

Overview of General Order 178 and Decision D.26-05-007

May 27, 2026



California Public
Utilities Commission

Key Changes in GO 178

- **Definitions revised:** "Attacher" updated to include Local Government and Tribal entities
- **Expanded Applicability:** Major 5 pole owners + Small LECs + Small and Multi-jurisdictional Utilities
 - Access with or without a CPCN
- **Transparency:** Pole owners must make publicly available
 - (a) list of approved contractors, and
 - (b) internal design, construction & maintenance standards
- **Self Help Remedies:** Criteria for pole reinforcement and simple replacement by the attacher
- **Unauthorized Attachment:** Penalty increase + reporting requirement



From Guidelines to Mandatory Rules

PRIOR ROW RULES

- Characterized as "guidelines"
- Parties could negotiate deviations
- Applied inconsistently utility-by-utility
- Opaque qualification processes for attachers
- Limited applicability (Major Pole Owners; large/mid ILECs; PG&E, SCE, SDG&E)



GO 178 — MANDATORY RULES

- "Guidelines" language removed
- Rules apply to all utilities under Commission jurisdiction
- Limits negotiated departures from the rules
- Compliance is required
- Presumptive standard in any dispute brought to Commission

Who GO 178 Now Covers

Major Pole Owners

PG&E, SCE, SDG&E, Frontier, AT&T — previously covered

Other Pole Owners: Small LECs & SMJUs

Smaller incumbent telephone companies; Small & multi-jurisdictional utilities (e.g., Bear Valley, PacifiCorp)

Attachers

Expanded ROW rules for all attachers.

Attachers: Expanded to include Gov. and Tribal Entities

Local governments & Tribal entities — access without CPCN via contract to comply with GO 95, GO 128, & GO 178



The Problem: Make-Ready Delays

- Before a new attachment, a **pole must be "made ready"** — existing attachments rearranged, or pole reinforced / replaced
- **Traditional process:** coordinated through the pole owner and each existing attacher — multiple separate return trips
- Record shows: **utilities fall behind on make-ready** → broadband deployment timelines slip
- **Providers have waited 1+ year** for make-ready on poles needed for active projects
- **Rural communities wait longer** for connectivity as a result



Categories of Self-Help Work (§IV.E.3)

A. Pole Reinforcement

- **Available when:** incumbent utility approves reinforcement AND determines it will bring attachment into compliance
- **Attacher must:** use utility-approved contractors; comply with utility standards; coordinate customer notifications
- **Utility approval** is a prerequisite — no self-help without it

B. Simple Replacement

- **Available when:** replacement can be done WITHOUT necessitating deenergization
- **Attacher must:** use utility-approved contractors; comply with utility standards; coordinate customer notifications
- **Post-completion:** pole owner performs final inspection; identifies remediation needs

C. Complex Replacement

- **SELF-HELP NOT AVAILABLE** — requires deenergization or disruption of utility service
- **Pole owners:** encouraged but NOT required to complete within attacher's requested timeframe
- One-year mandatory deadline **removed** — conflict with GO 95 and IOU GRC planning cycles

Standardized Self-Help Agreement (§IV.E.4)

120 days

Major Pole Owners hold **workshop** with all interested parties (~mid-Sept 2026)

+ 60 days

Major Pole Owners file **Tier 3 Advice Letter** to CD w/ proposed Standardized Agreement

NOTES

- **Agreement must cover:** uniform terms, conditions & safety procedures for surveys, make-ready, reinforcements, simple replacements
- **Must include:** enhanced indemnification, insurance & bonding
- **Obligation to develop & file** falls exclusively on the 5 Major Pole Owners

Annual Compliance Reporting & Penalties

Annual Compliance Reports

- 1. Unauthorized Attachments:** # unauthorized attachments identified in prior calendar year; fines assessed; HFTD Tier classification of violations
- 2. Attachments Denied:** Number of requests denied due to need for pole replacement

PENALTY INCREASES

- **Unauthorized attachments:** \$500 → up to \$1,000 per violation (§VI.D.2)
- **Database non-compliance (D.21-10-019):** also up to \$1,000 per violation (§VI.D.5)



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