

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 28, 2023

CA2023-1042

Ross Johnson
Area Manager Regulatory Relations
AT&T North, 430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Sacramento and Yolo Counties

Dear Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell and Emiliano Solorio of ESRB conducted a CIP audit of AT&T in Sacramento and Yolo Counties from March 6-10, 2023. During the audit, ESRB staff conducted field inspections of AT&T's communications facilities and reviewed pertinent documents and records.

As a result of the audit, ESRB identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than May 26, 2023, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations. The response should indicate the date each remedial action and preventive measure was completed. For any outstanding items not addressed, please provide the projected completion dates of all corrective actions for the violations outlined in Sections II & IV, and field observations listed in Section V of the enclosed Audit Report.

If you have any questions concerning this audit, please contact Samuel Mandell at (916) 217- 8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Banu Acimis".

Banu Acimis, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC CIP Audit Report for AT&T Sacramento and Yolo Counties

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Nathan Sarina, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC

Rickey Tse, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC

CPUC AUDIT FINDINGS OF AT&T
SACRAMENTO AND YOLO COUNTIES

March 6-10, 2023

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) reviewed the following records:

- AT&T Sacramento and Yolo Counties' service territory map.
- AT&T's General Order (GO) 95 and 128 maintenance and inspection procedures and programs.
- AT&T's inspector training program.
- Patrol and detailed-inspection records and findings for the last five years.
- Records for intrusive pole inspections conducted in the last five years.
- Work order records and completed and pending corrective actions for overhead and underground AT&T facilities for the last five years.
- Incoming/Outgoing Third-Party Safety Hazard notifications for the last five years.
- Pole loading and safety factor calculations completed in the last 12 months.
- New construction projects completed in the last 12 months.

II. Records Violations

ESRB identified the following violations during the record review portion of the audit:

1. GO 95, Rule 18-B1(a), Maintenance Programs states in part:

"The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:

- (i) *Level 1 -- An immediate risk of high potential impact to safety or reliability:*
 - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
- (ii) *Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*
 - *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

- (iii) *Level 3 -- Any risk of low potential impact to safety or reliability:*
- *Take corrective action within 60 months subject to the exception specified below.”*

ESRB’s review of AT&T’s work orders from January 1, 2018 to January 12, 2023 found that AT&T had a total of 34 late-pending work orders and 121 late-closed work orders. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 155 late work orders by hazard level, including the total number of late work orders, as well as late-pending and late-closed work orders, which are included in the total.

Table 1: Late Work Orders

Hazard Levels	Total Late Work Orders	Late-Pending Work Orders	Late-Closed Work Orders
1	44	-	44
2	72	34	38
3	3	-	3
N/A	36	-	36
Total	155	34	121

N/A: Not available

2. GO 95, Rule 31.2, Inspection of Lines states in part:

“Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard.”

GO 95, Rule 80.1-A(2), Statewide Inspection Requirements states in part:

“Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State.”

AT&T only conducts inspections outside of the High Fire-Threat District (HFTD) when safety hazards or nonconformances are identified by AT&T during routine non-inspection work or by a third-party. However, the facilities inspected by AT&T are limited to facilities one span in each direction from the location of the safety hazard/nonconformance. Therefore, ESRB determined that AT&T’s inspection procedure¹ does not ensure that its overhead communication facilities located outside of the HFTD are inspected frequently and thoroughly per GO 95, Rules 31.2 and 80.1-A(2).

¹ AT&T document: G.O. 95 Visual Inspections of Overhead Lines. Date issued: 1/30/2013.

3. GO 128, Rule 17.2, Inspection states in part:

“Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules.”

