

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

Order Instituting Rulemaking Regarding
Emergency Disaster Relief Program.

Rulemaking 18-03-011

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON
WIRELINE PROVIDER RESILIENCY STRATEGIES**

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Dated: **August 12, 2020**

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Table of Contents

Section	Page
I. INTRODUCTION	1
II. DESCRIPTION OF EDISON CARRIER SERVICES (ECS)	2
III. RESPONSE TO RULING REQUESTING COMMENTS ON WIRELINE PROVIDER RESILIENCY STRATEGIES	5
A. Resiliency.....	5
1. Please provide comment on whether the Commission should adopt the resiliency requirement (including the strategies identified in Section 6.2.2 of the Decision) for wireline providers?	5
2. Should this requirement be modified or tailored for wireline providers? If so, how?.....	6
B. Backup Power Requirement – Time Duration.....	6
1. Please provide comment on whether the Commission should adopt the 72-hour time duration for the wireless provider’s backup power requirement for wireline providers.	6
2. Is it reasonable to adopt a backup power requirement of reduced duration?	7
3. Should this requirement be modified or tailored for wireline providers? If so, how?.....	7
C. Backup Power Requirement – Deployment.....	8
1. Please provide comment on whether the Commission should adopt the requirement to permit wireline providers to maintain service through various technological means, identify areas where service cannot be maintained, ensure that customers in high fire threat districts have access to 72-hour backup power during an emergency, and require that this obligation be fulfilled in 12 months from the effective date of the decision?	8
2. Should this requirement be modified or tailored for wireline providers? If so, how?.....	9
D. Backup Power Requirement - Service Level Coverage.....	9

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON WIRELINE
PROVIDER RESILIENCY STRATEGIES**

Table of Contents (Continued)

Section		Page
1.	Please provide comment on whether the Commission should adopt the minimum service level requirement for wireline providers to maintain access to 911 service, 211 service, ability to receive emergency alerts and notifications, and basic internet browsing during a disaster or commercial power outage?	9
2.	Should this requirement be modified or tailored for wireline providers? If so, how?.....	10
3.	Please provide comment on whether applying a 72-hour backup power requirement is reasonable for wireline companies.....	10
4.	What barriers exist that may make a broad backup power requirement infeasible or impracticable for wireline providers?	10
5.	Please provide comments on the position of wireless providers that deploying backup generation sufficient to maintain service throughout their networks would be overly burdensome due to distributed nature of the work, need for 10,000s of network components to be powered either through batteries, fixed generators, or portable generators. What is the public benefit, if any, for wireline providers to maintain their networks for all customers during a power outage?.....	11
6.	Which wireline facilities or portions of the wireline infrastructure present challenges in meeting backup power requirements?	11
E.	Communications Resiliency Plans.....	11
1.	Please provide comment on whether the Commission should adopt the requirement to submit a Resiliency Plan via Tier 2 Advice Letter to the Communications Division within six months of the effective date of decision that includes an array of elements outlined in D.20-07-011, section 6.5.2, for wireline providers?.....	12
2.	Should this requirement be modified or tailored for wireline providers? If so, how?.....	13
F.	Waivers	13
1.	Please provide comment on whether the Commission should adopt the requirement to allow certain sites or facilities that have been identified as either not needing backup power, are unable to support backup power due to safety risks, or, because it is	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON WIRELINE
PROVIDER RESILIENCY STRATEGIES**

Table of Contents (Continued)

Section	Page
objectively impossible or infeasible to deploy backup power as being exempt from the from the backup power requirement and provide additional information on these sites and facilities in the Communications Resiliency Plans as listed in D.20-07-011, section 6.6.2 for wireline providers?.....	13
2. Please provide comments on how the Commission should define “objectively not feasible.”.....	14
3. Should this requirement be modified or tailored to for wireline providers? If so, how?.....	14
G. Emergency Operations Plans	14
1. Please provide comments on whether the Commission should adopt the requirement to submit annual preparedness information that includes emergency operations plan, contact information, preparedness exercise attestation, and public communications plans, and is detailed in D.20-07-011, section 6.8.2, for wireline providers.	14
2. Alternatively, should this requirement be modified or tailored to fit an implementable approach for wireline providers? If so, how?.....	15
H. Alternate Wireline Industry Proposal	15
1. Is the alternate network resiliency, which generally limit the obligation of wireline providers to maintain service for a minimum of 72-hours during an outage to two sets of customers, critical facilities and wireless carrier customers, and dependent on certain conditions, and outlined in detail by the California Cable Telecommunications Association’s (CCTA) proposal reasonable?	15
2. Is it reasonable for non-critical customers to lose wireline communications during a power outage?	16
3. Is the proposed list of critical facility customers sufficient?	16
4. What components of wireline networks need to remain in service in order to maintain service for wireless carrier customers?	16
5. Are the five proposed conditions reasonable? What is the significance of each of these conditions?.....	16

