it will not receive any funding for the middle-mile components. The written letter must include the following:

- Identifying information for the project(s) such as the grantee organization name, project name, project address, any identifying project number, the date of the award, and the grant amount.
- A statement that PST will deploy the last-mile component of the project(s) and comply with all the guidelines, requirements, and conditions associated with the grant of the CASF funds.

## V. APPLICATION REVIEW AND EVALUATION

Staff reviewed all applications according to the guidelines, requirements, and evaluation adopted in D.21-03-006, as follows:

- I. Project Area Eligibility
- II. Minimum Performance Criteria
- III. Funding Determination
- IV. Safety and Community Support

Staff's review and evaluation of the applications is summarized below.

### **Applicant**

PST is an experienced Internet service provider that operates terrestrial and wireless networks in Plumas and Eastern Sierra counties. PST, a CPCN holder, is a wholly owned subsidiary of Plumas-Sierra Rural Electric Cooperative (PSREC). Founded in 1937, PSREC is a member-owned electric distribution utility providing electrical power and related services to over 7,500 member/owners in Plumas, Lassen, and Sierra counties in California, and portions of Washoe County in Nevada. In 1987, PSREC management and the board of directors formed its PST subsidiary to offer affordable telecommunication and internet services in PSREC's electrical service areas where communications were not previously available. Since the mid-1990s, PST has offered satellite television, dial-up Internet access, satellite high-speed broadband, Wi-Fi Internet access, and wireless cellular telephone services in several areas within its service territory.

**A. Long Valley – Spring Garden Mid-Mile / Last-Mile Broadband Project**

On May 4, 2020, PST submitted a CASF Infrastructure application requesting 100 percent funding of \$4,118,255 to deploy middle and last-mile fiber optic wireline technology to the communities of Long Valley and Spring Garden in Plumas County. The originally proposed project would enable broadband access at speeds of up to 1 Gbps download and 1 Gbps upload to 31 CASF-eligible households.

**Project Area Eligibility**

No provider filed a valid “right-of-first refusal” for PST’s Long Valley Project area by January 15, 2020.<sup>13</sup> The proposed project areas include census blocks identified by the Federal Communications Commission’s (FCC) Connect America Fund Phase II program awarded to AT&T.<sup>14,15</sup> There are no existing facilities-based wireline or fixed wireless broadband service providers in the project area. According to the latest 2019 California Interactive Broadband Map,<sup>16</sup> the area is unserved; only dial-up service is available.<sup>17</sup>

On September 10, 2020, PST revised its application due to an accounting error. On February 19, 2021, based on the successful challenge of three census blocks, Staff directed PST to remove the challenged blocks. On March 5, 2021, PST submitted a revised application which removed the challenged blocks, expanded the project area, and increased its funding request. The expanded project summary and map were posted for challenge on the Commission’s website on March 12, 2021. On May 20, 2021, PST increased its funding request at the recommendation of the Commission’s Energy Division to accurately reflect California Environmental Quality Act (CEQA) review, studies, and special use permits costs.

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<sup>13</sup> Pub. Util. Code § 281(f)(4)(A)(ii), repealed in 2021, prohibited the Commission from awarding CASF funding to a project applicant if an existing facility-based broadband provider demonstrated, in response to the Commission’s annual offer, that it would deploy broadband or upgrade existing broadband service throughout the proposed project area within 180 days.

<sup>14</sup> Pub. Util. Code § 281(f)(5)(C)(i), repealed in 2021, prohibited the Commission, prior to July 1, 2020, from awarding CASF funding to a project applicant where an existing facility-based broadband provider had accepted federal funds for broadband deployment from Phase II of the Connect America Fund.

<sup>15</sup> CAF II funding awarded to AT&T as part of CAF II Connect America Model version 4.3.

<sup>16</sup> With data as of December 31, 2019.

<sup>17</sup> Dial-up provides speed less than 200 Kbps downstream and 200 Kbps upstream.

On June 25, 2021, Staff requested that PST revise its original Long Valley Project application<sup>18</sup> to remove six census blocks shown as served on the 2019 California Interactive Broadband Map. On July 12, 2021, PST provided its revised application and funding request of \$5,016,256. On July 30, 2021, PST submitted an updated application, as the July 12, 2021, version reflected data based on census block groups and not census blocks as required by CASF guidelines. The revised Long Valley Project Summary was posted on the Commission's website on August 6, 2021. See Table 1 below for the original and final Long Valley Project revisions.

**Table 1: Long Valley Project Revisions**

<b>Submission Dates</b>	<b>Census Blocks</b>	<b>Unserved Households</b>	<b>Funding Requested</b>
05/04/2020	18	31	\$4,118,255
07/30/2021	15	19	\$5,016,256

Staff finds the grant funding request reasonable even with the reduction of households from 31 to 19 because 93% of the project costs are attributed to middle-mile infrastructure that is indispensable to provide access to the last-mile fiber-to-the-home (FTTH) service. Additionally, PST updated its budget to reflect increased pole attachment and permitting costs associated with the rising cost of deploying broadband infrastructure.

### **Middle-Mile Infrastructure**

PST proposes adding approximately 22.35 miles of middle-mile fiber to its network and upgrading equipment at its existing facilities to provide last-mile FTTH service. PST proposes to extend its existing middle-mile infrastructure installed along the Highway 70 corridor. Currently, there is no middle-mile infrastructure along the project area; this infrastructure is indispensable to providing last-mile service. Therefore, Staff determined the middle-mile infrastructure is necessary to provide last-mile service to the proposed communities and thus eligible for CASF funding, pursuant to Pub. Util. Code § 281(b)(2)(A). This middle-mile infrastructure must be offered at reasonable rates to other carriers.<sup>19</sup>

Table 2 below, summarizes PST's middle-mile and last-mile proposed project costs for its May 4, 2020, and July 12, 2021 applications for the Long Valley Project.

<sup>18</sup> May 4, 2020 application.

<sup>19</sup> Pursuant to the requirements of Decision 21-03-006

**Table 2: Long Valley Project Funding Requests**

Submission Date	Middle-Mile Funding Request	Last-Mile Funding Request	Total Funding Request
05/04/2020	\$3,926,511	\$191,744	\$4,118,255
07/12/2021	\$4,661,052	\$355,205	\$5,016,256

i. Challenges

Pursuant to Public Util. Code Sec. 281(f)(8) and as required by D.18-12-018, the Commission provided an opportunity for entities to challenge the applications. Challenges were due on June 8, 2020.

Digital Path Inc. (Digital Path) and Frontier Communications of California, Inc. (Frontier) filed timely challenges. However, the challenges were based on the 2018 California Interactive Broadband Map (with data as of December 31, 2018) and is a year behind the updated 2019 California Interactive Broadband Map (with data as of December 31, 2019).

The Commission updates its California Interactive Broadband Map once a year after collecting broadband deployment data from providers and validating that data using a number of resources, including technical information such as loop length, consumer feedback and location of subscribers. The latest map is based on December 2019 data and was published in December 2020. The latest map should reflect (or should have reflected) the challenges claimed by the challenger if the provider submitted correct broadband data to the Commission for the annual data submission. Therefore, the challenges are denied since the latest 2019 California Interactive Broadband Map shows the project area is eligible.

ii. RDOF

The Long Valley project area does not include any RDOF-eligible areas.<sup>20</sup>

**Minimum Performance Criteria**

Staff reviewed PST's application and determined the Long Valley Project meets the minimum performance criteria pursuant to D.21-03-006, Appendix A, Section 6, as summarized in Table 3.

Pursuant to the CASF Program rules, project construction must be completed, following receipt of permits, within 12 months if the project is categorically exempt from CEQA,

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<sup>20</sup>See The California RDOF map at <https://www.broadbandmap.ca.gov/federal/funding/>.



and within 24 months for all other projects. However, the Long Valley Project may need additional time to ensure that the CDT Director or designee approves the middle-mile component. As additional time is needed to ensure that the middle-mile component of CASF projects complement California's initiatives for broadband deployment, a waiver in the CASF Program rules regarding project completion is required. Thus, the Long Valley Project must be completed in 27 months. If the time necessary for the CDT Director or designee to approve the middle-mile component is extended by mutual agreement between the CDT Director or designee and PST, Staff is authorized to also extend the time for completion of the project by the period of time specified by the CDT Director or designee.

**Table 3: Minimum Performance Criteria**

	<b>CASF Performance Criteria</b>	<b>Proposed Project</b>
<b>Project Completion</b>	CEQA-exempt projects must be completed within 15 months (unless further extended by CD); and all other projects shall be completed within 27 months (unless further extended by CD), to allow for CDT approval of middle-mile component	12 months <sup>21</sup> (Non-CEQA Exempt)
<b>Pricing</b>	Prices committed for two years after completion of the project	2-years
<b>Speed</b>	At least 100/20 Mbps <sup>22</sup>	1 Gbps / 1 Gbps
<b>Latency</b>	Maximum of 100 ms of latency	< 100 ms
<b>Data Caps</b>	Minimum of 190 GBs per month	No data cap
<b>Affordability</b>	Must offer low-income plan	\$15 monthly

### **Project Completion and CEQA**

PST's Long Valley Project is subject to California Environmental Quality Act (CEQA) review and the project must be completed within 27 months from the start date (whereby PST has secured CEQA approval from the Commission and all required permits).<sup>23</sup>

### **Pricing, Speed, Latency, Data Caps, and Affordability**

<sup>21</sup> For projects that contain a middle-mile component, PST may request an extension of time to allow for CDT approval of middle-mile components. However, CEQA exempt projects shall be completed within 15 months and all other projects shall be completed within 27 months, unless the time is further extended by the Director of CD.

<sup>22</sup> SB 156, enacted on July 20, 2021 and effective immediately, increased the speed requirements for CASF projects to 100 Mbps download and 20 Mbps upload. *See* Pub. Util. Code Sec. 281(f)(5).

<sup>23</sup> *See* Appendix A for details of CEQA compliance requirement.

PST commits to residential and low-income broadband pricing plans, as summarized in Table 4 and Table 5, for two years after completion of the project. PST will waive the activation and installation fees for two years from completion of the project and will charge \$99 thereafter. Moreover, PST will offer a broadband service plan to low-income customers at \$15 monthly. PST's service offerings are for broadband access only and do not include interconnected voice services.

**Table 4: PST's Broadband Pricing Plan**

Download Speed	Upload Speed	Monthly Price
15 Mbps	5 Mbps	\$65
20 Mbps	5 Mbps	\$75
25 Mbps	10 Mbps	\$85
50 Mbps	10 Mbps	\$95
100 Mbps	20 Mbps	\$109

**Table 5: PST's Broadband Low-Income Pricing Plans**

Download Speed	Upload Speed	Monthly Price
10 Mbps	1 Mbps	\$15
15 Mbps	5 Mbps	\$25
20 Mbps	5 Mbps	\$35

The proposed speed offerings (up to 100 Mbps download and up to 20 Mbps upload) meet the 100/20 minimum performance requirement. This project can provide Internet service with speeds of up to 1 Gbps downstream and 1 Gbps upstream, upon request and at specific pricing. Broadband service will be available to residential customers, anchor institutions and small businesses.