ESRB found that AT&T does not have procedures to ensure that all its underground communication facilities are inspected frequently and thoroughly per GO 128, Rule 17.2. AT&T only conducts underground inspections when safety hazards or nonconformances are identified by AT&T during unrelated routine work or by a third-party. However, the underground facilities inspected by AT&T are limited to facilities one span in each direction from the location of the safety hazard/nonconformance.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure #	Structure Type	Structure Location/Address	City
1		Padmount PFP	38.652812, -121.551196	Sacramento
2		UG Service Box	38.652053, -121.551938	Sacramento
3		UG Service Box	38.651670, -121.552317	Sacramento
4		UG Service Box	38.651088, -121.551888	Sacramento
5		Handhole	38.650903, -121.551425	Sacramento
6		UG Service Box	38.650793, -121.551153	Sacramento
7		Communication Pole	38.911700, -122.024625	Dunnigan
8		Communication Pole	38.911789, -122.024691	Dunnigan
9		Communication Pole	38.911052, -122.024656	Dunnigan
10		Communication Pole	38.744467, -122.007315	Esparto
11		Communication Pole	38.7453905, -122.0075116	Esparto
12		Communication Pole	38.7462834, -122.0074918	Esparto
13		Communication Pole	38.7469155, -122.0074811	Esparto
14		Communication Pole	38.7475817, -122.0074674	Esparto
15		Communication Pole	38.7437391, -122.0073534	Esparto
16		Communication Pole	38.7429957, -122.0073745	Esparto
17	121718761	Joint Pole	38.7065285, -122.0442351	Capay
18	121718760	Joint Pole	38.7066603, -122.0448215	Capay
19	23715	Joint Pole	38.706444, -122.043733	Capay
20		Joint Pole	38.7069181, -122.0465877	Capay
21		Joint Pole	38.706998, -122.047019	Capay
22		Joint Pole	38.707057, -122.047419	Capay
23		Padmount PFP	38.521148, -121.972120	Winters
24		Joint Pole	38.5211166, -121.9722855	Winters
25		Joint Pole	38.5210857, -121.9723489	Winters
26		Joint Pole	38.520945, -121.972794	Winters
27		Joint Pole	38.5207751, -121.9731981	Winters
28		Joint Pole	38.520625, -121.973604	Winters
29		Joint Pole	38.520546, -121.973863	Winters
30		Joint Pole	38.520413, -121.974265	Winters

31		Joint Pole	38.520250, -121.974692	Winters
32		Joint Pole	38.49482, -122.029373	Winters
33		Communication Pole	38.494743, -122.028842	Winters
34		Communication Pole	38.494774, -122.028279	Winters
35		Joint Pole	38.494880, -122.027616	Winters
36		Joint Pole	38.910457, -121.526887	Nicolaus
37		Joint Pole	38.910471, -121.526066	Nicolaus
38		Joint Pole	38.910485, -121.525360	Nicolaus
39	121106412	Joint Pole	38.910615, -121.525106	Nicolaus
40		Joint Pole	38.910623, -121.524661	Nicolaus
41		Joint Pole	38.910644, -121.523873	Nicolaus
42	121672035	Joint Pole	38.9395833, -121.5246667	Rio Oso
43		Joint Pole	38.939479, -121.524417	Rio Oso
44		Communication Pole	38.939578, -121.524357	Rio Oso
45	121672028	Joint Pole	38.9393015, -121.5247442	Rio Oso
46	121693045	Joint Pole	38.939034, -121.524761	Rio Oso
47	121672036	Joint Pole	38.940476, -121.524696	Rio Oso
48	121672039	Joint Pole	38.941320, -121.524720	Rio Oso
49		Communication Pole	38.941536, -121.524494	Rio Oso
50		Communication Pole	38.7352801, -121.6840956	Woodland
51		Communication Pole	38.7354658, -121.6840728	Woodland
52	120786463	Joint Pole	38.6759500, -121.7707580	Woodland
53		Joint Pole	38.675667, -121.770772	Woodland
54		Joint Pole	38.675631, -121.770319	Woodland
55	120333970	Joint Pole	38.675630, -121.769935	Woodland
56		Joint Pole	38.675608, -121.769489	Woodland
57	120333945	Joint Pole	38.675996, -121.769556	Woodland
58		Joint Pole	38.676180, -121.769570	Woodland
59		Joint Pole	38.551179, -121.743977	Davis
60	110324196	Joint Pole	38.551195, -121.743697	Davis
61		Joint Pole	38.551077, -121.743561	Davis
62		Joint Pole	38.551162, -121.743122	Davis
63		Joint Pole	38.551007, -121.743921	Davis
64	110505318	Joint Pole	38.550937, -121.744299	Davis
65		UG Vault	38.545809, -121.740692	Davis
66		Joint Pole	38.7108854, -121.0712400	El Dorado Hills