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON WIRELINE
PROVIDER RESILIENCY STRATEGIES**

Table of Contents (Continued)

Section		Page
6.	How will the specific customers within each of the critical facility categories be identified?	18
7.	Will critical facility customers pay an additional premium to receive service that is maintained throughout a loss of power?.....	18
8.	Is 12 months a reasonable timeline to implement these requirements?	18
I.	Communities without Sufficient Wireless Coverage (i.e., Rural Communities).....	19
1.	Is the concern by the Rural County Representatives of California (RCRC) regarding long-term telecommunications reliability challenges in rural communities because, due to a lack of access to wireless services, many residents in these areas require a greater dependence on wireline services reasonable?.....	19
2.	Are there other communities without sufficient wireless coverage that rely solely on wireline communications?	19
3.	If the wireline industry proposal is adopted, how would these communities receive vital emergency notices, such as evacuation alerts, particularly during a power outage?.....	19
4.	Should additional requirements be developed for wireline service providers to maintain service in these communities during a power outage?	19
5.	How can these communities be identified?	20
6.	Could the Commission’s CalSPEED program be used to identify these communities?.....	20
J.	FCC Backup Battery Requirements (for facilities-based fixed residential voice services).....	20
1.	For providers subject to the requirements of offering standby backup power devices for sale to subscribers, please discuss how many subscribers have purchased these backup power devices in California, on a year by year basis since 2015.....	20
2.	Given the expectation that these batteries will ensure service for a 24-hour period, can these wireline networks maintain service for	

**COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E)
IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON WIRELINE
PROVIDER RESILIENCY STRATEGIES**

Table of Contents (Continued)

Section		Page
	24 hours? Is a 24-hour backup power requirement for wireline networks more feasible than a 72- hour backup power requirement? If not, please indicate why not?	20
IV.	CONCLUSION.....	21

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I.

INTRODUCTION

On July 16, 2020, the California Public Utilities Commission (“Commission”) adopted Decision (D.) 20-07-011, which requires California’s wireless providers to develop comprehensive resiliency strategies to prepare for catastrophic disasters and power outages. Pursuant to the *Administrative Law Judge’s Ruling Requesting Comments on Wireline Provider Resiliency Strategies*, dated July 22, 2020 (“Ruling”), Southern California Edison Company (“SCE”) respectfully submits its responses to the questions set forth in the Ruling to aid the Commission in determining whether the wireless provider resiliency strategies should also be applied to wireline providers or whether the Commission should modify resiliency strategies specifically for wireline providers.

In summary, SCE does not believe that stringent resiliency requirements are needed for Competitive Local Exchange Carriers (CLECs) that provide wireline services, such as SCE’s commercial telecommunications business. This is especially true because SCE’s telecommunication business is prohibited from providing services to residential customers who are the primary concern of this Rulemaking.

Like most CLECs, SCE has designed its commercial telecommunication networks with resiliency in mind. Without a certain level of network resiliency, SCE would be unsuccessful in offering services to critical and other customers in the marketplace, and no further regulation is necessary. Additionally, SCE cannot meet some of the stringent and redundant resiliency requirements that the California Public Utilities Commission (CPUC) is contemplating, such as the requirement for wireline carriers to provide 72-hour power backup at its most of its customer locations because either (1) the building owner will not allow it; (2) local authorities will not allow it; or (3) costs would be prohibitive for a short term customer arrangement. To provide needed flexibility for CLECs, the CPUC's resiliency requirements on CLECs and other wireline providers should be eliminated or modified as discussed in more detail in these comments.

II.

DESCRIPTION OF EDISON CARRIER SERVICES (ECS)

SCE is a facilities-based CLEC operating primarily in Southern California through its telecommunications business unit Edison Carrier Solutions (ECS).¹ ECS' wireline services include Ethernet, internet access, wavelengths, and SONET services. ECS' wireline customers include wireline providers, wireless carriers, cable television companies, government entities, schools, and other enterprises of all sizes. ECS does not provide any services directly to residential customers and, in fact, is precluded from doing so in its Certificate of Public Convenience and Necessity (CPCN).

