

BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Resolution No. T-17323 Approval of  
the California Advanced Services Fund  
Expense Budget for Fiscal Year 2014-  
15 (July 1, 2014 through June 30, 2015)  
to Comply with the Requirements of  
Public Utilities Code Section 270.

Draft Res. T-17403  
(Served September 19, 2013)

**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES  
ON DRAFT RESOLUTION T-17403**

## SUBJECT INDEX

<b>TABLE OF AUTHORITES.....</b>	<b>3</b>
<b>SUMMARY OF RECOMMENDED CHANGES.....</b>	<b>4</b>
<b>I. INTRODUCTION.....</b>	<b>5</b>
<b>II. DISCUSSION.....</b>	<b>5</b>
A. The Draft Resolution Errs In Requesting Additional Funds without Adequate Support...	5

APPENDIX

CERTIFICATE OF SERVICE

**TABLE OF AUTHORITIES**

**CPUC Decisions**

Resolution T-17403..... 5

**Statutes, Regulations, Rules**

Rule 14.5..... 5

## **SUMMARY OF RECOMMENDED CHANGES**

The Division of Ratepayer Advocates recommends that the Commission reject Draft Resolution T-17403 as *currently* written. Draft Resolution T-17403 proposes to increase the California Advanced Services Fund expense budget to \$82,663,504 for Fiscal Year 2014-2015- an increase of 41%, or \$24,364,118 over Fiscal Year 2013-2014. In addition, the Draft Resolution will increase CASF Administrative Costs by \$2,216,457.

Division of Ratepayer Advocates recommends that the Commission require Communications Division to provide additional detail in the draft Resolution concerning the CASF budget increases prior to considering Draft Resolution T-17403 for approval again.

## Introduction

Pursuant to Rule 14.5 of the Rules of Practice and Procedure of the California Public Utilities Commission (the “CPUC” or “Commission”), the Division of Ratepayer Advocates (“DRA”) hereby submits these Comments on Draft Resolution T-17403 (“Draft Resolution”) issued by the CPUC’s Communications Division (“CD”) on September 19, 2013. If adopted, the Draft Resolution would approve a budget of \$82.663 million for the CASF for fiscal year (“FY”) 2014-2015 which includes increases in several areas that aren’t adequately justified. Below is a table which compares the CASF budget for FY 2012-2013, FY 2013-2014, and the proposed CASF budget for FY 2014-2015.

	Consortia Grants	Administrative Costs	Total	Dollar Increase	Percentage Increase
<b>FY2012-2013</b>	\$1,884,424	\$1,759,696	\$39,999,999		
<b>FY2013-2014</b>	\$2,849,413	\$1,223,443	\$58,299,386	\$18,299,387	46%
<b>FY2014-2015</b>	\$3,798,285	\$3,439,900	\$82,476,504	\$24,177,118	41%

Source: CPUC Budget Resolutions T-17371, T-17403

As discussed below, DRA urges the Commission to request more information be included in the Draft Resolution before considering it for vote.

### **I. The Draft Resolution Errs In Requesting Additional Funds without Adequate Support**

DRA notes that the FY 2014-15 CASF budget request of \$82,663,504 is substantially higher than the FY 2013-2014 authorized budget of \$58,299,386. As in previous comments to the Commission on the issue of the CASF,<sup>1,2</sup> DRA continues to support greater transparency in the CASF budgeting and expenditure process. Consistent with this recommendation, DRA

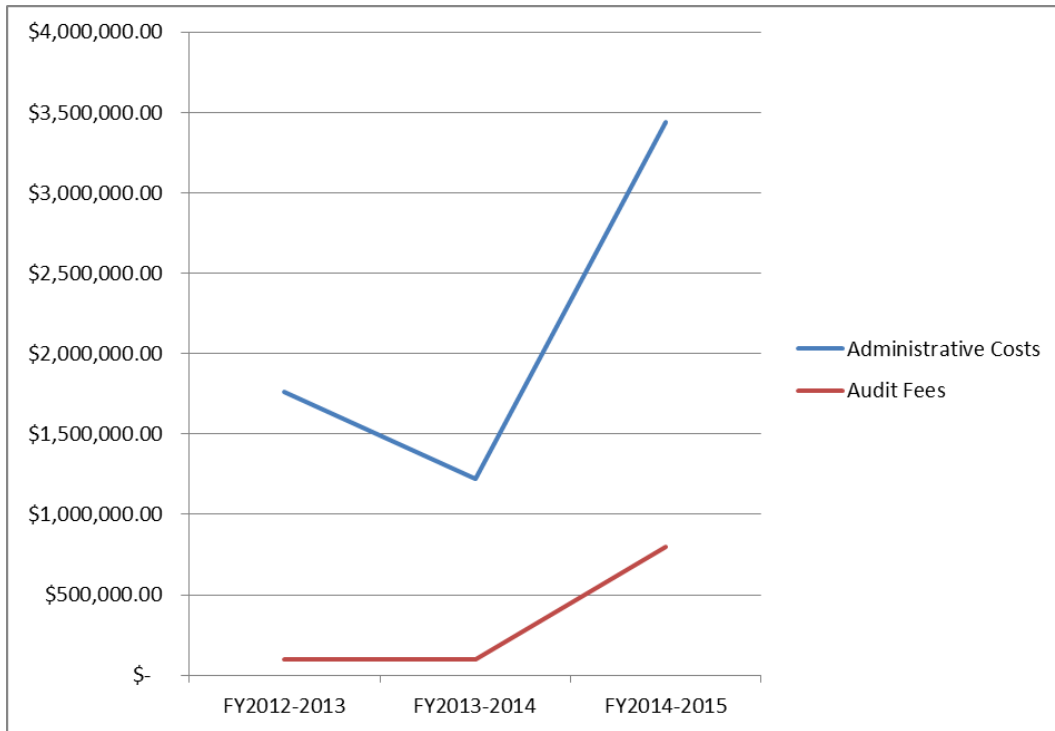
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<sup>1</sup> “When public money is being used to fund projects with little or no competition, ratepayers can only ensure that funds are being reasonably and efficiently used by being fully informed of the details of such projects so they can participate in the process of allocating such funds.” *Comments of the Division for Ratepayer Advocates on the Order Instituting Rulemaking (R.10-12-008), January 21, 2011.*

