

Date of Hearing: July 1, 2026

ASSEMBLY COMMITTEE ON UTILITIES AND ENERGY

Cottie Petrie-Norris, Chair

SB 1425 (Cortese) – As Amended June 24, 2026

**SENATE VOTE:** 28-8

**SUBJECT:** High-Speed Rail Authority: property: right-of-way

**SUMMARY:** Authorizes the California High-Speed Rail Authority (HSRA) to issue permits for activities that encroach on the HSRA's right-of-way (ROW) and grants HSRA broad enforcement powers, including removal of unpermitted encroachments, civil penalties of \$5,000 per day, and recovery of costs through litigation. Specifically, **this bill:**

- 1) Adopts numerous definitions governing the chapter, including:
  - a) "New crossing" which means a new crossing, facility, or infrastructure on the HSRA's ROW installed to accommodate new crossings or facilities.
  - b) "New work" which means work necessary to implement a new installation on the HSRA's ROW, or to repair, maintain, expand, or relocate an existing crossing or structure that was previously installed, relocated, or replaced.
  - c) "Right-of-way" which means any property interest, including, but not limited to, an easement, license, permit, joint-use agreement, or fee ownership, that is acquired by the HSRA for high-speed rail purposes.
- 2) Prohibits a person from installing or performing any encroachment within the California HSRA's ROW without first obtaining an encroachment permit from the HSRA.
- 3) Provides that no person has any franchise rights within the HSRA's ROW.
- 4) Authorizes the HSRA to issue an encroachment permit, in accordance with this bill, that authorizes a permittee to install or perform any kind of encroachment that is not inconsistent with the function, operation, maintenance, enlargement, rehabilitation, safety, or security of the high-speed train system or the HSRA's ROW, as specified.
- 5) Provides that by issuing a permit the HSRA is not responsible for the competence or reliability of the permittee or the encroachment.
- 6) Requires a person seeking a permit to provide the HSRA with all reports, studies, plans, analyses, and other supporting documents as required by the HSRA.
- 7) Requires the HSRA to approve or deny an application for an encroachment permit no later than 60 days from the date of receipt of the complete application, as specified.
- 8) Provides that, except as provided in writing between the permittee and the HSRA, an encroachment permit is to be revocable and nontransferable and may only be modified or transferred with written approval of the HSRA.

- 9) Requires an encroachment to be removed if a permit is revoked.
- 10) Authorizes, before issuing or executing an encroachment permit, the HSRA to require any applicant to provide proof of insurance naming the authority, its directors, and its employees as additional insureds in an amount reasonably necessary to protect the state's interest.
- 11) Authorizes the HSRA to adopt a fee schedule for encroachment permits, as specified.
- 12) Requires notice to be given to the owner, occupant, or person in possession of the encroachment, or to any other person causing or permitting the encroachment to exist, by serving a notice that includes a demand for the immediate removal of the encroachment from the HSRA's ROW, as specified.
- 13) Authorizes the HSRA to remove any encroachment that meets both of the following criteria:
  - a) Not later than 60 days from the date on which a notice was given, the owner, occupant, or person in possession of the encroachment has not asserted a right to be in possession, and has not removed, or commenced to remove the encroachment; and
  - b) The encroachment obstructs, threatens, or prevents the proper operation, maintenance, or rehabilitation of the high-speed train system, or threatens the safety or health of the passengers or workers of the high-speed rail.
- 14) Authorizes the HSRA to immediately remove any encroachment that meets both of the following criteria:
  - a) Not later than three days from the date on which a notice is served, the owner, occupant, or person in possession of the encroachment has not asserted a right to be in possession, and has not removed, or commenced removing in a diligent manner, the encroachment; and
  - b) The encroachment poses an imminent threat to the integrity of one or more features of the high-speed train system, or to the safety and health of the passengers and workers of the high-speed rail.
- 15) Authorizes the HSRA, in the case of an emergency, to take any action necessary to avert, alleviate, repair, or mitigate any threat to the high-speed train system, including the passengers or workers of the high-speed rail.
- 16) Provides that if the HSRA removes any encroachment upon the failure of the owner, occupant, or person in possession of the encroachment to comply with the notice given, the Authority or the Attorney General may bring a civil action seeking the recovery the expense of the removal and related costs.
- 17) Provides that the HSRA or the Attorney General may seek the recovery of civil penalties of the sum of five thousand dollars (\$5,000) for each day the encroachment remains after the expiration of the applicable response period and recover attorney's fees and costs.
- 18) Provides that if the owner, occupant, or person in possession of the encroachment, or person causing or suffering the encroachment to exist, or the agent of any of these parties, disputes or denies the existence of the encroachment or asserts a right to be in possession of the

