Southern California Edison  
IEC (Corp ID 6096)  
Status of Advice Letter 193  
As of November 20, 2018


Division Assigned:  Telecommunications
Date Filed:  11-13-2018
Date to Calendar: 

Authorizing Documents:  None

| Disposition: | Accepted |
| Effective Date: | 11-13-2018 |

Resolution Required:  No
Resolution Number:  None
Commission Meeting Date:  None

CPUC Contact Information:
415-703-1565  
TD_PALCOORDINATOR@cpuc.ca.gov

AL Certificate Contact Information:
Darrah Morgan  
626-302-2086  
advicetariffmanager@sce.com
To: Telecommunications Carrier Filing Advice Letter  
From: Telecommunications Division PAL Coordinator  
Subject: Your Advice Letter Filing  

The Telecommunications Division of the California Public Utilities Commission has processed your recent Advice Letter (AL) filing and is returning an AL status certificate for your records.

The AL status certificate indicates:

- Advice Letter Number  
- Name of Filer  
- CPUC Corporate ID number of Filer  
- Subject of Filing  
- Date Filed  
- Disposition of Filing (Accepted, Rejected, Withdrawn, etc.)  
- Effective Date of Filing  
- Other Miscellaneous Information (e.g., Resolution, if applicable, etc.)

The Telecommunications Division has made no changes to your copy of the Advice Letter Filing; please review your Advice Letter Filing with the information contained in the AL status certificate, and update your Advice Letter and tariff records accordingly.

All inquiries to the California Public Utilities Commission on the status of your Advice Letter Filing will be answered by Telecommunications Division staff based on the information contained in the Telecommunications Division’s PAL database from which the AL status certificate is generated. If you have any questions on this matter please contact the:

Telecommunications Division PAL Coordinator at (415) 703-1565, or by e-mail to td_pal_coordinator@cpuc.ca.gov
ADVICE 193
(U 6096-C)

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA
COMMUNICATIONS DIVISION

SUBJECT: Informational Advice Letter
2018 Fourth Quarter Report of Southern California Edison Company for Competitive Local Exchange Projects - Additional Construction Projects

PURPOSE

In compliance with Decision (D.) 98-12-083, on August 31, 2018, Southern California Edison Company (SCE) submitted Advice Letter 192, its 2018 Fourth Quarter Report, which summarized the competitive local exchange construction projects that were anticipated for the fourth quarter. SCE has now identified and submits twenty-two additional construction projects it intends to construct in the fourth quarter of 2018.

BACKGROUND

In D.98-12-083, the California Public Utilities Commission (Commission or CPUC) granted a certificate of public convenience and necessity (CPCN) to SCE to operate as a competitive local carrier (CLC) in the State of California. D.98-12-083 requires CLCs to implement specific mitigation measures adopted in the Mitigated Negative Declaration, attached to the Decision as Appendix D, in compliance with the California Environmental Quality Act.

Appendix D to D.98-12-083 contains the mitigation monitoring process for the CLCs’ proposed projects and describes the roles and responsibilities of government agencies in implementing and enforcing the selected mitigation measures.

Mitigation Measure B of Appendix D to D.98-12-083 requires the CLCs to submit a quarterly report, as an informational advice letter, one month prior to the beginning of each quarter that summarizes the construction projects that each intends to construct in the upcoming quarter. The report is to contain a description of the project and its location and a summary of the CLC’s compliance with the mitigation measures described in the Mitigated Negative Declaration. The purpose of the report is to inform
the local agencies of future projects so that coordination of projects among CLCs in the same locality can be conducted.

Mitigation Measure B requires the quarterly report to be submitted with the appropriate planning agency of the locality where the project(s) will occur and as an informational advice letter with the Commission’s Communications Division. This informational advice letter fulfills the latter requirement.

CONFIDENTIALITY

Since SCE’s Advice 1, submitted in March 1999, SCE has requested and believes that the Commission has treated the information on the construction projects contained in SCE’s quarterly reports as confidential proprietary information. SCE has continued to request confidential treatment of construction project information and will continue to request this same treatment in all future Advice Letters. Pursuant to Section 9.3 of General Order (GO) 96-B, GO 66-D, Public Utilities Code Section 583, and applicable law, SCE requests confidential treatment of Attachment A to this advice letter, which summarizes twenty-two additional competitive local exchange construction projects that are anticipated for the fourth quarter.¹ The complete advice letter (including Attachment A) is being submitted to the CPUC’s Communications Division in its entirety; however, Attachment A is not included in the public version of the advice letter posted on www.sce.com.

