

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 27, 2021

CA2021-889

Mark DiNunzio
Director, Regulatory Affairs – West
Cox Communications (Cox)
1550 W. Deer Valley Rd.
Phoenix, AZ 85027

SUBJECT: Audit of Cox Santa Barbara County District

Mr. DiNunzio:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi, Kyle King, and Stacey Ocampo of my staff conducted a Communication Infrastructure Provider (CIP) audit of Cox Communications' Santa Barbara County District from February 22, 2021 to February 26, 2021. The audit included a review of Cox Communications' inspection and maintenance records and a field inspections of Cox 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 September 27, 2021, by electronic or hard copy, of all corrective measures taken by Cox Communications to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 266-4730 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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Calvin Choi, 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
- Cox Communications' Overhead Lines Maintenance Plan
- Cox Communications' Visual Inspections of Overhead Lines

II. Field Inspection

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

| No. | Structure Number | Type of Structure | City |
|-----|------------------|-------------------|-------------|
| 1 | 1345364E | Pole | Carpinteria |
| 2 | 1345363E | Pole | Carpinteria |
| 3 | 4282852E | Pole | Carpinteria |
| 4 | 1345361E | Pole | Carpinteria |
| 5 | 4758360E | Pole | Carpinteria |
| 6 | 1345359E | Pole | Carpinteria |
| 7 | 1345358E | Pole | Carpinteria |
| 8 | 1345357E | Pole | Carpinteria |
| 9 | 4428864E | Pole | Carpinteria |
| 10 | 4371456E | Pole | Carpinteria |
| 11 | 1345354E | Pole | Carpinteria |
| 12 | 1345353E | Pole | Carpinteria |
| 13 | 2383668E | Pole | Toro Canyon |
| 14 | 1882419E | Pole | Toro Canyon |
| 15 | 4574529E | Pole | Toro Canyon |
| 16 | 1882418E | Pole | Toro Canyon |
| 17 | 4339401E | Pole | Toro Canyon |
| 18 | 18972197E | Pole | Montecito |
| 19 | 1927277E | Pole | Montecito |
| 20 | 4539811E | Pole | Montecito |
| 21 | 1840622E | Pole | Montecito |
| 22 | 2303870E | Pole | Montecito |
| 23 | 4534706E | Pole | Montecito |
| 24 | 4539810E | Pole | Montecito |
| 25 | 4539809E | Pole | Montecito |
| 26 | 4539808E | Pole | Montecito |
| 27 | 4539807E | Pole | Montecito |
| 28 | 4539806E | Pole | Montecito |
| 29 | 4539805E | Pole | Montecito |
| 30 | 4539804E | Pole | Montecito |
| 31 | GT125879 | Pole | Montecito |
| 32 | GT134333 | Pole | Montecito |
| 33 | 4032144E | Pole | Montecito |
| 34 | 4477374E | Pole | Montecito |

| | | | |
|----|------------------|------|---------------|
| 35 | GT302082 | Pole | Montecito |
| 36 | GT108104 | Pole | Montecito |
| 37 | 4539802E | Pole | Montecito |
| 38 | 4451902E | Pole | Montecito |
| 39 | 4635326E | Pole | Montecito |
| 40 | 4782464E | Pole | Santa Barbara |
| 41 | 4782696E | Pole | Santa Barbara |
| 42 | 4797512E | Pole | Santa Barbara |
| 43 | 4782463E | Pole | Santa Barbara |
| 44 | 1016063E | Pole | Montecito |
| 45 | 1524263E | Pole | Montecito |
| 46 | GT133538 | Pole | Montecito |
| 47 | 3689558T | Pole | Montecito |
| 48 | 886651E | Pole | Montecito |
| 49 | 3688T | Pole | Montecito |
| 50 | 4451450E | Pole | Montecito |
| 51 | 886598E | Pole | Montecito |
| 52 | 886597E | Pole | Montecito |
| 53 | 4464141E | Pole | Montecito |
| 54 | 886595E | Pole | Montecito |
| 55 | GT60713 | Pole | Montecito |
| 56 | 2244993E | Pole | Montecito |
| 57 | GT69435 | Pole | Montecito |
| 58 | 1238274E | Pole | Santa Barbara |
| 59 | 1236273E | Pole | Santa Barbara |
| 60 | 1236272E | Pole | Santa Barbara |
| 61 | 1236271E | Pole | Santa Barbara |
| 62 | 1236270E | Pole | Santa Barbara |
| 63 | 4093584E | Pole | Santa Barbara |
| 64 | 4093585E | Pole | Santa Barbara |
| 65 | 1236268E | Pole | Santa Barbara |
| 66 | 4093586E | Pole | Santa Barbara |
| 67 | 38 Voluntario St | Pole | Santa Barbara |
| 68 | 4551588E | Pole | Santa Barbara |
| 69 | 4744282E | Pole | Santa Barbara |
| 70 | 4753026E | Pole | Santa Barbara |
| 71 | 4796668 | Pole | Santa Barbara |
| 72 | 4041281E | Pole | Santa Barbara |
| 73 | GT123106 | Pole | Santa Barbara |
| 74 | GT123105 | Pole | Santa Barbara |

