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Mr. Paul Clanon, Executive Director
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

Subject: Authorize Agency-Owned Remote Meter Reading Equipment as Permanent Attachments to Distribution Poles and Street Lights

Dear Mr. Clanon:

Pacific Gas and Electric Company (PG&E) hereby submits, in accordance with General Order (G.O.) 95, Rule 34, a request to treat the installation of meter reading equipment owned by municipalities (including counties), municipal utility district, water district, irrigation district, and Southern California Gas Company (collectively referred to herein as "Agencies", individually as "Agency") as permanent attachments to PG&E's distribution poles and street lights.

Purpose

The purpose of this letter is to request Commission approval to allow Agency-owned remote meter reading equipment installations as permanent attachments under G.O. 95, Rule 34.

Background

Currently, third-party attachments to PG&E's electric distribution poles and street lights are limited to electrical supply, communication systems, and in the case of PG&E (following Commission approval of resolution USRB-2) government-owned camera and gunshot detection systems.

Recently, PG&E has received requests from Agencies that provide water services to agricultural, commercial, mixed-use and/or residential customers to provide space on distribution poles and street lights for equipment used to provide remote data collection from water meters. These Agencies are being required to install meters on previously unmetered water services. As they prepare to install the newly required meters, they are electing to install equipment that allows for remote reading (data collection) from the meters.

Southern California Gas Company has also approached PG&E with requests that PG&E allow attachment of Southern California Gas Company's Advanced Metering Project Data Collection Units (DCUs) to PG&E street light only facilities.

PG&E proposes to authorize such third-party use of its distribution poles and street lights as permanent attachments in accordance with all applicable rules of G.O. 95 and PG&E's construction standards. This proposal will provide PG&E the flexibility to allow Agencies the ability to maintain such attachments on PG&E poles and street lights for periods in excess of one year.

Under Rule 34, an attachment is considered permanent when the duration of the attachment is estimated to be one year or more. Rule 34 requires that all permanent attachments be approved by the Commission and the pole owner(s) involved. In contrast, Rule 34 also provides that temporary attachments may be authorized by a utility, provided that the installation is restricted to a period of one year or less.

PG&E anticipates that the requested attachment of Agency-owned remote meter reading equipment will normally exceed one year. For this reason, PG&E requests Commission approval to treat such installations as permanent attachments. In the case of a proposed attachment to a jointly-owned distribution pole, PG&E intends to obtain the approval of the affected joint owners in accordance with the existing procedures of the Northern California Joint Pole Association. Approval of this request will allow PG&E to enter into license agreements authorizing such attachments to PG&E's poles and street lights in accordance with the provisions of G.O. 69-C. As a condition to any such license, PG&E will require that the subject Agency-owned equipment be installed in accordance with all applicable construction rules in G.O. 95.

For the foregoing reasons, PG&E requests Commission Approval to treat installations of Agency-owned remote meter reading equipment as permanent attachments to PG&E's poles and street lights.

Sincerely,



Brian K. Cherry
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