Section 9.3 of GO 96-B provides the procedures for utilities requesting confidential treatment of information provided to the CPUC through an advice letter. Pursuant to Section 9.3, SCE provides the following in support of why it is appropriate to accord confidential treatment to Attachment A. The release of the information in Attachment A, if disclosed, could cause an unfair competitive advantage to potential competitors since the information is not known to those outside SCE. Such competitors, if they obtained this information, could use it to unfairly leverage their knowledge of SCE’s fiber construction locations. Further, as indicated above, SCE believes that the Commission has historically treated the information on construction projects submitted in SCE’s quarterly reports since 1999 as confidential.

As required in Section 9.3, SCE has included a proposed protective order should the Commission believe it is necessary or desires to issue a protective order. Pursuant to Section 9.3, SCE agrees to make Attachment A available to those persons on its advice letters service list who have executed a reasonable nondisclosure agreement for purposes of advice letter review. Such persons wishing to obtain a nondisclosure agreement may contact Gloria Ing in SCE’s Law Department at Gloria.Ing@sce.com or (626) 302-1999.

¹ Confidential Attachment A is accompanied by Attachment B, Proposed Protective Order, and a Confidentiality Declaration as Attachment C to the Commission, as required under Decision 16-08-024 and 17-09-023.
SCE believes it has satisfied the other requirements in Section 9.3 of GO 96-B as follows:

Section 9.3(a) - Required information on Cover Sheet: Please see SCE’s Summary Sheet submitted with this Advice Letter, which incorporates by reference this Advice Letter.

Section 9.3(b) - Specification of confidential information: SCE specifies that Attachment A is confidential and has marked each page as confidential.

Section 9.3(c) – Duration of confidentiality designation: The proprietary business information contained in Attachment A shall remain confidential for one year unless extended prior to the expiration of one year, or until an order of the Commission is issued designating the information not confidential.

Section 9.3(d) – Legal authority for request for confidentiality: Please see the first paragraph under the Confidentiality section of this Advice Letter.

Section 9.3(e)(f) – Identification of specific privileges: Not applicable.

Section 9.3(g) – Disclosure of information in an aggregate format: The confidential information provided in Attachment A cannot be aggregated, redacted, summarized, masked, or otherwise protected in a manner that would allow partial disclosure of the data, while still protecting confidential information. SCE would object to any disclosure of the confidential information in aggregated form.

Section 9.3(h): Statement over processes to maintain confidentiality and whether information has been disclosed: To the best of SCE’s knowledge, SCE maintains as confidential the information contained in Attachment A for which confidentiality is sought in this advice letter. To the best of SCE’s knowledge, SCE believes that the confidential information is maintained by SCE and provided internally only to those employees who need to know the information to carry out their job duties. SCE also believes that the confidential information has not been disclosed to any person other than employees of SCE or non-market participants (such as staff of the Commission or a representative of the local jurisdiction, under which circumstances SCE requests that the information be kept confidential).

**TIER DESIGNATION**

Pursuant to GO 96-B, Telecommunications Industry Rule 7.1(3), this advice letter is subject to Communications Division disposition and should be classified as Tier 1.

Pursuant to Mitigation Measure B, SCE shall provide the appropriate planning agencies with the portion of the quarterly report pertaining to projects in such agencies’ jurisdiction, upon request. The Commission shall receive a confidential description of all projects.
No cost information is required for this advice letter.

This advice letter will not increase any rate or charge, cause the withdrawal of service, or conflict with any other schedule or rule.

In accordance with Public Utilities Code Section 491, notice to the public is hereby given by submitting and keeping the advice letter open for public inspection at SCE’s corporate headquarters.

Southern California Edison Company

/s/ Gary A. Stern
Gary A. Stern, Ph.D.