encroachment pursuant to a valid permit, the HSRA or the Attorney General may commence an action to abate the encroachment as a public nuisance.

- 19) Prohibits a person, unless permitted by existing law or subject to an encroachment permit, from draining water from or onto the HSRA's ROW, as specified.
- 20) Provides that if a person who violates the prohibition of 19) is notified of the violation and fails, neglects, or refuses to cease and discontinue the diversion, drainage, seepage, or overflow of the waters or to pay for the repairs, the HSRA may make repairs and perform work as it determines necessary to prevent the further drainage, diversion, overflow, or seepage of the waters.
- 21) Authorizes, if the HSRA undertakes repairs pursuant to 20), the HSRA or the Attorney General to file a civil action seeking the amount expended for those repairs and work, and a civil penalty of five thousand dollars (\$5,000) for each day the drainage, diversion, overflow, or seepage of the waters is permitted to continue, after the service of the notice.
- 22) Provides that any person who injures or damages any feature of the high-speed train system or the HSRA's ROW is liable for necessary repairs, and the HSRA or the Attorney General may file a civil action seeking the amount expended for the repairs, and attorney's fees and costs for a prevailing plaintiff.
- 23) Prohibits any person, without a permit from the HSRA, from digging up, cutting down, pruning, trimming, or otherwise injuring any tree or shrub within the HSRA's ROW.
- 24) Provides that a person who violates 23) is liable for a civil penalty in the sum of five thousand dollars (\$5,000) for each shrub or tree so damaged in an action brought by the HSRA or the Attorney General.
- 25) Requires that all monies recovered in action, except the award of any reasonable attorney's fees and costs which must be provided to the recovering agency to recoup the cost of litigation, be deposited into the High-Speed Rail Property Fund.
- 26) Creates the High-Speed Rail Property Fund.
- 27) Authorizes the HSRA to adopt regulations to implement this bill.

