

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 23, 2023

CA2023-1029

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

**SUBJECT:** Audit of AT&T South Region/Imperial County

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, James Miller of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's South Region/Imperial County Service Region from February 13, 2023, to February 17, 2023. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T's 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 June 23, 2023, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit, please contact James Miller at (213) 660-8898 or [James.Miller@cpuc.ca.gov](mailto: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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Majed Ibrahim, Senior Utilities Engineer, ESRB, SED, CPUC  
James Miller, Utilities Engineer, 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 orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- 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.	Facility Identification	Facility Type	Location
1	68668	Pole	Calipatria
2	68663	Pole	Calipatria
3	67665D	Pole	Calipatria
4	67666D	Pole	Calipatria
5	Pole East of Previous (No Tag)	Pole	Calipatria
6	Pole East of Previous (No Tag)	Pole	Calipatria
7	Pole East of Previous (No Tag)	Pole	Calipatria
8	Pole East of Previous (No Tag)	Pole	Calipatria
9	Pole East of Previous (No Tag)	Pole	Calipatria
10	67672	Pole	Calipatria
11	67673D	Pole	Calipatria
12	67981D	Pole	Calipatria
13	67614D	Pole	Calipatria
14	675003D	Pole	Calipatria
15	65615D	Pole	Calipatria
16	1237133	Pole	Calipatria
17	1237136	Pole	Calipatria
18	T-11810	Pole	Seeley
19	507768H	Pole	Seeley
20	101045H	Pole	Seeley
21	1061020H	Pole	Seeley
22	20000ID	Pole	Seeley
23	H810707	Pole	Seeley
24	20358D	Pole	Seeley
25	H810706	Pole	Seeley
26	507770H	Pole	Seeley
27	1142400D	Pole	Seeley
28	1057361H	Pole	Seeley
29	21496D	Pole	Seeley
30	T-19003	Pole	Seeley
31	1204570	Pole	Seeley
32	1221527	Pole	Ocotillo
33	1045272H	Pole	Ocotillo
34	1048092H	Pole	Ocotillo
35	1221528	Pole	Ocotillo
36	23763D	Pole	Ocotillo
37	1048088H	Pole	Ocotillo

38	827791H	Pole	Ocotillo
39	22531D	Pole	Ocotillo
40	22917	Pole	Ocotillo
41	Pole South of Previous (No Tag)	Pole	Ocotillo
42	1060622H	Pole	Ocotillo
43	61304D	Pole	Imperial
44	61322D	Pole	Imperial
45	61303D	Pole	Imperial
46	61302D	Pole	Imperial
47	61301D	Pole	Imperial
48	Pole East of Previous (No Tag)	Pole	Imperial
49	60855D	Pole	Imperial
50	60332ID	Pole	Imperial
51	60794D	Pole	Imperial
52	62748D	Pole	Imperial
53	102831H	Pole	Imperial
54	507780H	Pole	Imperial
55	730721H	Pole	Imperial
56	802396H	Pole	Imperial
57	802386H	Pole	Imperial
58	1033890H	Pole	Imperial
59	653289H	Pole	Imperial
60	6377D	Pole	Imperial
61	102818H	Pole	Imperial
62	417677H	Pole	Imperial
63	102816H	Pole	Imperial
64	102817H	Pole	Imperial
65	1053974H	Pole	Imperial
66	1053973H	Pole	Imperial
67	1093572H	Pole	Imperial
68	102821H	Pole	Imperial
69	102823H	Pole	Imperial
70	1170400	Pole	Imperial
71	1053967H	Pole	Imperial
72	1198 Meadow View Avenue	Fiber Terminal	El Centro
73	1178 Meadow View Avenue	Pedestal	El Centro
74	1122 Meadow View Avenue	Pedestal	El Centro
75	1022 Meadow View Avenue	Pedestal	El Centro
76	902 Meadow View Avenue	Pedestal	El Centro
77	802 Meadow View Avenue	Pedestal	El Centro
78	1022 Valley View Avenue	Pedestal	El Centro
79	1102 Valley View Avenue	Pedestal	El Centro
80	1178 Valley View Avenue	Pedestal	El Centro