GAS:rf:cm
Enclosures
**Company Name:** Southern California Edison Company  
**Address:** P.O. Box 800, 8631 Rush Street  
**City, State, ZIP:** Rosemead, CA 91770  
**Date AL served on parties:** 11/9/18  
**CPUC Utility Number:** U 6096-C

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<td>II ☐ III ☐</td>
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<tr>
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<tbody>
<tr>
<td>Darrah Morgan</td>
<td><a href="mailto:advicetariffmanager@sce.com">advicetariffmanager@sce.com</a></td>
<td>626-302-2086</td>
<td>626-302-6396</td>
</tr>
<tr>
<td>Darrah Morgan</td>
<td><a href="mailto:advicetariffmanager@sce.com">advicetariffmanager@sce.com</a></td>
<td>626-302-2086</td>
<td>No. Tariff Sheets: -0-</td>
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**Tariff Schedules** (see keyword list on reverse): None  
**Keyword:** Compliance

**Subject of advice letter** (Service(s) included): Informational Advice Letter - 2018 Fourth Quarter Report of Southern California Edison Company for Competitive Local Exchange Projects – Additional Construction Projects

**Authorization for advice letter:** D.98-12-083  
(Resolution #, Decision #, etc.)

**Affected services:**

(Other services affected, pending or replacement AL)

**Rate Element(s) affected and % change:**

(Non-recurring and / or recurring)

**Confidential treatment requested?** ☑ Yes ☐ No  
If yes, specification of confidential information: See advice letter.  
Confidential information will be made available to appropriate parties who execute a nondisclosure agreement.  
Name and contact information to request nondisclosure agreement/access to confidential information: Gloria Ing, SCE Law Department at (626) 302-1999 or Gloria.Ing@sce.com

**Submit Protest and/or Correspondence to:**  
Director, Telecommunications Division  
505 Van Ness Ave., San Francisco, CA 94102

**GRC-LEC** = Cost of Service LEC Carrier  
**URF-Carrier** = Uniform Regulatory Framework Carrier  
(see D.06-08-030/D.07-09-019)

**OTHER** = Wireless (CMRS) Carrier

Protest also must be served on utility:

(see utility advice letter for more information)
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<th>Resolution Required</th>
<th>Supv. / Analyst <em><strong><strong><strong><strong><strong><strong>/</strong></strong></strong></strong></strong></strong></em>_</th>
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<tr>
<td>Rev. 09/24/07</td>
<td>Notes: ___________________________________________</td>
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Advice 193

Attachment A

CONFIDENTIAL INFORMATION
Advice 193

Attachment B

Proposed Protective Order
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Informational Advice Letter )
2018 Fourth Quarter Report of Southern )
California Edison Company for Competitive )
Local Exchange Projects - Additional )
Construction Projects )

Advice 193

PROTECTIVE ORDER

This Protective Order shall govern access to Recipients of Protected Material contained in the confidential version of the above-referenced Advice Letter submitted by Southern California Edison Company (“SCE”). Recipient has requested access to Protected Material relating to SCE’s Advice Letter and may be granted access pursuant to the terms of this Protective Order for the sole purpose of Recipient developing a response before the California Public Utilities Commission (“CPUC” or “Commission”) to SCE's Advice Letter under the CPUC’s procedural rules and only if access is necessary for Recipient to develop that response. This Protective Order does not address the right of employees of the California Public Utilities Commission (“CPUC” or “Commission”) acting in their official capacities (“Commission Staff”) to view protected materials because Commission Staff are entitled to view Protected Materials in accordance with the requirements of Section 583 of the Public Utilities Code and the Commission’s General Order 66-D.

1. This Protective Order shall be available to and govern the use of any Protected Materials provided by SCE to Recipient relating to the above-referenced Advice Letter.

2. SCE has designated as protected those materials which customarily are treated by SCE as sensitive or proprietary, which are not available to the public, and which, if disclosed freely, would subject SCE or its customers to risk of competitive disadvantage or other business injury.

3. Definitions - for purposes of this Agreement:

   (a) The term "Nondisclosure Certificate" shall mean the certificate annexed hereto by which Recipient has been granted access to Protected Materials, which certifies Recipient’s understanding that such access to Protected Materials is provided pursuant to the terms and restrictions of this Protective Order, and that such Recipient’s Reviewing Representative has read the Protective Order and agrees to be bound by it.
(b) The term "Reviewing Representative" shall mean a person who has signed a
Nondisclosure Certificate, who has a need to access the Protective Material
for the purpose set forth in this Protective Order, and who is:

(1) an attorney representing Recipient;
(2) a paralegal or other employee assisting the attorney described in (1);
(3) an expert or an employee of an expert retained by Recipient; or
(4) employees or other representatives of Recipient.

