

**ABOVE-GROUND EQUIPMENT INITIATIVE
FREQUENTLY-ASKED QUESTIONS
JULY 2010**

The Ruling

Q. What is the new Rule?

A. Beginning August 2, 2010, Southern California Edison (SCE) will no longer accept designs from Residential, Commercial, or Industrial customers for new electrical service that call for specified pieces of electrical equipment to be installed in underground structures such as vaults. Customers will no longer be able to elect to have new installations of such equipment put underground pursuant to SCE's Added Facilities tariff Rule 2(h). Existing underground equipment will be maintained.

Q. Will existing under-ground equipment be moved above ground?

A. When existing underground equipment fails and must be replaced on an emergency basis, it will be replaced with the same or similar underground equipment, subject to availability. When existing underground equipment must be replaced for technical reasons and that replacement can be carried out in a planned process, SCE will consult with affected parties and attempt to place new equipment above-ground and on private property away from the public right-of-way wherever possible.

Q. To what electrical equipment does this new rule apply?

A. The new rule applies to primary-voltage electrical equipment such as transformers, switches, fuse cabinets, and capacitors operating at between 4 kilovolts (kV) and 35 kV.

Q. When will this new rule take effect?

A. The rule is effective the date SCE's Advice Filing was approved by the CPUC. The CPUC passed Resolution E-4329 on April 22, 2010, which is the effective date of the AGE Rule.

Q. What if a permit is in place for a project with underground equipment but construction hasn't begun?

A. The effective date of the rule is April 22, 2010. There is a ninety (90) day grace period to receive new applications for projects with requests for below ground equipment. After the 90 days, no new underground equipment applications will be accepted. The new rule is effective on all new projects on August 2, 2010. Final date for submittals will be July 30th. Details of the grace period and the implementation time line are outlined below.

- Pending Projects with Requests for below Ground Equipment- The following criteria applies to grandfathering existing approved plans or submittals made during or before the 90 day grace period:
- Existing final plans with below ground equipment are grandfathered unless significantly revised by the customer or determined to be inactive for 12 months.

- New submittals and any pre-existing submittals (preliminary plans) will have seven months from the effective date of AGE to go final. If not final in 7 months (on December 3, 2010) the project will need to be revised to include above ground equipment where applicable.
- All plans with below ground equipment that were final at the seven month deadline from the effective date of AGE have 12 months to install. If installation has not commenced in 12 months (December 2nd, 2011) project will need to be revised to include above ground equipment where applicable.

Q. Why is SCE making this change?

A. SCE's three main goals are (1) to increase worker and public safety, (2) to increase system reliability and (3) to enhance our stewardship of the environment.

Q. What does each of those three things mean?

A.

1. Enhancing worker and public safety – Electrical components such as transformers and fuses sometimes fail. Failure in a confined underground space such as a vault can have very serious consequences to utility employees working in that confined space and possibly to members of the public nearby.

2. Increasing electric system reliability – A key measure of electric system reliability is how long a power outage lasts before workers restore the power. Often the first required step is to pump accumulated water out of the underground vault before the real electrical work can even begin. Because it takes less time to find and repair a failed piece of equipment when it is located above ground than when it is located underground, reliability will improve.

3. Enhancing environmental stewardship – Underground vaults and other structures collect water, even when it is not raining. They collect run-off, and that water is often contaminated with everything from motor oil to pesticides. That water must be pumped out of the underground vault, tested, and hauled away for proper treatment and disposal as required by environmental laws. Sometimes the equipment itself must then be steam-cleaned before work can begin.

Q. What is the “public right-of-way”?

A. The public right-of-way consists of streets, alleys, parkways and the like. The various cities and counties in our service territory have granted SCE franchises authorizing us to locate equipment in the public right-of-way for purposes of transmitting and distributing electricity. SCE pays a franchise fee to each of these jurisdictions for that right.

Q. Will there be any exceptions to the AGE rule?

A. Yes. There are two conditions when exceptions may occur:

- 1.) When it is not technically feasible to place equipment above ground.
- 2.) When cities, or counties, present insurmountable objections to above ground equipment and provide space in public right of way.

