

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE

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October 17, 2025

CA2025-1304

Karen Flemion
Representative for San Simeon Community Cable
San Simeon Community Cable
810 Old Stage Coach Rd
San Simeon, CA 93452

SUBJECT: Communications Infrastructure Provider (CIP) Audit of San Simeon Community Cable (SSCC)

Ms. Flemion:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell, Rafael Herranz, and Nora Nguyen of ESRB staff conducted a CIP audit of San Simeon Community Cable from June 10, 2025 through June 12, 2025. During the audit, ESRB staff conducted field inspections of San Simeon's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations is enclosed. Please provide a response no later than November 17, 2025, via electronic copy of all corrective actions and preventive measures taken by SSCC to correct the identified violations and prevent the recurrence of such violations and observations.

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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

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 "Rickey Tse".

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

Enclosure: CPUC CIP Audit Findings of San Simeon Community Cable

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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Phil Shockley, Plant Manager, SSCC
Bill Flemion, Owner's Representative, SSCC

**SAN SIMEON COMMUNITY CABLE
COMMUNICATIONS AUDIT FINDINGS
June 10 – June 12, 2025**

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for San Simeon Community Cable:

- Overhead (OH) and Underground (UG) facility maps as of May 2025
- Wireless facility map as of May 2025
- Facility statistics as of May 2025
- Invoices of work orders from May 2020 – May 2025

II. Records Violations

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

1. General Order (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.

(1) Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.

a. 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.”*

San Simeon Community Cable did not have a written maintenance program.

2. GO 95, Rule 80.1A-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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*
- *Location*

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18-A3.

Each company’s procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.”

San Simeon Community Cable did not have a patrol and inspection procedure. This same issue was noted in 2015 during ESRB’s audit of San Simeon Community Cable under audit number CA2015-001.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Location #	Structure Type	Approximate GPS Coordinates
1	Padmount Communications	35.611506, -121.145188
2	Padmount Communications	35.611173, -121.145016
3	Padmount Communications	35.61086, -121.144834
4	Padmount Communications	35.610472, -121.144593
5	Padmount Communications	35.61062, -121.144134
6	Padmount Communications	35.610687, -121.143927
7	Padmount Communications	35.610781, -121.143741
8	Padmount Communications	35.609765, -121.144192
9	Padmount Communications	35.609553, -121.143646
10	Padmount Communications	35.609811, -121.14306
11	Padmount Communications	35.610022, -121.142506
12	Padmount Communications	35.610132, -121.142584
13	Padmount Communications	35.610373, -121.141766
14	Padmount Communications	35.611585, -121.142869
15	Vault	35.61214, -121.14353
16	Padmount Communications	35.612653, -121.144119
17	Vault	35.6138, -121.145468
18	Vault	35.610996, -121.140029
19	Joint Wood Pole	35.611033, -121.140086
20	Vault	35.611225, -121.139584
21	Vault	35.611334, -121.139326
22	Padmount Communications	35.612148, -121.139977
23	Vault	35.613535, -121.141088

Location #	Structure Type	Approximate GPS Coordinates
24	Joint Wood Pole	35.61354, -121.141115
25	Vault	35.615199, -121.142391
26	Joint Wood Pole	35.615187, -121.142382
27	Vault	35.615995, -121.14304
28	Vault	35.616524, -121.143441
29	Vault	35.616919, -121.14376
30	Joint Wood Pole	35.616935, -121.143768
31	Vault	35.617283, -121.144021
32	Joint Wood Pole	35.617267, -121.144048
33	Vault	35.617629, -121.144337
34	Vault	35.61776, -121.144487
35	Vault	35.618188, -121.143415
36	Vault	35.618996, -121.142639
37	Vault	35.619837, -121.142002
38	Vault	35.620722, -121.141303
39	Joint Wood Pole	35.620739, -121.141343
40	Joint Wood Pole	35.620577, -121.141986
41	Joint Wood Pole	35.620476, -121.142346
42	Vault	35.617519, -121.144746
43	Padmount Communications	35.617027, -121.145144
44	Padmount Communications	35.616418, -121.145705
45	Vault	35.616251, -121.145182
46	Vault	35.61637, -121.145119
47	Vault	35.616771, -121.144742
48	Vault	35.615796, -121.146252
49	Joint Wood Pole	35.615822, -121.146244
50	Padmount Communications	35.615162, -121.142482
51	Padmount Communications	35.616418, -121.143553
52	Joint Wood Pole	35.616446, -121.143538
53	Padmount Communications	35.616234, -121.143889
54	Joint Wood Pole	35.616062, -121.143929
55	Padmount Communications	35.616268, -121.144402
56	Padmount Communications	35.61589, -121.144157
57	Padmount Communications	35.615758, -121.144321
58	Joint Wood Pole	35.615577, -121.144335

Location #	Structure Type	Approximate GPS Coordinates
59	Joint Wood Pole	35.615255, -121.144677
60	Joint Wood Pole	35.615765, -121.145303
61	Joint Wood Pole	35.614758, -121.144054
62	Joint Wood Pole	35.614587, -121.144216
63	Padmount Communications	35.61164, -121.139692
64	Padmount Communications	35.611758, -121.139991
65	Comms-Only Wood Pole	35.612139, -121.140288
66	Padmount Communications	35.61252, -121.141453
67	Joint Wood Pole	35.612865, -121.141868
68	Joint Wood Pole	35.613523, -121.142673
69	Joint Wood Pole	35.614039, -121.143295
70	Joint Wood Pole	35.61155, -121.141405
71	Joint Wood Pole	35.61194, -121.141998
72	Joint Wood Pole	35.612388, -121.142465
73	Joint Wood Pole	35.612834, -121.142966
74	Joint Wood Pole	35.613292, -121.143424
75	Joint Wood Pole	35.613543, -121.143648
76	Joint Wood Pole	35.621578, -121.142651

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, 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.”