(c) The term “Protected Material” refers to those materials described in Section 2
above.

Notwithstanding Section 3(b)(1-4) above, SCE has the right to refuse to provide a
Reviewing Representative access to Protected Material if grounds exist such that the
Reviewing Representative could use Protective Material for commercial or improper usage.
If Recipient disagrees with SCE’s refusal to provide Protected Material, Recipient may seek
resolution under the procedures set forth in Section 10(a).

4. Protected Materials shall be made available under the terms of this Protective Order
only to Recipient and only through its Reviewing Representatives.

5. (a) Protected Materials shall remain available to Recipient for 90 days from the date
SCE provides access to Recipient of the Protective Materials.

(b) Within 15 calendar days of such date set forth in Section 5(a), Recipient shall
return to SCE the Protected Materials, including notes of Protected Material, copies of advice
letters, official transcripts and exhibits in this proceeding that contain Protected Materials, or,
upon agreement by SCE, shall destroy the materials in a manner determined by SCE. Within
such time period, Recipient shall also submit to SCE an affidavit stating that, to the best of its
knowledge, all Protected Materials and documents containing Protected Materials have been
returned or have been destroyed.

6. All Protected Materials shall be maintained by Recipient in a secure place. Access to
Protected Materials shall be limited to those Reviewing Representatives specifically
authorized pursuant to this Protective Order.

7. (a) Protected Materials shall be treated as confidential by Recipient and by the
Reviewing Representative in accordance with the Nondisclosure Certificate executed
pursuant to Section 8. Protected Materials shall not be used except as necessary for the sole
purpose of Recipient developing a response before the CPUC to SCE's Advice Letter under
the CPUC’s procedural rules and only if access is necessary for Recipient to develop that
response, nor shall they be disclosed in any manner to any person except a Reviewing
Representative who needs to know the information for the purpose set forth in this Protective
Order.
(b) Reviewing Representatives may make notes of Protected Materials which shall be treated as notes of Protected Materials if they disclose the contents of Protected Materials. Reviewing Representatives may not make copies of Protected Materials unless agreed to by SCE. Any such copies become Protected Materials.

8. A Reviewing Representative shall not be permitted to inspect, participate in discussions regarding, or otherwise be permitted access to Protected Materials pursuant to this Protective Order unless Reviewing Representative has first executed a Nondisclosure Certificate. A copy of each Nondisclosure Certificate shall be provided to counsel for Recipient and to SCE prior to disclosure of any Protected Material to that Reviewing Representative.

9. Any Reviewing Representative may disclose Protected Materials to (a) any other Reviewing Representative as long as the disclosing Reviewing Representative and receiving Reviewing Representative both have executed a Nondisclosure Certificate, or (b) a member of the CPUC’s Public Advocates Office who is engaged in the conduct of this Advice Letter. Public Advocates Office is subject to the rules and regulations that govern the treatment of Protected information such as Public Utilities Code Section 583 and General Order 66(d). In the event that any Reviewing Representative to whom Protected Materials are disclosed ceases to be engaged in these proceedings, or is employed or retained for a position whose occupant is not qualified to be a Reviewing Representative under Section 3(b), access to Protected Materials by the person shall be terminated. Even if no longer engaged in this proceeding, every person who has executed a Nondisclosure Certificate shall continue to be bound by the provisions of this Protective Order and the certificate.

10. (a) Subject to Section 15, the CPUC, Presiding Administrative Law Judge of the CPUC, or Law and Motion Administrative Law Judge of the CPUC, as appropriate, shall resolve any disputes arising under this Protective Order. Prior to presenting any dispute under this Protective Order to the Commission, Presiding Administrative Law Judge, or Law and Motion Administrative Law Judge under Resolution ALJ-164 or the CPUC’s Rules of Practice and Procedure, the parties to the dispute shall meet and confer and use their best efforts to resolve the dispute.