### **Funding Determination**

PST is eligible to receive 100 percent funding to cover the cost of its Long Valley Project. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(11) and CASF program rules adopted in D.21-03-006, Appendix A. Table 6, below, details Staff's funding level determination for the Long Valley Project.

**Table 6: Criteria for Project Funding Level for Long Valley Project**

<b>Funding Criteria</b>	<b>Proposed Project</b>
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (up to 40%)	40%
Low Income – (up to 40%) <ul style="list-style-type: none"><li>• Median Household Income for community is less than CARE standard for family of 4, which is currently \$53,000 (30%)<sup>24</sup></li><li>• Applicant serves low-income customers for no more than \$15/month (10%)</li></ul>	30%  10%
Others: PU Code § 281 (f)(11) Criteria – (up to 20%) <ul style="list-style-type: none"><li>• Inaccessible Location (10%)</li><li>• Uses Existing Infrastructure (10%)</li><li>• Makes a Significant Contribution to the Program Goal (10%)</li></ul>	10% 10% 10%
<b>Total Funding Level</b>	<b>100%</b> <sup>25</sup>

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified Long Valley Project area meets all the eligibility criteria, as previously described in the Project Area Eligibility section.

**Service Level Preference qualifies for an additional 40 percent funding.** According to the latest 2019 California Interactive Broadband Map, Staff confirmed all the proposed project areas are unserved by wireline or fixed wireless broadband service and are therefore eligible for an additional 40 percent funding.

**Low Income Consideration qualifies for an additional 40 percent funding.** The median income of the census block groups in the proposed project area is \$50,163, and thus qualifies for an additional 30 percent funding. PST commits to offer broadband service for eligible low-income subscribers at \$15/month, which meets the criteria for an additional 10 percent funding.

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<sup>24</sup> <https://www.cpuc.ca.gov/care/>.

<sup>25</sup> D.21-03-006, Summary of Funding Criteria - Maximum funding level is 100 percent.

**Other Factor Considerations qualify for an additional 20 percent funding.** The Long Valley Project meets all three criteria defined in Pub. Util. Code § 281(f)(11) and qualifies for the additional 20 percent funding.

**The proposed project meets the inaccessible location criteria for an additional 10 percent funding.** The project areas are located in the Sierra Valley region of the remote northern Sierra Nevada mountains. The project areas are in difficult terrain and relatively inaccessible to advanced broadband communications infrastructure. Additionally, the proposed project areas are in rural census blocks as defined by the U.S. Census.

**The proposed project is eligible for an additional 10 percent funding for use of existing infrastructure.** PST estimates the project to be 89 percent overhead installation and proposes to use existing utility poles for deployment of broadband service.

**The proposed project makes a significant contribution to the program goal and is eligible for an additional 10 percent funding.** The Long Valley Project area is located within the Northeast California Connect Consortium region, which is at 89 percent served,<sup>26</sup> and below the CASF program goal. Therefore, this project will make a significant contribution to the program goal.

### **Safety and Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. The Long Valley Project will provide enhanced communications services that will promote public safety capabilities in an area located in a Tier 2 Fire-Threat District.<sup>27</sup>

The Long Valley Project is greatly supported by the community to increase opportunities for individuals to attain education, skills and training needed to obtain employment and contribute to economic and workforce development, to improve health care, education, public safety, and quality of life for community members. A broad range of elected officials, educational institutions and community stakeholders including: United States House Representative Doug LaMalfa (District 1), California Senator Brian Dahle (District 1), California Assemblywomen Megan Dahle (District 1),

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<sup>26</sup> See 2020 Annual Report on the CASF Program, California Public Utilities Commission, Issued April 2021, page 14, Table 7: Remaining Unserved Households in Each Consortia Region.

<sup>27</sup> See <https://ia.cpuc.ca.gov/firemap/>

Plumas County Board of Supervisors, Lassen County Board of Supervisors, Plumas County Office of Education/United School District, Feather River College, Lassen County Chamber of Commerce, Plumas County Public Health Agency, East Sierra Valley Chamber of Commerce, Mohawk Valley Stewardship Council and the Sierra Nevada Journeys sent letters of support for the Long Valley Project.

### **B. Mohawk Valley Mid-Mile / Last-Mile Broadband Project**

On May 4, 2020, PST submitted a CASF Infrastructure application requesting 100 percent funding of \$2,271,039 to deploy middle and last-mile fiber optic wireline technology to the Mohawk Valley area of Plumas County. The originally proposed project would enable broadband access at speeds of up to 1 Gbps download and 1 Gbps upload to 23 CASF-eligible households.

#### **Project Area Eligibility**

No provider filed a valid “right-of-first refusal” for PST’s Mohawk Valley Project area by January 15, 2020,<sup>28</sup> nor do the proposed project areas include census blocks identified by the Federal Communications Commission’s (FCC) Connect America Fund Phase II program.<sup>29</sup> There are no existing facilities-based wireline or fixed wireless broadband service providers in the project area. According to the latest 2019 California Interactive Broadband Map,<sup>30</sup> the area is unserved; only dial-up service is available.<sup>31</sup>

On September 10, 2020, PST revised its application due to an accounting error. On February 19, 2021, based on the successful challenge of four census blocks, PST removed the challenged blocks. On March 5, 2021, PST submitted a revised application which was posted on the Commission’s website on March 12, 2021. On May 21, 2021, PST decreased its funding request.

On June 25, 2021, Staff requested that PST amend its original Mohawk Valley Project application<sup>32</sup> to remove six census blocks shown as served on the latest California

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<sup>28</sup> Pub. Util. Code § 281(f)(4)(A)(ii), repealed in 2021, prohibited the Commission from awarding CASF funding to a project applicant if an existing facility-based broadband provider demonstrated, in response to the Commission’s annual offer, that it would deploy broadband or upgrade existing broadband service throughout the proposed project area within 180 days.

<sup>29</sup> Pub. Util. Code § 281(f)(5)(C)(i), repealed in 2021, prohibited the Commission, prior to July 1, 2020, from awarding CASF funding to a project applicant where an existing facility-based broadband provider had accepted federal funds for broadband deployment from Phase II of the Connect America Fund.

<sup>30</sup> With data as of December 31, 2019.

<sup>31</sup> Dial-up provides speed less than 200 Kbps downstream and 200 Kbps upstream.

<sup>32</sup> May 4, 2020 Application.

Interactive Broadband Map. On July 12, 2021, PST provided its revised application and decreased its funding request to \$1,941,754. On July 30, 2021, PST submitted an updated application, as the July 12, 2021 version reflected data based on census block groups and not census blocks as required by CASF guidelines. See Table 7 below for the original and final Mohawk Valley Project revisions.

**Table 7: PST Mohawk Valley Project Revisions**

Submission Date	Census Blocks	Unserved Households	Funding Requested
05/04/2020	11	23	\$2,271,039
07/30/2021	5	7	\$1,941,754

Staff finds the grant funding request reasonable even with the reduction of households from 23 to 7 because 87% of the project costs are attributed to middle-mile infrastructure that is indispensable to provide access to the last-mile fiber-to-the-home (FTTH) service.

### **Middle-Mile Infrastructure**

PST proposes adding approximately 10.32 miles of middle-mile fiber to its network and upgrading equipment at its existing facilities to provide last-mile FTTH service. PST proposes to extend its existing middle-mile infrastructure installed along the Highway 70 corridor. Currently, there is no middle-mile infrastructure along the project area: this infrastructure is indispensable to providing last-mile service. Therefore, Staff determined the middle-mile infrastructure is necessary to provide last-mile service to the proposed communities and thus eligible for CASF funding, pursuant to Pub. Util. Code § 281(b)(2)(A). This middle-mile infrastructure must be offered at reasonable rates to other carriers.<sup>33</sup>

Table 8 below, shows PST's middle-mile and last-mile proposed project costs for its May 4, 2020, and July 12, 2021 applications for the Mohawk Valley Project.

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<sup>33</sup> Pursuant to the requirements of Decision 21-03-006

**Table 8: Mohawk Valley Project Funding Requests**

Submission Date	Middle-Mile Funding Request	Last-Mile Funding Request	Total Funding Request
05/04/2020	\$2,062,888	\$208,151	\$2,271,039
07/12/2021	\$1,684,499	\$257,255	\$1,941,754

i. Challenges

Pursuant to Public Util. Code Sec. 281(f)(8) and as required by D.18-12-018, the Commission provided an opportunity for entities to challenge the applications. Challenges were due on June 8, 2020.

Digital Path Inc. (Digital Path) filed a timely challenge. However, the challenge was based on the 2018 California Interactive Broadband Map (with data as of December 31, 2018) and is a year behind the updated 2019 California Interactive Broadband Map (with data as of December 31, 2019).

As explained above, the challenge is denied since the latest 2019 California Interactive Broadband Map shows the project area is eligible.

ii. RDOF

The Mohawk Valley project area does not include any RDOF-eligible areas.<sup>34</sup>

**Minimum Performance Criteria**

Staff reviewed PST's application and determined the Mohawk Valley Project meets the minimum performance criteria pursuant to D.21-03-006, Appendix A, Section 6, as summarized in Table 9.

Pursuant to the CASF Program rules, project construction must be completed, following receipt of permits, within 12 months if the project is categorically exempt from CEQA, and within 24 months for all other projects. However, the Mohawk Valley may need additional time to ensure that the CDT Director or designee approves the middle-mile component. As additional time is needed to ensure that the middle-mile component of CASF projects complement California's initiatives for broadband deployment, a waiver in the CASF Program rules regarding project completion is required. Thus, the Mohawk Valley project must be completed in 27 months. If the time necessary for the CDT Director or designee to approve the middle-mile component is extended by

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<sup>34</sup> See The California RDOF map at <https://www.broadbandmap.ca.gov/federal/funding/>.

mutual agreement between the CDT Director or designee and PST, Staff is authorized to also extend the time for completion of the project by the period of time specified by the CDT Director or designee.