Q. What does technically feasible mean?

A. As stated in the CPUC ruling (Resolution E-4329), Technically feasible means, “The availability of the required physical space, either readily available or through architectural design, that can be set aside to accommodate the required electrical distribution equipment necessary for SCE to serve the customer. The required physical space includes the necessary room for structures, required retaining walls or barriers and required operating clearances for equipment. The required space is defined by existing design standards within the operation and maintenance requirements that are in compliance with applicable safety codes and regulations such as CPUC General Order 128.”

It should be noted that some preliminary building designs may not provide the necessary space for utility equipment, but through negotiation with the customer, space should be provided in the final design.

The required physical space includes the necessary room for structures, retaining walls or barriers and maintaining the required working clearances around pad-mounted equipment as shown in the UGS Manual.

Q. So are we going to see hundreds of huge new cabinets popping up everywhere?

A. No. Through it can be hard to tell one kind of above-ground cabinet from another, many of those you see today are either controllers for traffic signals (which SCE does not own), or cabinets associated with the various telephone companies’ new fiber optic cable systems. SCE places relatively few new structures with this kind of equipment for its own use each year. Wherever possible, SCE locates these on private property.

What are the Practical Consequences

Q. Can you identify the specific aspects of the electric business that will be impacted by this change, and the "how" and "when" of each impact?

A. When underground equipment is replaced with above-ground equipment, the time required to restore service caused by the failure of that equipment will be reduced. In the case of existing underground equipment, how soon that will happen depends on when the replacement of the underground equipment becomes necessary.

Q. Are there any other state utilities with similar policies, and if so do you have any pictures, dimensions sizes, colors and cost of these structures?

A. San Diego Gas & Electric Company has had this policy for several years. Questions regarding photographs of above-ground equipment, dimensions and so forth are answered below.

Q. My city likes SCE’s Rule 20 program for undergrounding overhead electric wires. Does this new rule mean the end of that program?

A. Not at all. Rule 20 – including Rule 20A, 20B and 20C – will continue in effect. Above-ground placement of transformers, switches and the like is already a standard part of what you might think of as an “underground” electric system where the cables are located in conduits and ducts beneath the street. (Even today, where transformers and other equipment may be installed

underground, there are nevertheless above-ground structures such as vents for dissipating the heat produced by the equipment.)

Q. Will this impact scheduling dates and time frames, and will it increase or decrease energized dates?

A. Because it is easier to install above-ground equipment, SCE believes schedules will be shortened and service available sooner.

Q. Will this process increase or decrease switching procedures time?

A. Above-ground equipment will be easier, faster and safer to switch.

Q. Do customers or developers have a right to challenge this rule change?

A. SCE hopes that its commitment to consultation with customers and local governments will satisfy any concerns about this new rule. However, the CPUC Public Advisor's Office is always available to respond to questions or concerns. That office can be reached at 415-703-2074 or 866-849-8390 (toll free) for the San Francisco office, and 213-576-7055 or 866-849-8391 (toll free) for the Los Angeles office.

Q. Will this underground equipment rule increase customer rates?

A. No. In fact, because it is typically less expensive to install and maintain equipment above-ground equipment than equipment installed below ground, this initiative can help constrain upward pressure on utility rates.

Q. Does SCE expect any increase or decrease in work order pricing?

A. Work order pricing should decrease because above-ground equipment is typically less expensive to install.

Q. Will SCE continue to use BURD Transformers in vaults to feed traffic signals and street lighting?

A. Existing underground installations will continue in use. When equipment change-outs or upgrades are necessary and can take place on a planned basis, SCE will consult with those impacted on the location of the new above-ground equipment.

Aesthetics

Q. Can we paint the above-ground structures a different color to match a surrounding theme or neighborhood?

A. SCE will allow the equipment to be painted colors other than the standard green. However, customers must follow SCE's painting policy which can be found in the Aboveground Equipment Aesthetics Improvement Manual (AIM) manual or by contacting your local SCE planner or project manager. The information is also available at our web site: www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. How can I screen the above-ground structures? What can I build or plant around them to hide them?

A. SCE has published an Aesthetics Improvement Manual (AIM) that contains painting option examples, screening ideas, and information on digital wrap of the cabinets. Painting and other screening options are at customers' expense and subject to certain technical considerations such as not obscuring identification information. The AIM manual is available at www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. Is SCE going to provide landscape shielding for the above ground structures?

