



## WESTSIDE CITIES

- BEVERLY HILLS
- CULVER CITY
- LOS ANGELES
- SANTA MONICA
- WEST HOLLYWOOD
- COUNTY OF LOS ANGELES

May 4, 2009

CPUC, Energy Division  
Attention: Tariff Unit  
505 Van Ness Avenue  
San Francisco, California 94102

**SUBJECT:** Rule Modifications to Accommodate Southern California Edison Company's Initiative to Install Above-Ground Equipment in SCE's Underground Distribution Systems Whenever Feasible  
[\(ADVICE 2334-E\)](#)

Dear Commissioners:

The Westside Cities Council of Governments request the Public Utilities Commission Energy Division table until more information is provided to the Westside Cities consideration of the intent of Southern California Edison (SCE) to make certain rule modifications to accommodate the installation of above-ground equipment in SCE's underground distribution systems and to systematically replace existing underground installations above-ground whenever feasible. This matter has only been reviewed briefly with some staff and not fully with elected officials of the Westside. However, of the elected officials who have learned of the proposed rule modifications, there is strong opposition and belief that such modifications would be a setback to the achievement of the goals SCE is seeking with the proposed rule modifications and the partnership that communities have had with SCE on design of such improvements.

The SCE Advice 2334-E indicates the reason for the modifications is to enhance service reliability, safety and protection of the environment. The Westside Cities feel these are among the right factors to drive such important modifications to the manner in which installations are currently designed. However, the Westside Cities have not been fully briefed on the intended modifications, which also mean that

discussions with the Westside Cities as a key partner representing its public constituencies has not occurred.

Over the years, the Westside Cities, as has most municipalities and counties, has worked very hard to create balance between often difficult approaches to public improvements. Therefore, the Westside Cities in making this request hopes SCE meets with the Westside Cities and other municipalities and counties as a partner to determine the best approach to insuring safety, protection of the environment, and reliability of these critical public infrastructure installations.

Sincerely,



Gordon R. Anderson  
INTERIM EXECUTIVE DIRECTOR

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