67		Joint Pole	38.7114403, -121.0711146	El Dorado Hills
68	121138746	Joint Pole	38.7122683, -121.0711682	El Dorado Hills
69	121138747	Joint Pole	38.7122918, -121.0711012	El Dorado Hills
70		Joint Pole	38.7125281, -121.0705010	El Dorado Hills
71	120758874	Joint Pole	38.724913, -121.073126	El Dorado Hills
72		Communication Pole	38.723928, -121.071805	El Dorado Hills
73		Communication Pole	38.724488, -121.071324	El Dorado Hills
74		Communication Pole	38.724775, -121.070938	El Dorado Hills
75		Communication Pole	38.7254430, -121.0706908	El Dorado Hills
76		Communication Pole	38.7260658, -121.0702626	El Dorado Hills
77		Communication Pole	38.7265918, -121.0698985	El Dorado Hills
78		Communication Pole	38.7272489, -121.0695193	El Dorado Hills
79	UD 062604	Joint Pole	38.7111112, -121.216093	Orangevale
80	UD 062605	Joint Pole	38.7116982, -121.2161523	Orangevale
81	UD 062607	Joint Pole	38.7120347, -121.2162147	Orangevale
82	UD 062608	Joint Pole	38.7123920, -121.2162291	Orangevale
83	UD 119580	Joint Pole	38.712937, -121.216239	Orangevale
84	UD 062465	Joint Pole	38.7110559, -121.2152166	Orangevale
85	UD 062464	Joint Pole	38.711032, -121.214547	Orangevale
86		Communication Pole	38.678266, -121.208566	Orangevale
87		Communication Pole	38.6783306, -121.2089285	Orangevale
88		Joint Pole	38.678355, -121.209610	Orangevale
89		Communication Pole	38.678359, -121.210282	Orangevale
90		Communication Pole	38.678375, -121.210856	Orangevale
91		Communication Pole	38.678381, -121.211369	Orangevale
92		Joint Pole	38.6783209, -121.2079713	Orangevale
93		Joint Pole	38.678335, -121.207552	Orangevale
94	UD 097104	Joint Pole	38.678334, -121.207113	Orangevale

95		Communication Pole	38.652942, -121.245499	Fair Oaks
96		Communication Pole	38.653031, -121.245464	Fair Oaks
97		Communication Pole	38.652959, -121.244978	Fair Oaks
98	UD 095032	Joint Pole	38.653033, -121.244960	Fair Oaks
99	UD 095034	Joint Pole	38.653102, -121.245606	Fair Oaks
100		Communication Pole	38.652941, -121.246015	Fair Oaks
101		Communication Pole	38.652948, -121.246564	Fair Oaks
102		Joint Pole	38.652943, -121.246822	Fair Oaks
103	UD 020923	Joint Pole	38.570485, -121.464860	Sacramento
104	UD 076851	Joint Pole	38.570664, -121.464791	Sacramento
105	UD 020925	Joint Pole	38.570816, -121.464712	Sacramento
106	UD 082306	Joint Pole	38.570966, -121.464682	Sacramento
107	UD 020927	Joint Pole	38.571108, -121.464629	Sacramento
108		Joint Pole	38.571201, -121.464786	Sacramento
109	UD 020929	Joint Pole	38.571240, -121.464994	Sacramento
110	UD 020921	Joint Pole	38.570161, -121.465005	Sacramento
111	UD 020920	Joint Pole	38.569861, -121.465145	Sacramento
112	UD 020919	Joint Pole	38.569525, -121.465277	Sacramento
113	UD 020916	Joint Pole	38.569213, -121.465395	Sacramento
114	UD 020915	Joint Pole	38.568863, -121.465557	Sacramento

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. 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.”

ESRB’s findings are listed in Table 1:

Table 1: GO 95, Rule 31.1 Findings

Location #	Findings
44	The communication pole is leaning, and the base is exposed.
73	Broken lashing wire on the span.
90	There is an abandoned guy anchor sticking out of the ground at the pole.
108	There is an abandoned guy anchor sticking out of the ground at the pole.

2. 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.”

ESRB’s findings are listed in Table 2:

Table 2: GO 95, Rule 31.6 Findings

Location #	Findings
31	There is an abandoned AT&T service drop on the pole.
41	There is an abandoned AT&T service drop on the pole.
43	There is an abandoned AT&T service drop on the pole.
98	There is an abandoned AT&T service drop on the pole.
103	There is an abandoned AT&T service drop on the pole.

Location #	Findings
108	There is an abandoned AT&T communications line that is broken being held together by lashing and sagging below 8 feet.

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

“Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight 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.

Nothing herein contained shall be construed as requiring utilities to grant permission for such use of their overhead facilities; or permitting any use of joint poles or facilities for such permanent or temporary construction without the consent of all parties having any ownership whatever in the poles or structures to which attachments may be made; or granting authority for the use of any poles, structures or facilities without the owner’s or owners’ consent.”