In the commercial marketplace, customers define their service requirements. This includes their expectations of service reliability and resiliency. As an example, Federal Aviation Administration (FAA) requirements are much more stringent than a small business that operates during traditional business hours and that does not rely on internet or wireline service heavily. A

¹ The Commission in D. 98-12-083 granted SCE its certificate of public convenience and necessity (CPCN) as a Competitive Local Exchange (CLEC) that could provide certain telecommunication services to non-residential customers.

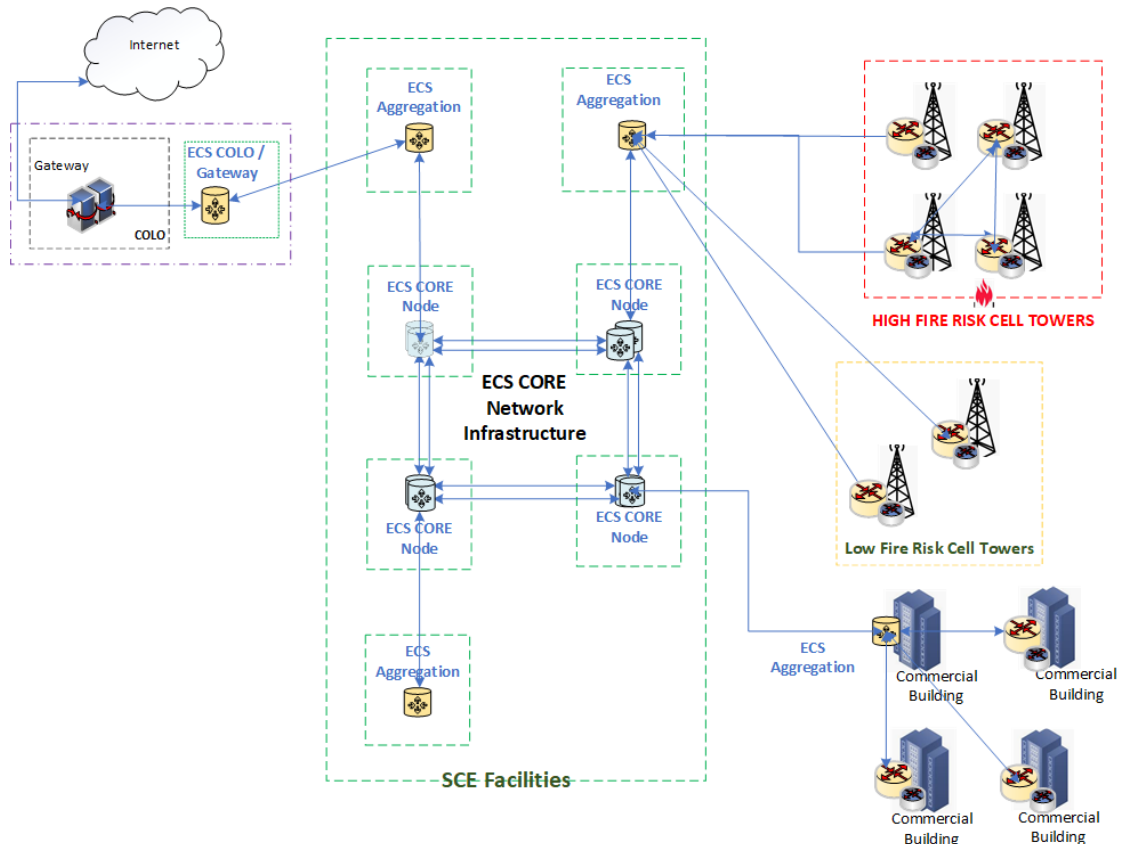
customer with critical needs will often obtain power backup for their operations and deliberately procure wireline services with extra resiliency. This extra resiliency can include redundant equipment and multiple circuits on different pathways with one provider. Another common way for customers with critical traffic to obtain resiliency is by purchasing services for the same site from multiple providers. In the case of wireless providers in high fire areas, ECS depends on the wireless provider to provide power (including backup) for its equipment that is located at their sites.

Like most CLECs, ECS has designed its commercial telecommunications network with resiliency in mind. As shown on the network diagram (Figure 1), ECS defines its network locations within four major classes.