| | | | |
|-----|--------------------------|------|---------------|
| 75 | GT119379 | Pole | Santa Barbara |
| 76 | Near 1113 Carpinteria St | Pole | Santa Barbara |
| 77 | GT119380 | Pole | Santa Barbara |
| 78 | S3988Y | Pole | Santa Barbara |
| 79 | GT61868 | Pole | Santa Barbara |
| 80 | T1326A | Pole | Santa Barbara |
| 81 | 1915049E | Pole | Santa Barbara |
| 82 | S29107Y | Pole | Santa Barbara |
| 83 | GT118856 | Pole | Santa Barbara |
| 84 | 4538124E | Pole | Santa Barbara |
| 85 | S29105Y | Pole | Santa Barbara |
| 86 | S28270Y | Pole | Santa Barbara |
| 87 | 50906LAC | Pole | Santa Barbara |
| 88 | 4959957E | Pole | Santa Barbara |
| 89 | S28015Y | Pole | Santa Barbara |
| 90 | S28014Y | Pole | Santa Barbara |
| 91 | S28013Y | Pole | Santa Barbara |
| 92 | 4842662 | Pole | Goleta |
| 93 | 4199175E | Pole | Goleta |
| 94 | 4429696E | Pole | Goleta |
| 95 | 1372455E | Pole | Goleta |
| 96 | 1372456E | Pole | Goleta |
| 97 | 1372485E | Pole | Goleta |
| 98 | 1372446E | Pole | Goleta |
| 99 | 4563265E | Pole | Goleta |
| 100 | 1217380E | Pole | Goleta |
| 101 | 1217299E | Pole | Goleta |
| 102 | 1345787E | Pole | Goleta |
| 103 | 903236E | Pole | Goleta |
| 104 | 1188952E | Pole | Goleta |
| 105 | 903237E | Pole | Goleta |
| 106 | 1216879E | Pole | Goleta |
| 107 | 1133219E | Pole | Goleta |
| 108 | S18926Y | Pole | Goleta |
| 109 | S18925Y | Pole | Goleta |
| 110 | S18924Y | Pole | Goleta |
| 111 | 1345339E | Pole | Goleta |
| 112 | GT120438 | Pole | Goleta |
| 113 | 1345340E | Pole | Goleta |

| | | | |
|-----|-----------------------------|--------------------|---------------|
| 114 | 4660256E | Pole | Goleta |
| 115 | GT120437 | Pole | Goleta |
| 116 | S18921Y | Pole | Goleta |
| 117 | 1188674E | Pole | Goleta |
| 118 | S18368Y | Pole | Goleta |
| 119 | 644931E | Pole | Goleta |
| 120 | 1217086E | Pole | Santa Barbara |
| 121 | 4263683E | Pole | Santa Barbara |
| 122 | 4263682E | Pole | Santa Barbara |
| 123 | 1829170E | Pole | Santa Barbara |
| 124 | 1675476E | Pole | Santa Barbara |
| 125 | 1256912E | Pole | Santa Barbara |
| 126 | 4371463E | Pole | Santa Barbara |
| 127 | 4263680E | Pole | Santa Barbara |
| 128 | 2178713E | Pole | Santa Barbara |
| 129 | 1675475E | Pole | Santa Barbara |
| 130 | 4421940E | Pole | Santa Barbara |
| 130 | 3137967E | Pole | Santa Barbara |
| 132 | S13797Y | Pole | Santa Barbara |
| 133 | 712330E | Pole | Santa Barbara |
| 134 | 4875476E | Pole | Santa Barbara |
| 135 | 4660262E | Pole | Santa Barbara |
| 136 | X3658E | Pole | Santa Barbara |
| 137 | 950124E | Pole | Santa Barbara |
| 138 | Across 223 Ellwood Beach Dr | Pedestal | Goleta |
| 139 | 236 Ellwood Beach Dr | Handhole | Goleta |
| 140 | 245 Ellwood Beach Dr | Pedestal | Goleta |
| 141 | 246 Ellwood Beach Dr | Pedestal | Goleta |
| 142 | 251 Ellwood Beach DR | Pedestal | Goleta |
| 143 | 254 Ellwood Beach Dr | Pedestal | Goleta |
| 144 | 264 Ellwood Beach Dr | Pad mount Doghouse | Goleta |
| 145 | 283 Ellwood Beach Dr | Pedestal | Goleta |
| 146 | 278 Ellwood Beach Dr | Pedestal | Goleta |
| 147 | 301 Ellwood Beach Dr | Handhole | Goleta |
| 148 | 312 Ellwood Beach Dr | Pad mount Doghouse | Goleta |
| 149 | 312 Ellwood Beach Dr | Pedestal | Goleta |
| 150 | 325 Ellwood Beach Dr | Handhole | Goleta |
| 151 | 332 Ellwood Beach Dr | Pedestal | Goleta |
| 152 | 348 Ellwood Beach Dr | Pedestal | Goleta |