**Table 9: Minimum Performance Criteria**

	<b>CASF Performance Criteria</b>	<b>Proposed Project</b>
<b>Project Completion</b>	CEQA-exempt projects must be completed within 15 months (unless further extended by CD); and all other projects shall be completed within 27 months (unless further extended by CD), to allow for CDT approval of middle-mile component.	9 months <sup>35</sup> (Non CEQA Exempt)
<b>Pricing</b>	Prices committed for two years after completion of the project	2-years
<b>Speed</b>	At least 100/20 Mbps <sup>36</sup>	1 Gbps / 1 Gbps
<b>Latency</b>	Maximum of 100 ms of latency	< 100 ms
<b>Data Caps</b>	Minimum of 190 GBs per month	No data cap
<b>Affordability</b>	Must offer low-income plan	\$15 monthly

### **Project Completion and CEQA**

PST's Mohawk Valley Project is subject to California Environmental Quality Act (CEQA) review and the project must be completed within 27 months from the start date (whereby PST has secured CEQA approval from the Commission and all required permits).<sup>37</sup>

### **Pricing, Speed, Latency, Data Caps, and Affordability**

PST commits to residential and low-income broadband pricing plans, as summarized in Table 10 and Table 11, for two years after completion of the project. PST will waive the activation and installation fees for two years from completion of the project and will charge \$99 thereafter. Moreover, PST will offer a broadband service plan to low-income customers at \$15 monthly. PST's service offerings are for broadband access only and do not include interconnected voice services.

<sup>35</sup> For projects that contain a middle-mile component, PST may request an extension of time to allow for CDT approval of middle-mile components. However, CEQA exempt projects shall be completed within 15 months and all other projects shall be completed within 27 months, unless the time is further extended by the Director of CD.

<sup>36</sup> SB 156, enacted on July 20, 2021 and effective immediately, increased the speed requirements for CASF projects to 100 Mbps download and 20 Mbps upload. *See* Pub. Util. Code Sec. 281(f)(5).

<sup>37</sup> *See* Appendix A for details of CEQA compliance requirement.



**Table 10: PST's Broadband Pricing Plan**

Download Speed	Upload Speed	Monthly Price
15 Mbps	5 Mbps	\$65
20 Mbps	5 Mbps	\$75
25 Mbps	10 Mbps	\$85
50 Mbps	10 Mbps	\$95
100 Mbps	20 Mbps	\$109

**Table 11: PST's Broadband Low-Income Pricing Plans**

Download Speed	Upload Speed	Monthly Price
10 Mbps	1 Mbps	\$15
15 Mbps	5 Mbps	\$25
20 Mbps	5 Mbps	\$35

The proposed speed offerings (up to 100 Mbps download and up to 20 Mbps upload) meet the 100/20 minimum performance requirement. This project can provide Internet service with speeds of up to 1 Gbps downstream and 1 Gbps upstream, upon request and at specific pricing. Broadband service will be available to residential customers, anchor institutions and small businesses.

### **Funding Determination**

PST is eligible to receive 100 percent funding to cover the cost of its Mohawk Valley Project. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(11) and CASF program rules adopted in D.21-03-006, Appendix A. Table 12, below, details Staff's funding level determination for the Mohawk Valley Project.

**Table 12: Criteria for Project Funding Level for Mohawk Valley**

Funding Criteria	Proposed Project
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (up to 40%)	40%
Low Income – (up to 40%) Median Household Income for community is less than CARE standard for family of 4, which is currently \$53,000 (30%) <sup>38</sup>	0%

<sup>38</sup> <https://www.cpuc.ca.gov/care/>

<ul style="list-style-type: none"> <li>Applicant serves low-income customers for no more than \$15/month (10%)</li> </ul>	10%
Others: PU Code § 281 (f)(11) Criteria – (up to 20%) <ul style="list-style-type: none"> <li>Inaccessible Location (10%)</li> <li>Uses Existing Infrastructure (10%)</li> <li>Makes a Significant Contribution to the Program Goal (10%)</li> </ul>	10% 10% 10%
<b>Total Funding Level</b>	<b>100%<sup>39</sup></b>

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified Mohawk Valley Project area meets all the eligibility criteria, as previously described in the Project Area Eligibility section.

**Service Level Preference qualifies for an additional 40 percent funding.** According to the latest California Interactive Broadband Map, Staff confirmed all the proposed project areas are unserved by wireline or fixed wireless broadband service and are therefore eligible for an additional 40 percent funding.

**Low Income Consideration does not qualify for additional 10 percent funding.** The median income of the census block group in the proposed project area is \$64,560, which does not meet the CASF low-income eligibility threshold. PST commits to offer broadband service for eligible low-income subscribers at \$15/month, which meets the criteria for an additional 10 percent funding.

**Other Factor Considerations qualify for an additional 20 percent funding.** The Mohawk Valley Project meets all three criteria defined in Pub. Util. Code § 281(f)(11) and qualifies for the additional 20 percent funding.

**The proposed project meets the inaccessible location criteria for an additional 10 percent funding.** The project areas are located in the Sierra Valley region of the remote northern Sierra Nevada mountains. The project areas are in difficult terrain and relatively inaccessible to advanced broadband communications infrastructure. Additionally, the proposed project areas are in rural census blocks as defined by the U.S. Census.

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<sup>39</sup> D.21-03-006, Summary of Funding Criteria - Maximum funding level is 100 percent.

**The proposed project is eligible for an additional 10 percent funding for use of existing infrastructure.** PST estimates the project to be 80 percent overhead installation and proposes to use existing utility poles for deployment of broadband service.

**The proposed project makes a significant contribution to the program goal and is eligible for an additional 10 percent funding.** The Mohawk Valley Project area is located within the Northeast California Connect Consortium region, which is at 89 percent served,<sup>40</sup> and below the CASF program goal. Therefore, this project will make a significant contribution to the program goal.

### **Safety and Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. The Mohawk Valley Project will provide enhanced communications services that will promote public safety capabilities in an area located in a Tier 2 Fire-Threat District.<sup>41</sup>

The Mohawk Valley Project is supported by the community to increase opportunities for individuals to attain education, skills and training needed to obtain employment and contribute to economic and workforce development, to improve health care, education, public safety, and quality of life for community members. A broad range of elected officials, educational institutions and community stakeholders including: United States House Representative Doug LaMalfa (District 1), California Senator Brian Dahle (District 1), California Assemblywomen Megan Dahle (District 1), Plumas County Board of Supervisors, Lassen County Board of Supervisors, Plumas County Office of Education/United School District, Feather River College, Lassen County Chamber of Commerce, Plumas County Public Health Agency, East Sierra Valley Chamber of Commerce, Mohawk Valley Stewardship Council, and the Sierra Nevada Journeys sent letters of support for the Mohawk Valley Project.

### **C. Southern Lassen Mid-Mile / Last-Mile Broadband Project**

On May 4, 2020, PST submitted a CASF Infrastructure application requesting 100 percent funding of \$13,630,662 to deploy middle and last-mile fiber optic wireline technology to the Southern Lassen area of Lassen County. The originally proposed

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<sup>40</sup> See 2020 Annual Report on the CASF Program, California Public Utilities Commission, Issued April 2021, page 14, Table 7: Remaining Unserved Households in Each Consortia Region.

<sup>41</sup> See <https://ia.cpuc.ca.gov/firemap/>

project would enable broadband access at speeds of up to 1 Gbps download and 1 Gbps upload to 778 CASF-eligible households.

### **Project Area Eligibility**

No provider filed a valid “right-of-first refusal” for PST’s Southern Lassen Project area by January 15, 2020.<sup>42</sup> The proposed project areas include census blocks identified by the Federal Communications Commission’s (FCC) Connect America Fund Phase II program awarded to AT&T, Frontier, and California Internet L.P. dba GeoLinks.<sup>43,44</sup> There are no existing facilities-based wireline or fixed wireless broadband service providers in the project area. According to the latest 2019 California Interactive Broadband Map,<sup>45</sup> the area is unserved; only dial-up service is available.<sup>46</sup>

On September 10, 2020, PST revised its application due to an accounting error. On June 25, 2021, Staff requested that PST remove 60 census blocks shown as served on the 2019 California Interactive Broadband Map. On July 12, 2021, PST revised its application and decreased funding to \$11,108,189. On July 30, 2021, PST submitted an updated application as the July 12, 2021 version reflected data based on census block groups and not census blocks as required by CASF guidelines. The revised Southern Lassen Project Summary was posted on the Commission’s webpage on August 6, 2021. See Table 13 below for the original and final Southern Lassen Project revisions.

**Table 13: Southern Lassen Project Revisions**

Submission Date	Census Blocks	Unserved Households	Funding Requested
05/04/2020	109	778	\$13,630,662
07/30/2021	49	138	\$11,108,189

<sup>42</sup> Pub. Util. Code § 281(f)(4)(A)(ii), repealed in 2021, prohibited the Commission from awarding CASF funding to a project applicant if an existing facility-based broadband provider demonstrated, in response to the Commission’s annual offer, that it would deploy broadband or upgrade existing broadband service throughout the proposed project area within 180 days.

<sup>43</sup> Pub. Util. Code § 281(f)(5)(C)(i), repealed in 2021, prohibited the Commission, prior to July 1, 2020, from awarding CASF funding to a project applicant where an existing facility-based broadband provider had accepted federal funds for broadband deployment from Phase II of the Connect America Fund.

<sup>44</sup> CAF II funds awarded to AT&T and Frontier as part of CAF II Connect America Cost Model version 4.3; and GeoLinks as part of CAF II Auction 903.

<sup>45</sup> With data as of December 31, 2019.

<sup>46</sup> Dial-up provides speed less than 200 Kbps downstream and 200 Kbps upstream.

Staff finds the grant funding request reasonable even with the reduction of households from 778<sup>47</sup> to 138 because 95% of the project costs are attributed to middle-mile infrastructure that is indispensable to provide access to the last-mile fiber-to-the-home (FTTH) service.

### **Middle-Mile Infrastructure**

PST proposes adding approximately 79.54 miles of middle-mile fiber to its network and upgrading equipment at its existing facilities to provide last-mile FTTH service. PST proposes to extend its existing middle-mile infrastructure installed along the Highway 395 corridor (previously funded with ARRA and CASF grants) to deliver last-mile service. Currently, there is no middle-mile infrastructure along the project area and PST is unable to deliver last-mile service without constructing additional infrastructure. Therefore, Staff determined the middle-mile infrastructure is necessary to serve the proposed communities and thus eligible for CASF funding, pursuant to Pub. Util. Code § 281(b)(2)(A). This middle-mile infrastructure must be offered at reasonable rates to other carriers.<sup>48</sup>

Table 14 below, shows PST's middle-mile and last-mile proposed project costs for its May 4, 2020, and July 12, 2021 Southern Lassen Project applications.

**Table 14: Southern Lassen Project Funding Requests**

Submission Date	Middle-Mile Funding Request	Last-Mile Funding Request	Total Funding Request
05/04/2020	\$12,851,684	\$778,978	\$13,630,662
07/12/2021	\$10,586,935	\$521,254	\$11,108,189

#### **i. Challenges**

Pursuant to Public Util. Code Sec. 281(f)(8) and as required by D.18-12-018, the Commission provided an opportunity for entities to challenge the applications. Challenges were due on June 8, 2020.

