

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 21, 2023

CA2023-1037

Lisa Ludovici
Director, Government Affairs Sierra Nevada
270 Bridge Street
San Luis Obispo, CA 93401

Subject: Audit of Charter's San Luis Obispo County Service Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), James Miller of my staff conducted a communications infrastructure provider audit of Charter's San Luis Obispo County Service Area from May 1, 2023 to May 5, 2023. The audit included a review of Charter's records and field inspections of Charter'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 January 22, 2024, by electronic or hard copy, of all corrective measures taken by Charter 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, you can contact James Miller at (213) 266-4715 or James.Miller@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: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

My staff reviewed the following records during the audit:

- Patrol & Detailed Inspection records.
- Late Inspections
- Work Orders Created from Inspections
- Repair Work Orders
- Intrusive Testing Records
- Third Party Notifications
- Pole Loading Calculation Records

II. Field Inspections

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

No.	Facility Identification	Facility Type	Location
1	PT5446-1/121158486	Pole	San Luis Obispo
2	JP435-2/121158487	Pole	San Luis Obispo
3	121158486	Pole	San Luis Obispo
4	PT705-1/121158727	Pole	San Luis Obispo
5	JP117	Pole	San Luis Obispo
6	121117665	Pole	San Luis Obispo
7	#5 at 48 Buena Vista Avenue	Pole	San Luis Obispo
8	#6 at 48 Buena Vista Avenue	Pole	San Luis Obispo
9	#8 at 48 Buena Vista Avenue	Pole	San Luis Obispo
10	#8 at 2400 Loomis Street	Pole	San Luis Obispo
11	Tagless pole at 2404 Loomis Street	Pole	San Luis Obispo
12	#9 at 2565 Fox Hollow Road	Pole	San Luis Obispo
13	#2 at 2565 Fox Hollow Road	Pole	San Luis Obispo
14	#21 at 2565 Fox Hollow Road	Pole	San Luis Obispo
15	#22 at 2565 Fox Hollow Road	Pole	San Luis Obispo
16	#23 at 2565 Fox Hollow Road	Pole	San Luis Obispo
17	220045/110362756	Pole	Atascadero
18	121302901	Pole	Atascadero
19	121302912	Pole	Atascadero
20	110197813	Pole	Atascadero
21	121302911	Pole	Atascadero
22	121302913	Pole	Atascadero
23	121302910	Pole	Atascadero
24	121302904	Pole	Atascadero
25	121302905	Pole	Atascadero
26	121302906	Pole	Atascadero
27	120101226	Pole	Atascadero
28	121302907	Pole	Atascadero
29	121074201	Pole	Atascadero
30	120763735	Pole	Cambria
31	120843377	Pole	Cambria
32	121113940	Pole	Cambria
33	121113939	Pole	Cambria
34	121338562	Pole	Cambria
35	121338563	Pole	Cambria
36	121338564	Pole	Cambria
37	121338479	Pole	Cambria
38	121338481	Pole	Cambria
39	121338482	Pole	Cambria

40	121338485	Pole	Cambria
41	110482820	Pole	Cambria
42	121338559	Pole	Cambria
43	121338558	Pole	Cambria
44	121338477	Pole	Cambria
45	121291765	Pole	Cambria
46	121338561	Pole	Cambria
47	121336694	Pole	Morro Bay
48	110483875	Pole	Morro Bay
49	110416694	Pole	Morro Bay
50	121496352	Pole	Morro Bay
51	121496390	Pole	Morro Bay
52	121496391	Pole	Morro Bay
53	121496393	Pole	Morro Bay
54	121496394	Pole	Morro Bay
55	Tagless pole at 780 Piney Way	Pole	Morro Bay
56	121496396	Pole	Morro Bay
57	120412935	Pole	Morro Bay
58	120270785	Pole	Morro Bay
59	120404080	Pole	Morro Bay
60	120404078	Pole	Morro Bay
61	120404077	Pole	Morro Bay
62	120270784	Pole	Morro Bay
63	120412921	Pole	Morro Bay
64	120412923	Pole	Morro Bay
65	120412924	Pole	Morro Bay
66	120412925	Pole	Morro Bay
67	120256301	Pole	Morro Bay
68	120256153	Pole	Morro Bay
69	120256152	Pole	Morro Bay
70	#21 on San Luis Bay Drive	Pole	Avila
71	#22 on San Luis Bay Drive	Pole	Avila
72	#22-5 on San Luis Bay Drive	Pole	Avila
73	110288320	Pole	Avila
74	Pole west of 110288320	Pole	Avila
75	120148066	Pole	Avila
76	120426573	Pole	Pismo Beach
77	120426551	Pole	Pismo Beach
78	120426713	Pole	Pismo Beach
79	120426572	Pole	Pismo Beach
80	120426569	Pole	Pismo Beach
81	120426568	Pole	Pismo Beach
82	120426567	Pole	Pismo Beach

