



Chairman Ajit V. Pai
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

November 14, 2017
CIO 17-005

Re: Notice of Inquiry (NOI) WT Docket No. 17-200

Dear Chairman Pai:

The Sacramento Municipal Utility District (SMUD) is writing in response to the Wireless Telecommunications Bureau's request for comment on realignment of 896-901/935-940 MHz (900 MHz) spectrum, Notice of Inquiry (NOI) WT Docket No. 17-200.

As the nation's sixth-largest community-owned electric service provider, SMUD has been providing low-cost, reliable electricity for more than 65 years to Sacramento County (and small adjoining portions of Placer and Yolo Counties). SMUD is a recognized industry leader and award winner for its innovative energy efficiency programs, renewable power technologies, and for its sustainable solutions for a healthier environment. SMUD is the first large California utility to receive more than 20 percent of its energy from renewable resources.

Some facts and figures

- Population in our service area: 1.4 million
- Size of our service area: 900 square miles
- Total accounts served (residential + business): 624,770
- Number of SMUD employees: 2,007
- Miles of power lines we own: 10,473
- Power from non-carbon-emitting resources: 50%

SMUD, as many utilities in the United States, needs reliable wireless communications to maintain, operate and protect its critical infrastructure. This includes automated meter reading; supervisory control & data acquisition (SCADA) to control power plants, transmission lines and bulk substations; distribution automation (DA) to control capacitor banks, switches and neighborhood substations; and monitoring and control of water flow in our reservoirs and dams, including the potential FERC Dam Safety Performance Monitoring Program that may require video monitoring of dams. These activities require wide band, exclusive radio channels to assure integrity of our operations. Frequency congestion in populated areas restricts the availability of wireless channels. Additionally, the North American Electric Reliability Corporation (NERC) critical infrastructure protection standards

require increasingly secure control systems that need a proprietary broadband network built to SMUD's specifications and requirements.

Realignment of the 900 MHz spectrum has the potential to provide the broadband frequencies that SMUD and the electrical power utilities need. SMUD believes this realignment is a reasonable approach as long as incumbents in the band are adequately re-located if needed and appropriately compensated for costs to relocate.

SMUD recognizes that the rulemaking process involves the gathering of significant amounts of information and opinions from the various interested parties; and we ask the Commission to continue evaluating this re-banding proposal. SMUD supports options such as this that provide dedicated, broadband spectrum for critical infrastructure organizations in California and throughout the United States.

Sincerely,

A handwritten signature in dark ink, appearing to read "Steve Clemons". The signature is fluid and cursive, with a large, stylized "S" at the beginning and a long, sweeping underline.

Steve Clemons
Chief Information Officer
Sacramento Municipal Utility District