

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



November 11, 2022

CA2022-947

Lisa Ludovici
Charter Communications
Director, Government Affairs – Central and Northern California
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Audit of Charter Communications' ("Spectrum") Malibu District

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi and Kyle King of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications' Malibu District from July 18, 2022 to July 22, 2022. The audit included a review of Charter Communications' inspection and maintenance records and field inspections of Charter Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than December 14, 2022, by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 266-4730 or Calvin.Choi@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Calvin Choi, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground patrol and detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Charter Communications' Overhead Lines Maintenance Plan
- Charter Communications' Visual Inspections of Overhead Lines

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of communication or supply lines and equipment.

GO 95 Rule 18, Resolution of Potential Violations of General Order 95 and Safety Hazards, states in part:

Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Charter Communications' records indicated that for 2021, Charter Communications completed 328 work orders past their due date for corrective action.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure Number	Type of Structure	City
1	11768 Ellice St.	Handhole	Malibu
2	11802 Ellice St.	Handhole	Malibu
3	11802 Ellice St.	Pedestal	Malibu
4	1330922E	Pole	Malibu
5	1330923E	Pole	Malibu
6	1330924E	Pole	Malibu
7	31770 Broad Beach Rd.	Handhole	Malibu
8	31744 Broad Beach Rd.	Handhole	Malibu
9	31740 Broad Beach Rd.	Handhole	Malibu
10	31736 Broad Beach Rd.	Handhole	Malibu
11	31666 Broad Beach Rd.	Handhole	Malibu
12	31659 Broad Beach Rd.	Handhole	Malibu
13	31652 Broad Beach Rd.	Pedestal	Malibu
14	783009E	Pole	Malibu
15	783010E	Pole	Malibu
16	4545970E	Pole	Malibu
17	783012E	Pole	Malibu
18	783013E	Pole	Malibu
19	783014E	Pole	Malibu
20	783015E	Pole	Malibu
21	15202TWC	Pole	Malibu
22	726887E	Pole	Malibu
23	1638431E	Pole	Malibu
24	4856960E	Pole	Malibu
25	25299Y	Pole	Malibu
26	726885E	Pole	Malibu
27	GT113578	Pole	Malibu
28	4297483E	Pole	Malibu
29	726876E	Pole	Malibu
30	726877E	Pole	Malibu
31	726875E	Pole	Malibu
32	4557627E	Pole	Malibu
33	726874E	Pole	Malibu
34	770763E	Pole	Malibu
35	770762E	Pole	Malibu

36	1210153E	Pole	Malibu
37	770761E	Pole	Malibu
38	3005574E	Pole	Malibu
39	770759E	Pole	Malibu
40	770764E	Pole	Malibu
41	821766E	Pole	Malibu
42	2054993E	Pole	Malibu
43	783033E	Pole	Malibu
44	783032E	Pole	Malibu
45	1027721E	Pole	Malibu
46	4032094E	Pole	Malibu
47	1939838E	Pole	Malibu
48	2239900E	Pole	Malibu
49	3007049E	Pole	Malibu
50	1027720E	Pole	Malibu
51	1027744E	Pole	Malibu
52	900051E	Pole	Malibu
53	26343 Lookout Rd.	Handhole	Malibu
54	1868131E	Pole	Malibu
55	711038E	Pole	Malibu
56	119798	Pole	Malibu
57	701652E	Pole	Malibu
58	2102548E	Pole	Malibu
59	701653E	Pole	Malibu
60	701654E	Pole	Malibu
61	4197890E	Pole	Malibu
62	874481E	Pole	Malibu
63	4264001E	Pole	Malibu
64	1007810E	Pole	Malibu
65	1027784E	Pole	Malibu
66	1027785E	Pole	Malibu
67	3002942E	Pole	Malibu
68	798289E	Pole	Malibu
69	798288E	Pole	Malibu
70	798287E	Pole	Malibu
71	798284E	Pole	Malibu
72	4108864E	Pole	Malibu
73	27033 Sea Vista Dr.	Pedestal	Malibu
74	27065 Sea Vista Dr.	Handhole	Malibu
75	1199380E	Pole	Malibu

