

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



March 30, 2023

CA2023-1024

Kristen Camuglia  
Cox Communications  
27121 Towne Centre Dr.  
Foothill Ranch, CA 92610

Subject: Audit of Cox's Southern San Diego County area

Ms. Camuglia:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Richard Le of my staff conducted a Communication Infrastructure Provider (CIP) audit of Cox's Southern San Diego County area from March 20, 2023 to March 24, 2023. The audit included a review of Cox's inspection and maintenance records and a field inspection of Cox's 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 May 1, 2023, by electronic or hard copy, of all corrective measures taken by Cox to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Richard Le at (213) 999 – 9053 or [Richard.Le@cpuc.ca.gov](mailto:Richard.Le@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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, ESRB, SED, CPUC  
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC  
Richard Le, Utilities Engineer, ESRB, SED, CPUC

## Audit Findings

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- Cox's documented inspection program

### II. Records Review – Violations List

**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 pole load calculation for pole P186072 shows a span length in the direction of 162 and 167 degrees as 50 feet but the field measurement was approximately 30 feet.

**GO 95, Rule 31.2, Inspection of Lines**, states in part:

*Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.*

**GO 128, Rule 17.2, Inspection**, states:

*Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements these rules.*

- Cox's records indicated that from December 2017 through December 2022, Cox completed 529 patrol inspections of its nodes past Cox's scheduled due date.
- Cox's records indicated that from December 2017 through December 2022, Cox completed 4 detailed inspections of its nodes past Cox's scheduled due date.
- Cox's records indicated that from December 2017 through December 2022, Cox completed 480 undefined type of inspections of its nodes past Cox's scheduled due date.

**GO 95, Rule 18-B1, Maintenance Programs,** states in part:

*Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...*

**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.*

- Cox's records indicated that from December 2017 through December 2022, Cox completed 8 overhead work orders past Cox's due date for corrective action. Additionally, as of the date of the audit, Cox had 1 open overhead work order that was past Cox's scheduled due date for corrective action.

### III. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID.	Type of Structure	Location
1	P195384	Pole	Alpine
2	1041770H	Pole	Alpine
3	P972133	Pole	Alpine
4	972134	Pole	Alpine
5	P972135	Pole	Alpine
6	P972738	Pole	Alpine
7	972739	Pole	Alpine
8	972743	Pole	Alpine
9	P30423	Pole	Alpine
10	972744	Pole	Alpine
11	972745	Pole	Alpine
12	P186072	Pole	Chula Vista
13	P188208	Pole	Chula Vista
14	P83755	Pole	Chula Vista
15	Pole at 568 I St	Pole	Chula Vista
16	P83757	Pole	Chula Vista
17	JP184205	Pole	Chula Vista
18	P188216	Pole	Chula Vista
19	P88550J	Pole	Chula Vista
20	P82935	Pole	Chula Vista
21	P83348	Pole	Chula Vista
22	P294522	Pole	Chula Vista
23	JP180408	Pole	Chula Vista
24	P83377	Pole	Chula Vista
25	Pedestal in front of 982 Roca Place	Pedestal	Chula Vista
26	Pedestal in front of 994 Roca Place	Pedestal	Chula Vista
27	Pedestal in front of 991 Roca Place	Pedestal	Chula Vista
28	Pedestal in front of 975 Roca Place	Pedestal	Chula Vista
29	Vault in front of 974 Roca Place	Vault	Chula Vista
30	Pedestal in front of 1616 Sycamore Dr	Pedestal	Chula Vista
31	Pedestal in front of 1636 Sycamore Dr	Pedestal	Chula Vista
32	Pedestal in front of 1633 Sycamore Dr	Pedestal	Chula Vista
33	Pedestal in front of 822 La Huerta	Pedestal	Chula Vista

34	Pedestal in front of 840 La Huerta	Pedestal	Chula Vista
35	Pedestal in front of 4318 El Bosque	Pedestal	Chula Vista
36	Pedestal in front of 4330 El Bosque	Pedestal	Chula Vista
37	Pedestal in front of 852 La Huerta	Pedestal	Chula Vista
38	Pedestal in front of 10085 El Capitan Rd	Pedestal	El Cajon
39	Pedestal in front of 10099 El Capitan Rd	Pedestal	El Cajon
40	P185719	Pole	Imperial Beach
41	P88410	Pole	Imperial Beach
42	P87084	Pole	Imperial Beach
43	P87531	Pole	Imperial Beach
44	P252043	Pole	Imperial Beach
45	P87532	Pole	Imperial Beach
46	P186974	Pole	Imperial Beach
47	81138	Pole	Imperial Beach
48	375114	Pole	La Mesa
49	P375113	Pole	La Mesa
50	375112	Pole	La Mesa
51	375111	Pole	La Mesa
52	375110	Pole	La Mesa
53	P375109	Pole	La Mesa
54	P375108	Pole	La Mesa
55	P375107	Pole	La Mesa
56	375106	Pole	La Mesa
57	P375105	Pole	La Mesa
58	P375104	Pole	La Mesa
59	P377609	Pole	La Mesa
60	JP377610	Pole	La Mesa
61	JP377611	Pole	La Mesa
62	JP377612	Pole	La Mesa
63	JP377613	Pole	La Mesa
64	377614	Pole	La Mesa
65	P372902	Pole	Lakeside
66	P375058	Pole	Lakeside
67	P372903	Pole	Lakeside
68	P376447	Pole	Lakeside
69	P376448	Pole	Lakeside
70	P196258	Pole	Lakeside
71	P376449	Pole	Lakeside
72	JP478043	Pole	Lakeside
73	P376450	Pole	Lakeside
74	JP478044	Pole	Lakeside

