

**CPUC AUDIT FINDINGS FOR CONSOLIDATED COMMUNICATIONS
ROSEVILLE AND SACRAMENTO REGIONS
OCTOBER 13 – 17, 2025**

I. Records Review

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

- Statistics for the CLEC and ILEC service areas,
- CLEC and ILEC wired facility maps,
- List of CLEC’s and ILEC’s COs and Huts, poles, and splitter cabinets,
- Safety hazards notices sent to and received from 3rd parties,
- List of CONC’s inspectors,
- List of work orders in the last 5 years (September 2020 – August 2025)
- List of new construction projects completed in the last 12 months.

II. Records Violations

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

1. GO 95, Rule 18-B, Maintenance Programs states in part:

“Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.

The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company’s facilities.”

ESRB’s findings related to the above rule are as follows:

- 1) Regarding inspection records, CONC responded, in its pre-audit data request, that:

“Consolidated has not established a regular cadence of inspections. All Field Operations technicians, during the normal course of their duties, routinely patrol their designated areas and identify any safety or non-compliance issues. Such issues are communicated to the Engineering and Field Operations teams via email.”

CONC did not provide any inspection records.

RESPONSE:

Consolidated is committed to compliance with GO 95. While Field Operations technicians currently perform routine patrols during their daily duties to identify and email safety issues to Engineering, Consolidated acknowledges the need for more structured, auditable processes.

Consolidated is beginning a comprehensive review of its plant inspection process and expects completion along with process change recommendations in the 4th quarter 2026. The anticipated date of implementation is January 1, 2027.

- 2) Regarding the training program, CONC stated, in its pre-audit data request, that:

“Consolidated does not have a structured inspector training course, but trains any technician that may be assigned inspector responsibilities through live activity in the field during the regular course of business.”

CONC did not provide its training and certification programs prescribing required qualifications for the company representatives who perform inspections and/or who schedule corrective actions.

RESPONSE:

Consolidated currently provides certifications for OSHA and safety training to all its field operations employees. In addition, as explained in our previous response to Pre-Audit Data Request 1, DR #4, “All technicians are provided regular updates on both GO 95 and GO 128 and new hires receive a job aid developed by the Electricity Safety and Reliability Branch.”

Consolidated is evaluating a more formal curriculum that bridges existing field-based training with documented technical training, including 3rd party certification courses that would introduce training and certification related specifically to GO95 and GO128 requirements.

2. GO 95, Rule 18-B. (1) (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 findings related to the above rule are as follows:

- 1) CONC did not specify how the work orders were developed such as through routine inspections, learned from customers, or third-party notifications.

RESPONSE:

Consolidated provided a list of work orders that were separated by routine inspections, identified from customer or public entities, or received TPN’s (via email) from other CLEC/ILEC/ELECs.

Consolidated is evaluating updates to its record-keeping for work orders to clearly delineate the source of discovery, specifically distinguishing between routine inspections, customer/public reports, and TPNs.

- 2) CONC also did not provide due dates of the work orders.

RESPONSE:

Completion dates were provided as the list of work orders were already completed.

III. Field Inspection

During the field inspection from October 13 to 17, 2025, ESRB staff inspected CONC's Communications facilities at locations listed in Table 1.

RESPONSE:

Consolidated would like to note that of the 86 locations inspected none were service impacting or an immediate hazard and would fall under the level 3 definition.