#### **EXISTING LAW:**

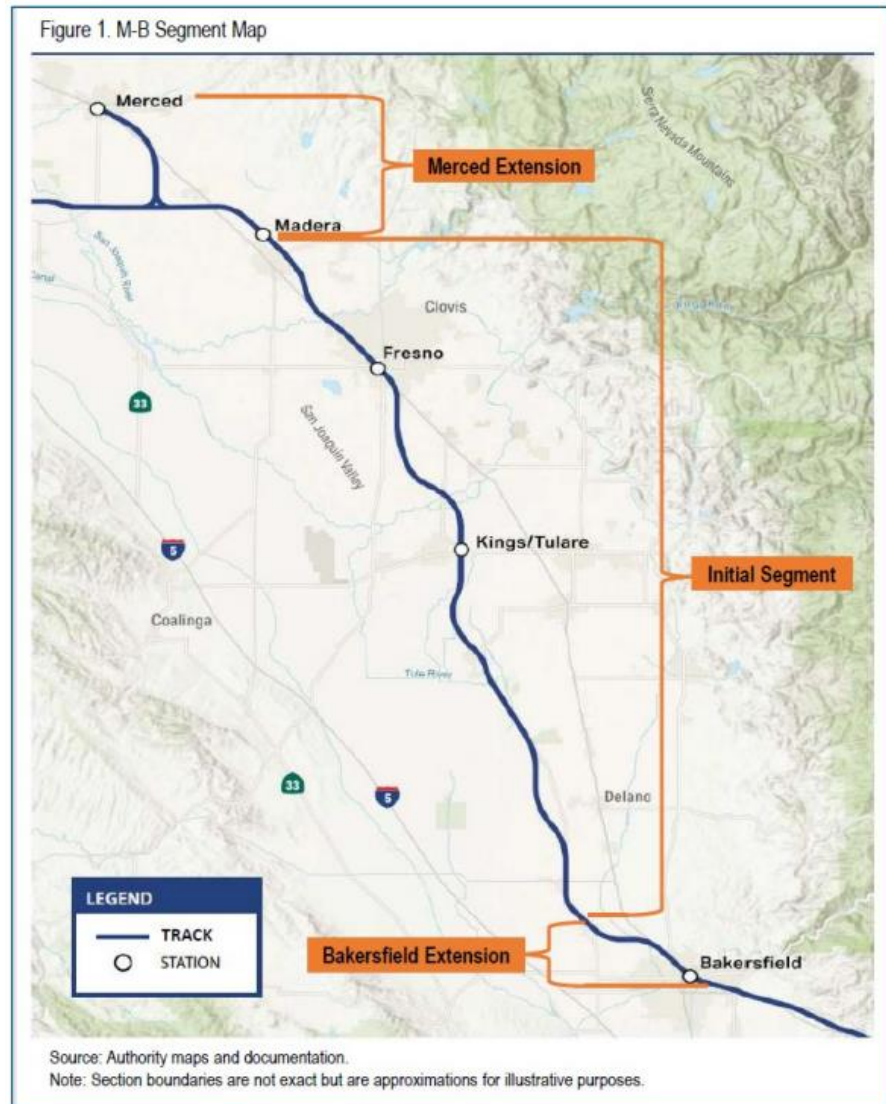
- 1) Establishes the HSRA to develop and implement a high-speed rail system in the state, and vests it with specified powers and duties, including those related to the acquisition of rights-of-way through purchase and eminent domain proceedings, as specified. (Public Utilities Code §§ 185000, *et seq.*)
- 2) Requires the HSRA to submit a biennial project update report, which must be approved by the Secretary of Transportation and submitted to the Legislature, on the development and implementation of intercity high-speed train service. The report, at a minimum, must include a program-wide summary and details by project segment, with all information necessary to clearly describe the status of the project, as specified. (Public Utilities Code § 185033.5)

- 3) Authorizes the HSRA to acquire rights-of-way (ROW) through purchase or eminent domain. (Public Utilities Code § 185036 (b))
- 4) Authorizes the HSRA to sell or lease excess ROW parcels to municipalities or other local agencies for public purposes, and may accept as all or part of the consideration for the sale or lease any substantial benefits the state will derive from the municipality or other local agency's undertaking maintenance or landscaping costs that would otherwise be the obligation of the state. (Public Utilities Code § 185040)
- 5) Requires, when the HSRA needs any utility to remove any utility facility lawfully maintained in the ROW of any HSRA property to a location entirely outside the HSRA property ROW, the HSRA to pay the reasonable and necessary cost of the removal and relocation, as specified. (Public Utilities Code § 185501 (A))
- 6) Establishes a process for encroachment permitting and to prevent unauthorized encroachments for the State Water Project operated by the Department of Water Resources. (Water Code § 12899, *et seq.*)
- 7) Establishes a process for encroachment permitting and to prevent unauthorized encroachments for the Department of Transportation. (Streets and Highways Code § 660, *et seq.*)
- 8) Defines the state highway's "ROW" as "all, or any part, of the entire width of ROW of a state highway, whether or not the entire area is actually used for highway purposes." This includes any airspace over and under state highways as well. For Caltrans, encroachment permits are issued for activities such as the installation, maintenance, or removal of utilities; landscaping and hardscaping; commercial filming activities; special events; surveys; temporary traffic control; and modifications and improvements to the highway infrastructure. (Streets and Highways Code § 660)
- 9) Defines encroachment as any tower, pole, pole line, pipe, pipeline, fence, billboard, stand or building, or any structure, object of any kind, or special event such as a street festival, sidewalk sale, community-sponsored activity, or community-approved activity which is in, under, or over any portion of the state highway right of way. (Streets and Highways Code § 660)

**FISCAL EFFECT:** According to the Senate Committee on Appropriations, this bill may result in significant cost to the HSRA, at least in the high hundreds of thousands of dollars into the near future. However, the committee notes that HSRA indicated it does not anticipate the need for additional positions to implement this bill and expects the permit process to generate sufficient revenues to offset costs.