1. The core network nodes in the center of the network, which are hardened to support all network traffic.
2. The aggregation-hubs that are also hardened for all traffic. These critical core-node and aggregation-hub locations already have physical security and significant protection if a disaster occurs (fire-related or otherwise). Both the core-nodes and the aggregation-hubs have redundant equipment and battery backup sized to maintain power during most disaster scenarios. All traffic through the core-nodes and aggregation-hubs is treated the same whether the customer procured extra resiliency or not.
3. The customer locations (including wireless cell tower sites), which vary widely in their resiliency based primarily on the customers preferences. Backup power is often at the discretion of the building owner who may or may not be the customer.
4. The network gateways and interconnections where ECS connects to the internet and to other telecommunications carriers. Backup power at these gateways is controlled by the vendor and a service level agreement is in place between ECS and the vendor as to expected availability of service.

The entire network is monitored and maintained on a 24-hour 365-day basis. As to the facilities outside of ECS' and other locations, the fiber optic cables that connect the network locations to one another are routed on diverse paths, wherever practical, to mitigate the risk of outages due to fallen tree branches, fires, and automotive accidents.

Figure 1- ECS High Level System Topology (Illustrative Diagram)



LEGEND	
	ECS Router / Switch
	Customer Prem Router / Switch
	Aggregation / Gateway Node
	CORE Node
	Core and Aggregation Facility (Green Dash)
	ECS COLO (Green Dotted)
	Telecom Colocation (Purple Dot / Dash)
	Low Risk Fire Cell Towers (Yellow Dash)
	High Risk Fire Cell Towers (Red Dash Fire Symbol)
	Fiber – Network Connectivity

III.

RESPONSE TO RULING REQUESTING COMMENTS ON WIRELINE PROVIDER RESILIENCY STRATEGIES

A. Resiliency

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE's telecom business. Notwithstanding the above, SCE provides the following comments:

1. **Please provide comment on whether the Commission should adopt the resiliency requirement (including the strategies identified in Section 6.2.2 of the Decision) for wireline providers?**

The Ruling defines resiliency as the ability to recover from or adjust to adversity or change through an array of strategies including, but not limited to (a) backup power; (b) redundancy; (c) hardening; (d) temporary facilities; (e) communication and coordination with emergency responders at the local, state, and federal level; and (f) preparedness planning. SCE agrees with this definition but believes that though the strategies are well-intentioned, they should be deployed differently based on customer need.

As discussed in Section II, ECS already employs a certain amount of redundancy and preparedness planning at all its locations ("b" and "f"). Additionally, in the core-nodes and aggregations hubs, ECS includes the enhanced strategies of backup power, temporary facilities, and hardening ("a," "c," and "d"). These enhanced strategies are also employed on an ad hoc basis at customer locations at the customer's discretion. These strategies should be restricted to critical communications where the customer operates.

As to communications and coordination ("e"), like all CLECs, ECS follows federal and state law on communicating significant outages by reporting them promptly to the CPUC under General Order No. 133-C and to the Federal Communications Commission (FCC) under 47

C.F.R. Part 4. Additional reporting of outages under this Rulemaking would be duplicative. Unless an emergency responder organization is a direct customer of ECS, communication and coordination with the emergency responder organization is appropriately left to ECS' customers, therefore this requirement is unnecessary.

2. Should this requirement be modified or tailored for wireline providers? If so, how?

As discussed in Section II and above, ECS includes enhanced strategies of backup power, temporary facilities, and hardening at its core-nodes and aggregation hubs. These enhanced strategies are also employed on an ad hoc basis at customer locations at the customer's discretion. As such, SCE does not believe that resiliency requirements are needed for CLECs that provide wireline services, such as SCE's telecom business.

B. Backup Power Requirement – Time Duration

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE's telecom business. Notwithstanding the above, SCE provides the following comments:

1. Please provide comment on whether the Commission should adopt the 72-hour time duration for the wireless provider's backup power requirement for wireline providers.

A flat 72-hour time duration may be reasonable for a wireless provider because each of their sites serve hundreds of individuals with basic telecommunications services. However, a CLEC generally serves no more than a handful of customers at each of its end points and backup power at these end points is controlled by the customer or their landlord. Since the backup power duration is at the customer's discretion, SCE believes this power requirement should not be placed on CLECs. Further, SCE's telecom business does not serve residential customers

directly, who are the primary concern of this Rulemaking. Additionally, as discussed in Section II, ECS includes enhanced strategies of backup power, temporary facilities, and hardening at its core-nodes and aggregation hubs. These enhanced strategies are also employed on an ad hoc basis at customer locations and at the customer's discretion.