A. Customers and developers will be able to landscape around the cabinets, subject to required safety clearances and access requirements. SCE has published landscaping guidelines with proper clearance requirements which is available in the Aboveground Equipment Aesthetics Improvement Manual (AIM) manual as well as in two landscape brochures. Both the AIM manual and landscape brochures should be reviewed with your local planner or project manager and are available at www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. Will SCE provide refundable amounts to customers for their landscaping to hide these above ground structures?

A. Because a customer's decision to provide landscaping or other screening would be a personal aesthetic one, SCE will not be able to fund these installations.

Q. Will SCE consider relaxing its standards to allow more landscaping on 3 sides of the above ground structure, even if it may need to be ripped out in the event of a power outage issue?

A. SCE has developed standards, over years of operating experience, which include the minimum clearances around structures, weight requirements, etc., minimize the hazards to employees working on this equipment and provide for safe access to distribution facilities for maintenance and repairs.

However, SCE is committed to accommodating customer needs and to seeking workable solutions to mitigate potential aesthetic impacts within the established safety standards. SCE allows permanent landscaping around three sides of its structures and/or (hardscape masonry walls) if it meets SCE's minimum safety standard clearances. To support minimum clearance requirements, SCE has developed an alternative to permanent shrubbery. The concept of the portable planter was developed to provide better screening and assure clearances. Because most residential pad-mount transformers are of low-profile design (typically less than 36" tall) these portable planters provide effective screening.

Design Standards and Placement

Q. Can we design the plans to keep the structures away from back-to-back or adjacent driveway approaches? The island between driveways at the property lines leave little clearance for other underground utilities (Tel, CATV, Gas, Water), especially in cul-de-sacs.

A. Yes, this can be and is already done today under current policies. Developers should work with all affected utilities as they design their new tracts. SCE will consult with other utilities when it proposes to replace underground equipment with above-ground. We would urge you to

provide conceptual equipment locations and/or review your preliminary electric plan to ensure the best design that meets the requirements of SCE and your aesthetic concerns.

Q. Will the above-ground structures be placed directly in the front of a home entry or view window?

A. SCE will locate these cabinets on private property wherever we are able to obtain the necessary easements to do so from landowners. Where the cabinets must be placed in the public right-of-way SCE will consult with affected property owners and local government to minimize impacts. Though this kind of equipment must be placed within a certain distance of where it is needed, there is often some flexibility on specific placement.

Q. Will easements be necessary for the placement of these structures?

A. In order for SCE to place these cabinets on private property and away from the public right-of-way, developers or property owners will have to provide SCE with easements.

Q. Will there be grandfathering of designs in progress and/or construction in progress?

A. Designs that are received by SCE before the effective date of this new rule will continue to be honored. Both the designs and construction installation of grandfathered projects are still subject to the deadlines listed above. For example, a master planned community which has partial below ground transformers installed, would only be allowed to continue their use until the sunset dates.

Q. Will there be new design and or safety standards?

A. No, SCE has always had design standards for above-ground installations. What will change is the availability of underground installations.

Q. What are the standards? When will these be available?

A. The standards are available now, and can be found at www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. We do we expect to see revisions in the ADS, DDS, DUG and UGS SCE's structures manuals?

A. The standards themselves are already available and are not changing. Only the option to install this equipment underground is being phased out.

Q. At what date will our Applicant Designers, start to implement this new design policy and procedure?

A. The implementation date of this new design policy and procedure is August 2, 2010. Designs received by SCE prior to the effective date of this new rule will be honored even if they call for underground facilities.

Q. What impacts will we face on previously designed projects? Will they need to be redesigned? If so, will SCE expedite the redesign process to meet our scheduled dates?

A. SCE will not require redesign of projects for which designs calling for underground facilities have already been received.

Q. What will SCE do, from a design standpoint, to facilitate the need for fewer transformers at a given geographical area?

A. SCE will address this concern by sizing transformers in the initial design at an optimal location to provide safe and reliable service. The SCE design organization embraces early notification and participation in the conceptual design process. If engaged early in the conceptual/preliminary design phase, SCE can provide valuable engineering support for the development community and municipalities.

Equipment that is Affected

Q. Other than the above-ground transformer pads and switches, what other items will end up above ground?

A. The rule applies to primary-voltage distribution equipment including transformers, switches, fuse cabinets, capacitors and junction bars.

Q. Will the cables also be in above-ground equipment?

A. In areas with underground electric systems today, and in areas where new systems are required to be installed underground, such as new residential developments, the conductors (underground wires and cables) will continue to be installed and maintained underground. The transformers, switches and other equipment will be installed above ground, as they already are in many cases today.

