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September 23, 2009

Mr. Honesto Gatchalian/ Ms. Maria Salinas
Energy Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102

**RE: League Opposition to Resolution E-4241. Southern California Edison (SCD)
(I.D. 8841)**

Dear Mr. Gatchalian and Ms. Salinas:

Please be advised that the League of California Cities, at our 2009 General Assembly attended by more than 380 member cities, unanimously opposed the Draft Resolution (E-4241) by the California Public Utilities Commission regarding the deletion of the customer option of placing distribution system equipment underground.

Please find the enclosed resolution, adopted by the General Assembly of the League of California Cities, outlining our concerns regarding the draft resolution.

If you have any questions or concerns regarding this position, please feel free to contact Kyra Ross, Legislative Representative, at 916-658-8200.

Sincerely,

A handwritten signature in black ink, appearing to read "Chris McKenzie".

Chris McKenzie
Executive Director

Encl.: League of California Cities Resolution, adopted at 2009 General Assembly
cc: See attached Certificate of Service and Service List



September 2009
QUALIFIED PETITIONED RESOLUTION

4. RESOLUTION IN OPPOSITION TO RULE MODIFICATIONS TO ACCOMMODATE SOUTHERN CALIFORNIA EDISON COMPANY'S INITIATIVE TO INSTALL ABOVE-GROUND EQUIPMENT

Source: City of West Hollywood

General Resolutions Committee Recommendation: Approve

General Assembly Recommendation: Approve

WHEREAS, in March of 2009, the Southern California Edison Company (SCE) launched an initiative to discontinue its existing practice of installing below-ground equipment for underground distribution systems; and

WHEREAS, above-ground installations are suspected of causing fires and considered a public safety hazard; and

WHEREAS, above-ground installations could limit project development by limiting development space and intruding into the city's right-of-way; and

WHEREAS, the Southern California Edison Company's initiative for above-ground installations infringes on cities' authority and right over its affairs; and

WHEREAS, under the current rule Southern California Edison and cities must work together to identify safe and responsive solutions to equipment placement whether under-or above-ground and this relationship should be preserved; now, therefore be it

RESOLVED, by the General Assembly of the League of California Cities, assembled at the Annual Conference in San Jose, September 18, 2009, that the League oppose the rule modifications proposed by the SCE Initiative, to install above-ground equipment in SCE's underground distribution system and to urge the CPUC to reject SCE's proposal – Advice 2334-E (U 338-E) – to delete the customer option of placing distribution system equipment underground when receiving new service under Tariff Rules 2, 15 and 16, that is to be considered by the California Public Utilities Commission at its October 15, 2009 meeting, I.D. #8841, Energy Division Resolution E-4241, Southern California Edison.

CERTIFICATE OF SERVICE

I, the undersigned, declare that I am a citizen of the United States and am employed in the City and County of Sacramento, State of California. I am over the age of 18 and not a party to this action; my business address is: 1400 K Street, Sacramento, CA 95814.

On September 23, 2009, I served the document(s) described as: **League Opposition to Resolution E-4241. Southern California Edison (SCD) (I.D. 8841)** by placing true copies thereof enclosed in sealed envelopes addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

(BY MAIL) I am "readily familiar" with the firm's practice for collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Sacramento, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

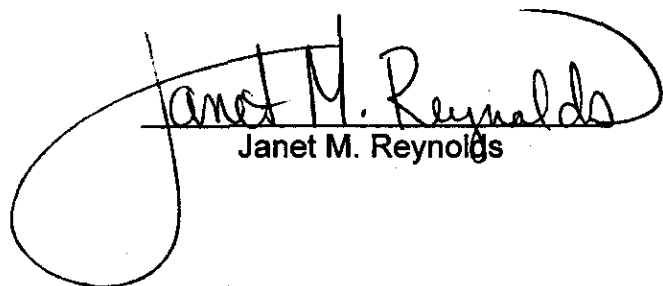
(BY FAX) I transmitted, pursuant to Rules 2001 et seq., the above described document(s) by facsimile machine (which complied with Rule 2003(3)), to the above-listed facsimile number(s). The transmission originated from facsimile phone number (916) 658-8240 and was reported as complete and without error. The facsimile machine properly issued a transmission report, a copy of which is attached hereto.

(BY PERSONAL SERVICE) I caused such envelope(s) to be delivered by hand to the offices of the addressee(s).

(BY OVERNIGHT DELIVERY) I caused said envelope(s) to be delivered overnight via an overnight delivery service in lieu of delivery by mail to the addressee(s).

Executed on September 23, 2009 at Sacramento, California

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


Janet M. Reynolds

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