

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 5, 2022

CA2021-896

Mark A. DiNunzio
Cox Communications
Director, Regulatory Affairs – West (AZ, CA, NV)
1550 West Deer Valley Road
Phoenix, AZ 85027

SUBJECT: Audit of Cox Communications North San Diego County District

Mr. DiNunzio:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), James Miller and Richard Le of my staff conducted a CIP audit of Cox Communications' North San Diego County District from April 12, 2021 to April 16, 2021. The audit included a review of Cox Communications' inspection and maintenance records and a field inspection of Cox Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by Staff is enclosed along with this letter. Please advise me no later than May 5, 2022, 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, you can contact James Miller at (213) 660-8898 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: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, CPUC
Majed Ibrahim, Senior Utilities Engineer Supervisor, ESRB, CPUC
James Miller, Utilities Engineer, ESRB, 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.
- Cox Communications' Intrusive Inspection of Wood Poles
- 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 Identification	Structure Type	Location
1	P10532	Pole	San Marcos
2	P713822	Pole	San Marcos
3	P227705	Pole	San Marcos
4	P319553	Pole	San Marcos
5	P319551	Pole	San Marcos
6	P410037	Pole	San Marcos
7	P514555	Pole	San Marcos
8	P166506	Pole	Escondido
9	313569	Pole	Escondido
10	P618015	Pole	Escondido
11	P16720	Pole	Escondido
12	P16721	Pole	Escondido
13	P410800	Pole	Escondido
14	P401801	Pole	Escondido
15	P410802	Pole	Escondido
16	801784H	Pole	Escondido
17	P16718	Pole	Escondido
18	P16716J	Pole	Escondido
19	P16715	Pole	Escondido
20	P16714	Pole	Escondido
21	P209137	Pole	Escondido
22	P16740	Pole	Escondido
23	P16739	Pole	Escondido
24	1012467H	Pole	Escondido
25	1012467H	Pole	Escondido
26	1012466H	Pole	Escondido
27	P16738	Pole	Escondido
28	P16737	Pole	Escondido
29	P510918	Pole	Escondido
30	P16728	Pole	Escondido
31	P16722	Pole	Escondido
32	P516415	Pole	Escondido
33	P218263	Pole	Escondido
34	P513304	Pole	Escondido
35	P513305	Pole	Escondido
36	P513306	Pole	Escondido
37	P870203	Pole	Poway
38	P870204	Pole	Poway

39	P870205	Pole	Poway
40	P872765	Pole	Poway
41	P870206	Pole	Poway
42	P870207	Pole	Poway
43	P870209	Pole	Poway
44	P715126	Pole	Poway
45	P715127	Pole	Poway
46	P717736	Pole	Poway
47	P715128	Pole	Poway
48	P715129	Pole	Poway
49	P718253	Pole	Poway
50	P718254	Pole	Poway
51	715910	Pole	Ramona
52	717943	Pole	Ramona
53	P712518	Pole	Ramona
54	P712519	Pole	Ramona
55	P712520	Pole	Ramona
56	P713912	Pole	Ramona
57	P233609	Pole	Ramona
58	P233611	Pole	Ramona
59	P32738	Pole	Ramona
60	322 Flores de Oro	Pedestal with Tap	Rancho Santa Fe
61	344 Flores de Oro	Pedestal with Amplifier	Rancho Santa Fe
62	361 Flores de Oro	Pedestal	Rancho Santa Fe
63	361 Flores de Oro	Pedestal with Amplifier	Rancho Santa Fe
64	3059 Paso Cielo	Pedestal with Tap	Rancho Santa Fe
65	3035 Paso Cielo	Pedestal with Tap	Rancho Santa Fe
66	3011 Paso Cielo	Pedestal with Tap	Rancho Santa Fe
67	108 Cerro St.	Pedestal with Amplifier	Encinitas
68	102 Cerro St.	Pedestal with Tap	Encinitas
69	114 Cerro St.	Pedestal with Tap	Encinitas
70	1604 Olmeda St.	Pedestal with Tap	Encinitas
71	1620 Olmeda St.	Pedestal with Tap	Encinitas
72	1624 Olmeda St.	Pedestal with Tap	Encinitas
73	120 Chapalita Dr.	Pedestal with Tap	Encinitas
74	128 Chapalita Dr.	Pedestal with Tap and Equalizer	Encinitas
75	202 Chapalita Dr.	Pedestal with Tap	Encinitas
76	119 Rosebay Dr.	Pedestal with Amplifier	Encinitas
77	757 Teaberry St.	Pedestal with Tap	Encinitas
78	751 Teaberry St.	Pedestal with Tap	Encinitas
79	754 Teaberry St.	Pedestal with Tap	Encinitas
80	748 Teaberry St.	Pedestal with Amplifier	Encinitas
81	733 Snapdragon St.	Pedestal with Tap	Encinitas