Q. Can structures be enclosed?

A. No. In order to maintain the access required to service this equipment and to assure proper cooling, the equipment may not be enclosed in other structures. However, SCE does allow equipment to be installed in walk in vaults. Our engineering department, working with your planner and project manager will establish the design criteria on a case by case basis.

Q. Will the clearances for structures be changed for above-ground structures?

A. Above-ground has been standard SCE design for many years, and the clearance requirements will not change.

Q. Will the current manufacturers produce these structures, for example, Utility Vault and Jensen?

A. Yes. SCE's design standards aren't changing, so we will continue to use qualified manufacturers of above-ground structures and components. The relevant design standard that is available for viewing external to SCE is the Underground Structures (UGS) Manual. This publication can be found at www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. In circumstances where a home buyer must accept relocation to above ground and the home is less than 10 years old, will SCE be responsible for any easement adjustments or homeowner claims or litigation?

A. To the extent that SCE needs new easements for above ground distribution facilities, SCE would acquire such easements in a manner consistent with SCE Tariff Rules 15 and 16. Regarding homeowner claims or litigation, SCE would not agree, in advance, to be responsible for claims or litigation, without understanding the claim or litigation matter at issue.

Cities and Municipalities

Q. Have all the Cities bought into this new rule?

A. The AGE rule applies primarily to residential, commercial and industrial customers. SCE plans to work with individual consenting cities on a case by case basis to implement AGE where it is technically preferred and feasible.

Q. What about cities whose local ordinances require underground structures?

A. SCE recognizes that many local governments and their residents and businesses not only feel very strongly that utility equipment should be located below ground, but also believe that their local authority—referred to as “police power”—authorizes them to adopt local ordinances restricting the placement of utility facilities above ground or prohibiting above-ground placement entirely. However, California courts and the California Public Utilities Commission have held that on matters of the design of the electric system, the authority of the CPUC is paramount, and in most every instance, cities can neither prohibit nor restrict utilities from installing equipment above ground.

Q. So is SCE just going to thumb its nose at cities, including those with neighborhoods having historical character, and just stick these cabinets wherever it wants to?

A. Not at all. The CPUC expects utilities such as SCE to consult with local governments and anyone else affected, in an effort to decide upon an agreeable location.

Q. Don't cities have any authority here?

A. Cities have what is called “police power,” which enables them to regulate matters affecting the public health and safety. While that power does not permit cities to ban above-ground equipment entirely, it does permit them to influence the placement. For example, one cabinet may not be too close to an intersection, where it might block motorists' views. Again, SCE will consult with local governments on placement, and prefers to place the equipment out of the public right-of-way and the public's view wherever possible.

Q. What are the impacts, if we are under construction in a municipality that is not in agreement? Will we move forward as originally planned and designed? Will this affect our energized date?

A. Because SCE will continue to honor existing designs calling for underground placement until the effective date of this new rule; we believe there will not be an issue. SCE encourages applicants to design to the new standard now, however, and will be meeting with local governments and representative organizations to explain the new rule and the legal issues it involves.

Q. Will SCE provide support on the developers' behalf, if any resistance is received from a city municipality?

A. SCE will continue to honor existing designs calling for underground placement prior to the effective date of the new rule. SCE will furnish to local governments briefing materials explaining the company's understanding of the legal issues involved in the rule.

Q. What will SCE do to facilitate City acceptance of above ground facilities within the parkway and/or right of way?

A. The first choice of location for equipment is on private property. Parkways within the project footprint are a good alternative. Use of the public right-of-way will be the placement of last resort when no other location is available. As indicated above, SCE will accept input from both builders and local jurisdictions and will evaluate the merits of location options. SCE is committed to working with all parties and will accommodate reasonable requests. Ultimately, SCE has the responsibility for its electrical infrastructure and will design the system to provide safe and reliable service based on the established criteria. In addition, SCE hopes to further allay local governments' concerns through a collaborative process

Q. In circumstances where a city will not accept an above ground application, will SCE coordinate a resolution with the city?