81	1198 Valley View Avenue	Pedestal	El Centro
82	Bernardi Street and Cross Avenue	Splice Enclosure	Imperial
83	196 Bernardi Street	Pedestal	Imperial
84	184 Bernardi Street	Pedestal	Imperial
85	180 Bernardi Street	Splice Enclosure	Imperial
86	2324 Cedro Avenue	Pedestal	Imperial
87	2336 Cedro Avenue	Pedestal	Imperial
88	2344 Cedro Avenue	Pedestal	Imperial
89	185 Bianca Court	Pedestal	Imperial
90	187 Bianca Court	Pedestal	Imperial
91	181 Sampson Street	Pedestal	Imperial
92	184 Sylvia Court	Pedestal	Imperial
93	221 Aten Road	Splice Enclosure	Imperial
94	804 East 2nd Street	Service Area Interface	Imperial
95	804 East 2nd Street	Sub Box	Imperial
96	809 East 2nd Street	Pedestal	Imperial
97	817 East 2nd Street	Pedestal	Imperial
98	905 East 2nd Street	Pedestal	Imperial
99	909 East 2nd Street	Pedestal	Imperial
100	1005 East 2nd Street	Pedestal	Imperial
101	1101 East 2nd Street	Pedestal	Imperial
102	1109 East 2nd Street	Pedestal	Imperial
103	1121 East 2nd Street	Pedestal	Imperial
104	976 Madison Avenue	Pedestal	Brawley
105	964 Madison Avenue	Pedestal	Brawley
106	940 Madison Avenue	Pedestal	Brawley
107	930 Madison Avenue	Pedestal	Brawley
108	916 Madison Avenue	Pedestal	Brawley
109	902 Madison Avenue	Pedestal	Brawley
110	882 Madison Avenue	Pedestal	Brawley
111	842 Madison Avenue	Pedestal	Brawley
112	125 Emma Place	Pedestal	Brawley
113	113 Emma Place	Pedestal	Brawley
114	824 South 1st Street	Pedestal	Brawley
115	884 South 1st Street	Pedestal	Brawley
116	Julia Drive and South 1st Street	Pedestal	Brawley

### III. Field Inspection – Violations List

My staff 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.*

The following AT&T overhead facilities were not maintained for their intended use:

- The lashing wire on an AT&T conductor was broken just east of Pole No. 67672.
- An AT&T down guy wire attached to Pole No. 67981D was broken.
- AT&T's ground wire on Pole No. 65615D was cut.
- A strand-mounted terminal was not properly attached to its strand near Pole No. 507770H.

**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. 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 near the following poles:

- T-19003
- 61303D
- 61302D

**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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.*

The ground wire on Pole No. 802396H lacked a suitable covering at ground level.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8** requires the minimum radial clearance between communication conductors at midspan to be twelve inches.

AT&T communications conductors were in contact with third-party communications conductors midspan near the following poles:

- T-19003
- 1204570
- 102818H
- 102821H

**General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19** requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

A down guy attached to Pole No. 1221528 was in contact with an AT&T communications conductor supported on the same pole.

**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 step on Pole No. 60794D was located at a height of less than eight feet.

**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 yard sale sign was attached to Pole No. 1053967H.

**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 at 113 Emma Place could not be opened because its base had been encased in concrete.

**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 above-ground enclosures were not secured against entry by unauthorized persons by means of locks or other suitable means:

- The pedestal at 802 Meadow View Avenue
- The pedestal at 184 Bernardi Street
- The pedestal at 181 Sampson Street
- The pedestal at 817 East 2nd Street
- The pedestal at 909 East 2nd Street
- The pedestal at 1101 East 2nd Street
- The pedestal at 1109 East 2nd Street
- The pedestal at 930 Madison Avenue