

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 8, 2025

CA2025-1319

Jenny Smith
Director, Regulatory & Government Affairs
9260 E. Stockton Blvd.
Elk Grove, CA 95624

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Ferndale and Petrolia region.

Ms. Smith:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Javier Reyes of ESRB staff conducted a CIP audit of Frontier's Ferndale and Petrolia region from May 27 to May 30, 2025. During the audit, ESRB staff conducted field inspections of Frontier's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than **September 8, 2025**, by electronic copy of all corrective actions and preventive measures taken by Frontier to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@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 Report for Frontier's Ferndale and Petrolia Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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Judy Geise, Manager, Regulatory, Frontier

**CPUC AUDIT FINDINGS OF FRONTIER
FERNDALE & PETROLIA REGION
MAY 27 – 30, 2025**

I. Records Review

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

- Frontier’s Inspection & Maintenance Procedures, January 2025
- Frontier’s Facility Statistics of Ferndale and Petrolia Region
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (March 2020 – February 2025)
- Most Recent Work Orders Conducted in the Last 5 Years (March 2020 – February 2025)
- Safety Hazard Notifications Frontier Received and Sent to Third Parties in the Last 5 Years (March 2020 – February 2025)
- Employee statistics
- 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-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 Frontier’s work orders from March 2020 through February 2025 found that 9 out of 49 (or 18%) pending work orders are overdue and 4 out of 13 (or 31%) closed work orders were completed late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their priority level, and late-closed work orders are work orders that were completed past their assigned due date based on their priority level. Table 1 below breaks down the 13 late work orders by priority level.

Table 1: Late Work Orders

Priority Level¹	Late-Pending Work Orders²	Late-Closed Work Orders	Total Late Work Orders
2b	7	3	10
2c	2	1	3
Total	9	4	13

Frontier must provide ESRB with its corrective action plan to complete the 9 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

Table 2: Most Overdue Work Orders

Priority Level	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
2b	TK2803583	273
2c	TK2174100	147

Frontier identified work order #TK2803583 on June 26, 2022, for obstructed space/unauthorized attachment with a required finish date of June 26, 2023. The work order was completed on March 25, 2024 indicating it was 273 days past the required finish date of June 26, 2023.

¹ According to Frontier’s Maintenance Procedures, Priority Level 2b work orders must be completed within 12 months and Priority Level 2c work orders must be completed within 36 months.

² As of February 28, 2025.

Frontier identified work order #TK2174100 on October 4, 2021, to repair a broken communications guy wire with a required finish date of October 4, 2024. The work order is still pending and is 147 days past due as of February 28, 2025.

2. 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.”

The inspection list spreadsheet did not include any inspection of Frontier’s underground facilities between February 2020 and January 2025. Frontier is required to inspect underground facilities frequently and thoroughly for the purpose of ensuring that they are in good condition.

3. GO 95, Rule 80.1A(1) – Inspection Requirements for Joint-Use Poles in High Fire-Threat District states in part:

“In Tiers 2 and 3 of the High Fire-Threat District, inspection intervals for (i) Communication Lines located on Joint Use Poles (see Rule 21.8) that contain Supply Circuits (see Rule 20.6-D), and (ii) Communication Lines attached to a pole that is within three spans of a Joint Use Pole with Supply Circuits, shall not exceed the time specified in the following Table.”

Inspection	Tier 2	Tier 3
Patrol	2 Years	1 Year
Detailed	10 Years	5 Years

In response to Question 6 of the Pre-Audit Data Request, Frontier stated that all poles included in the audited wire centers are general poles and not located in a high fire threat area. ESRB determined that Frontier is attached to poles in the Petrolia and Honeydew areas, which are in a Tier 2 High Fire Threat District. Frontier is missing inspections for these areas and is required to conduct patrol inspections every 2 years and detailed inspections every 10 years.

III. Field Inspection

During the field inspection from May 27 – May 30, 2025, ESRB staff inspected Frontier’s communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	(40.2432356, -124.1235462)	Pedestal	N/A
2	(40.2431439, -124.1233940)	Pole	400017
3	(40.2431532, -124.1232555)	Pedestal	N/A
4	44670 Mattole Rd. Honeydew, CA	Pole	120545429
5	44550 Mattole Rd. Petrolia, CA	Pole	404283
6	(40.241777, -124.129610)	Pedestal	N/A
7	(40.2430211, -124.1278176)	Pole	404282
8	(40.2411575, -124.1301562)	Pole	404281
9	(40.2387791, -124.1323864)	B-Box	N/A
10	(40.2387791, -124.1323864)	Pole	404276
11	(40.2383709, -124.1325812)	B-Box	N/A
12	(40.2383020, -124.1328609)	Pole	120545661
13	(40.2325104, -124.1543236)	Pedestal	N/A
14	(40.2325104, -124.1543236)	Pole	308060
15	(40.2327177, -124.1543209)	Pole	404242
16	(40.2518321, -124.1833099)	Pole	400013
17	(40.2630232, -124.1968580)	Pole	400005
18	(40.2629236, -124.1968007)	Pedestal	N/A
19	(40.2629236, -124.1968007)	Fiber Box	N/A
20	(40.2730722, -124.2304329)	Pole	404063
21	(40.3249856, -124.2861106)	Pole	120587725
22	(40.3253774, -124.2860693)	Pole	120804752
23	(40.3259648, -124.2859805)	Pole	120587725
24	21 Lincoln St. Petrolia, CA	Pole	110075434
25	(40.3248695, -124.2871150)	Pole	120590739
26	40 Sherman Road Petrolia, CA	Terminal	T-186
27	(40.3254188, -124.2871509)	Pole	6162

