

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



July 3, 2025

CA2025-1201

Lisa Ludovici
Charter Communications
Director, Government Affairs – Central and Northern California
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Audit of Charter Communications SoCal South Management Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications' SoCal South Management Area (Chino Hills and Ontario) on May 12-16, 2025. The audit included a review of Charter Communications' inspection and maintenance records, and a field inspection of Charter 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 August 4, 2025, by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent such violations.

Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Norvik Ohanian at (213) 660-5528 or Norvik.Ohanian@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: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, Electric Safety and Reliability Branch, CPUC
Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol and Detailed Inspection Records
- Repair Work Order Records
- Inspection and Maintenance Program Procedures
- Third-Party Safety Hazard Notifications
- Pole Loading Calculations

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.

GO 95, Rule 44.1 – Installation and Reconstruction, states in part:

Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term “planned” applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.

The pole loading calculations provided by Charter communications for pole G16282Y incorrectly recorded a “30 feet / class 5” pole, which was found out to be a “35 feet / class 4” pole at the time of the field inspection. Additionally, the pole loading calculations included communication conductors extending in the 95° (East) direction, which were not present at the time of the field inspection.

II. Field Inspection

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

No.	Structure ID	Type of Structure	Location
1	1682363	Pole	Chino Hills
2	Adjacent to Pole 1682363	Handhole	Chino Hills
3	1682364E	Pole	Chino Hills
4	In front of 16475 Canyon Hills Rd (NW of Pole 1682364E)	Pole	Chino Hills
5	Corner of Canyon Hills Rd & SH 142	Pole	Chino Hills
6	Corner of Canyon Hills Rd & SH 142	Handhole	Chino Hills
7	4796415E	Pole	Chino Hills
8	4764122E	Pole	Chino Hills
9	411541E	Pole	Chino Hills
10	4882706E	Pole	Chino Hills
11	4580825E	Pole	Chino Hills
12	North of Pole 4580825E	Pole	Chino Hills
13	In front of 16801 Rosemary Ln	Pole	Chino Hills
14	736796H	Pole	Chino Hills
15	4384715E	Pole	Chino Hills
16	1057253E	Pole	Chino Hills
17	1057252E	Pole	Chino Hills
18	In front of 15885 Fetlock Ln	Handhole	Chino Hills
19	In front of 15857 Fetlock Ln	Pedestal	Chino Hills
20	In front of 15833 Fetlock Ln	Pedestal	Chino Hills
21	In front of 15821 Fetlock Ln	Pedestal	Chino Hills
22	In front of 15811 Fetlock Ln	Pedestal	Chino Hills
23	In front of 2053 Honey Bee Ln	Handhole	Chino Hills
24	In front of 2041 Honey Bee Ln	Handhole	Chino Hills
25	Corner of Pine Ave & Meadowhouse Ave	Handhole	Chino
26	4763260E	Pole	Chino
27	Adjacent to Pole 4763260E	Handhole	Chino
28	4604131E	Pole	Chino
29	447986E	Pole	Chino
30	447987E	Pole	Chino
31	4817830E	Pole	Chino
32	1891984E	Pole	Chino
33	4796222E	Pole	Chino
34	4909579E	Pole	Chino
35	4237659E	Pole	Chino
36	4759587E	Pole	Chino
37	4650187E	Pole	Chino
38	Adjacent to Pole 4650187E	Pole	Chino
39	4554661E	Pole	Chino
40	4328559E	Pole	Chino
41	4941875E	Pole	Chino