ESRB’s finding related to the above rule is listed in Table 1:

Table 1: GO 95, Rule 31.6 Finding

Location	Finding
30	Abandoned drop

2. GO 95, Rule 84.6-B, Ground Wires states:

“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. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.

Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).”

ESRB’s finding related to the above rule is listed in Table 2:

Table 2: GO 95, Rule 84.6-B Finding

Location	Finding
60	Loose ground molding exposing the wire

3. GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, etc. states:

“Clearances between overhead conductors, guys, messengers or trolley span wires and tops of rails, surfaces of thoroughfares or other generally accessible areas across, along or above which any of the former pass; also the clearances between conductors, guys, messengers or trolley span wires and buildings, poles, structures, or other objects, shall not be less than those set forth in Table 1, at a temperature of 60° F. and no wind.

The clearances specified in Table 1, Case 1, Columns A, B, D, E and F, shall in no case be reduced more than 5% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions. The clearances specified in Table 1, Cases 2 to 6 inclusive, shall in no case be reduced more than 10% below the tabular values because of temperature and loading as specified in Rule 43, or other conditions.

The clearance specified in Table 1, Case 1, Column C (22.5 feet), shall in no case be reduced below the tabular value because of temperature and loading as specified in Rule 43.

The clearances specified in Table 1, Cases 11, 12 and 13, shall in no case be reduced below the tabular values because of temperatures and loading as specified in Rule 43. Where supply conductors are supported by suspension insulators at crossings over railroads which transport freight cars, the initial clearances shall be sufficient to prevent reduction to clearances less than 95% of the clearances specified in Table 1, Case 1, through the breaking of a conductor in either of the adjoining spans. Where conductors, dead ends, and metal pins are concerned in any clearance specified in these rules, all clearances of less than 5 inches shall be applicable from surface of conductors (not including tie wires), dead ends, and metal pins, except clearances between surface of crossarm and conductors supported on pins and insulators (referred to in Table 1, Case 9) in which case the minimum clearance specified shall apply between center line of conductor and surface of crossarm or other line structure on which the conductor is supported.

All clearances of 5 inches or more shall be applicable from the center lines of conductors concerned.

When measuring the minimum allowable vertical conductor clearances in a span, the minimum clearance applies to the specific location under the span being measured and not for the entire span.”

ESRB's finding related to the above rule is listed in Table 3:

Table 3: GO 95, Rule 37 Finding

Location	Findings
32	Low service drop

4. 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 related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 86.2 Findings

Location	Findings
41	Slack down guy
76	Slack down guy

5. GO 95, Rule 92.4-C(1a), Grounding Conductors states in part:

“The grounding conductor from each ground rod (ground electrode) to the base of the pole shall not be less than 1 foot below the surface of the ground.”

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

Table 5: GO 95, Rule 92.4-C(1a) Findings

Location	Findings
59	Ground rod exposed above grade
68	Ground rod exposed above grade
75	Ground rod exposed above grade

6. 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 related to the above rule are listed in Table 6:

Table 6: GO 95, Rule 87.7-D(1) Findings

Location	Findings
19	Missing riser guard
26	Missing riser guard
76	Missing riser guard

7. 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 7:

Table 7: GO 128, Rule 17.8 Findings

Location	Findings
1	Missing ownership label
2	Missing ownership label

Location	Findings
3	Missing ownership label
4	Missing ownership label
5	Missing ownership label
6	Missing ownership label
7	Missing ownership label
8	Missing ownership label
9	Missing ownership label
10	Missing ownership label
11	Missing ownership label
12	Missing ownership label
13	Missing ownership label
16	Missing ownership label
18	Missing ownership label
20	Missing ownership label
21	Missing ownership label
22	Missing ownership label
23	Missing ownership label
25	Missing ownership label
27	Missing ownership label
28	Missing ownership label
29	Missing ownership label
31	Missing ownership label
33	Missing ownership label
34	Missing ownership label
35	Missing ownership label
36	Missing ownership label

Location	Findings
37	Missing ownership label
38	Missing ownership label
43	Missing ownership label
44	Missing ownership label
45	Missing ownership label
46	Missing ownership label
47	Missing ownership label
48	Missing ownership label
50	Missing ownership label
51	Missing ownership label
53	Missing ownership label
55	Missing ownership label
56	Missing ownership label
57	Missing ownership label
63	Missing ownership label
64	Missing ownership label
65	Missing ownership label

8. 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 findings related to the above rule are listed in Table 8:

Table 8: GO 128, Rule 17.1 Findings

Location	Findings
12	Ground wire is disconnected
14	Vault lid is buried and inaccessible
15	Vault lid is covered by vegetation and inaccessible
17	Vault lid is buried and inaccessible
23	Connection taps are heavily corroded
42	Vault lid is buried and inaccessible
48	Vault filled with dirt and pests
64	Bottom of pedestal is open

V. Observations

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

“For purposes of this rule, “Safety Hazard” means a condition that poses a significant threat to human life or property.”

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

- “(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.”*

During the field inspection, ESRB noted the third-party observations listed in Table 9.

Table 9: Third-Party Observations

Location	Entity	Violation Description
49	PG&E	Bottom of vault exposed
49	AT&T	Damaged ground cover
54	PG&E	Damaged ground cover and slack down guy
54	AT&T	Abandoned service and loose ground cover
73	PG&E	Tree pushing on pole
74	AT&T	Abandoned service