82	742 Snapdragon St.	Pedestal with Amplifier	Encinitas
83	745 Snapdragon St.	Pedestal with Tap	Encinitas
84	755 Snapdragon St.	Pedestal with Tap	Encinitas
85	155 Rosebay Dr.	Pedestal with Amplifier	Encinitas
86	180 Rosebay Dr.	Splice Box	Encinitas
87	739 Sunflower St.	Pedestal with Tap	Encinitas
88	208 Gloxina St.	Pedestal with Tap	Encinitas
89	215 Gloxina St.	Pedestal with Tap	Encinitas
90	220 Gloxina St.	Pedestal with Tap	Encinitas
91	Z20333	Pole	Oceanside
92	P20334	Pole	Oceanside
93	316 Surfrider Wy.	Pedestal with Tap	Oceanside
94	316 1/2 Surfrider Wy.	Pedestal with Amplifier	Oceanside
95	317 1/2 Surfrider Wy.	Pedestal with Connector	Oceanside
96	601 Cleveland St.	Pedestal with Tap	Oceanside
97	597 Cleveland St.	Pedestal with Splitter	Oceanside
98	674 N. Cleveland St.	Pedestal with Tap	Oceanside
99	694 N. Cleveland St.	Pedestal with Amplifier	Oceanside
100	691 N. Tremont St.	Pedestal whth Splitter	Oceanside
101	688 Windward Wy.	Pedestal	Oceanside
102	712 N. Tremont St.	Pedestal with Amplifier	Oceanside
103	732 N. Tremont St.	Pedestal with Tap	Oceanside
104	731 N. Tremont St.	Pedestal	Oceanside
105	801 N. Tremont St.	Pedestal with Tap	Oceanside
106	807 N. Tremont St.	Pedestal with Tap	Oceanside
107	715 N. Tremont St.	Pedestal with Tap	Oceanside
108	707 N. Tremont St.	Pedestal with Tap	Oceanside
109	500 The Strand North	Pedestal with Splitter	Oceanside
110	501 The Strand North	Pedestal with Amplifier	Oceanside
111	600 The Strand North	Pedestal with Amplifier	Oceanside
112	601 N. Pacific St.	Pedestal with Tap	Oceanside
113	621 N. Pacific St.	Pedestal	Oceanside
114	701 N. Pacific St.	Pedestal with Tap	Oceanside
115	709 N. Pacific St.	Pedestal with Tap	Oceanside
116	721 N. Pacific St.	Pedestal with Amplifier	Oceanside
117	801 N. Pacific St.	Pedestal with Connector	Oceanside
118	805 N. Pacific St.	Pedestal with Tap	Oceanside
119	809 N. Pacific St.	Pedestal with Tap	Oceanside
120	901 N. Pacific St.	Pedestal with Amplifier	Oceanside
121	915 N. Pacific St.	Pedestal with Splitter	Oceanside
122	915 N. Pacific St.	Power Supply	Oceanside
123	P13536	Pole	San Marcos
124	P516319	Pole	San Marcos

125	P419005	Pole	San Marcos
126	403 Placer Ave.	Pedestal	San Marcos
127	705 Ash Ln.	Pedestal	San Marcos
128	P714358	Pole	San Marcos
129	116127	Pole	San Marcos
130	P210461	Pole	San Marcos
131	P210456	Pole	San Marcos
132	P210455	Pole	San Marcos
133	P210458	Pole	San Marcos
134	P210459	Pole	San Marcos
135	P210460	Pole	San Marcos
136	P210452	Pole	San Marcos
137	P417010	Pole	San Marcos
138	P316078	Pole	Escondido
139	P316077	Pole	Escondido
140	P316075	Pole	Escondido
141	P316074	Pole	Escondido
142	P313720	Pole	Escondido
143	P236658	Pole	Escondido

III. Field Inspection - Violations List

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 ground wire for the line extender on Pole Number P712518 was detached.

GO95, 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.

A Cox service drop on Pole Number P16737 was abandoned and not removed.

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 and/or supply drops on the same pole to be twelve inches.

- An AT&T conductor was attached to a Cox conductor near Pole Number P16715.
- Cox and AT&T conductors were in contact between Poles Numbered P16716J and P209137.
- Cox and AT&T conductors were attached approximately two inches apart on Pole Number 1012466H.
- A Cox service drop was in contact with an AT&T conductor on Pole Number P16737.
- A Cox conductor was attached less than twelve inches from another communications conductor on Pole Number P717736.

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 service drops attached to the same pole to maintain a clearance of three inches.

A Cox conductor and a down guy both attached Pole Number P713822 were in contact with each other.

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 enclosures were equipped with locks but were not secure at the time of the audit:

- The pedestal at 322 Flores de Oro
- The pedestals at 102 and 114 Cerro Street
- The pedestal at 202 Chapalita Drive
- The pedestal at 119 Rosebay Drive
- The pedestal at 751 Teaberry Street
- The pedestal at 742 Snapdragon Street
- The splice box at 180 Rosebay Drive
- The pedestal at 208 Gloxina Street
- The pedestal at 316 ½ Surfrider Way
- The pedestal at 597 Cleveland Street
- The pedestals at 691, 801, 731, 715, and 707 North Tremont Street
- The pedestal at 600 The Strand North
- The pedestals at 601, 801, and 915 North Pacific Street

GO 128, Rule 36.5, Grounding and Bonding of Conductors and Equipment, states in part:

A. General Supply conductors and equipment of the following types shall be bonded in manholes and at other locations where conductors and equipment are accessible and in proximity to one another, and shall be grounded in accordance with Rule 36.5–C.

...
(5) Metal Cases Supply Equipment: Metal cases of transformers, switches, and other supply equipment.

The amplifiers in the pedestals at the following locations were not grounded:

- 748 Teaberry Street
- 316 ½ Surfrider Way
- 501 The Strand North
- 901 North Pacific Street
- 694 North Cleveland Street

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 3035 Paseo Cielo had a broken lock eyelet.

The pedestal at 915 North Pacific Street had a severely rusted base.