

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



February 1, 2024

CA2023-1033

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T Los Angeles (LA) Region Ventura County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's LA Region Ventura County District from June 19-23, 2023. The audit included a review of AT&T inspection and maintenance records and a field inspection of AT&T 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 March 1, 2024, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Mily Vaidya at 213-999-8528 or [Mily.Vaidya@cpuc.ca.gov](mailto:Mily.Vaidya@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 Kjetsli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Mily Vaidya, Utilities Engineer, ESRB, SED, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records
- Completed and pending corrective action work order.
- Pole loading calculations
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

## II. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	1443837E	Pole	Simi Valley
2	1443836E	Pole	Simi Valley
3	1332722E	Pole	Simi Valley
4	4730407E	Pole	Simi Valley
5	2241232E	Pole	Simi Valley
6	F4901	Pedestal	Simi Valley
7	In front of house 2762	Pedestal	Golf Meadows Court, Simi Valley
8	In front of house 2725	Pedestal	Simi Valley
9	1713040E	Pole	Simi Valley
10	1332863E	Pole	Simi Valley
11	4436977E	Pole	Simi Valley
12	1443873E	Pole	Simi Valley
13	1376753E	Pole	Simi Valley
14	4557561E	Pole	Simi Valley
15	1376751E	Pole	Simi Valley
16	4560692E	Pole	Simi Valley
17	1365171E	Pole	Simi Valley
18	1365169E	Pole	Simi Valley
19	F3002	Pedestal	Simi Valley
20	859878E	Pole	Simi Valley
21	4827682E	Pole	Simi Valley
22	741191H	Pole	Simi Valley
23	4473427E	Pole	Simi Valley
24	4827683E	Pole	Simi Valley
25	793222E	Pole	Simi Valley
26	644790E	Pole	Simi Valley
27	4860070E	Pole	Simi Valley
28	2016101E	Pole	Simi Valley
29	4946830E	Pole	Simi Valley
30	1166602E	Pole	Simi Valley
31	1281187E	Pole	Simi Valley
32	1089851E	Pole	Simi Valley
33	4572625E	Pole	Simi Valley
34	2235130E	Pole	Simi Valley
35	1281188E	Pole	Simi Valley
36	4635120E	Pole	Simi Valley
37	4521274E	Pole	Simi Valley
38	4521273E	Pole	Simi Valley
39	4300237E	Pole	Simi Valley

40	4630653E	Pole	Simi Valley
41	4784329E	Pole	Simi Valley
42	4784330E	Pole	Simi Valley
43	1359562E	Pole	Simi Valley
44	1359563E	Pole	Simi Valley
45	661396H	Pole	Simi Valley
46	661397H	Pole	Simi Valley
47	X14780E	Pole	Simi Valley
48	X14771E	Pole	Simi Valley
49	In front of	Handhole	921 Waterbury Ln
50	In front of	Handhole	924 Waterbury Ln
51	In front of	Handhole	964 Waterbury Ln
52	In front of	Handhole	945 Waterbury Ln
53	In front of	Pedestal	986 Waterbury Ln
54	In front of	Handhole	959 Waterbury Ln
55	In front of	Handhole	1011 Waterbury Ln
56	In front of	Handhole	1027 Waterbury Ln
57	In front of	Pedestal	2078 Pier Point Blvd
58	In front of	Handhole	2090 Pier Point Blvd
59	In front of	Handhole	Brockton Ln
60	In front of	Handhole	940 Brockton Ln
61	In front of	Pedestal	1059 Tuttle Ave, Simi Valley
62	In front of	Pedestal	1045 Tuttle Ave
63	In front of	Pedestal	641 Tuttle Ave
64	In front of	Pedestal	1003 Tuttle Ave
65	In front of	Pedestal	957 Tuttle Ave
66	In front of	Pedestal	933 Tuttle Ave
67	In front of	Pedestal	686 Tuttle Ave & Harper St
68	In front of	Handhole	743 Harper St
69	In front of	Handhole	795 Harper St
70	In front of	Pedestal	846 Harper St
71	In front of	Pedestal	847 Harper St
72	In front of	Pedestal	952 Etn Ave, Simi Valley
73	In front of	Handhole	887 Weaver St, Simi Valley
74	In front of	Handhole	696 Weaver St, Simi Valley
75	In front of	Handhole	673 Weaver St, Simi Valley
76	1096174E	Pole	Simi Valley
77	1096175E	Pole	Simi Valley
78	1096176E	Pole	Simi Valley
79	1096177E	Pole	Simi Valley
80	1096178E	Pole	Simi Valley
81	1096179E	Pole	Simi Valley
82	1096180E	Pole	Simi Valley
83	1096182E	Pole	Simi Valley
84	777827H	Pole	Simi Valley

85	1096172E	Pole	Simi Valley
86	1096171E	Pole	Simi Valley
87	1096170E	Pole	Simi Valley
88	1096169E	Pole	Simi Valley
89	1096168E	Pole	Simi Valley
90	1096167E	Pole	Simi Valley
91	1096166E	Pole	Simi Valley
92	1096165E	Pole	Simi Valley
93	4962347E	Pole	Simi Valley
94	4962347E	Pole	Simi Valley
95	1515148E	Pole	Simi Valley
96	Next to Pole 1515148E	Manhole	Simi Valley
97	1376449E	Pole	Simi Valley
98	1376448E	Pole	Simi Valley
99	1376447E	Pole	Simi Valley
100	1376446E	Pole	Simi Valley

### III. Field Inspection – Violations List

We observed the following violations during the field inspections:

**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.*

AT&T's facilities on the following poles required maintenance:

- Pole 4659676E: the guy anchor was completely buried.
- Pole 750712H: there was damaged lashing wire.
- Pole 4792298E: there was damaged lashing wire and a completely buried guy anchor.
- Pole 4874373E: third-party service drop was tangled with a communications conductor.
- Pole 230668: a communications conductor was not properly secured on pole.
- Pole 20 (in Mountain Pass): a service drop was not properly secured and is tangling.

**GO 95, Rule 86.2, Use**, 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.*

An AT&T down guy wire attached to each of the following poles was not maintained taut:

- Pole 329060 – down guy wire was not taut.
- Pole 750422H – down guy wire was not taut.
- Pole 5377 – down guy wire was not taut.
- Pole 30495 – down guy wire was broken.

**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.*

AT&T's facilities on the following poles had abandoned service drops:

- Pole 329061
- Pole 2444
- Pole 230667
- Pole 4169410E

**GO 95, Rule 35, Vegetation Management**, states in part:

*Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).*

AT&T's conductors attached to Pole number 750712H were strained by vegetation.

**GO 95, Rule 38, Table 2, Case 19, Column C** requires the minimum radial separation between communications service drops and guy wires passing conductors supported on the same pole to be 3 inches.

AT&T service drop attached to Pole number 4661015E was touching a third-party down guy wire.