42	G16075Y	Pole	Chino
43	G16074Y	Pole	Chino
44	G16073Y	Pole	Chino
45	720979E	Pole	Chino
46	720528E	Pole	Chino
47	4741159E	Pole	Chino
48	258606E	Pole	Chino
49	4787156E	Pole	Chino
50	In front of 2869 S Inverness Ct	Pedestal	Ontario
51	In front of 2809 Doral Ct	Pedestal	Ontario
52	In front of 2821 Carnoustie Ct	Handhole	Ontario
53	In front of 2811 Carnoustie Ct	Handhole	Ontario
54	In front of 2807 Carnoustie Ct	Handhole	Ontario
55	In front of 2833 Carnoustie Ct	Handhole	Ontario
56	In front of 2841 Carnoustie Ct	Handhole	Ontario
57	In front of 2855 Carnoustie Ct	Handhole	Ontario
58	In front of 2860 S La Costa Ct	Handhole	Ontario
59	In front of 2874 S La Costa Ct	Pedestal	Ontario
60	In front of 1928 E Merion Dr	Handhole	Ontario
61	4909574E	Pole	Ontario
62	Adjacent to Pole 4909574E	Pedestal	Ontario
63	Adjacent to Pole 4909574E	Handhole	Ontario
64	4909647E	Pole	Ontario
65	4909646E	Pole	Ontario
66	4909575E	Pole	Ontario
67	H15485Y	Pole	Ontario
68	Adjacent to Pole H15485Y	Pedestal	Ontario
69	4861190E	Pole	Ontario
70	4881553E	Pole	Ontario
71	G16282Y	Pole	Chino
72	Adjacent to Pole G16282Y	Handhole	Chino
73	East of 4493 Dahlia Rd	Pole	Chino
74	East of 4493 Dahlia Rd	Handhole	Chino
75	East of 13515 Calico Pl	Pole	Chino
76	East of 13515 Calico Pl	Handhole	Chino
77	G16283Y	Pole	Chino
78	G13926Y	Pole	Chino
79	G26919Y	Pole	Chino
80	Adjacent to Pole G26919Y	Handhole	Chino
81	G24526Y	Pole	Chino
82	Adjacent to Pole G24526Y	Handhole	Chino
83	In front of 4499 Marigold Dr	Pedestal	Chino
84	In front of 4469 Marigold Dr	Handhole	Chino
85	In front of 4459 Marigold Dr	Handhole	Chino
86	In front of 13556 Daisy Ln	Handhole	Chino
87	In front of 13540 Daisy Ln	Handhole	Chino
88	In front of 13532 Daisy Ln	Handhole	Chino

89	In front of 13516 Daisy Ln	Handhole	Chino
90	In front of 13492 Daisy Ln	Handhole	Chino
91	In front of 13476 Daisy Ln	Handhole	Chino
92	In front of 4453 Dahlia Rd	Handhole	Chino
93	In front of 4477 Dahlia Rd	Handhole	Chino
94	In front of 4493 Dahlia Rd	Handhole	Chino
95	4407721E	Pole	Chino
96	West of Pole 4407721E	Pole	Chino
97	4282960E	Pole	Chino
98	4889819E	Pole	Chino
99	1277679E	Pole	Chino
100	4407720E	Pole	Chino
101	4407719E	Pole	Chino
102	Adjacent to Pole 4407719E	Handhole	Chino
103	FTR-126772	Pole	Chino
104	1499064E	Pole	Ontario
105	1377230E	Pole	Ontario
106	1377229E	Pole	Ontario
107	1377228E	Pole	Ontario
108	1377227	Pole	Ontario
109	1377226E	Pole	Ontario
110	1377225E	Pole	Ontario
111	1377224E	Pole	Ontario
112	1615216E	Pole	Ontario
113	1386722E	Pole	Ontario
114	1386723E	Pole	Ontario
115	1386724E	Pole	Ontario
116	1386725E	Pole	Ontario
117	1386726E	Pole	Ontario
118	Adjacent to Pole 1386726E	Pedestal	Ontario
119	Adjacent to Pole 1386726E	Power Supply	Ontario
120	In front of 3327 Pine Ridge Loop	Pedestal	Ontario Ranch
121	In front of 3327 Pine Ridge Loop	Handhole	Ontario Ranch
122	In front of 3327 Pine Ridge Loop	Power Supply	Ontario Ranch
123	In front of 3331 Pine Ridge Loop	Handhole	Ontario Ranch
124	In front of 3333 Pine Ridge Loop	Handhole	Ontario Ranch
125	In front of 3353 Pine Ridge Loop	Handhole	Ontario Ranch
126	In front of 3363 Pine Ridge Loop	Handhole	Ontario Ranch
127	In front of 3381 Pine Ridge Loop	Pedestal	Ontario Ranch
128	In front of 3383 Pine Ridge Loop	Handhole	Ontario Ranch
129	In front of 3395 Pine Ridge Loop	Handhole	Ontario Ranch
130	In front of 3403 Pine Ridge Loop	Handhole	Ontario Ranch
131	In front of 3421 Pine Ridge Loop	Handhole	Ontario Ranch
132	622447E	Pole	Ontario
133	4422584E	Pole	Ontario
134	1205094E	Pole	Ontario
135	622446E	Pole	Ontario