**BACKGROUND:**

*The HSRA* – The California High-Speed Rail Authority (HSRA) was created by SB 1420 (Kopp, Chapter 796, Statutes of 1996) to plan and build a high-speed rail system connecting major population centers in the state. In 2008, voters approved Proposition 1A, which authorized \$10 billion in general obligation bonds to help fund the project and set performance requirements, including a maximum travel time of 2 hours and 40 minutes between San Francisco and Los Angeles. Since then, the project has faced major obstacles, primarily due to insufficient funding, delays in acquiring land, and issues from relocating utilities. As of May 31, 2025, \$14.4 billion has been spent, mostly on the Merced to Bakersfield segment, as shown in Figure 1.<sup>1</sup>



Various efforts to effectively fund the train have been made over the years. SB 1029 (Committee on Budget and Fiscal Review, Chapter 152, Statutes of 2012) appropriated nearly \$8 billion to begin the Central Valley construction. SB 862 (Committee on Budget and Fiscal Review, Chapter 36, Statutes of 2014) dedicated 25% of Cap-and-Trade revenues to the project on an ongoing basis. The 2022-23 Budget appropriated the remaining \$4.1 billion in Prop 1A bonds, and SB 198 (Committee on Budget and Fiscal Review, Chapter 71, Statutes of 2022) refocused the HSRA on completing the Merced-to-Bakersfield segment as its priority. Most recently, AB 1207 (Irwin, Chapter 117, Statutes of 2025) and SB 840 (Limon and McGuire, Chapter 121, Statutes of 2025) extended the Cap-and-Trade program (now Cap-and-Invest) through 2045 and committed \$1 billion annually to the HSRA through 2045. However, new California Air Resources Board regulations effective September 2026 are expected to cut Greenhouse Gas Reduction Fund revenues roughly in half – to about \$2 billion

<sup>1</sup> CHSRA Office of the Inspector General, *Pre-Construction Activities for the Merced and Bakersfield Extensions: Persistent Delays in Securing Agreements with Third Parties Require New Solutions*; February 21, 2025; <https://hsr.ca.gov/wp-content/uploads/2025/02/Early-Works-Engagement-FINAL-A11Y.pdf>

annually – creating significant funding uncertainty for the high-speed rail project, which as a Tier 2 program under SB 840 may receive inadequate funding.

*Changes Proposed in HSRA’s 2026 Business Plan* – The HSR project has faced significant challenges from the beginning that have delayed the project and increased costs. For example, the acquisition of ROW on the initial 119-mile segment from Madera County to Poplar Avenue north of the city of Shafter in Kern County delayed construction for years. Recently, HSRA has acquired these properties, helping to ensure that the newly selected track-laying consortium has access to the guideway. On June 1, 2026, the Authority’s Board of Directors approved a Track and Systems Construction Contract to begin installing electrified track and signaling.

In an attempt to mitigate some of the difficulties the project has faced, the HSRA identifies the need for numerous, significant, and likely controversial changes (some statutory) in its 2026 Business Plan.<sup>2</sup> These include CEQA exemptions, streamlined utility relocation and third-party management, dedicated legal resources for ROW cases, boosted land use authority and value capture mechanisms, joint development and commercial opportunities, and encroachment permit authority.

On encroachment permitting specifically, the plan identifies it as one of the policy gaps impeding both construction and commercialization. The HSRA notes that it currently lacks explicit authority to issue encroachment permits within its ROW, preventing it from authorizing utilities and businesses to build, install, or cross infrastructure on HSRA property, despite many organizations having already expressed a need for such access. The plan calls for the Legislature to grant this authority, modeled on the existing Caltrans and Department of Water Resources frameworks, describing it as essential to streamlining coordination, improving project efficiency, and supporting the economic activity and asset commercialization strategy the HSRA is counting on to generate revenue before train service begins.