Table 1: Field Inspection Locations

Location	Location	Structure
1	977 Sparta Way, Lincoln	UG Enclosure
2	935 Sparta Way, Lincoln	UG Enclosure
3	590 10th Street, Lincoln	UG Enclosure
4	550 10th Street, Lincoln	UG Enclosure
5	3016 Venture Drive, Lincoln	UG Enclosure
6	3015 Venture Drive, Lincoln	UG Enclosure
7	3018 Venture Drive, Lincoln	UG Enclosure
8	Moore Road & Nelson Lane, Lincoln	Pole
9	38.8680211, -121.3397479	Pole 2327
10	38.8680229, -121.3388792	Pole 194910
11	38.8680344, -121.3379803	Pole
12	3290 Arena Blvd, Natomas	UG Enclosure
13	Stemler Drive & Flora Springs Way, Natomas	UG Manhole
14	Stemler Drive & Flora Springs Way, Natomas	UG Enclosure
15	2800 Del Paso Road, Natomas	UG Enclosure
16	2750 Del Paso Road, Natomas	UG Enclosure
17	2951 Howe Ave, Sacramento	UG Enclosure
18	6001 Kenneth Ave, Carmichael	Pole 178718
19	5962 Kenneth Ave, Carmichael	UG Enclosure
20	6061 Shirley Ave, Carmichael	UG Enclosure
21	6047 Shirley Ave, Carmichael	Pole 028218
22	6047 Shirley Ave, Carmichael	Pole 155806
23	6039 Shirley Ave, Carmichael	Pole 028219
24	5911 Palm Drive, Carmichael	Remote terminal ground mounted
25	5190 Arden Way, Carmichael	Remote terminal UG Enclosure
26	5190 Arden Way, Carmichael	Pole 140361

Location	Location	Structure
27	5160 Arden Way, Carmichael	Pole 183239
28	5154 Arden Way, Carmichael	Pole 140359
29	5114 Arden Way, Carmichael	Pole 140358
30	129 Grape Street, Roseville	Pole 01143
31	133 Grape Street, Roseville	Pole 01153
32	137 Grape Street, Roseville	Pole 01154
33	140 Grape Street, Roseville	Pole
34	143 Grape Street, Roseville	Pole 01376
35	500A Oakland Ave, Roseville	Pole
36	224 Bonny Knoll Road, Roseville	Pole PG&E 0597
37	609 Carpenter Way, Roseville	UG Enclosure
38	611 Carpenter Way, Roseville	UG Enclosure
39	1520 Sierra Gardens Drive, Roseville	Pole
40	1525 Sierra Gardens Drive, Roseville	Pole 2533
41	5550 Douglas Blvd, Granite Bay	UG Enclosure
42	5550 Douglas Blvd, Granite Bay	UG Enclosure
43	8603 Quartsite Circle, Granite Bay	UG Enclosure
44	8543 Quartsite Circle, Granite Bay	Pole 121408784
45	8163 Sundance Drive, Orangevale	UG Enclosure
46	8175 Sundance Drive, Orangevale	UG Enclosure
47	8179 Sundance Drive, Orangevale	UG Enclosure
48	7549 Soquel Way	UG Enclosure
49	7525 Soquel Way, Citrus Hights	UG Enclosure
50	3006 Tomato Alley, Sacramento	Pole 019780
51	3002 Tomato Alley, Sacramento	Pole 019784
52	3000 Tomato Alley, Sacramento	Pole 019785
53	2017 30th Street, Sacramento	Pole 019786
54	30th Street & T Street, Sacramento	Pole 020188
55	3008 Tomato Alley, Sacramento	Pole 019778
56	3028 Tomato Alley, Sacramento	Pole 156111
57	Richard Blvd & Vine Street, Sacramento	Pole 198184
58	1351 Vine Street, Sacramento	Pole 118798
59	1301 Vine Street, Sacramento	Pole 118797
60	1275 Vine Street, Sacramento	Pole 189092
61	7311 Greenhaven Drive, Sacramento	UG Enclosure
62	7263 Greenhaven Drive, Sacramento	UG Enclosure
63	7231 Greenhaven Drive, Sacramento	UG Enclosure
64	7225 Greenhaven Drive, Sacramento	UG Enclosure
65	7230 South Land Park Drive, Sacramento	UG Enclosure