| | | | |
|-----|-----------------------------|--------------------|--------|
| 153 | 355 Ellwood Beach Dr | Pedestal | Goleta |
| 154 | 360 Ellwood Beach Dr | Handhole | Goleta |
| 155 | 375 Ellwood Beach Dr | Pedestal | Goleta |
| 156 | 385 Ellwood Beach Dr | Pedestal | Goleta |
| 157 | 357 Mathilda Dr | Pedestal | Goleta |
| 158 | 350 Mathilda Dr | Pedestal | Goleta |
| 159 | 345 Mathilda Dr | Pedestal | Goleta |
| 160 | 340 Mathilda Dr | Pedestal | Goleta |
| 161 | 323 Mathilda Dr | Pedestal | Goleta |
| 162 | 310 Mathilda Dr | Pedestal | Goleta |
| 163 | 309 Mathilda Dr | Pedestal | Goleta |
| 164 | 297 Mathilda Dr | Pad mount Doghouse | Goleta |
| 165 | 290 Mathilda Dr | Pedestal | Goleta |
| 166 | 40 Willow Spring Ln | Pedestal | Goleta |
| 167 | 101 La Calera Way | Pedestal | Goleta |
| 168 | 101 La Calera Way | Pedestal | Goleta |
| 169 | 109 La Calera Way | Pedestal | Goleta |
| 170 | 107 La Calera Way | Pedestal | Goleta |
| 171 | Rear of 125 La Calera Way | Pedestal | Goleta |
| 172 | Rear of 129 La Calera Way | Pedestal | Goleta |
| 173 | Rear of 137 La Calera Way | Pedestal | Goleta |
| 174 | Rear pf 154 La Calera Way | Pedestal | Goleta |
| 175 | Rear of 158 La Calera Way | Pedestal | Goleta |
| 176 | 150 La Calera Way | Pedestal | Goleta |
| 177 | 150 La Calera Way | Handhole | Goleta |
| 178 | Rear of 6922 Chenango Court | Handhole | Goleta |
| 179 | Rear of 6914 Chenango Court | Handhole | Goleta |
| 180 | Rear of 6906 Chenango Court | Handhole | Goleta |
| 181 | 6926 La Calera Way | Handhole | Goleta |
| 182 | 39 N San Mateo Rd | Handhole | Goleta |
| 183 | Rear of 69 Patricia Ln | Handhole | Goleta |
| 184 | Rear of 75B Patricia Ln | Handhole | Goleta |
| 185 | Rear of 57A Patricia Ln | Handhole | Goleta |
| 186 | Rear of 23B Patricia Ln | Handhole | Goleta |
| 187 | Rear of 17B Patricia Ln | Handhole | Goleta |
| 188 | 15 Calle Real | Handhole | Goleta |
| 189 | 29A Calle Real | Handhole | Goleta |
| 190 | Rear of 35B Calle Real | Pedestal | Goleta |
| 191 | Rear of 33A Calle Real | Handhole | Goleta |

III. Field Inspection – Violations List

We observed the following violations during the field inspections:

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).

Cox communications conductors attached to the following poles were strained by vegetation:

- 4539809E
- 4539804E

GO 95, Rule 56.2, Uses (Guy Wires), 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.

A Cox down guy wire attached to the following poles was not taut:

- 1882419E
- 4339401E
- 1236273E

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 moulding attached to the following poles was damaged:

- GT118856
- S29105Y

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground, states in part:

Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.

A Cox riser attached to the following poles was damaged or missing:

- 1345363E – Riser was not protected with conduit.
- GT302082 – Riser was not protected with conduit.
- GT118856 – Riser was not protected with conduit.
- 1188952E – Riser was not protected with conduit.
- 903237E – Riser was not protected with conduit.
- 1217086E – Riser was not protected with conduit.
- 4263682E – Riser was not protected with conduit.
- 886595E – Riser was not protected with conduit.
- 1882418E – Riser was not protected with conduit.
- 4539802E – Riser was not protected with conduit.
- 4538124E – Riser was not protected with conduit.
- 4959957E – Riser was not protected with conduit.
- 1524263E – Conduit was not fully covering riser.
- GT69435 – Conduit was not fully covering riser.
- 3689SBT – Conduit was not fully covering riser.
- 4093586E – Conduit protecting riser was broken.

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 Cox underground facilities were not maintained for their intended use:

- The pad-mount “doghouse base” located in front of 309 Mathilda Way was caved in and not maintained for its intended use.
- The pedestal door located in front of 297 Mathilda Drive was unsecured and broken.
- The pedestal enclosure located in front of 290 Mathilda Drive was bent and had underground conductors exposed.
- The pedestal located on the side of 101 La Calera Way was unsecured and open.
- The handhole cover located in the rear of 125 La Calera Way was damaged.
- The handhole cover located in the rear of 129 La Calera Way was damaged.
- The handhole cover located in the rear of 137 La Calera Way was damaged.
- The handhole cover located in the rear of 6922 Chenango Court was damaged.
- The handhole cover located in the rear of 6906 Chenango Court was damaged.
- The handhole cover located in the rear of 33A Calle Real was damaged.