75	P478828	Pole	Lakeside
76	P376451	Pole	Lakeside
77	P247699S	Pole	Lakeside
78	P478829	Pole	Lakeside
79	P372904	Pole	Lakeside
80	P876530	Pole	Lakeside
81	P375478	Pole	Lakeside
82	P776345	Pole	Lakeside
83	P835147	Pole	National City
84	Pole at the intersection of E 20th St and F Ave	Pole	National City
85	P835123	Pole	National City
86	P835124	Pole	National City
87	P835119	Pole	National City
88	C1-002	Pole	National City
89	1055531H	Pole	San Diego
90	1055532H	Pole	San Diego
91	376247	Pole	San Diego
92	376246	Pole	San Diego
93	376245	Pole	San Diego
94	376149	Pole	San Diego
95	P376148	Pole	San Diego
96	P192489	Pole	San Diego
97	P251807	Pole	San Diego
98	P162687	Pole	San Diego
99	P474686	Pole	San Diego
100	617879H	Pole	San Diego
101	P474684	Pole	San Diego
102	P474683	Pole	San Diego
103	617882H	Pole	San Diego
104	P474226	Pole	San Diego
105	Z370857	Pole	San Diego
106	P474227	Pole	San Diego
107	617883H	Pole	San Diego
108	P729171	Pole	San Diego
109	P738857	Pole	San Diego
110	666594	Pole	San Diego
111	P293569	Pole	San Diego
112	Pedestal in front of 2029 Meade	Pedestal	San Diego
113	Pedestal in front of 4392 Alabama	Pedestal	San Diego
114	Pedestal in front of 2111 Meade	Pedestal	San Diego
115	Pedestal in front of 2131 Meade	Pedestal	San Diego
116	Pedestal in front of 2217 Meade	Pedestal	San Diego
117	Pedestal in front of 2231 Meade	Pedestal	San Diego

118	Pedestal in front of 6679 Anton	Pedestal	San Diego
119	Pedestal in front of 6763 Anton	Pedestal	San Diego
120	Pedestal in front of 6741 Anton	Pedestal	San Diego
121	Pedestal in front of 2309 Meade	Pedestal	San Diego
122	Pedestal in front of 435 Brandywood	Pedestal	San Diego
123	Pedestal in front of 419 Brandywood	Pedestal	San Diego
124	Pedestal in front of 383 Brandywood	Pedestal	San Diego
125	Pedestal in front of 371 Brandywood	Pedestal	San Diego
126	Pedestal in front of 4105 Alcorn	Pedestal	San Diego
127	Pedestal in front of 1541 Peterlynn	Pedestal	San Diego
128	Pedestal in front of 1505 Peterlynn	Pedestal	San Diego
129	Pedestal in front of 1489 Peterlynn	Pedestal	San Diego
130	Pedestal in front of 1475 Peterlynn	Pedestal	San Diego
131	Pedestal in front of 3055 Anella Rd	Pedestal	San Ysidro
132	Pedestal in front of 3067 Anella Rd	Pedestal	San Ysidro
133	Pedestal in front of 3101 Anella Rd	Pedestal	San Ysidro
134	Pedestal in front of 3119 Anella Rd	Pedestal	San Ysidro
135	Pedestal in front of 3741 Janse Way	Pedestal	San Ysidro
136	2nd pedestal in front of 3741 Janse Way	Pedestal	San Ysidro
137	P575247	Pole	Santee
138	777849	Pole	Santee
139	P575248	Pole	Santee
140	P575249	Pole	Santee
141	P575250	Pole	Santee
142	P575251	Pole	Santee
143	P575252	Pole	Santee
144	P575254	Pole	Santee
145	P575255	Pole	Santee
146	P575256	Pole	Santee
147	P575259	Pole	Santee
148	P575258	Pole	Santee

149	P575260	Pole	Santee
150	P575261	Pole	Santee
151	P575262	Pole	Santee
152	P575263	Pole	Santee
153	P575264	Pole	Santee
154	575265	Pole	Santee
155	P575266	Pole	Santee
156	P248582	Pole	Santee



#### **IV. Field Inspection – Violations List**

My staff observed the following violations during the field inspection portion of the audit:

**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.*

Cox's facilities on the following poles required maintenance:

- Pole P972738 – Cox's facilities were incorrectly transferred to the new pole.
- Pole 1055531H – Cox's riser conduit was damaged and hanging off the pole.
- Pole P88410 – Cox's riser conduit was improperly secured to the pole with a rope.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C**, requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The separation between Cox communications facilities and a third-party communications conductor on each of the following poles had less than 12 inches of vertical separation:

- Pole at the intersection of E 20th St. and F Ave. – Cox's conductor in contact with another communication conductor.
- Pole 617883H – Cox's service-drop in contact with another communication service-drop.
- Pole P375113 – Cox's conductor in contact with another communication conductor

**GO 95, Rule 31.6, Abandoned Lines**, states in part:

*Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property.*

A permanently abandoned Cox conductor on each of the following poles was not removed:

- Pole P575251
- Pole P376148

**GO 128, Rule 17.1, 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 pedestal in front of 2111 Meade had an unsecured cover.
- The pedestal in front of 975 Roca Place had a damaged cover.