2. Is it reasonable to adopt a backup power requirement of reduced duration?

Yes, it is reasonable to adopt a backup power requirement of reduced duration (*i.e.*, less than 72 hours), as there are other resiliency strategies that may be reasonably deployed. For wireline companies, a well-designed core network can reroute traffic in case of power loss or circuit interruption. In addition, affected customers may establish and employ the “right level” of protection that meets their respective needs. These customers may opt to secure backup circuits from other wireline providers on different routing pathways to enhance the resiliency of critical network traffic. Therefore, having a backup power requirement as “the solution” may be effective at wireless cell towers to ensure equipment is energized, but it is not always necessary for other wireline services.

3. Should this requirement be modified or tailored for wireline providers? If so, how?

This requirement should be eliminated or modified for wireline providers. This is further discussed in Section II and in sections above. The nature of wireline service is to have thousands of interconnected network points each with their own appropriate level of resiliency requirements. For example, end user customers may provide their own backup power strategy at their facilities and these end users' resiliency strategies are beyond the scope of this Rulemaking.

C. Backup Power Requirement – Deployment

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE’s telecom business. Notwithstanding the above, SCE provides the following comments:

- 1. Please provide comment on whether the Commission should adopt the requirement to permit wireline providers to maintain service through various technological means, identify areas where service cannot be maintained, ensure that customers in high fire threat districts have access to 72-hour backup power during an emergency, and require that this obligation be fulfilled in 12 months from the effective date of the decision?**

Yes, CLECs should be permitted to maintain service through various technological means. Clearly having alternative means (and not a one-size-fits-all approach) to implement the requirements is necessary, as a strategy that works well in one location may be unworkable in another.

Since each wireline service crosses through multiple networks points, which may be temporarily rerouted at any time, it would be impossible to definitively identify areas where service cannot be maintained in advance.

It will be difficult or impossible to have 72-hour backup power in areas that are High Risk for fire due to even more stringent requirements from US Forestry Service, Bureau of Land Management, Air Quality Management Districts, County, City, State and Federal, Building and Safety rules and regulations, which would not permit a generator, and/or a larger tank to be installed at a location. County, City Building and Safety and Coastal Commission requirements differ, and each location would require evaluation and discussion with local planning departments to determine impact, which could include lengthy processing with governmental entities tasked with protecting the environment. This lengthy and expensive process is impractical at customer locations where the wireline service contract is likely three to five years.

2. **Should this requirement be modified or tailored for wireline providers? If so, how?**

Technical issues such as the 72-hour timeframe, the term “various technological means,” implementation timing of 12 months, end-to-end wireline provider accountabilities (see Figure 1– moving cellular traffic/backhaul requires traffic handoffs where multiple companies potentially own and manage the equipment separately), and scope exclusions would be best managed in technical discussion forums or workshops, where the subject matter experts can work together for an optimal solution.

D. **Backup Power Requirement - Service Level Coverage**

SCE does not believe that resiliency requirements are needed for CLECs that provide wireline services, such as SCE’s telecom business. Notwithstanding the above, SCE provides the following comments:

1. **Please provide comment on whether the Commission should adopt the minimum service level requirement for wireline providers to maintain access to 911 service, 211 service, ability to receive emergency alerts and notifications, and basic internet browsing during a disaster or commercial power outage?**

ECS does not directly provide 911 service, 211 service, or an individual’s ability to receive emergency alerts and notifications. However, ECS does provide internet service directly to businesses and provides general telecommunications services to wireless providers and other wireline providers. For services provided to other wireline providers, ECS does not have visibility into the type or criticality of the traffic; therefore, SCE does not recommend a one-size-fits-all approach for all wireline services.

2. **Should this requirement be modified or tailored for wireline providers? If so, how?**

This requirement should be eliminated or modified for wireline providers. This is further discussed in Section II and in sections above.

3. **Please provide comment on whether applying a 72-hour backup power requirement is reasonable for wireline companies.**

For ECS, providing 72-hour backup power may not be feasible for all of ECS' network locations. For more than 1,000 of ECS' equipment locations, providing 72-hour backup power may not be feasible because either (1) the building owner will not allow it; (2) local authorities will not allow it; or (3) costs would be prohibitive for a short-term customer arrangement.

