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Via Electronic Mail

California Public Utilities Commission
505 Van Ness Avenue
San Francisco, California 94102

Office of Energy Infrastructure Safety
715 P Street, 20th Floor
Sacramento, California 95814

Re: DISH Wireless L.L.C. Comments to Electrical Undergrounding Plans (Docket #2023-UPs) for Guidelines for the 10-Year Electrical Undergrounding Distribution Infrastructure Plan (“Undergrounding Plan”)

DISH Wireless, L.L.C. (U-4533-C) (“DISH”) hereby submits comments on Guidelines for the Electrical Undergrounding Plans (Docket #2023-UPs) mandated by SB 884.¹ DISH has reviewed both the Memo to Stakeholders and Request for Comments and Proposals on Guidelines for Development of 10-Year Undergrounding Plans (“Staff Documents”) and noted that there is no mention of how utility poles will be managed and/or maintained after undergrounding of the electrical lines. DISH is currently constructing an advanced standalone 5G wireless network across the nation, including in California. Removal of existing electrical distribution poles would undermine this effort and increase risks to the public during wildfires and other emergencies, because wireless carriers continue to rely upon utility poles to install equipment, as explained below.

A major premise behind the Undergrounding Plan is to reduce wildfire risk and improve safety for Californians. Yet, telecommunications carriers are necessary to the functioning of 911 and mobile voice and broadband services used for communications by first responders and citizens during wildfire emergencies. Wireless telecommunications carriers often locate equipment on utility poles. In Wildfire Threat Zones 2 and 3, where undergrounding is being reviewed, there are few other vertical structures available for wireless equipment and/or broadband attachments. Removing distribution poles therefore also removes critical infrastructure to support communications equipment.

¹ Codified at Cal. Pub. Util. Code §388.5(e)(4).

DISH's 5G network supports mobile broadband and emergency 911 traffic, both of which are important for first responders to detect wildfire ignition early, communicate and coordinate fire-fighting efforts, and warn citizens of impending evacuations. The California Public Utilities Commission has recognized the importance of wireless communications services during emergencies: "We must ensure that California's wireless customers have access to communications services during disasters or power outages, can receive emergency alerts and notifications, and access the internet for critical information during times of crises."² For this reason, the continued availability of utility poles required to support telecommunications services must be considered as a factor in evaluating the large electric utilities' 10-year undergrounding plans.

Unfortunately, the Staff Documents fail to consider how or whether electric utilities may dispose of utility poles after undergrounding their facilities. The Office should include a consideration of the safety risks created by loss of vertical infrastructure needed to support communications equipment and services during wildfires as part of its analysis of electric utilities' 10-year undergrounding plans. Without considering of this risk, Energy Safety will not have a complete record to evaluate the efficacy of underground in reducing wildfire risk, as SB 884 mandate.

Public Utilities Code section 8388.5(d)(2) directs Energy Safety to approve an Undergrounding Plan only if the large electrical corporation "has shown" that the Undergrounding Plan will substantially increase electric reliability and "substantially reduce the risk of wildfire." Clearly, if first responders are unable to communicate warnings, evacuation orders, and other essential messages, the risk of wildfires becoming even more catastrophic is almost certain. Therefore, Energy Safety should revise its guidelines to include an explicit consideration of the effect of undergrounding on communications' providers ability to continue providing critical services during wildfires if such undergrounding will result in a loss of necessary infrastructure to support communications equipment.

DISH is committed to building out its 5G network to ensure that first responders and Californians have readily available communications to assist in reducing the scope, duration and devastation from wildfire emergencies. To that end, DISH respectfully requests that Energy Safety make the revisions requested in these comments.

Sincerely,
/s/ Anita Taff-Rice
Counsel for DISH Wireless L.L.C.

cc: fred.hanes@cpuc.ca.gov

² *Id.*, at p.76.