136	4538248E	Pole	Ontario
137	4707831E	Pole	Ontario
138	4658203E	Pole	Ontario
139	622450E	Pole	Ontario
140	16754	Pole	Ontario
141	1714549E	Pole	Ontario
142	4178070E	Pole	Ontario
143	4514444E	Pole	Ontario
144	H5023Y	Pole	Ontario
145	H5022Y	Pole	Ontario
146	4357468E	Pole	Ontario
147	4538250E	Pole	Ontario
148	622754E	Pole	Ontario
149	622755E	Pole	Ontario
150	622756E	Pole	Ontario

III. Field Inspection – Violations List

My observed the following violations during the field inspections portion of the audit:

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 Charter Communications' facilities on each of the following poles required maintenance:

- G16073Y – The riser conduit attached to the pole was damaged, exposing the communications conductor
- 4554661E – The Charter communications cables were not transferred to the new pole in place.
- 1386723E – The ground wire attached to the pole was severed.
- 1205094E – The service drop cable were damaged due to nearby burned tree.
- 622450E – The service drop cable were strained by a wooden window frame from the building it was serving.
- 4909647E – The lashing wire of Charter communications cables attached to pole was loose or broken.
- 1377227 – The service drop supporting messenger wire was broken.

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.

Charter communications cables attached to each of the following poles were permanently abandoned and not removed:

- 4941875E
- G16075Y
- G16073Y
- 4741159E
- 258606E
- 1377229E
- 1386724E

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).

Charter communications cables attached to each of the following poles were strained by vegetation:

- 4580825E
- Pole in front of 16801 Rosemary Ln

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8, requires the minimum vertical separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Communication Conductors and Supply Drops” on the same pole and in adjoining midspans to be 12 inches.

Charter communications conductors or service drops supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductors or service drops supported on the same pole:

- Pole in front of 16475 Canyon Hills Rd (NW of Pole 1682364E) – a Charter communications conductor was in contact with a third-party communications conductor.
- Pole 4764122E – a Charter communications conductor was in contact with a third-party communications conductor at midspan.
- Pole 4384715E – a Charter communications service drop was in contact with a third-party communications conductor.
- Pole 4941875E – a Charter communications service drop was in contact with a third-party communications service drop.
- Pole G16075Y – a Charter communications service drop was in contact with a third-party communications conductor.
- Pole 720528E – a Charter communications service drop was in contact with a third-party communications service drop.
- Pole 258606E – a Charter communications service drop was in contact with a third-party communications conductor at midspan.
- Pole 4909574E – a Charter communications conductor was in contact with a third-party communications conductor.
- Pole G26919Y – a Charter communications conductor and node box were in contact with a third-party communications conductor.
- Pole G24526Y – a Charter communications conductor was in contact with a third-party communications conductor at midspan.
- Pole 4407719E – a Charter communications conductor was in contact with a third-party communications service drop.

- Pole 1499064E – a Charter communications conductor was in contact with a third-party communications service drop.
- Pole 1377230E – a Charter communications conductor was in contact with a third-party communications conductor at midspan.
- Pole 1377228E – a Charter communications amplifier was in contact with a third-party communications conductor.
- Pole 1377225E – a Charter communications amplifier was in contact with a third-party communications conductor.
- Pole 1377224E – a Charter communications service drop was in contact with a third-party communications service drop.
- Pole 1386723E – a Charter communications amplifier was in contact with a third-party communications conductor.
- Pole 4538248E – a Charter communications amplifier and service drop were in contact with a third-party communications conductor.
- Pole 4658203E – a Charter communications conductor was in contact with a third-party communications conductor at midspan.
- Pole 622450E – a Charter communications conductor was in contact with a third-party communications conductor at midspan.
- Pole 622754E – a Charter communications conductor was in contact with a third-party communications conductor.
- Pole 622755E – a Charter communications service drop was in contact with a third-party communications service drop.