During the challenge period, GeoLinks submitted a letter requesting that Staff uphold AB 1665 restrictions on the approval of CASF Infrastructure grants for projects in census blocks where an existing facilities-based broadband provider has accepted federal CAF II funds for broadband deployment.<sup>49</sup> GeoLinks did not send a Right of First Refusal

<sup>47</sup> Based on the California Interactive Broadband Map there are 749 eligible households in the project area and not the 778 noted in the Southern Lassen CASF application.

<sup>48</sup> Pursuant to the requirements of Decision 21-03-006.

<sup>49</sup> See AB 1665, previously codified at Public Utilities Code § 281(f)(5)(c).

letter (ROFR)<sup>50</sup> for the project area nor notify the Commission before July 1, 2020 that it had begun or completed its CAF II deployment in the census blocks contained in PST's Southern Lassen application.<sup>51</sup> Furthermore, AB 1665's prohibitions against leveraging CASF and CAF II funds on the same project have lapsed, pursuant to a sunset provision.<sup>52</sup> For these reasons, Staff determined that the CAF II census blocks within PST's Southern Lassen Project area are eligible for CASF grant funding.

Digital Path Inc. (Digital Path) and Frontier filed timely challenges. However, the challenges were based on the 2018 California Interactive Broadband Map (with data as of December 31, 2018) and are a year behind the updated 2019 California Interactive Broadband Map (with data as of December 31, 2019).

As explained above, the challenges are denied since the latest 2019 California Interactive Broadband Map shows the project area is eligible.

ii. RDOF

While some portions of the Southern Lassen Project overlap with areas for which California Internet, L.P. dba GeoLinks has RDOF eligibility, GeoLinks has not yet received Eligible Telecommunications Carrier (ETC) status in these areas. Staff did not remove the RDOF-eligible areas from this project.

**Minimum Performance Criteria**

Staff reviewed PST's application and determined the Southern Lassen Project meets the minimum performance criteria pursuant to D.21-03-006, Appendix A, Section 6, as summarized in Table 15.

Pursuant to the CASF Program rules, project construction must be completed, following receipt of permits, within 12 months if the project is categorically exempt from CEQA, and within 24 months for all other projects. However, the Southern Lassen Project may need additional time to ensure that the CDT Director or designee approves the middle-

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<sup>50</sup> Pub. Util. Code § 281(f)(4)(A)(ii), prior to its repeal in 2021, prohibited the Commission from awarding CASF funding to a project applicant if an existing facility-based broadband provider demonstrates, in response to the Commission's annual offer, indicated that it would deploy broadband or upgrade existing broadband service throughout the proposed project area within 180 days.

<sup>51</sup> Pub. Util. Code Sec. 281(f)(5)(C), repealed in 2021, specified that the CAF II areas were ineligible for CASF until July 1, 2020, unless the existing facility-based broadband provider had notified the Commission that it had either completed or elected not to build its CAF II deployment in the census block.

<sup>52</sup> See Public Utilities Code § 281(f)(5)(C)(i) (prior to 2021, since repealed).

mile component. As additional time is needed to ensure that the middle-mile component of CASF projects complement California's initiatives for broadband deployment, a waiver in the CASF Program rules regarding project completion is required. Thus, the Southern Lassen Project must be completed in 15 months. If the time necessary for the CDT Director or designee to approve the middle-mile component is extended by mutual agreement between the CDT Director or designee and PST, Staff is authorized to also extend the time for completion of the project by the period of time specified by the CDT Director or designee.

**Table 15: Minimum Performance Criteria**

	<b>CASF Performance Criteria</b>	<b>Proposed Project</b>
<b>Project Completion</b>	CEQA-exempt projects must be completed within 15 months (unless further extended by CD); and all other projects shall be completed within 27 months (unless further extended by CD), to allow for CDT approval of middle-mile component	9 months <sup>53</sup> (CEQA Exempt)
<b>Pricing</b>	Prices committed for two years after completion of the project	2-years
<b>Speed</b>	At least 100/20 Mbps <sup>54</sup>	1 Gbps / 1 Gbps
<b>Latency</b>	Maximum of 100 ms of latency	< 100 ms
<b>Data Caps</b>	Minimum of 190 GBs per month	No data cap
<b>Affordability</b>	Must offer low-income plan	\$15 monthly

### **Project Completion and CEQA**

PST's Southern Lassen Project is categorically exempt from California Environmental Quality Act (CEQA) review. The project is located in the Southern Lassen area of Lassen County. The project setting consists of a mix of open agricultural land with sparse population and limited access due to the agricultural production fields, areas of high desert, and areas consisting of dense trees in mountainous topography. The project consists of 113.64 miles of fiber optic cabling adjacent to Highway 395, A3, Highway 36, Elysian Valley Road, Wingfield Road, and Gold Run Road. PST has provided the Commission with its plan to use existing roads, rights-of-way (ROW), and utility easements for the installation of aerial and underground fiber cable.

<sup>53</sup> For projects that contain a middle-mile component, PST may request an extension of time to allow for CDT approval of middle-mile components. However, CEQA exempt projects shall be completed within 15 months and all other projects shall be completed within 27 months, unless the time is further extended by the Director of CD.

<sup>54</sup> SB 156, enacted on July 20, 2021 and effective immediately, increased the speed requirements for CASF projects to 100 Mbps download and 20 Mbps upload. See Pub. Util. Code Sec. 281(f)(5).

PST's Southern Lassen Project includes 95.61 miles of aerial fiber installation on existing overhead poles and 18.03 miles of underground fiber installed in conduit and placed in existing public utility easements considered previously disturbed. Plumas-Sierra Rural Electric Cooperative (PSREC) will follow guidelines for proper trenching and backhoe usage. Upon completion of conduit and cable placement, the site will be returned to its original condition.

PST's methods of aerial installation will follow General Order 95 pole safety and loading requirements. If pole-loading calculations do not initially meet GO 95 requirements, PST will replace poles to comply with GO 95. PST is expected to obtain CalTrans Encroachment permits for road crossings and lease agreements with Lassen Municipal Utilities District and Frontier Communications for joint use of their existing infrastructure when necessary.

Based on the above information, the Commission's Energy Division has confirmed that the project meets the criteria of the CEQA categorical exemptions found in CEQA Guidelines, 14 C.C.R. § 15301 (Existing Facilities) and 14 C.C.R. § 15303 (New Construction or Conversion of Small Structures). Therefore, the entirety of the Southern Lassen Project is categorically exempt from CEQA.

### **Pricing, Speed, Latency, Data Caps, and Affordability**

PST commits to residential and low-income broadband pricing plans, as summarized in Table 16 and Table 17, for two years after completion of the project. PST will waive the activation and installation fees during the two-year commitment period. Moreover, PST will offer a broadband service plan to low-income customers at \$15 monthly. PST's service offerings are for broadband access only and do not include interconnected voice services.

**Table 16: PST's Broadband Pricing Plan**

<b>Download Speed</b>	<b>Upload Speed</b>	<b>Monthly Price</b>
15 Mbps	5 Mbps	\$65
20 Mbps	5 Mbps	\$75
25 Mbps	10 Mbps	\$85
50 Mbps	10 Mbps	\$95
100 Mbps	20 Mbps	\$109



**Table 17: PST's Broadband Low-Income Pricing Plans**

Download Speed	Upload Speed	Monthly Price
10 Mbps	1 Mbps	\$15
15 Mbps	5 Mbps	\$25
20 Mbps	5 Mbps	\$35

The proposed speed offerings (up to 100 Mbps download and up to 20 Mbps upload) meet the 100/20 minimum performance requirement. This project can provide Internet service with speeds of up to 1 Gbps downstream and 1 Gbps upstream, upon request and at specific pricing. Broadband service will be available to residential customers, anchor institutions and small businesses.

### **Funding Determination**

PST is eligible to receive 100 percent funding to cover the cost of its Southern Lassen Project. Staff considered the statutory factors to determine the grant funding level, as described by Pub. Util. Code § 281(f)(11) and CASF program rules adopted in D.21-03-006, Appendix A. Table 18, below, details Staff's funding level determination for PST's Southern Lassen Project.

**Table 18: Criteria for Project Funding Level for Southern Lassen**

Funding Criteria	Proposed Project
Baseline for Eligible Project (60%)	60%
Service Level Preference: Only Dial-up or No Internet Connectivity (up to 40%)	40%
Low Income – (up to 40%) <ul style="list-style-type: none"><li>Median Household Income for community is less than CARE standard for family of 4, which is currently \$53,000 (30%)<sup>55</sup></li><li>Applicant serves low-income customers for no more than \$15/month (10%)</li></ul>	0% 10%
Others: PU Code § 281 (f)(11) Criteria – (up to 20%) <ul style="list-style-type: none"><li>Inaccessible Location (10%)</li><li>Uses Existing Infrastructure (10%)</li><li>Makes a Significant Contribution to the Program Goal (10%)</li></ul>	10% 10% 10%
<b>Total Funding Level</b>	<b>100%<sup>56</sup></b>

<sup>55</sup> <https://www.cpuc.ca.gov/care/>

<sup>56</sup> D.21-03-006, Summary of Funding Criteria - Maximum funding level is 100 percent.

**Baseline for an Eligible Project qualifies for 60 percent funding.** The CASF program is intended to finance capital costs of projects deploying broadband facilities in unserved areas of California. The identified Southern Lassen Project area meets all the eligibility criteria, as previously described in the Project Area Eligibility section.

**Service Level Preference qualifies for an additional 40 percent funding.** According to the latest California Interactive Broadband Map, Staff confirmed all the proposed project areas are unserved by wireline or fixed wireless broadband service and are therefore eligible for an additional 40 percent funding.

**Low Income Consideration does not qualify for additional 10 percent funding.** The median income of the census block groups in the proposed project area is \$62,624, which does not meet the CASF low-income eligibility threshold. PST commits to offer broadband service for eligible low-income subscribers at \$15/month, which meets the criteria for an additional 10 percent funding.

**Other Factor Considerations qualify for an additional 20 percent funding.** The Southern Lassen Project meets all three criteria defined in Pub. Util. Code § 281(f)(11) and qualifies for the additional 20 percent funding.

**The proposed project meets the inaccessible location criteria for an additional 10 percent funding.** The project is located in the Southern Lassen region of the remote northern Sierra Nevada mountains. The area consists of open agricultural land with limited access and difficult terrain and is relatively inaccessible making it difficult to deploy broadband communications infrastructure. The vast majority of the proposed project areas are in rural census blocks as defined by the U.S. Census.

**The proposed project is eligible for an additional 10 percent funding for use of existing infrastructure.** PST estimates the project to be 70 percent overhead installation and proposes to use existing utility poles for deployment of broadband service.

**The proposed project makes a significant contribution to the program goal and is eligible for an additional 10 percent funding.** The Southern Lassen Project area is located within the Northeast California Connect Consortium region, which is 89 percent served,<sup>57</sup> and below the CASF program goal. Therefore, this project will make a significant contribution to the program goal.