(b) If Recipient contests the designation of materials as protected, Recipient shall notify SCE by specifying in writing the materials whose designation is contested. This Protective Order shall continue to apply to such materials after the notification is made. Recipient may seek resolution of the dispute under the procedures set forth in Section 10(a). If the CPUC, Presiding Administrative Law Judge, or Law and Motion Administrative Law Judge of the CPUC finds that the materials at issue are not entitled to protection, the procedures of Section 15 shall apply.

11. All copies of all documents reflecting Protected Materials that are submitted or submitted with the Commission, including the portion of the hearing testimony, exhibits, transcripts, briefs and other documents which refer to Protected Materials, shall bear the prominent markings indicating that the contents are confidential or that the contents include Protected Materials subject to this Protective Order.

12. If Recipient desires to include, utilize or refer to any Protected Materials, Recipient shall first notify Counsel for SCE.
13. Nothing in this Protective Order shall be construed as precluding SCE from objecting to the use of Protected Materials on any legal grounds.

14. Nothing in this Protective Order shall preclude Recipient from requesting the CPUC, or Presiding Judge or the Law and Motion Administrative Law Judge of the CPUC, or any other body having appropriate authority, to find that this Protective Order should not apply to all or any materials previously designated as Protected Materials pursuant to this Protective Order.

15. If the CPUC, Presiding Judge, or the Law and Motion Administrative Law Judge of the CPUC finds at any time that all or part of the Protected Materials need not be protected, those materials shall, nevertheless, be subject to the protection afforded by this Protective Order for seven (7) business days from the date of the decision unless, within such period, a party files a rehearing request or an interlocutory appeal on that finding with the Commission, in which case the materials shall remain protected until seven (7) business days after the final order resolving the question of confidentiality. SCE and Recipient do not waive their rights to seek additional administrative or judicial remedies after the Commission's or the Presiding Judge's or the Law and Motion Administrative Law Judge decision respecting Protected Materials or Reviewing Representatives, or the Commission's denial of an appeal or rehearing thereof.

16. SCE does not waive the right to pursue any other legal or equitable remedies that may be available in the event of actual or anticipated disclosure of Protected Materials.

17. Access and use by Governmental Entities: In the event the CPUC receives a request for a copy of or access to a party’s Protected Materials from a state governmental agency that is authorized to enter into a written agreement sufficient to satisfy the requirements for maintaining confidentiality set forth in Government Code Section 6254.5(e), the CPUC may, not less than five (5) days after giving written notice to SCE of the request, release such protected material to the requesting governmental agency, upon receiving from the requesting agency an executed Interagency Confidentiality Agreement. Such Interagency Confidentiality Agreement shall (i) provide that the agency will treat the requested Protected Materials as confidential in accordance with this Protective Order, (ii) include an explanation of the purpose for the agency’s request, as well as an explanation of how the request relates to furtherance of the agency’s functions, (iii) be signed by a person authorized to bind the agency contractually, and (iv) expressly state that furnishing of the requested Protected Materials to employees or representatives of the agency does not, by itself, make such Protected Materials public. In addition, the Interagency Confidentiality Agreement shall include an express acknowledgment of the CPUC’s sole authority (subject to judicial review) to make the determination whether the Protected Materials should remain confidential or be disclosed to the public, notwithstanding any provision to the contrary in the statutes or regulations applicable to the agency.

18. CPRA Requests: If a request is made pursuant to the California Public Records Act (“CPRA”), Government Code sections 6250, et seq., that SCE’s Protected Materials submitted with or otherwise in the possession of the CPUC be produced, the CPUC will notify SCE of the CPRA request. The CPUC also will notify the requester that the Protected Materials are public records that have been submitted with or submitted to the CPUC accompanied by a claim that they are confidential and/or that there is a public interest served by withholding the records. The CPUC will thereafter proceed to determine, pursuant to
applicable law, whether the requested Protected Materials are excluded from public inspection. In the event the CPUC receives a request from a federal government agency or a judicial subpoena for the production of a party’s Protected Materials in the CPUC’s possession, the CPUC will also notify SCE of such request. In the event that a CPRA requester brings suit to compel disclosure of a party’s Protected Materials, the CPUC will promptly notify SCE of such suit, and Commission Staff and SCE shall cooperate in opposing the suit.