Providing 72-hour backup power at all end user locations may not be technically or commercially feasible, which needs to be assessed case-by-case given the variables that need to be considered. For example, battery backup power may be provided assuming space is available, and the property owner approves. Providing 72-hour backup power requires adequate space, which may have a significant impact on property owners that do not have adequate space. Often, ECS' customer is not the owner of the property and would not be able to approve the installation of backup power equipment without the owner's consent. The building owner would need to approve any installations and it is unknown at this time if ECS could gain approval at every location. Also, many of ECS' contracts are short-term, three years or fewer. Supplying 72-hour backup power for every short-term contract may not be sustainable.

4. **What barriers exist that may make a broad backup power requirement infeasible or impracticable for wireline providers?**

At a minimum, ECS anticipates barriers to obtaining building owner approval, environmental restrictions, technological feasibility, space requirements, and costs to provide backup power at each end user location.

5. **Please provide comments on the position of wireless providers that deploying backup generation sufficient to maintain service throughout their networks would be overly burdensome due to distributed nature of the work, need for 10,000s of network components to be powered either through batteries, fixed generators, or portable generators. What is the public benefit, if any, for wireline providers to maintain their networks for all customers during a power outage?**

Where a wireless provider has tens of thousands of network components, wireline providers have multiples of that to support their wireless customers. Deployment to support power backup for all wireline network components would be overly burdensome.

6. **Which wireline facilities or portions of the wireline infrastructure present challenges in meeting backup power requirements?**

Customer locations will present challenges in meeting backup power requirements. Customer locations are not always customer-owned and backup generation would require building owner approval, additional space, possible construction, and permitting.

E. Communications Resiliency Plans

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE's telecom business. Notwithstanding the above, SCE provides the following comments:

1. Please provide comment on whether the Commission should adopt the requirement to submit a Resiliency Plan via Tier 2 Advice Letter to the Communications Division within six months of the effective date of decision that includes an array of elements outlined in D.20-07-011, section 6.5.2, for wireline providers?

It is feasible to submit a high-level plan with strategies based on the class of location. Specifics of each site are confidential, and release of such information is protected by federal law. 18 C.F.R. Chapter I, Federal Energy Regulatory Commission, Department of Energy (NERC/CIP) regulations for SCE-owned substations and CPNI (Section 222 of the Communications Act) for customer locations. Designing an overarching resiliency strategy could be completed in 12 months.

ELEMENT	RESPONSE
Detailed PSPS and grid outage response plans	It is reasonable to provide high-level strategies based on the type of network location.
Facilities with and without battery backup, fixed generation, and mobile generator hookups	Specific locations of critical SCE facilities are confidential under federal law (NERC/CIP) Customer locations are confidential under federal law (CPNI).
The number of mobile generators and refueling trucks and specify which are stationed in California	It is reasonable to specify the number of mobile generators and refueling trucks and to specify which are stationed in California.
Identify the ability to replace damaged facilities, including logical and physical network route diversity and temporary facilities (e.g., mobile cell sites and temporary microwave backhaul)	It is reasonable to identify the ability to replace damaged facilities, including logical and physical network route diversity and temporary facilities.
Identify employees dedicated to refueling and vendors including company and contract agreement	Individual employee names are confidential and so are refueling contracts.
Identify to the ability to support near real time reporting on system outages as required by CPUC rules, Cal OES regulations and California Government Code	Significant outages are already reported promptly to the CPUC under General Order No. 133-C and to the FCC under 47 C.F.R. Part 4 and a duplication of this effort is unwarranted.
Provide copies of refueling schedules	It is reasonable to provide copies of refueling schedules.
Provide copies of roaming agreement	Does not apply to wireline.
Provide copies of cooperative agreements to pool resources with other providers	Does not apply to wireline.

2. **Should this requirement be modified or tailored for wireline providers? If so, how?**

Submission of a high-level plan with strategies based on class of location is feasible, however, specific locations of critical SCE facilities and customer locations are confidential under federal law and, therefore, cannot be provided. Additionally, near real-time reporting on system outages are already reported promptly to the CPUC under General Order No. 133-C and to the FCC under 47 C.F.R. Part 4.

F. **Waivers**

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE's telecom business. Notwithstanding the above, SCE provides the following comments:

1. **Please provide comment on whether the Commission should adopt the requirement to allow certain sites or facilities that have been identified as either not needing backup power, are unable to support backup power due to safety risks, or, because it is objectively impossible or infeasible to deploy backup power as being exempt from the from the backup power requirement and provide additional information on these sites and facilities in the Communications Resiliency Plans as listed in D.20-07-011, section 6.6.2 for wireline providers?**

Yes, at a minimum, customer sites should be automatically excluded to comply with federal confidentiality laws described above in Section III.G.1.