GO 95, Rule 38 – Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19, requires the minimum radial separation between “Communication Conductors (Including Open Wire, Cables and Service Drops)” from “Guys and span wires passing conductors supported on the same poles” to be 3 inches.

A Charter communications service drop supported on pole 1057253E was in contact with SCE down guy attached to the same pole.

GO 95, Rule 56.2 – Overhead Guys, Anchor Guys and Span Wire 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.

The Charter communications down guy wire attached to pole 4580825E was loose and not taut.

GO 95, Rule 84.8-C(2)(a) – Service Drops, Clearances above Ground and Buildings, Above Private Thoroughfares or Private property, Industrial and Commercial Premises, states in part:

Over private driveways, lanes or property accessible to vehicles, service drops shall not be less than 16 feet.

The Charter Communication service drop supported on pole 622446E had an above ground vertical clearance of less than 16 feet in a private commercial parking lot.

GO 95, Rule 84.8-C(4) – Service Drops, Clearances above Ground and Buildings, From Buildings and Structures, states in part:

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions.

The Charter communications service drop attached to Pole H5022Y was contacting the roof of the building it was not serving.

GO 95, Rule 87.7-D(1) – Risers, 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 ...

The Charter communications risers attached to each of the following poles were not protected by a covering properly:

- 720979E
- 4407719E
- FTR-126772

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 facilities required maintenance:

- The cover of the pedestal in front of 2869 S Inverness Ct could not be closed securely.
- The cover of the pedestal in front of 2809 Doral Ct could not be closed securely.
- The connection tap box inside the handhole in front of 4459 Marigold Dr was corroded.
- The handhole in front of 13540 Daisy Ln was damaged/cracked.
- The handhole in front of 13516 Daisy Ln was damaged/cracked.
- The cover of the handhole in front of 4493 Dahlia Rd was damaged.

The following facilities were filled with a large amount of dirt:

- Handhole adjacent to pole 1682363E
- Handhole in front of 2841 Carnoustie Ct
- Handhole in front of 2855 Carnoustie Ct
- Pedestal in front of 2874 S La Costa Ct
- Handhole in front of 4453 Dahlia Rd

The pedestals located at each of the following locations were missing grounding means:

- In front of 15857 Fetlock Ln
- In front of 2869 S Inverness Ct
- In front of 2809 Doral Ct
- In front of 2874 S La Costa Ct

GO 128, Rule 42.7 – Covers, states in part:

Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.

The cover of the handhole located at each of the following locations was not securely closed, allowing unauthorized access to the structures:

- Adjacent to pole 1682363E
- Corner of Canyon Hills Rd & SH 142
- In front of 2053 Honey Bee Ln
- In front of 2041 Honey Bee Ln
- In front of 2821 Carnoustie Ct

- In front of 2811 Carnoustie Ct
- In front of 2807 Carnoustie Ct
- In front of 2833 Carnoustie Ct
- In front of 2841 Carnoustie Ct
- In front of 2855 Carnoustie Ct
- In front of 2860 S La Costa Ct
- In front of 1928 E Merion Dr
- Adjacent to Pole 4909574E
- East of 4493 Dahlia Rd
- Adjacent to Pole G26919Y
- In front of 4469 Marigold Dr
- In front of 4459 Marigold Dr
- In front of 13556 Daisy Ln
- In front of 13540 Daisy Ln
- In front of 13532 Daisy Ln
- In front of 13516 Daisy Ln
- In front of 13492 Daisy Ln
- In front of 13476 Daisy Ln
- In front of 4453 Dahlia Rd
- In front of 4477 Dahlia Rd
- In front of 4493 Dahlia Rd
- In front of 3331 Pine Ridge Loop
- In front of 3333 Pine Ridge Loop
- In front of 3363 Pine Ridge Loop
- In front of 3383 Pine Ridge Loop
- In front of 3395 Pine Ridge Loop
- In front of 3421 Pine Ridge Loop