19. Contents of Protected Materials or any other form of information that copies or discloses Protected Materials shall not be disclosed to anyone other than in accordance with this Protective Order and shall be used only in connection with the purpose identified in this Order.

 Entered: _____________________________________
 Administrative Law Judge

 Date: ______________________________________
BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA

Informational Advice Letter
2018 Fourth Quarter Report of Southern California Edison Company for Competitive Local Exchange Projects - Additional Construction Projects

NON-DISCLOSURE CERTIFICATE

I hereby certify my understanding that access to Protected Materials is provided to me pursuant to the terms and restrictions of the Protective Order in this proceeding, that I have been given a copy of and have read the Protective Order, and that I agree to be bound by it. I understand that the contents of the Protected Materials, any notes or other memoranda, or any other form of information that copies or discloses Protected Materials shall not be disclosed to anyone other than in accordance with that Protective Order. I acknowledge that a violation of this certificate constitutes a violation of an order of California Public Utilities Commission.

By: ________________________________
Title: ______________________________
Representing: _______________________
Date: ______________________________
Advice 193

Attachment C

Confidentiality Declaration
SCE'S INFORMATIONAL ADVICE LETTER FOR COMPETITIVE LOCAL EXCHANGE PROJECTS

DECLARATION OF JASIN GLASNER

REGARDING THE CONFIDENTIALITY OF CERTAIN DATA

I, Jasin Glasner, declare and state:

1. I am Principal Manager, Accounting, Finance, and Contracts, of Edison Carrier Solutions at Southern California Edison (SCE). Kevin E. Walker, Senior Vice President of Customer and Operational Services, delegated authority to me to sign this declaration. I have responsibility for overseeing and reviewing the Informational Advice Letter required by Decision (D.) 98-12-083, dated December 17, 1998, which granted a certificate of public convenience and necessity (CPCN) to SCE to operate as a competitive local exchange carrier in the State of California. This decision requires SCE to implement specific mitigation measures adopted in the Mitigated Negated Declaration, attached to the Decision as Appendix D, in compliance with the California Environmental Quality Act.

2. I am making this declaration in accordance with the instructions set forth in Decision 16-08-024 and Decision 17-09-023 of R. 14-11-001, which were issued August 25, 2016, and September 28, 2017, respectively, and govern the submission of confidential documents to the Commission.

3. I have personal knowledge of the facts and representations herein and, if called upon to testify, could and would do so, except for those facts expressly stated to be based upon information and belief, and as to those matters, I believe them to be true.

4. SCE requests confidential treatment of its communication fiber network, specifically, backbone cable information because of concerns over electrical grid security. SCE uses portions of the same communication cables to provide electric utility service in California. Knowing the location of the initial starting point of the cable splice point, and cable route path, identifies the communication cable that connects back into the actual fiber communication network operating the grid. The communication path
back to an electric substation or other critical electric facility can be traced from the original backbone splice location by viewing either overhead cable facilities or by obtaining locations of existing SCE underground vaults or manholes.

5. Listed below are the data for which SCE is seeking confidential protection and the basis for SCE’s confidentiality request.

<table>
<thead>
<tr>
<th>Location of Confidential Data</th>
<th>Pages (if available)</th>
<th>Description of Information that is Confidential</th>
<th>Basis for SCE’s Confidentiality Claim</th>
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<tbody>
<tr>
<td>Attachment A of SCE’s Informational Advice Letter, submitted pursuant to D. 98-12-083, App. D (Mitigation Measure B)</td>
<td>Ranges from 20-100 pages for each filing</td>
<td>Project route description which reflects where the project ties into SCE’s communication network backbone and the route each it travels to reach the end customer location.</td>
<td>The information is protected under Gov’t Code §6254(k) regarding disclosure prohibited by federal law, specifically, CFR 47 U.S.C §222 (privacy of customer information). Every telecommunications carrier, such as SCE, must protect the confidentiality of customer’s proprietary information (§222(a)). The route description included in this filing includes customer location information which is defined as customer proprietary network information under §222(h)1.A.</td>
</tr>
</tbody>
</table>

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on October 22, 2018, at Pomona, California.

Jasin Glasner