#### COMMENTS:

- 1) *Author’s Statement.* According to the author, “California is building the nation’s first 220 mph, fully electrified, high-speed rail system, and there will be massive development potential along the 500-mile corridor. It is vital that the HSR Authority be able to protect these rights-of-way from encroachments that may interfere with or delay this transformational project. SB 1425 will facilitate timely construction by establishing a permitting program for encroachments that are consistent with the functions and operations of the project’s right-of-way. A clear encroachment permitting process will help ensure that the Authority can protect the project’s land and work more effectively with local property owners, businesses and public entities to bolster the surrounding communities.”
- 2) *Purpose of Bill.* This bill seeks to fill a gap in the HSRA’s legal toolkit. Unlike Caltrans and the Department of Water Resources (DWR), the HSRA currently has no explicit statutory authority to regulate who can access or build within its ROW, leaving it unable to authorize requests from utilities, cities, developers, and others who need to cross or work within the corridor. The bill addresses this by creating a formal encroachment permit system – modeled on the frameworks used by Caltrans and DWR – that allows the

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<sup>2</sup> <https://hsr.ca.gov/wp-content/uploads/2026/06/2026-Final-Business-Plan-060126-A11Y.pdf>

Authority to grant, condition, and revoke access to its ROW, while also giving it civil and criminal enforcement tools to protect the integrity and safety of a system where trains will eventually travel at over 200 miles per hour.

- 3) *Utility Concerns at the Forefront.* The state's largest electric and gas investor-owned utilities<sup>3</sup> (IOUs) and the local publicly-owned utilities (POUs) argue the bill goes beyond what is a necessary encroachment power for HSRA, pointing to specific problems in the bill's construction: namely, that the definitions of "encroachment," "new crossing," and "new work" could require permits even for routine maintenance and emergency repairs on existing infrastructure. This could mean utility workers responding to a gas leak or downed wire within the ROW could face misdemeanor prosecution and civil penalties if they act before obtaining a permit. The utilities also argue the bill's blanket elimination of franchise rights raises constitutional Takings and Contract Clause concerns, particularly for utilities with pre-existing easements and agreements that predate HSRA's acquisition of the ROW. Finally, they note that a sole-expense relocation requirement attached to every new permit contradicts the negotiated cost-sharing frameworks in existing master agreements and prescribed in the Public Utilities Code, and those costs will ultimately be passed on to ratepayers. Moreover, since HSRA has already been managing encroachments through cooperative agreements without this statutory authority, it is unclear what this bill adds for existing utilities in the Central Valley — where construction is actively underway — versus simply creating new legal exposure for them.
- 4) *Scoping Issues.* Anyone seeking to work within the HSRA's ROW — whether a local government, utility, developer, or private citizen — must have legal authorization to do so. Caltrans and the Department of Water Resources both have encroachment permit frameworks that cover a wide range of activities, from utility installation and landscaping to surveys and special events. The HSRA, however, lacks equivalent authority. Under current law, it can only issue access permits to utilities that were originally identified during project scoping as needing to relocate or replace their infrastructure, so called "impacted utilities" that operate under existing protected agreements. For anyone else — so-called non-impacted entities — there is no legal mechanism for the HSRA to grant access to its ROW.

The HSRA has identified several pending requests it states it cannot legally accommodate under current law, including a renewable energy company seeking to connect a new generation facility to the grid, a water district seeking to install pipes between properties it owns on both sides of the alignment, a city seeking to run a sewer mainline through HSRA property, a farmer seeking to divert drainage water across the ROW during heavy rains, and a utility seeking to cross the HSRA's ROW at multiple locations to serve new customers. The Authority contends that the absence of a formal encroachment permitting process is creating delays for these requests, though opponents note that the Authority has in practice been managing similar situations through cooperative agreements without explicit statutory authority.

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<sup>3</sup> Pacific Gas & Electric (PG&E), Southern California Edison (SCE), Southern California Gas (SoCalGas), and San Diego Gas & Electric (SDG&E)

While the case for granting HSRA encroachment permitting authority seems reasonable, the specific drafting of this bill raises legitimate questions about how these new powers would be applied in practice. Most notably, the bill's broad definitions and expansive scope have prompted concern from utilities that have negotiated master agreements governing the utilities' existing infrastructure within the HSRA ROW. These so-called impacted utilities argue that the bill as written could effectively supersede those negotiated agreements, subjecting infrastructure that is already operating under established frameworks to a new permitting regime, mandatory relocation at the utility's sole expense, and potential criminal and civil liability for routine utility work. Currently, the bill includes a non-impairment clause noting that the chapter does not alter nor impair any right that a person obtained pursuant to these protected agreements. How adequately this clause protects rights arising under those existing agreements is a central unresolved question, and one with significant implications for both utility operations and ratepayers.