2. Please provide comments on how the Commission should define “objectively not feasible.”

ECS considers locations “objectively not feasible” where (1) the cost is prohibitive; (2) landlords who are not willing to allow generators or green energy power backups; and (3) governmental rights and permits cannot be obtained or have onerous add-on requirements.

3. Should this requirement be modified or tailored to for wireline providers? If so, how?

In addition to all of SCE’s other recommendations, customers should be allowed to opt-out for their own services.

G. Emergency Operations Plans

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE’s telecom business. Notwithstanding the above, SCE provides the following comments:

1. Please provide comments on whether the Commission should adopt the requirement to submit annual preparedness information that includes emergency operations plan, contact information, preparedness exercise attestation, and public communications plans, and is detailed in D.20-07-011, section 6.8.2, for wireline providers.

Submission of a high-level plan with strategies based on class of location is feasible. Specifics of each site are confidential, and release of such information is protected by federal law. NERC/CIP for SCE-owned substations and CPNI for customer locations.

2. **Alternatively, should this requirement be modified or tailored to fit an implementable approach for wireline providers? If so, how?**

Wireless transmission site locations are public information and are registered with both the FCC and the CPUC. As discussed in the previous section, most wireline locations are confidential, therefore any report, such as the Emergency Operations Plan, would have to be less detailed for specific locations than a similar wireless provider report.

H. **Alternate Wireline Industry Proposal**

SCE believes that resiliency requirements are not needed for CLECs that provide wireline services, such as SCE's telecom business. Notwithstanding the above, SCE provides the following comments:

1. **Is the alternate network resiliency, which generally limit the obligation of wireline providers to maintain service for a minimum of 72-hours during an outage to two sets of customers, critical facilities and wireless carrier customers, and dependent on certain conditions, and outlined in detail by the California Cable Telecommunications Association's (CCTA) proposal reasonable?**

SCE recommends that the 72-hour power backup requirement be limited to those "critical facilities and wireless carrier customers," which have their own backup power facilities as described in CCTA proposal. This includes fire stations, police stations, hospitals, and emergency command centers in Tier 2 and 3 High Fire-Threat Districts.

2. **Is it reasonable for non-critical customers to lose wireline communications during a power outage?**

Yes, for office buildings and other general commercial facilities. When the power goes off, the people go home, work remotely, or move to a secondary facility as determined by their employer's own resiliency plans.

3. **Is the proposed list of critical facility customers sufficient?**

The current list of critical facility customers appears to be sufficient. It is easy, however, to have scope creep – adding more customers to the “critical list” that are not truly critical. This would dilute the efforts to provide effective backup to actual critical facility customers in an emergency scenario.

4. **What components of wireline networks need to remain in service in order to maintain service for wireless carrier customers?**

The equipment collocated at the specific wireless site, core-nodes, aggregation-hubs, network gateways/interconnections and fiber optic cables and routing facilities (conduits, manholes, poles, and towers, cages, splice cases, etc.) that interconnect with the equipment. Equipment components include User Network Interface (UNI), Network to Network Interface (NNI), Network Aggregation, Gateway Equipment, Aggregation and Colocation Facility (COLO) location(s).

5. **Are the five proposed conditions reasonable? What is the significance of each of these conditions?**

Condition 1. The customer’s facility is powered either by its own backup power or via commercial power.

Response 1: Yes – The wireline network can't move traffic that can't be received, processed and routed into the wireline network. It requires that input to initiate the communications process.

Condition 2. The wireline company owns the network components that serve the customer (*e.g.*, not including leased facilities).

Response 2: This supports the idea that each wireline provider must back up its own network and this Rulemaking covers all providers. Each wireline provider takes on the responsibility for its portion of the wireline traffic, and not for elements upstream or downstream. It is critical to establish demarcation elements for clarity on responsibilities.

Condition 3. The wireline company can obtain the necessary access, permits and/or other relevant approvals to install and maintain equipment, as long as doing so does not present risk of harm to persons or property and is feasible.

Response 3: A carve-out is necessary for situations where it is objectively not feasible.

Condition 4. The wireline company's facilities have not been damaged and any backup power equipment can be safely accessed by workers for refueling and other maintenance purposes.