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<sup>57</sup> See 2020 Annual Report on the CASF Program, California Public Utilities Commission, Issued April 2021, page 14, Table 7: Remaining Unserved Households in Each Consortia Region.

### **Safety and Community Support**

The CASF program encourages the deployment of broadband throughout the State to enable the public to access Internet-based safety applications, telehealth services, emergency services, and to allow first responders to communicate with each other and collaborate during emergencies. The Southern Lassen Project will provide enhanced communications services that will enhance public safety capabilities in an area located in a Tier 2 Fire-Threat District.<sup>58</sup>

The Southern Lassen Project is greatly supported by the community to increase opportunities for individuals to attain education, skills and training needed to obtain employment and contribute to economic and workforce development, to improve health care, education, public safety, and quality of life for community members. A broad range of elected officials, educational institutions and community stakeholders including: United States House Representative Doug LaMalfa (District 1), California Senator Brian Dahle (District 1), California Assemblywomen Megan Dahle (District 1), Plumas County Board of Supervisors, Lassen County Board of Supervisors, Plumas County Office of Education/United School District, Feather River College, Lassen County Chamber of Commerce, Plumas County Public Health Agency, East Sierra Valley Chamber of Commerce, Mohawk Valley Stewardship Council, and the Sierra Nevada Journeys; sent letters of support for the Southern Lassen Project.

## **VI. COMPLIANCE REQUIREMENTS**

PST is required to comply with all the guidelines, requirements, and conditions associated with the Infrastructure Account grant funding as specified in D.21-03-006, its Appendix A and this Resolution. Such compliance includes, but is not limited to those listed in Appendices A and B.

## **VII. PAYMENTS TO CASF RECIPIENTS**

The Commission may reimburse PST's expenses in accordance with Pub. Util. Code § 281(f)(10). Details of reimbursable expenses are in Appendix B.

## **VIII. COMMENTS**

In compliance with Pub. Util. Code section 311(g)(1), a Notice of Availability (NOA) was e-mailed on November 12, 2021, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution, and of the opportunity to comment, at

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<sup>58</sup> See <https://ia.cpuc.ca.gov/firemap/>

the Commission's website at <http://www.cpuc.ca.gov/>. This NOA also served to inform parties that the final conformed Resolution the Commission adopts will be posted and available on this same website.

Formal comments were submitted by Etheric Communications, LLC (Etheric) and California Internet, L.P. dba GeoLinks on November 29, 2021. No reply comments were received.

### **Etheric and GeoLinks Comments**

Etheric, and GeoLinks assert that Draft Resolution T-17750 "is based on factual, procedural and legal error" and that funding these projects "contradicts D.21-01-003, [Public Utilities Code] Section 281 and Section 270 by intentionally granting the CASF award overlapping Etheric and GeoLinks RDOF service areas."<sup>59</sup> They further state that PU Code Sections 281 and 270(c) direct and encourage the Commission to consider and "maximize the amount of federal funding to California participants in the federal programs." Etheric and GeoLinks suggest that the Commission not approve Resolution T-17750, or, alternatively, delay or remove overlapping portions of the projects.

### **Staff's Response to Comments**

Claims by Etheric and GeoLinks that awarding CASF funding in Resolution T-17750 is contrary to the law and public interest that govern the CASF program do not have merit and should not be considered. While some portions of the Southern Lassen Project overlap with RDOF-eligible areas, the commenting parties have not received ETC designation in these areas. Therefore, Staff will not remove these RDOF-eligible areas from the Southern Lassen Project. Furthermore, the companies referenced were designated by the Federal Communications Commission (FCC) as announced winning bidders in Auction 904. The areas in California covered by those announced winning bids for these providers have not been awarded any funds by the FCC, nor approved by the FCC to receive awards.

The FCC requires companies to obtain a high-cost ETC designation that covers its winning bid areas. In California, the Commission designates ETCs. The Commission has been working with the companies to make determinations on each ETC application. The FCC is simultaneously evaluating the same providers, along with scores of others across the country.<sup>60</sup>

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<sup>59</sup> Comments of Etheric Communications, LLC and California Internet, L.P. dba GeoLinks Opposing Draft Resolution T-17750, November 29, 2021, page 3.

<sup>60</sup> Federal Communications Commission, Notice of Proposed Rulemaking In the Matter of Rural Digital Opportunity Fund Connect America Fund, WC Docket No. 19-126, WC Docket No. 10-90 and AU Docket

## FINDINGS

1. On May 4, 2020, the Communications Division received 54 applications for the CASF Infrastructure Account.
2. On May 18, 2020, Staff posted the project summaries, including a listing of the census blocks and ZIP Codes covered by the project, and the proposed project area map. The summary was posted on the "CASF Applications Project Summaries" webpage, which may be found on the Commission's CASF webpage.
3. Pub. Util. Code Sec. 281(f)(5) requires the Commission to fund projects that "deploy infrastructure capable of providing broadband access at speeds of a minimum of 100 mbps downstream and 20 mbps upstream."
4. The middle-mile component of projects funded by the CASF Program should complement California's middle-mile initiatives.
5. The CASF Program operates more efficiently if it is clear which projects actually are being deployed, so that funds are not encumbered for projects that will not be built.
6. Staff received challenges to the Long Valley Project from GeoLinks and Frontier. The latest California Interactive Broadband Map should reflect the challenges if the provider submitted correct broadband data to the Commission for the annual data submission. Therefore, the challenge is denied since the California Interactive Broadband Map shows the project area as eligible.
7. Staff received one challenge to the Mohawk Valley Project from GeoLinks. The latest California Interactive Broadband Map should reflect the challenges if the provider submitted correct broadband data to the Commission for the annual data submission. Therefore, the challenge is denied since the California Interactive Broadband Map shows the project area as eligible

8. Staff received two challenges to the Southern Lassen Project. The latest California Interactive Broadband Map should reflect the challenges claimed by GeoLinks and Frontier if the providers submitted correct broadband data to the Commission for the annual data submission. Therefore, the challenges are denied since the 2019 California Interactive Broadband Map shows the project area as eligible.
9. The Long Valley and Mohawk Valley Project areas do not include any RDOF-eligible areas.
10. While some portions of the Southern Lassen Project overlap with areas for which California Internet, L.P. dba GeoLinks has RDOF-eligibility, GeoLinks has not yet received Eligible Telecommunications Carrier (ETC) status in these areas. Staff did not remove the RDOF-eligible areas from this project.
11. Based on its review, Staff determined that the projects qualify for funding pursuant to D. 21-03-006 and its Appendix A and recommends Commission approval of CASF funding for the PST Long Valley, Mohawk Valley and Southern Lassen Project up to the amount of \$18,066,199.
12. The Commission has determined that the Long Valley and Mohawk Valley projects are not categorically exempt from CEQA review.
13. The Commission has determined that the Southern Lassen Project is categorically exempt from CEQA review, pursuant to CEQA guidelines at 14 C.C.R § 15301 regarding exemption for existing facilities and 14 C.C.R § 15303 regarding new construction or conversion of small structures.
14. As additional time is needed to ensure that the middle-mile component of CASF projects complement California's initiatives for broadband deployment, a waiver in the CASF Program rules regarding project completion is required.
15. A notice letter was e-mailed on November 12, 2021, informing all applicants filing for CASF funding and parties on the CASF distribution list of the availability of the draft of this Resolution, and of the opportunity for comment, at the Commission's website <http://www.cpuc.ca.gov>. Formal comments were submitted by Etheric Communications, LLC and California Internet, L.P. dba GeoLinks on November 29, 2021. No reply comments were received.

**THEREFORE, IT IS ORDERED that:**

1. The CASF Infrastructure Account funding for Long Valley – Spring Garden, Mohawk Valley, and Southern Lassen Projects as discussed in this resolution is adopted.
2. The total approved from the CASF Infrastructure Account is up to \$18,066,199, as follows:

APPLICANT	PROJECT	CASF APPROVED AMOUNT
PST	Long Valley-Spring Garden	\$5,016,256
PST	Mohawk Valley	\$1,941,754
PST	Southern Lassen	\$11,108,189

3. PST shall comply with all guidelines, requirements and conditions associated with a CASF award, as specified in D.18-12-018 and its Appendix 1, D. 21-03-006, Appendix A, and all requirements for this project included in this Resolution, including Appendices A – D.
4. PST must offer open access to last-mile communications service providers requesting access to middle-mile infrastructure funded by CASF grants, as set forth in D.21-03-006.
5. The CASF grant award for the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen projects are conditioned on whether the Director of the California Department of Technology (CDT) or designee finds that the middle-mile components of the projects complement the California middle-mile initiative described in SB 156.
6. This process for CDT approval of the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen projects should take place within three months from the approval of this Resolution. However, the time allowed for the CDT Director or designee to approve the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen projects may be extended an additional three months, or longer, by mutual agreement between the CDT Director or designee and PST. PST will send written notice of this time extension, if any, to the CD Director.

7. If the CDT Director or designee approves the middle-mile component of the project, the CD Director shall, in writing, approve release of CASF funding for the middle-mile component. At that time, Staff may proceed with project funding activities. If the CDT Director or designee does not approve the middle-mile component of the project, CASF Program funding for the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen projects is automatically rescinded on the date that the CD Director receives written notice that CDT did not approve the middle-mile component.
8. In the event that the CDT Director or designee does not approve the middle-mile component of the Long Valley, Mohawk Valley and Southern Lassen projects, PST has 90 days from the date that the CD Director receives written notice that CDT did not approve the middle-mile component to inform the CD Director by a written letter that it still plans to deploy the last-mile component of the Long Valley, Mohawk Valley or Southern Lassen projects, even though it will not receive any funding for the middle-mile component. The written letter must include the information specified in this resolution.
9. The Long Valley and Mohawk Valley Projects must be completed in 27 months. The Southern Lassen Project must be completed in 15 months. If the time necessary for CDT to approve the middle-mile component is extended by mutual agreement between CDT and PST, Staff is authorized to also extend the time for completion of the project by the period of time specified by the CDT Director or designee.
10. If PST fails to complete the project in accordance with the CASF guidelines and requirements outlined in D.21-03-006 and its Appendix A, and the terms outlined in this Resolution, PST must reimburse some or all of the CASF funds that it has received.
11. PST must complete and execute the consent form (to be sent to the Grantee after this Resolution is adopted) agreeing to the conditions set forth in this Resolution and return it the CASF Staff within 30 calendar days from the date of the adoption of this Resolution. Failure to submit the consent form within 30 calendar days from the adoption date of this Resolution may result in the Commission voiding the grant award.
12. The Commission cannot release funds for construction activities for the Long Valley and Mohawk Valley Projects until CEQA review is complete. PST is



required to comply with the requirements set forth in the CEQA Section of the Resolution. PST must provide the Proponent's Environmental Assessment (PEA) prior to the first payment. CASF will reimburse the CPUC Energy Division for all costs related to the PEA.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on December 16, 2021. The following Commissioners approved it:

/s/ RACHEL PETERSON

Rachel Peterson  
Executive Director

MARYBEL BATJER  
President

MARTHA GUZMAN ACEVES

CLIFFORD RECHTSCHAFFEN

GENEVIEVE SHIROMA

DARCIE L. HOUCK

Commissioners

## APPENDIX A

### Compliance Requirements

#### A. California Environmental Quality Act (CEQA)

Plumas-Sierra Telecommunications' (PST) Long Valley and Mohawk Valley Projects are subject to CEQA review. The Commission must complete CEQA review prior to disbursing CASF funds for construction activities. The initial funding granted in this Resolution may be used for project development and other PST activities that do not involve construction or any activities that would have any direct or indirect effect on the physical environment.