*As a result, the committee recommends amendments to refine the definitions of "new crossing" to instead be "qualified installation" which means a crossing, facility, or infrastructure installed on the authority's right-of-way on or after January 1, 2027; and of "new work" to instead be "qualified work" which means work necessary to implement a qualified installation. The committee also recommends defining "protected agreement" as those agreements entered into pursuant to existing Public Utilities Code statutory authorities, and explicitly stating that only parties with protected agreements that do not address permitting will be subject to the provisions of the bill.*

- 5) *The Right-of-Way is Bigger than the Railroad.* The bill defines ROW broadly to include any property interest acquired by the HSRA for high-speed rail "purposes," which could encompass not just the active train corridor itself but potentially adjacent parcels being developed for commercial, energy, or other ancillary purposes. As noted above, the HSRA's 2026 Business Plan proposes a new vision for the train system. It frames the corridor as one of the world's most commercially compelling high-speed rail opportunities – connecting the Bay Area and Los Angeles area through the Central Valley – but additionally lays out a strategy to achieve operating profitability by commercializing the ROW before trains even run. This vision is proposed to be achieved through energy transmission, broadband, solar generation, and data center leasing.

The safety and engineering justifications for tightly regulating encroachments near high-speed rail infrastructure operating at 200 miles per hour are self-evident. In those circumstances, the margin for error is vanishingly small and the consequences of a compromised structure or unauthorized intrusion could be catastrophic. But those same justifications do not apply with equal force to a solar farm on surplus HSRA land or a data center on a non-operational parcel. Yet the bill as drafted applies a single permitting framework uniformly across the entire ROW, with the same standards, timelines, fees, and enforcement mechanisms regardless of whether the encroachment is adjacent to live track or on a piece of HSRA property serving an entirely different commercial purpose. A more calibrated approach might distinguish between the active rail corridor — where rigorous safety-based permitting standards are clearly warranted — and other HSRA-owned property, where a lighter-touch framework more akin to standard land use authorization may be more appropriate.

To illustrate, Southern California Edison has requested amendments to the bill seeking authorization – outside the permitting process required in the bill – to stage their vehicles and equipment within the ROW prior to responding to utility outage events. According to Edison, this is common practice with existing agreements related to highway ROWs. However, the reasonableness of this request depends entirely on where within the ROW the staging would occur. Parking utility vehicles and equipment adjacent to a data center or solar installation on surplus HSRA land is a very different proposition than doing so alongside track where trains will be traveling at 200 miles per hour. *In order to adequately grapple with this distinction, the committee recommends amending the definition of ROW to instead identify an “operating right-of-way” that is specific to the “function, operation, maintenance, enlargement, rehabilitation, safety, or security of the high-speed rail system” but excludes property acquired or held by the authority that is not necessary for the train’s construction, operation, or maintenance. The committee also recommends amendments throughout clarifying that the provisions of the bill only apply within the “operating right-of-way.”*

- 6) *Competing Points on Safety.* Even setting aside questions about the ROW’s broader commercial footprint, the utilities raise a legitimate and narrower concern: that even within the active rail corridor, the bill’s enforcement framework is poorly suited to emergency situations. A gas leak, a downed power line, or a failing pipeline should not wait for a 60-day permitting cycle, and utility field crews responding to such events are already operating under their own mandatory federal and state safety obligations that may require immediate action regardless of whether HSRA authorization has been obtained. The bill does include an emergency exception, but it only authorizes the Authority – not a utility or third party – to take any action necessary in an emergency. The utilities argue this is written too narrowly and that the threat of misdemeanor prosecution and civil penalties for acting without a permit creates unacceptable legal exposure for workers responding to exactly the kinds of urgent, public-safety-driven situations where speed is paramount.