A. SCE has met with local governments prior to filing the Advice Letter, and has worked to address local governments' concerns. Now that the CPUC has approved the Advice Letter, SCE will continue to meet with and work with local governments to address their concerns. SCE recognizes that working through these design details is an important part of the process. In the process of designing service, SCE will seek input from both builders and local jurisdictions and will evaluate the merits of that input. SCE is committed to working with all parties and will consider reasonable requests. Ultimately, SCE has the responsibility for the electrical infrastructure and will design the system to provide adequate service at just and reasonable rates based on the established design criteria including the AGE. In areas where developers understand a city may take issue with the AGE, SCE strongly recommends the developers coordinate a meeting with SCE in the plan initiation stage to provide the developers with mitigating designs. A joint coordination meeting with the city is also suggested to reduce the possibility of last-minute issues.

Existing Underground Equipment

Q. Will an existing Buried Underground Residential Distribution (BURD) transformer be converted to above ground padmount if the BURD fails?

A. No, not unless a replacement is unavailable or other electrical considerations would call for SCE to replace the failed transformer with one that is too large to be installed within the existing underground structure.

Q. Who will be responsible at SCE for securing easements if a BURD fails and a replacement transformer must be installed above ground?

A. SCE will consult will first seek an easement from a private property owner to permit installation of a required new transformer or other component on private property, and will pay fair compensation for it. If an easement cannot be obtained, SCE will install the replacement equipment in the public right-of-way where technically feasible to do so.

Q. What does it mean that SCE will "look for opportunities" to retrofit existing underground installations with new above-ground equipment?

A. SCE does not intend to go in and dig up existing underground equipment that is working and that is appropriate for its job and replace it with above-ground models. If an underground component fails, causing an unplanned outage, SCE will replace it with underground equipment if available. If a replacement part is unavailable, for example if the original manufacturer no longer makes the part, SCE may have no choice but to replace it with above-ground. But if a piece of underground equipment requires replacement because it is no longer appropriate for the job, as where a transformer built for a certain amount of customer load is no longer adequate because a neighborhood has grown, SCE will replace that component with a right-sized component installed above ground at SCE's discretion, and when it is technically feasible. SCE will consult ahead of time with those who will be affected, and will try to obtain an easement to put the equipment on private property

Q. Are you going to go in, dig up everything that's underground today, and replace it with above-ground equipment?

A. No. Existing underground equipment will be maintained. If it fails, it will be replaced with new underground equipment subject to availability. When existing underground equipment must be replaced, and that replacement can be carried out in a planned process—such as when the electrical demand in an area will exceed the capacity of an existing underground transformer—SCE will determine if it is in its best interest considering safety, cost, and reliability and will consult with affected parties to locate the new equipment above ground.

Q. Is this initiative only for new installations?

A. The initiative applies to new residential tracts and other new developments. Additionally, it applies when there is a customer-driven upgrade and capacity increase resulting in a change of use or occupancy as defined in state or local law; or when agreed to by the local authority and SCE on a case-by-case basis. Existing underground equipment will be maintained. See the answer above for a discussion of the circumstances under which SCE will replace existing underground equipment with above-ground.

Q. How many above ground and underground facilities does SCE currently have? How many per square mile of service territory?

A. Within its 50,000 mile service territory, SCE has approximately 2,293,512 pieces of equipment above and below ground. The majority of SCE's equipment is above ground with 87% of it being overhead. 13% of SCE's equipment is under ground. Of that 13%, 7.3% is padmount equipment, 3.7% is BURD, 1% is in vaults, another .5% is in manholes and .6% is other sub-surface type equipment.

Residential and Commercial Developments

Q. Will this apply to commercial and industrial?

A. Yes.

Q. This change will potentially cost developers more money (may need more structures). Will SCE be offering any compensation, particularly in today's market?

A. SCE believes this new standard may actually cost developers less money. Installing equipment at ground level does not require expensive trenching or the added cost of underground vaults or capsules. In the end, because developers pass those costs on to homebuyers, this initiative may help lower the cost of buying a home.

Q. Am I going to have to put in more retaining walls?

A. Retaining walls are required in construction situations in which ground is significantly uneven. Whether or not a small retaining wall would be required because of the above-ground placement of electrical equipment would depend on the circumstances.

Q. Who can I talk to if I have a special case where I do not have the room or the structure would ruin the appearance of my job?

A. If a private property owner does not make an easement available, SCE will locate the equipment in the public right-of-way, as our franchise agreements allow. In the unlikely circumstance in which no right-of-way is available, then above-ground installation would be technically feasible. Where there is latitude to locate the device at some distance in one direction or the other, SCE will consult with affected parties on the location to be used.