Prior to any construction activity for the Long Valley and Mohawk Valley Projects, PST is required to seek further authority from the Commission for such activity by filing a Proponent's Environmental Assessment (PEA) pursuant to Commission Rule of Practice and Procedure 2.4; and must undergo an environmental review pursuant to CEQA (California Public Resources Code § 21000 et seq.). PST should contact the Supervisor of the Commission's Energy Division CEQA Unit well in advance of a contemplated filing to (a) consult with staff regarding the process of developing and filing a PEA; (b) provide for cost recovery per Rule of Practice and Procedure 2.5; and (c) enter into a Memorandum of Understanding to allow the Energy Division to initiate the retention of an environmental contractor to perform the environmental review.

PST's Long Valley Project is subject to National Environmental Policy Act (NEPA) review, as acknowledged in its application. PST should make every effort to ensure that the Commission's CEQA Unit is aware of and included in the NEPA process.

PST must provide a PEA prior to the first payment. The Commission cannot release funds for the construction project until the Commission has completed CEQA review. PST has agreed in its application to provide a PEA and has allocated a total of \$1,000,000 in its budgets for environmental review and permitting. A summary of PST budgeted CEQA and Caltrans permitting costs are in Table A1 below.

**Table A1: Summary of PST's CEQA and Permitting Funding**

PROJECT	PERMITTING COSTS
Long Valley	\$700,000
Mohawk Valley	\$300,000

B. Deployment Schedule

The Commission expects PST to complete the Long Valley and Mohawk Valley Projects within 27 months from the start date (whereby the applicants have secured CEQA approval from the Commission and all required permits), and the Southern Lassen Project within 15 months, and the applicant has committed to do so. If the applicant is unable to complete the proposed project within the timeframe requirement specified in this Resolution, PST must notify the Director of the Communications Division as soon as PST becomes aware of this possibility. If such notice is not provided, the Commission may reduce payment for failure to satisfy this requirement of timely notification to the Director.

C. Execution and Performance

Staff and the grantee shall determine a project start date after the CASF grant recipient has obtained all approvals, including CEQA permits. Should PST or any contractor it retains fail to commence work by the designated date, upon five days written notice the Commission may terminate the grant. In the event that PST fails to complete the project in accordance with the terms of Commission approval as set forth in this resolution, PST shall reimburse some or all of the CASF funds that it has received. PST must complete all construction covered by the grant on or before the grant's termination date.

D. Letter of Credit

The Commission exempts Certificate of Public Convenience and Necessity (CPCN) holders from providing a letter of credit, on the basis that the company submitted a performance bond to the Commission to maintain its CPCN and that the Commission has other means to enforce compliance. In its application, PST provided proof of CPCN registration and thus is exempt from the requirement of providing a letter of credit.

E. Project Audit

The Commission has the right to conduct any necessary audit, verification, and discovery during project implementation/construction to ensure that CASF funds are spent in accordance with Commission approval.

PST's invoices will be subject to a financial audit by the Commission at any time within three years of completion of the work.

F. Reporting

All grantees must submit biannual progress reports on the status of the project, irrespective of whether grantees request reimbursement or payment. These reports are due semi-annually, in March and September, until the project is completely built and operational. Progress reports shall report the schedule for deployment, major

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construction milestones and costs submitted in the proposal; indicate the actual date of completion of each task/milestone as well as problems and issues encountered, and the actions taken to resolve these problems and issues during project implementation and construction; and identify future risks to the project.

Before full payment of the project is made, PST must submit a project completion report. PST shall also include test results on the download and upload speeds by census block in the final completion report. PST must certify that each progress report is true and correct under penalty of perjury.

G. Prevailing Wage

Section 1720 of the California Labor Code specifies that CASF-subsidized projects are subject to prevailing wage requirements. PST has committed to follow state prevailing wage requirements with regards to this project.

H. Contractor Reporting

Frontier must comply with the contractor reporting requirements of Section 281(l)(1) of the California Public Utilities Code, which requires reporting of certain information for all contractors and subcontractor undertaking a contract or subcontract in excess of twenty-five thousand dollars (\$25,000) on CASF-subsidized projects.

## APPENDIX B

### Payments to CASF Recipients

Pub. Util. Code § 281(f)(10) defines the costs the Commission may reimburse as follows:

- Costs directly related to the deployment of infrastructure;
- Costs to lease access to property or for Internet backhaul services for a period not to exceed five years; and
- Costs incurred by an existing facility-based broadband provider to upgrade its existing facilities to provide for interconnection.

Additionally, D.21-03-006 (Appendix A, Section 7) caps administrative expenses directly related to the project at 15 percent of the grant amount.<sup>61</sup>

The grantee may submit reimbursement requests at the following intervals:

- 10 percent completion;
- 35 percent completion;
- 60 percent completion;
- 85 percent completion; and
- 100 percent completion.

The final 15 percent payment request (from 85 to 100 percent) will not be paid without an approved completion report. Payments are based on submitted receipts, invoices and other supporting documentation showing expenditures incurred for the project in accordance with the approved CASF funding budget included in the CASF grantee's application.

Payment to grantees shall follow the process adopted for funds created under Public Utilities Code § 270. The Commission generally processes payments within 20-25 business days, including Communications Division and Administrative Services review time. The State Controller's Office (SCO) requires an additional 14- 21 days to issue payment from the day that requests are received by SCO from Administrative Services.

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<sup>61</sup> Administrative costs are defined as "indirect overhead costs attributable to a project, per generally accepted accounting principles (GAAP), and the direct cost of complying with Commission administrative and regulatory requirements related to the grant itself." Applicants seeking additional funds will require a Commission exemption included in a draft resolution.

**APPENDIX C**  
**PST's Long Valley - Spring Garden**  
**CASF Application Key Information**

<i>Project Name</i>	<b>Long Valley - Spring Garden Project</b>
<i>Project Plan</i>	The project proposes to deploy middle-mile and last-mile fiber optic technology to the communities of Long Valley and Spring Garden in Plumas County to enable high-speed Internet service to 19 unserved households.
<i>Project Size (in square miles)</i>	1.37
<i>Download/Upload speed</i>	100 Mbps / 20 Mbps
<i>Location</i>	Plumas County
<i>Community Name</i>	Long Valley - Spring Garden
<i>Census Blocks (15)</i>	060630002021228; 060630002021247; 060630002021208; 060630002021163; 060630002021091; 060630002021209; 060630002021134; 060630002021133; 060630002021207; 060630002021135; 060630002021147; 060630002021182; 060630002021146; 060630002021222; 060630002021159.
<i>Median Household Income</i>	\$50,163
<i>Estimated Potential Subscriber Size</i>	19 households
<i>Subscriber Take Rate</i>	6 customers (30 percent take rate)
<i>Pricing Plan ((Monthly- stand-alone pricing)</i>	<b>Low Income Pricing:</b> 10 Mbps/1 Mbps \$15; 15 Mbps/5 Mbps \$25; 20 Mbps/5 Mbps \$35 <b>Regular Pricing:</b> 15 Mbps / 5 Mbps \$65; 20 Mbps/5 Mbps \$75; 25 Mbps/10 Mbps \$85; 50 Mbps/10 Mbps \$95; 100 Mbps/20 Mbps \$109; 1Gbps/1Gbps \$299
<i>Deployment Schedule (from permit approval date)</i>	12 months
<i>Proposed Project Budget (Total)</i>	\$5,016,256 (Middle-Mile Budget: \$4,661,052; Last-Mile Budget: \$355,205)
<i>Grant Requested Amount</i>	\$5,016,256
<i>CASF Grant Amount (100 percent)</i>	\$5,016,256
<i>Recommended Grant per household</i>	\$264,013.47