That said, the counterpoint is equally compelling. Just as staging utility vehicles alongside active high-speed rail track raises obvious safety concerns, so too does the prospect of utility crews entering the rail corridor unannounced and uncoordinated in the midst of an emergency – even with the best of intentions. A train traveling at 200 miles per hour cannot stop quickly, and the consequences of an uncoordinated incursion onto active track, even by trained utility workers, could be catastrophic for everyone involved. These situations require careful, advanced coordination between the HSRA and utility operators so that when an emergency does occur, all parties know exactly what the protocols are, who has authority to act, and how access to the ROW will be safely managed. The prudent direction is not to exempt utilities from any coordination requirement, but rather to work out those protocols in advance – likely through the very kinds of master agreements the utilities already have in place – so that emergency access is pre-authorized, clearly defined, and subject to agreed-upon safety conditions, rather than leaving it to be sorted out in the middle of a crisis. The current structure of the bill does not envision this. *Therefore, the committee recommends amendments directing HSRA and the utilities to establish reasonable rules related to encroachments in emergency situations.*

7) *Additional Amendments.* *The committee recommends further amendments to clarify various provisions of the bill, including that encroachment permits may be revoked for failure to comply with the permitting requirements, and that any infrastructure that must be relocated to accommodate the train will be relocated pursuant to existing statutory rules.*

8) *Related Legislation.*

SB 1411 (Stern, 2026) deletes the restriction for the HSRA to not enter into funding commitments to cumulatively exceed \$500 million in funds from the Greenhouse Gas Reduction Fund (GGRF), on project activities outside of the Merced to Bakersfield segment. Status: Held under submission in the Senate Committee on Appropriations.

9) *Prior Legislation.*

SB 445 (Wiener, 2025) would have required HSRA to develop and adopt regulations governing third-party permits and approvals. Of relevance to this committee, these HSRA regulations would include requirements on both investor-owned (IOU) and publicly-owned (POU) utilities – broadly inclusive of electric, gas, water, telecommunications, and other utilities – and largely involve relocation agreements between utilities and the HSRA to move utility infrastructure in the project’s path. Status: Held under submission in the Assembly Committee on Appropriations.

SB 1172 (Beall) authorizes the HSRA to carry out a variety of procedures related to property acquisition. Status: Chapter 790, Statutes of 2018.

AB 481 (Lowenthal) exempted the HSRA from certain requirements of property and ROW management, like Caltrans. Status: Chapter 481, Statutes of 2013.

AB 615 (Lowenthal) originally would have transferred additional personal and real property acquisition authority to the HSRA. AB 615 was amended into a bill to appropriate \$4 million from the High-Speed Passenger Train Bond Fund to the HSRA for the Los Angeles to San Diego segment. Status: Chapter 530, Statutes of 2011.

SB 543 (Margett) established an encroachment process at the Department of Water Resources. Status: Chapter 263, Statutes of 2005.

SB 1420 (Kopp) created the HSRA to direct development and implementation of intercity high-speed rail service that would be fully coordinated with other public transportation services. Status: Chapter 769, Statutes of 1996.

10) *Triple Referral.* This bill is triple referred. Prior to this committee, this bill was heard in both the Assembly Committee on Transportation and the Assembly Committee on Judiciary, where it passed out on 11-3-2 and 9-3-0 votes, respectively.

**REGISTERED SUPPORT / OPPOSITION:**

**Support**

350 Humboldt: Grass Roots Climate Action  
Associated General Contractors, California Chapters  
California Federation of Labor Unions, FL-CIO  
California State Council of Laborers  
Climate Action California  
Climate Action California (UNREG)  
International Union of Operating Engineers, Cal-Nevada Conference  
RailPAC - Rail Passenger Association of California  
State Building & Construction Trades Council of California  
Streets for All  
U.S. High Speed Rail Association

**Oppose**

Burbank/Burbank Redevelopment Agency; City of  
California Municipal Utilities Association  
Pacific Gas and Electric Company  
San Diego Gas and Electric Company  
Southern California Edison  
Southern California Gas Company  
Southern California Public Power Authority (SCPPA)

**Oppose Unless Amended**

Los Angeles Department of Water and Power (LADWP)  
United States Telecom Association (US Telecom - the Broadband Association)

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