76	1330884E	Pole	Malibu
77	1199379E	Pole	Malibu
78	1199378E	Pole	Malibu
79	1199376E	Pole	Malibu
80	1169188E	Pole	Malibu
81	1169187E	Pole	Malibu
82	4080381E	Pole	Malibu
83	GT253048	Pole	Malibu
84	4081239E	Pole	Malibu
85	817707E	Pole	Malibu
86	6295 Murphy Way	Handhole	Malibu
87	4863181E	Pole	Malibu
88	4046952E	Pole	Malibu
89	4046956E	Pole	Malibu
90	4125611E	Pole	Malibu
91	2114233E	Pole	Agoura Hills
92	2114232E	Pole	Agoura Hills
93	2114231E	Pole	Agoura Hills
94	4704669E	Pole	Agoura Hills
95	Pole in front of Peter Strauss Ranch	Pole	Agoura Hills
96	4743049E	Pole	Agoura Hills
97	2305 Waring Dr.	Pedestal	Agoura Hills
98	2336 Waring Dr.	Pedestal	Agoura Hills
99	2317 Waring Dr.	Pedestal	Agoura Hills
100	3004797E	Pole	Agoura Hills
101	4863764E	Pole	Agoura Hills
102	1879423E	Pole	Agoura Hills
103	29680 Mulholland Hwy	Pedestal	Agoura Hills
104	4844755E	Pole	Agoura Hills
105	4865605E	Pole	Agoura Hills
106	1827244E	Pole	Agoura Hills
107	4297721E	Pole	Agoura Hills
108	4865606E	Pole	Agoura Hills
109	825001E	Pole	Agoura Hills
110	Pole in front of Malibu State Park	Pole	Agoura Hills
111	4790511E	Pole	Agoura Hills
112	367955E	Pole	Agoura Hills
113	367956E	Pole	Agoura Hills
114	4539600E	Pole	Agoura Hills

115	1719489E	Pole	Agoura Hills
116	1045755E	Pole	Agoura Hills
117	4387728E	Pole	Agoura Hills
118	4913144E	Pole	Agoura Hills
119	4910611E	Pole	Agoura Hills
120	4631575E	Pole	Agoura Hills
121	4387744E	Pole	Agoura Hills
122	2115961E	Pole	Agoura Hills
123	4193954E	Pole	Agoura Hills
124	844022E	Pole	Agoura Hills
125	4847435E	Pole	Agoura Hills
126	4125091E	Pole	Agoura Hills
127	843971E	Pole	Agoura Hills
128	843970E	Pole	Agoura Hills
129	1199249E	Pole	Agoura Hills
130	4093866E	Pole	Calabasas
130	4521089E	Pole	Calabasas
132	4619699E	Pole	Calabasas
133	4619698E	Pole	Calabasas
134	4198630E	Pole	Calabasas
135	4198631E	Pole	Calabasas
136	4729979E	Pole	Calabasas
137	22351 Cairnloch St.	Handhole	Calabasas
138	22343 Cairnloch St.	Handhole	Calabasas
139	1638988E	Pole	Calabasas
140	1638987E	Pole	Calabasas
141	1638985E	Pole	Calabasas
142	4424003E	Pole	Calabasas
143	1576634E	Pole	Calabasas
144	1576636E	Pole	Calabasas
145	3827 Declaration Ave.	Handhole	Calabasas
146	4376980E	Pole	Calabasas
147	1576550E	Pole	Calabasas

IV. Field Inspection – Violations List

We observed the following violations during the field inspections:

GO 95, Rule 56.2, Uses (Guy Wires), states in part:

Guys shall be attached to structures, as nearly as practicable, at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44.

A Charter Communications' down guy wire attached to each of the following poles was not taut:

- 1027784E
- 3004797E
- 367956E
- 4387728E
- 843970E

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

Charter Communications risers attached to each of the following poles were not covered by a conduit near base of the pole:

- 1330924E
- 1868131E

GO 95, Rule 84.7-A, Climbing Space, states in part:

Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4-C1c, 84.4-D1 and 87.4-C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4-C1c.

The climbing space on pole 1169188E was obstructed by vegetation.

GO 95, Rule 86.4-D2, Passing and Attached to Same Pole, states in part:

Where a guy of a communication system and a guy of a supply system pass each other and are attached to the same pole, a separation of not less than 3 inches shall be maintained between such guys.

A Charter Communications span guy wire attached to pole 726885E was touching an SCE down guy wire attached to the same pole.

GO 95, Rule 31.1, Design, Construction, and Maintenance, states in part:

Electrical supply and communication systems shall be designed, constructed, and maintained for their intended use, regard being given to the conditions under which they are to be operated, to enable the furnishing of safe, proper, and adequate service.

The Charter Communications down guy anchor on each of the following poles was buried:

- 119798
- 1199379E
- 1169187E
- 4046956E
- 4913144E

The Charter Communications service drops on the following poles were not properly secured to the surface of the pole:

- 783013E
- 770761E
- 4863181E
- 4125611E
- 4093866E

GO 128, Rule 17.1, Design, Construction and Maintenance, states in part:

For all particulars not specified in these rules, design, construction, and maintenance should be done in accordance with accepted good practice for the given local conditions known at the time by those responsible for the design, construction, or maintenance of [the] communication or supply lines and equipment.

The following Charter Communications underground facilities were not maintained for their intended use:

- The handhole cover located in the front of 31736 Broad Beach Road was damaged with broken hook rings.
- The pedestal in front of 31652 Broad beach Road had a broken enclosure bracket.