ESRB’s finding is listed in Table 3:

Table 3: GO 95, Rule 34 Findings

Location #	Findings
9	A third-party ‘No Parking’ sign is attached to the pole.
10	A third-party ‘No Trespassing’ sign is attached to the pole.
40	A third-party business sign attached to pole.
85	The resident’s mailbox is attached to the pole.

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

“Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. 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). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is

present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule.”

ESRB’s finding is listed in Table 4:

Table 4: GO 95, Rule 35 Findings

Location #	Findings
15	Vegetation is straining and deflecting the communications lines.
27	Vegetation is straining and deflecting the communications lines.
78	Tree fallen on communication lines.

5. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 3 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts is 18 feet.

Allowable reduction under Rule 84.8-C2b Over residential driveways, lanes or over property accessible to vehicles, service drops shall not be less than 12 feet.

ESRB’s finding is listed in Table 5:

Table 5: GO 95, Rule 37 Findings

Location #	Findings
81	The AT&T service drop’s vertical clearance is 17’6” at the center of the road.
83	The AT&T service drop’s vertical clearance is 10’5” over the residential driveway.

6. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1 Case 5 Column B states in part:

“The basic minimum allowable vertical clearance of a communication conductor and supply service drop in an above ground area accessible to pedestrians only is 10 feet.”

Exception (Rule 84.4-A(3)) Accessible to Pedestrians Only: Communication conductors of not more than 160 volts which transmit not more than 50 watts and communication cables having grounded metal sheaths may have a clearance above ground accessible to pedestrians only less than as specified in Table 1, Case 5, Column B, (10 feet) but not less than 8 feet.”

ESRB’s finding is listed in Table 6:

Table 63: GO 95, Rule 37 Findings

Location #	Findings
67	The communications span’s vertical clearance is less than eight feet.

7. GO 95, Rule 86.2, Guys, 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.”

ESRB’s findings are listed in Table 7:

Table 7: GO 95, Rule 86.2 Findings

Location #	Findings
49	The down guy anchor is being pulled out of the ground.
114	The down guy is slacked.

8. 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.”

ESRB’s finding is listed in Table 8:

Table 4: GO 95, Rule 86.9 Findings

Location #	Findings
7	Down guy missing marker.
9	Down guy missing marker.
114	Down guy missing marker.

9. GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground states:

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

a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

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

ESRB’s findings are listed in Table 9:

Table 9: GO 95, Rule 87.7 Findings

Location #	Findings
8	The riser cover is not properly secured.
25	The riser cover is shorter than eight feet.
39	The riser is not securely attached to the pole and the moulding is less than 8 feet.
54	The riser is not covered by any moulding and is not secured to the pole
97	The riser cover is not properly secured.
114	The riser cover is not properly secured.

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

“The lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.”

ESRB’s findings are listed in Table 10:

Table 5: GO 95, Rule 92.4 Findings

Location #	Findings
25	The first pole step is less than eight feet.
109	The first pole step is less than eight feet.

11. 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.

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.”

ESRB’s finding is listed in Table 11:

Table 6: GO 128, Rule 17.1 Findings

Location #	Findings
65	The vault lid is above grade on the sidewalk.

12. GO 128, Rule 43.3-C(1), Depth states:

“Buried communication cables shall be installed at a minimum depth of 12 inches below sidewalks, parkways, and private property.”

ESRB’s findings are listed in Table 12:

Table 7: GO 128, Rule 42.7 Findings

Location #	Findings
5	Communication service line spliced above ground.

V. Observations

1. GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(2) *“Where a communications company’s or an electric utility’s (Company A’s) actions result in potential violations of GO 95 for another entity (Company B), that entity’s (Company B’s) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation*

constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

- (3) If a company, while performing inspections of its facilities, discovers a Safety Hazard(s) on or near a communications facility or electric facility involving another company, the inspecting company shall notify the other entity of such Safety Hazard(s) no later than ten (10) business days after the discovery.*
- (4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.*

Table 13 includes all non-AT&T (third party) findings that ESRB observed during the audit.

Table 8: Observations

Location #	Findings
14	PG&E primary down guy is broken and hanging off the pole.
22	PG&E ground not attached to the pole.
27	Non-AT&T ground wire is exposed.
41	Abandoned PG&E service drop on the pole.
61	Cable riser is not covered with moulding.
68	Cable riser is not covered with moulding and is not secured to the pole.
70	Abandoned cable service drop on the pole.
84	The SMUD ground cover is damaged and not secured to the pole.
103	Cable riser not secured to pole or covered with moulding.