

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

In The Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for Authority to Lease Certain Fiber Optic Cables to CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS under the Master Dark Fiber Lease Agreement Pursuant to Public Utilities Code Section 851.

A.17-02-001  
(Filed February 3, 2017)

**SOUTHERN CALIFORNIA EDISON COMPANY'S (U 338-E)**  
**NOTICE OF *EX PARTE* COMMUNICATION**

FADIA RAFEEDIE KHOURY  
GLORIA M. ING

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1999  
Facsimile: (626) 302-6693  
E-mail: gloria.ing@sce.com

Dated: **June 11, 2018**

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

In The Matter of the Application of SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) for Authority to Lease Certain Fiber Optic Cables to CELLCO PARTNERSHIP D/B/A VERIZON WIRELESS under the Master Dark Fiber Lease Agreement Pursuant to Public Utilities Code Section 851.

A.17-02-001  
(Filed February 3, 2017)

**SOUTHERN CALIFORNIA EDISON COMPANY’S (U 338-E)  
NOTICE OF EX PARTE COMMUNICATION**

Pursuant to Rule 8.4 of the Rules of Practice and Procedure of the California Public Utilities Commission (“Commission”), Southern California Edison Company (“SCE”) gives the following report regarding its June 6, 2018 *ex parte* communication with Sean Simon, Chief of Staff to Commissioner Rechtschaffen, Simi George, Advisor to Commissioner Rechtschaffen, and Lester Wong, Advisor to Commissioner Randolph in the above-referenced proceeding.

On June 6, 2018, from 9:30 a.m. to approximately 10 a.m., Dawn Anaiscourt, Director, CPUC Regulatory Affairs, and Lisa Swenerton, Director & General Manager, Edison Carrier Solutions, met with Sean Simon, Chief of Staff to Commissioner Rechtschaffen, Simi George, Advisor to Commissioner Rechtschaffen, and Lester Wong, Advisor to Commissioner Randolph. The meeting took place at the Commission’s San Francisco offices located at 505 Van Ness Avenue, San Francisco, California. The communication was initiated by SCE and no written materials were provided.

In the meeting, SCE proposed a path forward for the Verizon proceeding. SCE stated that, in lieu of getting approval of the Master Lease Agreement (MLA) as it had originally requested in its application, SCE proposed to use the General Order 173 advice letter process to

approve each lease route order won from Verizon under the MLA. To aid in transparency, each advice letter would include information on utility fiber optic cable usage, shareholder-funded fiber optic cable usage, route details (e.g., cable length and location), transaction value, and the aggregate value of transactions under the MLA. SCE acknowledged the \$5,000,000 transaction value cap for advice letters under Public Utilities Code Section 851, noted that an interim check point or pause point was also possible, and underscored that the aggregate transaction value included in each advice letter would help the Commission and SCE monitor progress towards the limit. In addition, like all other dark fiber leases for the last 19 years, the lease route orders under the MLA would receive the revenue sharing mechanism designated for dark fiber leases in Decision 99-09-070.

SCE went on to describe the types of cable installations it was likely to perform under the MLA. SCE also clarified that, as a result of substantial shareholder investment in cable infrastructure over the years, the percentage of commercial use of the utility infrastructure has decreased significantly since the D.99-09-070 was issued.

Lastly, SCE discussed different procedural vehicles, including an alternate proposed decision and a motion to withdraw the original application.

Respectfully submitted,  
FADIA RAFEEDIE KHOURY  
GLORIA M. ING

*/s/ Gloria M. Ing*

By: Gloria M. Ing

Attorneys for  
SOUTHERN CALIFORNIA EDISON COMPANY

2244 Walnut Grove Avenue  
Post Office Box 800  
Rosemead, California 91770  
Telephone: (626) 302-1999  
Facsimile: (626) 302-6693  
E-mail: gloria.ing@sce.com

June 11, 2018