

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 9, 2024

CA2023-1100

Maegan Murphy
Crown Castle Communications
Utility Relations Manager for California
200 Spectrum Center Drive, Ste. 1700Cp
Irvine, CA 92618

SUBJECT: CIP Audit of Crown Castle Communications Los Angeles County East Regions

Ms. Murphy:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Calvin Choi and Jose Lastra of my staff conducted a Communication Infrastructure Provider (CIP) audit of Crown Castle Communications' Los Angeles County East Regions from November 13, 2023 to November 17, 2023. The audit included a review of Crown Castle's inspection and maintenance records and a field inspection of Crown Castle'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 March 11, 2024, by electronic or hard copy, of all corrective measures taken by Crown Castle Communications 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 Calvin Choi at 213-219-3034 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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Calvin Choi, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Crown Castle Communications' Intrusive Inspection of Wood Poles
- Crown Castle Communications' Overhead Lines Maintenance Plan
- Crown Castle Communications' Visual Inspections of Overhead Lines

II. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Type of Structure	Location
1	4713563E	Pole	Pasadena
2	1505801E	Pole	Pasadena
3	18721MP	Pole	Pasadena
4	19977MP	Pole	Pasadena
5	20345MP	Pole	Pasadena
6	19979MP	Pole	Pasadena
7	19982MP	Pole	Pasadena
8	21284MP	Pole	Pasadena
9	21108MP	Pole	Pasadena
10	21281MP	Pole	Pasadena
11	21529MP	Pole	Pasadena
12	4160502E	Pole	Pasadena
13	Next pole down from 4160502E	Pole	Pasadena
14	19611MP	Pole	Pasadena
15	14165MP	Pole	Pasadena
16	764658H	Pole	Pasadena
17	19992MP	Pole	Pasadena
18	19993MP	Pole	Pasadena
19	19994MP	Pole	Pasadena
20	19995MP	Pole	Pasadena
21	17668MP	Pole	Pasadena
22	19996MP	Pole	Pasadena
23	9593MP	Pole	Pasadena
24	9594MP	Pole	Pasadena
25	4587MP	Pole	Pasadena
26	Pole in front of 1306 Forest Ave	Pole	Pasadena
27	471039H	Pole	Pasadena
28	526535H	Pole	Pasadena
29	1432118E	Pole	Pasadena
30	488764E	Pole	South Pasadena
31	484440E	Pole	South Pasadena
32	484441E	Pole	South Pasadena
33	484442E	Pole	South Pasadena
34	4758751E	Pole	South Pasadena
35	484444E	Pole	South Pasadena
36	4502968E	Pole	South Pasadena
37	4502967E	Pole	South Pasadena
38	435977H	Pole	South Pasadena
39	Pole in front of 352 El Centro St	Pole	South Pasadena
40	445363H	Pole	South Pasadena

41	22316H	Pole	South Pasadena
42	632585H	Pole	South Pasadena
43	22332H	Pole	South Pasadena
44	204354M	Pole	Los Angeles
45	627719H	Pole	Los Angeles
46	204355M	Pole	Los Angeles
47	649276H	Pole	Los Angeles
48	564888H	Pole	Los Angeles
49	564889H	Pole	Los Angeles
50	821210H	Pole	Los Angeles
51	390200M	Pole	Los Angeles
52	464965H	Pole	Los Angeles
53	564892H	Pole	Los Angeles
54	322077M	Pole	Los Angeles
55	173508M	Pole	Los Angeles
56	167024M	Pole	Los Angeles
57	391266M	Pole	Los Angeles
58	391265M	Pole	Los Angeles
59	4143156M	Pole	Los Angeles
60	435273H	Pole	Los Angeles
61	1022690H	Pole	Los Angeles
62	230615M	Pole	Los Angeles
63	433308M	Pole	Los Angeles
64	150330M	Pole	Los Angeles
65	150331M	Pole	Los Angeles
66	377591M	Pole	Los Angeles
67	203155M	Pole	Los Angeles
68	203154M	Pole	Los Angeles
69	203153M	Pole	Los Angeles
70	203152M	Pole	Los Angeles
71	357643M	Pole	Los Angeles
72	203150M	Pole	Los Angeles
73	357643M	Pole	Los Angeles
74	379025M	Pole	Los Angeles
75	203147M	Pole	Los Angeles
76	425352M	Pole	Los Angeles
77	440065M	Pole	Los Angeles
78	440064M	Pole	Los Angeles
79	440063M	Pole	Los Angeles
80	2447M	Pole	Los Angeles
81	2335964E	Pole	Los Angeles
82	2335963E	Pole	Los Angeles
83	4536338E	Pole	Los Angeles
84	29054C	Pole	Los Angeles
85	23611A	Pole	Glendale

86	23610A	Pole	Glendale
87	23609A	Pole	Glendale
88	18721A	Pole	Glendale
89	Pole in front of 737 South Verdugo Rd	Pole	Glendale
90	18720A	Pole	Glendale
91	32904A	Pole	Glendale
92	32903A	Pole	Glendale
93	32902A	Pole	Glendale
94	23606A	Pole	Glendale
95	32906A	Pole	Glendale
96	1002886H	Pole	Glendale
97	1054809H	Pole	Glendale
98	1002888H	Pole	Glendale
99	29347A	Pole	Glendale
100	Pole on corner of Columbus Ave and Lexington Dr	Pole	Glendale
101	Pole in front of 415 N Columbus Ave	Pole	Glendale
102	29348A	Pole	Glendale
103	Pole in front of 506 N Columbus Ave	Pole	Glendale
104	30110A	Pole	Glendale
105	27129A	Pole	Glendale
106	27128A	Pole	Glendale
107	33468A	Pole	Glendale
108	27126A	Pole	Glendale
109	27125A	Pole	Glendale
110	27124A	Pole	Glendale
111	27114A	Pole	Glendale
112	27113A	Pole	Glendale
113	Pole next to 27113A	Pole	Glendale
114	26088A	Pole	Glendale
115	26087A	Pole	Glendale
116	Pole next to 240 Thompson Ave	Pole	Glendale
117	27112A	Pole	Glendale
118	33420A	Pole	Glendale
119	27111A	Pole	Glendale
120	27110A	Pole	Glendale
121	27109A	Pole	Glendale

III. Field Inspection – Violations List

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

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

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).

A Crown Castle communications conductor attached to each of the following poles was strained by vegetation:

- Pole in front of 352 El Centro St
- 564889H
- Pole in front of 415 N Columbus Ave

GO 95, Rule 54.6-B - Ground Wires, states in part:

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding attached to each of the following poles was damaged:

- 19982MP
- Pole in front of 1306 Forest Ave
- 649276H
- 27111A

GO 95, Rule 56.2 - Overhead Guys, Anchor Guys and Span Wires, 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.

The Crown Castle down guy wire supporting Pole 230615M was not taut.

GO 95, Rule 84.4 – Clearances, Above Ground, From Nonclimbable Street Lighting or Traffic Signal Poles or Standards states in part:

When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case 10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside. There shall be no interference with light distribution from lighting fixtures and workers shall not be hampered or endangered in the performance of their duties.

At midspan, a Crown Castle communications conductor supported on Pole 484440E was touching a streetlight and had a clearance of less than 12 inches.

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

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.

The outer most down guy wire supporting to each of the following poles did not have a guy marker:

- 9594MP
- 632585H
- 27129A
- 27124A
- Pole next to 240 Thompson Ave
- 27112A