**APPENDIX C**  
**PST Mohawk Valley**  
**CASF Application Key Information**

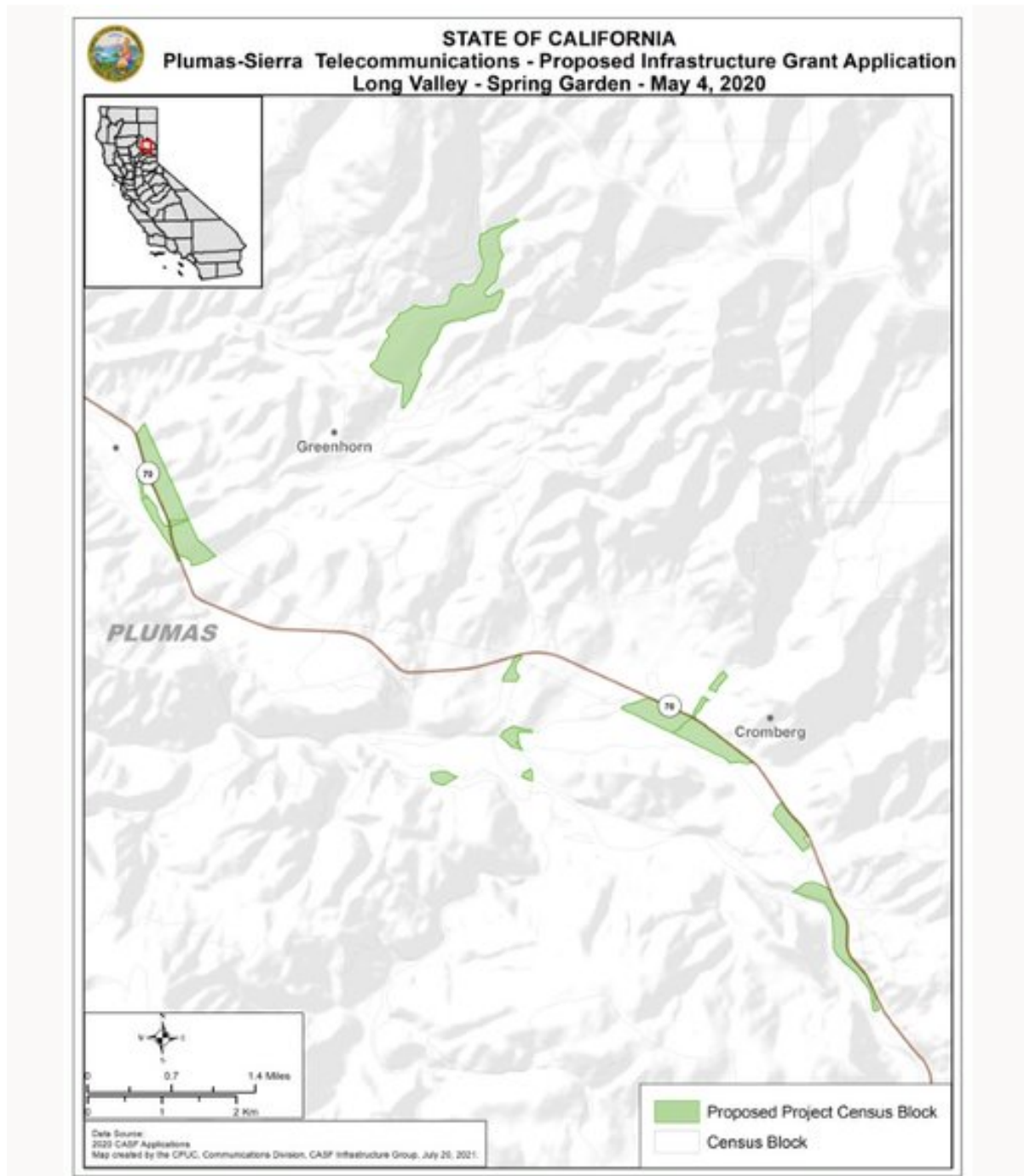
<i>Project Name</i>	<b>Mohawk Valley Project</b>
<i>Project Plan</i>	The project proposes to deploy middle-mile and last-mile fiber optic technology to the Mohawk Valley area of Plumas County to enable high-speed Internet service to 7 unserved households.
<i>Project Size (in square miles)</i>	.13
<i>Download/Upload speed</i>	100 Mbps / 20 Mbps s
<i>Location</i>	Plumas County
<i>Community Name</i>	Mohawk Valley
<i>Census Blocks (5)</i>	060630002011059 060630002011044 060630002011230 060630002011271 060630002011270
<i>Median Household Income</i>	\$64,560
<i>Estimated Potential Subscriber Size</i>	7 households
<i>Subscriber Take Rate</i>	2 customers (30 percent take rate)
<i>Pricing Plan (Monthly- (stand-alone pricing):</i>	<b>Low Income Pricing:</b> 10 Mbps/1 Mbps \$15; 15 Mbps/5 Mbps \$25; 20 Mbps/5 Mbps \$35  <b>Regular Pricing:</b> 15 Mbps / 5 Mbps \$65; 20 Mbps/5 Mbps \$75; 25 Mbps/10 Mbps \$85; 50 Mbps/10 Mbps \$95; 100 Mbps/20 Mbps \$109; 1Gbps/1Gbps \$299
<i>Deployment Schedule (from permit approval date)</i>	9 months
<i>Proposed Project Budget (Total)</i>	\$1,941,754 (Middle-Mile Budget: \$1,684,499; Last Mile Budget: \$257,255)
<i>Grant Requested Amount</i>	\$1,941,754
<i>CASF Grant Amount (100 percent)</i>	\$1,941,754
<i>Recommended Grant per household</i>	\$277,393.43

**APPENDIX C**  
**PST Southern Lassen Project -**  
**CASF Application Key Information**

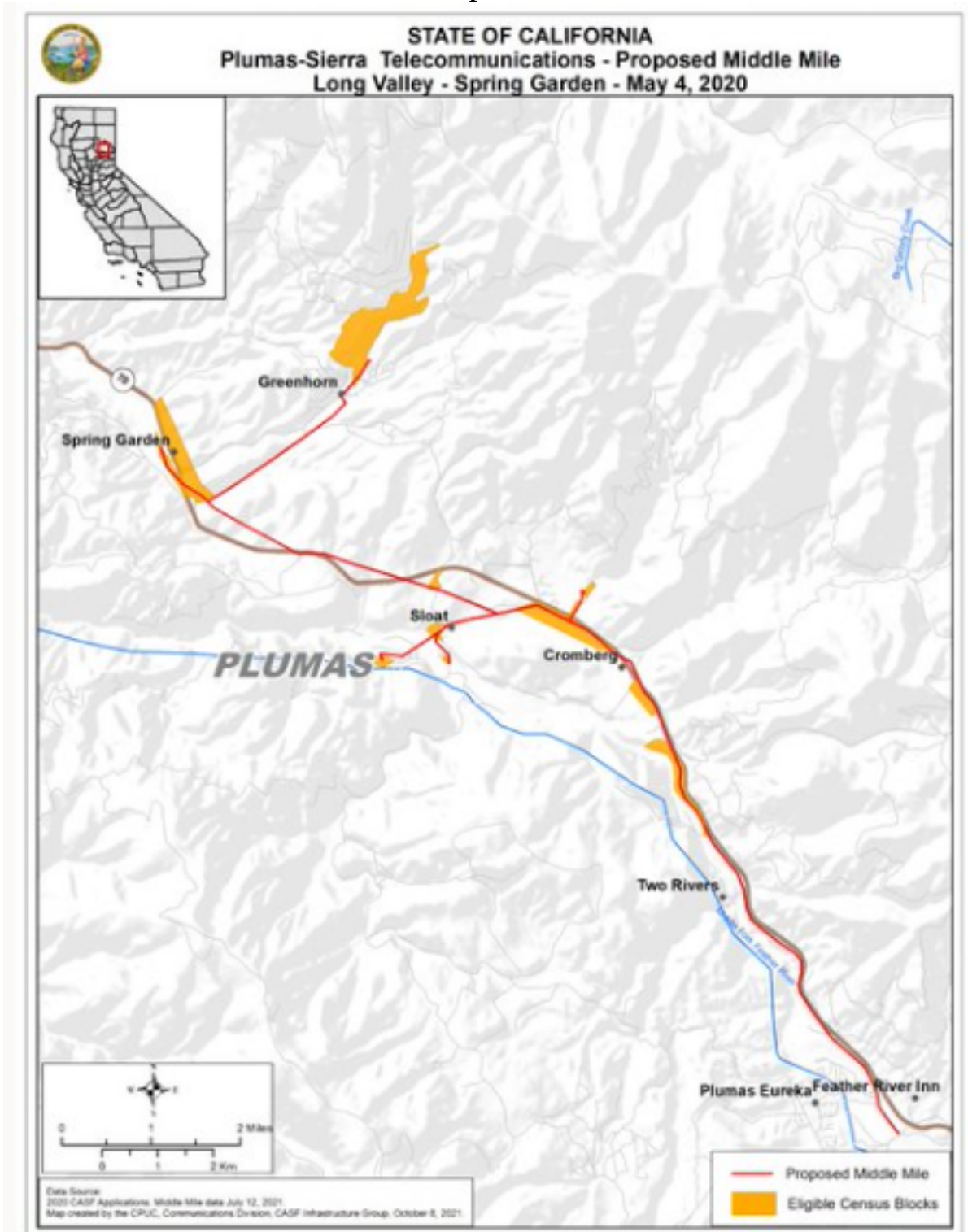
<i>Project Name</i>	<b>Southern Lassen Project</b>
<i>Project Plan</i>	The project proposes to deploy middle-mile and last-mile fiber optic technology to the Southern Lassen area of Lassen County to enable high-speed Internet service to 7 unserved households.
<i>Project Size (square miles)</i>	10.42
<i>Download/Upload speed</i>	100 Mbps / 20 Mbps
<i>Location</i>	Lassen County
<i>Community Name</i>	Southern Lassen
<i>Census Blocks (49)</i>	060350403021023; 060350406003100; 060350405003018; 060350404001059 060350405002014; 060350405003008; 060350405003055; 060350403022060 060350404001057; 060350404001022; 060350404001058; 060350406001354 060350404001020; 060350404001018; 060350404001112; 060350403021015 060350403031040; 060350403021007; 060350403023032; 060350403021013 060350404001001; 060350404001009; 060350403022024; 060350403021031 060350404001061; 060350403031077; 060350403022036; 060350405003047 060350405001022; 060350404001131; 060350403023024; 060350404001076 060350403042044; 060350403022000; 060350404001016; 060350405001011 060350403021058; 060350405001005; 060350403021057; 060350406001276 060350405002013; 060350405002016; 060350404001042; 060350405003052 060350404001046; 060350403021026; 060350403021033; 060350405003016 060350404001015
<i>Median Household Income</i>	\$62,624
<i>Estimated Potential Subscriber Size</i>	138 households
<i>Subscriber Take Rate</i>	41 customers (30 percent take rate)
<i>Pricing Plan</i> <i>(Monthly- (stand-alone pricing):</i>	<b>Low Income Pricing:</b> 10 Mbps/1 Mbps \$15; 15 Mbps/5 Mbps \$25; 20 Mbps/5 Mbps \$35 <b>Regular Pricing:</b> 15 Mbps / 5 Mbps \$65; 20 Mbps/5 Mbps \$75; 25 Mbps/10 Mbps \$85; 50 Mbps/10 Mbps \$95; 100 Mbps/20 Mbps \$109; 1Gbps/1Gbps \$299
<i>Deployment Schedule</i> <i>(from permit approval date)</i>	9 months
<i>Proposed Project Budget</i> <i>(Total)</i>	\$11,108,189 (Middle-Mile Budget: \$10,586,935; Last Mile Budget: \$521,254)
<i>Grant Requested Amount</i>	\$11,108,189
<i>CASF Grant Amount</i> <i>(100 percent)</i>	\$11,108,189
<i>Recommended Grant per household</i>	\$80,494.12