<sup>2</sup> “DRA has spent considerable time protesting the manner in which the CASF program has been administered to date, noting problems with transparency, lack of public input, lack of accountability, and the lack of clear program goals and requirements.” *Comments Of The Division Of Ratepayer Advocates On Assigned Commissioner’s Ruling Providing For Comment On Draft Proposal Relating To The Implantation Of The Consortia Grant Account, May 9, 2011*

recommends the Commission require greater detail for the proposed \$3.439 million in CASF administrative costs including<sup>3</sup> a detailed explanation for the unexplained increase of \$795,800 for Audit Fees and \$1.5M for Broadband Mapping Contracts.<sup>4</sup>

Chart 1-1



Source: CPUC Budget Resolutions T-17371, T-17403

Prior to authorizing a 41% budget increase, the Commission should require greater detail for the categories primarily responsible for the increase—Audit Fees, Broadband Mapping, and Consortia Grants.

**Audit Fees**

<sup>3</sup> Draft Resolution T-17403 at 3.

<sup>4</sup> The budgetary request for Broadband Mapping was not included in the CASF FY 2013-2014 budget.

The Draft Resolution states that its request of \$795,800 for FY 2014-2015 is for the auditing of both CASF monies and expenses.<sup>5</sup> DRA notes that this is a request of nearly 600% or \$695,800 more than the previous requested budget of \$100,000 in FY 2013-2014,<sup>6</sup> Without an adequate explanation for this estimated expense item, DRA is unable to find an increase of this magnitude to be reasonable. DRA strongly supports a robust audit program for the CASF as a basic protection of ratepayer funds.<sup>7</sup> However, the Commission should require CD to provide some justification for the requested amount of \$795,800 prior to approving the request.

### **Broadband Mapping Expenditures**

The Draft Resolution requests \$1.5M for broadband mapping in FY 2014-2015 due to the discontinuation of a 2009 federal grant of \$2.3M in September 2014. DRA urges the Commission to reject this requested expenditure due to the lack of information provided by the Draft Resolution to support the request. The Draft Resolution states that the \$1.5M figure was based on projected costs associated with prior Commission costs while working with universities in the California State University system.<sup>8</sup> Although DRA sees merit in the broadband mapping effort, the Draft Resolution provides inadequate support to justify an additional \$1.5M annual allocation when previously \$2.3M had been allocated to cover four years of broadband mapping expenditures (from 2009 through 2013).<sup>9</sup>

### **Consortia Grants**

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<sup>5</sup> Draft Resolution at 6.

<sup>6</sup> Resolution T-17371 at 3.

<sup>7</sup> California Senate Bill 1040 directs the Commission to conduct periodic financial and performance audits of the CASF.

<sup>8</sup> Draft Resolution at 6.

<sup>9</sup> Draft Resolution at 6.

DRA has concerns with the Draft Resolution’s request for \$950,000 out of the \$3.8M requested for new Consortia Awards. Consortia awards are available to eligible Consortia applicants<sup>10</sup> to fund the cost of broadband deployment activities other than the capital cost of facilities. The membership of a consortium can be broad, encompassing the range of community interests that share the common purpose of promoting greater deployment and adoption of broadband.<sup>11</sup> DRA has expressed its concern with the Consortia process to the Commission in prior pleadings and reiterates those concerns here. DRA found the original Consortia/CASF process to be a vague and ambiguous process that was lacking sufficient protections to ensure the appropriate expenditure of public funds and strong open access to optimize the use of public funds.<sup>12</sup> This area of the budget needs further clarification. Since the Draft Resolution does not expound upon how an additional \$950,000 for new Consortia awards was developed, the Commission should require additional clarifying information before considering this portion of the request.

## **Conclusion**

DRA appreciates the laudable and long-term goal of the CASF program in attempting to bridge California’s “Digital Divide.” Therefore, as outlined above, DRA urges the Commission to require greater detail and transparency in the CASF budgeting and expenditure processes to better ensure the effective and efficient use of public money. DRA recommends that the Commission require Communications Division to provide additional detail in the draft Resolution concerning the CASF budget increases in the areas noted above prior to considering Draft Resolution T-17403R for approval again.

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<sup>10</sup> Decision 11-06-038, page 10. An eligible Consortium may include, as specified by the commission, representatives of organizations, including, but not limited to, local and regional government, public safety, K-12 education, health care, libraries etc., and is not required to have as its lead fiscal agent an entity with a certificate of public convenience and necessity.

<sup>11</sup> Ibid

<sup>12</sup> Comments of the Division of Ratepayer Advocates on Decision Implementing Broadband Grant and Revolving Loan Program Provisions, January 6, 2012 at 14.



Respectfully submitted,

/S/ Alik Lee

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September 4, 2013

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day served a certified copy of the foregoing document “**COMMENTS OF THE DIVISION OF RATEPAYER ADVOCATES ON DRAFT RESOLUTION T-17403**” on all known parties to DRAFT RESOLUTION T-17403 by email.

Executed in San Francisco, California, on the Fourth day of September, 2013.

/s/Alik Lee

Alik Lee  
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