Q. What are the structure dimensions?

A. Please refer to SCE's Underground Structure (UGS) Manual and Aesthetics Improvement Manual (AIM) for the dimensions of particular equipment cabinets.

Q. What do they look like?

A. Examples of the cabinets and equipment covered by the above standards are available at www.sce.com/AboutSCE/Regulatory/distributionmanuals/.

Q. In high density neighborhoods (small lots under 5,000 square feet), where are these going to fit?

A. SCE anticipates that developers designed new tracts will be able to accommodate the equipment in an aesthetically pleasing manner. SCE recognizes that developers may in some cases have to provide for the equipment's installation in the public right-of-way.

Q. Can developers pay added facilities charges if they want to use only UG structures?

A. No. Where it is technically feasible to locate this equipment above ground, customers will not be able to use SCE's tariff Rule 2(h) Added Facilities to locate new installations underground in the future.

Q. What is the cost in comparison to UG structures?

A. Above-ground installations are generally less expensive, because they do not require excavation and installation of a vault or other structure to enclose the equipment.

Q. Are the above-ground structures refundable to the customer just like the UG structures are?

A. SCE's tariffs regarding refunds of customer advances are not affected by this initiative.

Q. When can consultants, contractors, developers expect to see updates to the all the SCE manuals that we all depend upon?

A. SCE's Design Standards are available on SCE's Website today. Please go to www.sce.com/AboutSCE/Regulatory/distributionmanuals.

Q. How are the above-ground structures going to be placed in apartment/condo environments?

A. Should any of the types of equipment covered by this rule be needed in order for SCE to provide electric service to an apartment or condominium complex, the developer should work with the local SCE planner—as developers do today—to provide a location for the structure.

Q. Will there be a 'grandfather clause' for existing development project entitlements and plan submittals?

A. SCE will "grandfather" both existing design(s)¹ and those that have been accepted through the 90-Day Transitional Grace period,² which will begin on the effective date of the Advice Letter (4-22-10). The AGE initiative should not have a direct impact on project entitlements. Proposed state legislation regarding extension of tentative tract maps has not been enacted and SCE cannot commit to what action it might take if such legislation is enacted. However, the developers' project costs should be less with the AGE design than with the current Buried Underground Residential Distribution (BURD) design. While the change could result in some additional costs due to the potential need for the redesign of plans, setbacks, landscape, etc., these incremental costs would most likely be more than offset by the elimination of the Rule 2(h) Added Facilities fees option for the BURD facilities, which builders must pay today to exercise the BURD installation option.

Q. What is the definition what constitutes a grandfathered 'submittal'?

A. SCE has stated that the grandfathering process for new projects begins with the preliminary plan submittal. The New Development planning organization within SCE has developed a standardized submittal document which provides the specific design and planning guidelines to ensure that developers have all the necessary information to generate a Preliminary plan (refer to SCE's preliminary checklist available from the SCE assigned Project Manager, "Items Required for All Submittals to SCE for Work Order Initiation").

Q. Will projects with dry utility joint trench installed and contract fees paid are grandfathered (even though transformers may not be installed)?

A. SCE will grandfather all existing projects with approved final design where the Rule 2(h) Added Facilities contract fees have been paid and dry utility joint trench installed. See Question and response below regarding inactive projects.

¹ This refers to designs that are finalized, with no further design changes.

² Refer to the Rule Section of this document, for a start to finish AGE Implementation Timeline for accepted designs

Q. Why will projects that are inactive for more than 12 months be required to re-file for new plan approval?

A. Requiring that new plan approval be obtained after 12 months of inactivity is a long-standing practice and applies to all projects, not just underground or BURD projects. This is not a new proposal, much less one driven by the AGE initiative. Inactive projects are projects that have not broken ground and where Added Facilities contract fees have not been paid. One reason for this practice is that SCE is also required to re-price all projects over one year old, since labor and/or material cost would most likely have changed in this time period. SCE will notify the builder/applicant in writing and also by telephone. A reasonable response time will be provided (SCE suggests 30 days as a reasonable response time) before the project is cancelled. Evidence of pending project action (e.g., building permits, Temporary Power requests) will determine if the project will be held open for an additional period of time.⁴ It is true, however, that re-filed plans will have to conform to SCE's then-current design standards, which would require above-ground installation of affected equipment except in cases where not technically feasible.