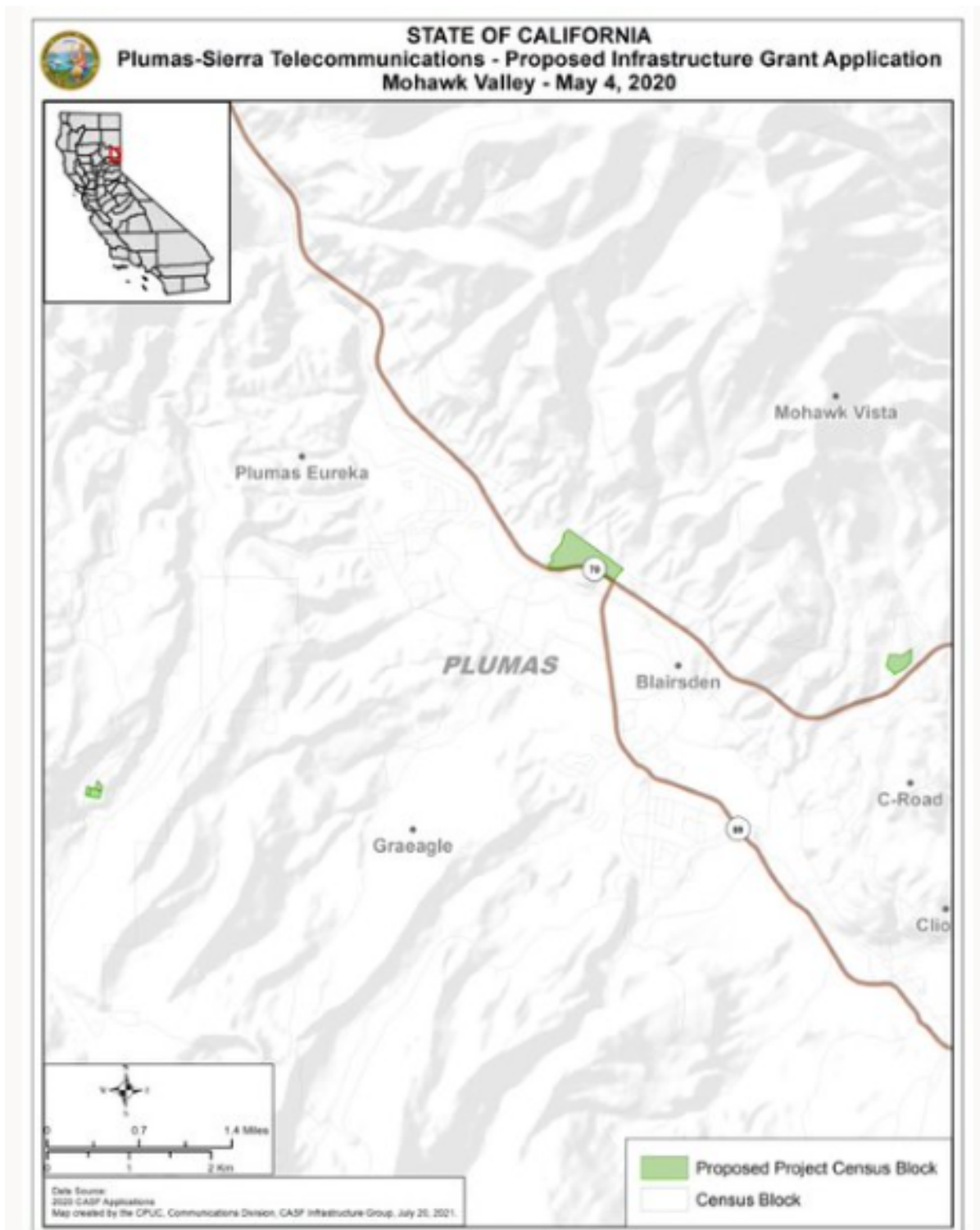
**APPENDIX D**  
**PST Long Valley**  
**Location Map (Last-Mile)**



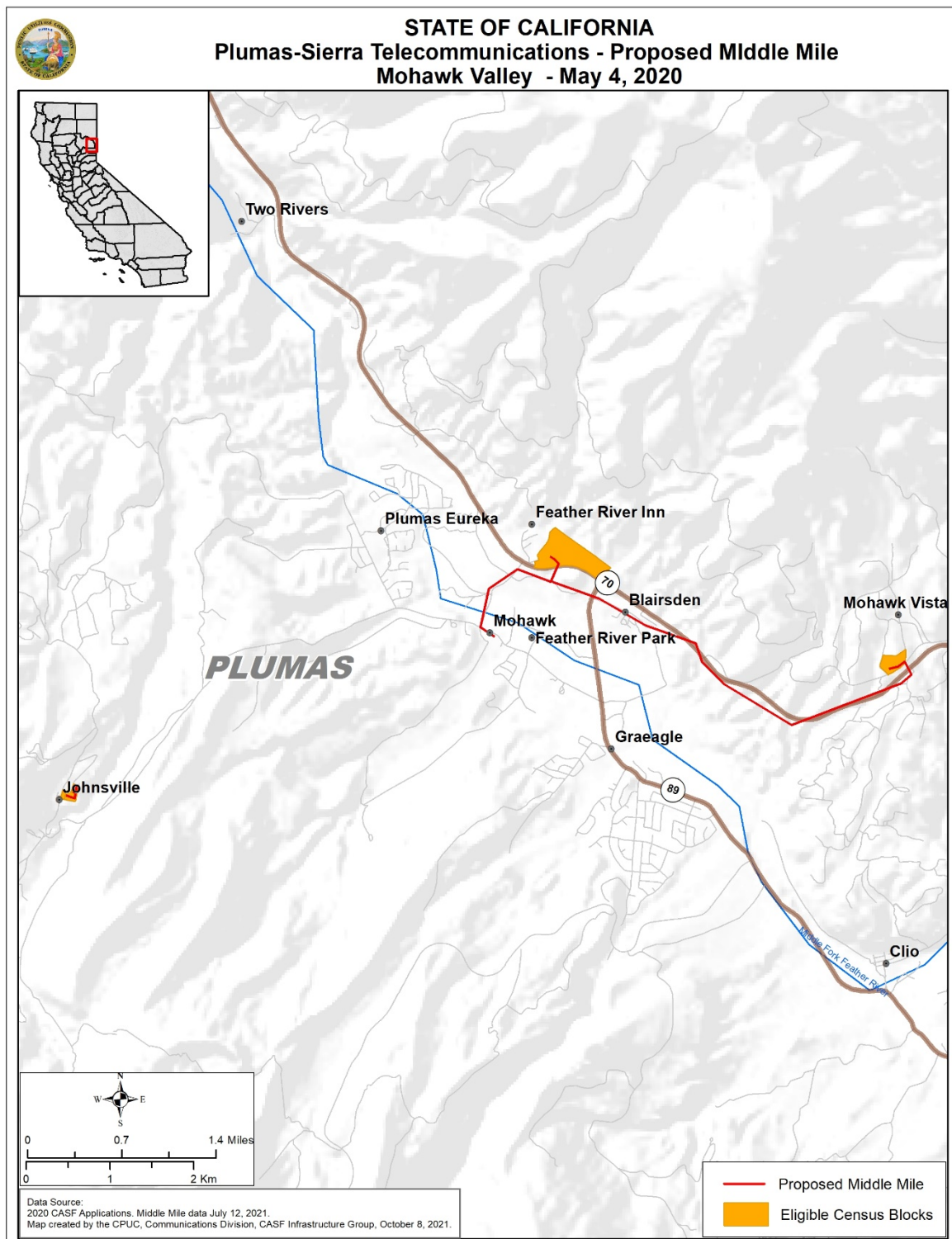
APPENDIX D  
PST Long Valley  
Location Map (Middle-Mile)



**APPENDIX D**  
**PST Mohawk Valley**  
**Location Map (Last-Mile)**

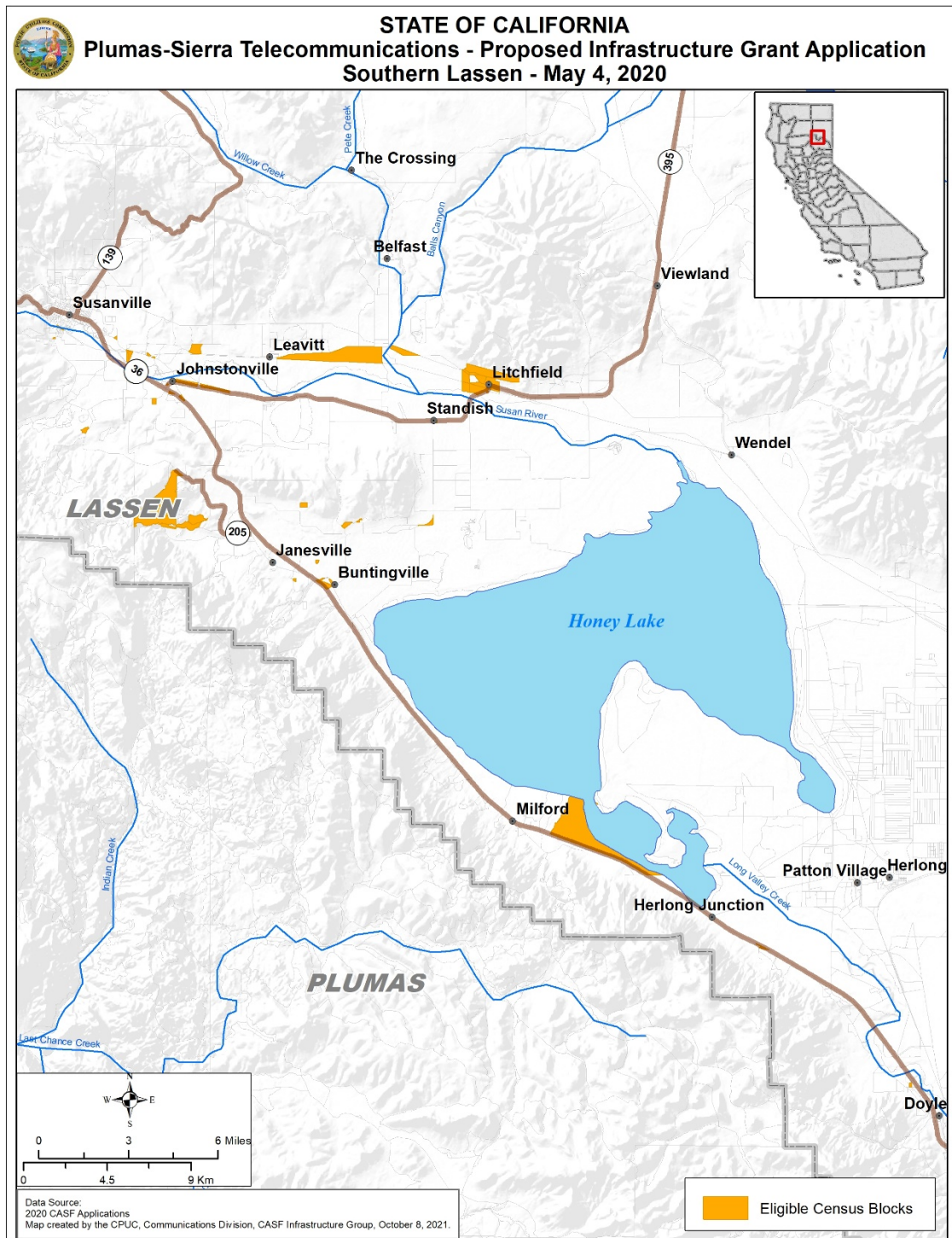


**APPENDIX D**  
**PST Mohawk Valley**  
**Location Map (Middle-Mile)**





**APPENDIX D**  
**PST Southern Lassen**  
**Location Map (Last-Mile)**



**APPENDIX D**  
**PST Southern Lassen**  
**Location Map (Middle-Mile)**