Response 4: If the facilities are damaged, backup power will not resolve the outage and SCE cannot risk an employee's personal safety to provide backup power to a damaged facility, whether inside a building or fiber optic cables located in the public right-of-way. Facilities should include infrastructure. It is easy to focus on equipment and backup power, but if cables, fibers within the cable, manholes, splice cases, and other facilities in-between are damaged it has the same effect – a loss of service.

Condition 5. For PSPS events, the investor-owned utilities (IOU) have provided the mandatory 48 to 72 hours' notice to the wireline communications facility operator, consistent with the guidelines adopted in D.19-05-042.

Response 5: If there is a timely notification, it gives the provider an opportunity to move temporary power options (or service reroutes) to the affected locations.

6. How will the specific customers within each of the critical facility categories be identified?

It would be critical for each customer to self-identify its traffic as requiring enhanced resiliency and be willing to do its part in creating this resiliency. The customer would take responsibility to enhance resiliency through providing its own power backup and trying to ensure the services it procures are redundant and diverse. The CPUC could consider a clearinghouse to evaluate and register critical facilities similar to the Telecommunications Service Priority (TSP) program. For services carrying critical federal government traffic, the TSP program provides such an identification and vetting process.

7. Will critical facility customers pay an additional premium to receive service that is maintained throughout a loss of power?

Yes, if additional or unusual costs are incurred by ECS, it would pass these costs through to the customer. Often, the higher price would move the customer away from purchasing the service or accepting a lower level of resiliency.

8. Is 12 months a reasonable timeline to implement these requirements?

Designing an overarching resiliency strategy could be completed in 12 months. However, implementing such a strategy may not be feasible because permitting alone is unpredictable and the process is generally lengthy (12 to 14 months is not unusual). There should be options for extension, deferral, and exceptions to assist if deployment challenges emerge.

I. Communities without Sufficient Wireless Coverage (i.e., Rural Communities)

- 1. Is the concern by the Rural County Representatives of California (RCRC) regarding long-term telecommunications reliability challenges in rural communities because, due to a lack of access to wireless services, many residents in these areas require a greater dependence on wireline services reasonable?**

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

- 2. Are there other communities without sufficient wireless coverage that rely solely on wireline communications?**

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

- 3. If the wireline industry proposal is adopted, how would these communities receive vital emergency notices, such as evacuation alerts, particularly during a power outage?**

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

- 4. Should additional requirements be developed for wireline service providers to maintain service in these communities during a power outage?**

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

5. How can these communities be identified?

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

6. Could the Commission's CalSPEED program be used to identify these communities?

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

J. FCC Backup Battery Requirements (for facilities-based fixed residential voice services)

1. For providers subject to the requirements of offering standby backup power devices for sale to subscribers, please discuss how many subscribers have purchased these backup power devices in California, on a year by year basis since 2015.

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

2. Given the expectation that these batteries will ensure service for a 24-hour period, can these wireline networks maintain service for 24 hours? Is a 24-hour backup power requirement for wireline networks more feasible than a 72-hour backup power requirement? If not, please indicate why not?

These questions do not apply to SCE because its telecommunications CPCN explicitly does not allow it to provide service to residential customers.

IV.

CONCLUSION

For all the foregoing reasons, the Commission should adopt SCE's recommendations herein.

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August 12, 2020

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

Order Instituting Rulemaking Regarding
Emergency Disaster Relief Program.

R.18-03-011

CERTIFICATE OF SERVICE

I hereby certify that, pursuant to the Commission's Rules of Practice and Procedure, I have this day served a true copy of **COMMENTS OF SOUTHERN CALIFORNIA EDISON COMPANY (U 338-E) IN RESPONSE TO JULY 22, 2020 RULING REQUESTING COMMENTS ON WIRELINE PROVIDER RESILIENCY STRATEGIES** on all parties identified on the attached service list(s) for **R.18-03-011**. Service was effected by one or more means indicated below:

- Transmitting the copies via e-mail to all parties who have provided an e-mail address.
- Placing the copies in sealed envelopes and causing such envelopes to be delivered by US Mail to the offices of the Commissioner(s) or other addresses(s).

**Colin Rizzo
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, Ca 94102-3214**

Executed this **August 12, 2020** at Rosemead, California.

/s/ Sylvia Valdez

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California
Public Utilities
Commission



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[TOP OF PAGE](#)

[BACK TO INDEX OF SERVICE LISTS](#)