Location	Location	Structure
66	7210 South Land Park Drive, Sacramento	UG Enclosure
67	2328 Florin Road, Sacramento	Pole 072642
68	3026 Florin Road, Sacramento	Pole 038387
69	3028 Florin Road, Sacramento	Pole 148135
70	3029 Florin Road, Sacramento	Pole 038388
71	3300 Fitzgerald Road, Rancho Cordova	UG Enclosure
72	3294 Fitzgerald Road, Rancho Cordova	Pole 058155
73	3294 Fitzgerald Road, Rancho Cordova	UG Enclosure
74	3285 Fitzgerald Road, Rancho Cordova	Pole 169672
75	3253 Fitzgerald Road, Rancho Cordova	Pole 058157
76	9266 Rising Creek Way, Elk Grove	UG Enclosure
77	9274 Rising Creek Way, Elk Grove	Pedestal
78	9275 Rising Creek Way, Elk Grove	Pedestal
79	10103 Elk Grove Florin Road, Elk Grove	UG Enclosure
80	9357 Castleview Drive, Elk Grove	UG Enclosure
81	9373 Castleview Drive, Elk Grove	Flower pot
82	9375 Castleview Drive, Elk Grove	UG Enclosure
83	8986 Weeping Fig Way, Elk Grove	UG Enclosure
84	8979 Weeping Fig Way, Elk Grove	UG Enclosure
85	8967 Weeping Fig Way, Elk Grove	Flower pot
86	8959 Weeping Fig Way, Elk Grove	UG Enclosure

IV. Field 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.

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 communication or supply lines and equipment.

A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard...”

ESRB’s findings related to the above rule are listed in Table 2:

Table 2: GO 95, Rule 31.1 Findings

Location	Findings
21	Broken ground moulding
28	Broken ground moulding
58	Broken ground moulding

RESPONSE:

Location	Response
21	Completed on 2/19/26
28	Issue belongs to Comcast, Fidium issued a TPN to Carrier.
58	Completed on 2/19/26

Note on Location 28: Consistent with the Company’s field assessment, the condition at Location 28 (broken ground moulding) was classified as a Level 3 item with low potential impact to safety. Under Rule 18.A(2), potential violations that do not constitute a "Safety Hazard" require notification within a reasonable time not to exceed 180 days. The TPN issued on December 2, 2025, occurred approximately 45 days after discovery, fulfilling the requirement for prompt notification of non-hazardous conditions.

2. 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.”

ESRB’s findings related to the above rule are listed in Table 3:

Table 3: GO 95, Appendix I Findings

Location	Findings
57	Guy wire slacked

RESPONSE:

Location	Response
57	Issues belongs to Comcast, Fidium issued a TPN to Carrier.

Note on Location 57: Consistent with the Company’s field assessment, the condition at Location 57 (Guy wire slacked) was classified as a Level 3 item with low potential impact to safety. Under Rule 18.A(2), potential violations that do not constitute a "Safety Hazard" require notification within a reasonable time not to exceed 180 days. The TPN issued on December 2, 2025 [see Table 4 below], occurred approximately 45 days after discovery, fulfilling the requirement for prompt notification of non-hazardous conditions

3. 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 GO 95.”

ESRB’s findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 18.A Findings

Location	Findings
8	TPN: AT&T splice terminal hanging
11	TPN: Missing pole ID number
18	TPN: SMUD's pole is not stable
21	TPN: AT&T down guy missing insulator
22	TPN: AT&T abandoned service drop, TPN: SMUD electrical ground rod exposed
43	TPN: PG&E UG enclosure lid broken
50	TPN: AT&T wire is low
52	TPN: Exposed ground wire
54	TPN: Broken vis strips
55	TPN: Abandoned communications service drops
56	TPN: AT&T and Comcast abandoned service drops and conductors
57	TPN: Comcast cables attached to guy wire
70	TPN: Electrical riser cover detached from pole
72	TPN: Missing guy guard on AT&T's guy wire

RESPONSE:

Location	Response
8	Fidium issued TPN to Carrier on 12/2/2025
11	Fidium issued TPN to Carrier on 12/2/2025
18	Fidium issued TPN to Carrier on 12/2/2025
21	Fidium issued TPN to Carrier on 12/2/2025
22	Fidium issued TPN to Carrier on 12/2/2025
43	Fidium issued TPN to Carrier on 12/2/2025
50	Fidium issued TPN to Carrier on 12/2/2025
52	Fidium issued TPN to Carrier on 12/2/2025
54	Fidium issued TPN to Carrier on 12/2/2025
55	Fidium issued TPN to Carrier on 12/2/2025
56	Fidium issued TPN to Carrier on 12/2/2025
57	Fidium issued TPN to Carrier on 12/2/2025
70	Fidium issued TPN to Carrier on 12/2/2025
72	Fidium issued TPN to Carrier on 12/2/2025

4. GO 128, Rule 17.1, Design, Construction and Maintenance states:

“Design, Construction and Maintenance 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.

All work performed on public streets and highways shall be done in such a manner that the operations of other utilities and the convenience of the public will be interfered with as little as possible and no conditions unusually dangerous to workmen, pedestrians or others shall be established at any time.”

ESRB’s findings related to the above rule are listed in Table 5:

Table 5: GO 128, Rule 17.1 Findings

Location	Findings
17	Broken enclosure lid
81	Broken enclosure lid

RESPONSE:

Location	Response
17	Completed on 2/19/26
81	Completed on 2/19/26

5. GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures states:

“Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.”

ESRB’s findings related to the above rule are listed in Table 6:

Table 6: GO 128, Rule 17.8 Findings

Location	Findings
1	Missing mark of ownership
12	Missing mark of ownership
16	Missing mark of ownership
19	Missing mark of ownership
20	Missing mark of ownership
61	Missing mark of ownership
62	Missing mark of ownership
63	Missing mark of ownership
64	Missing mark of ownership
71	Missing mark of ownership
73	Missing mark of ownership
76	Missing mark of ownership
77	Missing mark of ownership
78	Missing mark of ownership
79	Missing mark of ownership
80	Missing mark of ownership
83	Missing mark of ownership

RESPONSE:

Location	Response
1	Completed on 2/24/26
12	Completed on 2/24/26
16	Completed on 2/24/26
19	Completed on 2/24/26
20	Completed on 2/24/26
61	Completed on 2/24/26
62	Completed on 2/24/26
63	Completed on 2/24/26
64	Completed on 2/24/26
71	Completed on 2/24/26
73	Completed on 2/24/26
76	Completed on 2/24/26
77	Completed on 2/24/26
78	Completed on 2/24/26
79	Completed on 2/24/26
80	Completed on 2/24/26
83	Completed on 2/24/26

6. **GO 128, Rule 34.3, Self-contained Surface-mounted Equipment** states in part:

“C. Locking: Compartments and enclosures shall be made secure against entry by unauthorized persons by means of locks or other suitable means.”

ESRB’s findings related to the above rule are listed in Table 7:

Table 7: GO 128, Rule 34.3 Findings

Location	Findings
2	Missing bolts on lid
3	Missing bolts on lid
7	Missing bolts on lid
12	Missing bolts on lid
15	Missing bolts on lid
16	Missing bolts on lid
19	Missing bolts on lid
37	Missing bolts on lid
46	Missing bolts on lid
48	Missing bolts on lid

RESPONSE:

Location	Response
2	Completed on 2/24/26
3	Completed on 2/24/26
7	Completed on 2/24/26
12	Completed on 2/24/26
15	Completed on 2/24/26
16	Completed on 2/24/26
19	Completed on 2/24/26
37	Completed on 2/24/26
46	Completed on 2/24/26
48	Completed on 2/24/26

7. **GO 128, Rule 41.4.C.(4), Private Property** states:

“(4) Private Property: Communication duct systems on private property shall be installed to provide not less than 12 inches of top cover.”

ESRB’s findings related to the above rule are listed in Table 8:

Table 8: GO 128, Rule 41.4.C.(4) Findings

Location	Findings
84	Underground service drop has less than 12 inches of top cover

RESPONSE:

Location	Response
84	Fidium has scheduled to be resolved by 3/6/26