83	120426563	Pole	Pismo Beach
84	120426560	Pole	Pismo Beach
85	121103367	Pole	Arroyo Grande
86	120946665	Pole	Arroyo Grande
87	120946663	Pole	Arroyo Grande
88	120055488	Pole	Arroyo Grande
89	120946661	Pole	Arroyo Grande
90	120946667	Pole	Arroyo Grande
91	2190 Heritage Loop Road	Doghouse with Tap	Heritage Ranch
92	2190 Heritage Loop Road	Hand-hole with Coupler	Heritage Ranch
93	2295 Holly Drive	Doghouse with Amplifier	Heritage Ranch
94	2275 Holly Drive	Pedestal	Heritage Ranch
95	2255 Holly Drive	Pedestal with Tap	Heritage Ranch
96	2245 Holly Drive	Pedestal with Tap	Heritage Ranch
97	2225 Holly Drive	Pedestal with Tap	Heritage Ranch
98	2216 Holly Drive	Pedestal	Heritage Ranch
99	2195 Holly Drive	Doghouse with Amplifier	Heritage Ranch
100	2190 Holly Drive	Pedestal	Heritage Ranch
101	2160 Holly Drive	Pedestal	Heritage Ranch
102	2165 Holly Drive	Pedestal with Tap	Heritage Ranch
103	2155 Holly Drive	Pedestal with Tap	Heritage Ranch
104	701 Bernardo Avenue	Hand-hole	Morro Bay
105	795 Pacific Street	Hand-hole	Morro Bay
106	548 Pecho Valley Road	Power Supply	Morro Bay
107	1250 San Luis San Luis Bay Drive	Pedestal	Avila
108	San Luis Bay Drive and See Canyon Road	Power Supply	Avila
109	202 Beach Comber Drive	Hand-hole	Pismo Beach
110	206 Beach Comber Drive	Hand-hole	Pismo Beach
111	222 Beach Comber Drive	Hand-hole	Pismo Beach
112	230 Beach Comber Drive	Doghouse with Amplifier	Pismo Beach
113	Beach Comber Drive and Shell Beach Road	Vault	Pismo Beach
114	113 Beach Comber Drive	Hand-hole	Pismo Beach
115	125 Beach Comber Drive	Hand-hole	Pismo Beach
116	137 Beach Comber Drive	Hand-hole	Pismo Beach
117	143 Beach Comber Drive	Hand-hole	Pismo Beach
118	155 Beach Comber Drive	Hand-hole	Pismo Beach

III. Field Inspection Violations List

My staff observed the following violations during the field inspection:

GO 95, Rule 91.3 Stepping, B. Location of Steps, states in part:

The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step. Above this point steps shall be placed, with spacing between steps on the same side of the pole not exceeding 36 inches, at least to that conductor level above which only circuits operated and maintained by one party remain. Steps or fixtures for temporary steps shall be installed as part of a pole restoration process. Steps shall be so placed that runs or risers do not interfere with the free use of the steps.

The lowest pole steps on the following poles were located at a height of less than eight feet:

- 121338485
- The tagless pole at 780 Piney Way

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

An unauthorized “Slow – Kids Playing” sign was attached to Pole No. 120404080.

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 following overhead facilities required maintenance:

- A down guy wire on Pole #6 near 48 Buena Vista Avenue was detached from the pole.
- Vertical communications conductors on Pole Nos. 120426567 and 120946665 were partially outside their riser covers.

GO 95, Rule 56.4, Clearances, states in part:

The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.

Table 2, Column C, Case 19 requires guy wires and communications conductors supported on the same pole to maintain a radial clearance of three inches.

Charter communications conductors were in contact with down guy wires on each of the following poles:

- 121302912
- 121338563

GO 95, Rule 31.6, Abandoned Lines, states:

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. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

Abandoned service drops were observed on the following poles:

- 120256153
- 120256152

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops),” and “Communication Conductors and Supply Drops” supported on the same pole to be 12 inches.

Charter communications conductors were in contact with third-party communications conductors near the following poles:

- Pole No. 5 at 2302 Santa Ynez Avenue
- 120101226
- 121496392
- 120404077
- 120270784
- 120412925

GO 95, Rule 86.9, Guy Marker (Guy Guard), states:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

An outermost down guy wire on Pole No. 21 near 2565 Fox Hollow Road lacked a suitable covering.

GO 95, Rule 84.6-B, Ground Wires, states in part:

Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A...

Ground wire covering on each of the following poles was damaged such that the ground wire was exposed at a height of less than eight feet:

- 121338479
- 120404080

GO 128 Rule 34.3, Self-contained Surface-mounted Equipment, states in part:

Equipment installed partially or completely above the ground surface and not enclosed by a vault, room or fence shall conform to the following:

C. Locking Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.

The following surface-mounted facilities were not secured by means of locks or other means:

- The hand-hole near 2190 Heritage Loop Road
- The doghouse at 2295 Holly Drive
- The pedestal at 2255 Holly Drive
- The pedestal at 2225 Holly Drive
- The pedestal at 2216 Holly Drive
- The pedestal at 2160 Holly Drive
- The pedestal at 2155 Holly Drive
- The hand-hole at 202 Beach Comber Drive
- The hand-hole at 206 Beach Comber Drive
- The doghouse at 230 Beach Comber Drive
- The hand-hole at 125 Beach Comber Drive
- The hand-hole at 137 Beach Comber Drive
- The hand-hole at 143 Beach Comber Drive
- The hand-hole at 155 Beach Comber Drive

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 surface-mounted equipment required maintenance:

- The base of the doghouse at 2295 Holly Drive was buried such that the covering could not be secured.
- The base of the pedestal at 2275 Holly Drive was buried such that it could not be opened during the audit.
- The base of the pedestal at 2255 Holly Drive was buried such that the covering could not be secured.