Location #	Address/GPS Location	Structure Type	Structure #
28	(40.434912, -124.395294)	Pole	121532115
29	(40.435049, -124.394541)	Pole	120860260
30	(40.4426469, -124.381308)	Pole	110098701
31	(40.4665181, -124.3664612)	Pole	N/A
32	(40.4665181, -124.3664612)	AFC Box	FER XT-5004
33	(40.4669405, -124.3686106)	Pole	T810
34	(40.5678112, -124.2708910)	Pole	N/A
35	(40.5661456, -124.2707127)	Pole	N/A
36	(40.5242500, -124.1912985)	Pole	N/A
37	(40.5268772, -124.1869738)	Pole	497
38	(40.5283833, -124.1796476)	Pole	N/A
39	(40.5285630, -124.1788141)	Pole	T496
40	255 Price Creek School Rd. Ferndale, CA	Pole	T122
41	(40.5505022, -124.1725297)	Pole	N/A
42	5645 East Ferry Rd. Ferndale, CA	Pole	N/A
43	5795 Grizzly Buff Rd. Ferndale, CA	Pole	N/A
44	(40.5628350, -124.1878187)	Pedestal	N/A
45	(40.5777245, -124.1840636)	Pole	N/A
46	(40.5777311, -124.1850908)	Pole	T485
47	1580 Waddington Rd. Ferndale, CA	Pole	T95
48	(40.5850489, -124.2025587)	Pole	120022685
49	(40.5789692, -124.3308451)	Pole	N/A
50	(40.5789692, -124.3308451)	Pole	N/A
51	2100 Russ Ln. Ferndale, CA	Pedestal	N/A
52	1806 Centerville Rd. Ferndale, CA	Pole	T652
53	1613 Centerville Rd. Ferndale, CA	Pedestal	N/A
54	1613 Centerville Rd. Ferndale, CA	Pole	6887
55	464 Bluff St. Ferndale, CA	Pole	121940911

Location #	Address/GPS Location	Structure Type	Structure #
56	460 Ocean Ave. Ferndale, CA	Pole	121928377
57	430 Ocean Ave. Ferndale, CA	Pole	121925117
58	301 Emerson Ln. Ferndale, CA	Pole	T579
59	403 Emerson Ln. Ferndale, CA	Pole	T578
60	401 Emerson Ln. Ferndale, CA	Pole	T780
61	370 Schley Ave. Ferndale, CA	Pole	N/A
62	404 Schley Ave. Ferndale, CA	Pole	229
63	1703 Port Kenyon Rd. Ferndale, CA	Pole	121996571
64	1693 Port Kenyon Rd. Ferndale, CA	Pole	T261
65	Port Kenyon Rd. & Rasmussen Rd. Ferndale, CA	Pole	121650132
66	1118 Port Kenyon Rd. Ferndale, CA	Pole	121650146
67	1639 Fulmor Rd. Ferndale, CA	Pole	122033860
68	(40.6164779, -124.2505696)	Pole	N/A
69	(40.5959247, -124.2430185)	Pole	308023
70	(40.5969723, -124.2309181)	Pole	71
71	(40.5964489, -124.2308872)	Pole	N/A
72	(40.5991557, -124.2121426)	Pole	N/A
73	85 Waddington Rd. Ferndale, CA	Pole	121008693

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.

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 4:

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
17	Facilities need to be transferred to new pole.
20	Pole has woodpecker damage.
22	Old pole needs to be removed.
33	Pole has woodpecker damage.
52	Facilities need to be transferred to new pole.
56	Facilities need to be transferred to new pole.
72	There was a broken terminal on conductor.

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 related to the above rule are listed in Table 5:

Table 5: GO 95, Rule 31.6 Findings

Location #	Findings
63	There was an abandoned service drop.
70	There was an abandoned service drop.

3. GO 95, Rule 86.9, Guy Marker (Guy Guard) states:

“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 related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 86.9 Finding

Location #	Finding
31	Guy guard was broken.

4. GO 95, Rule 84.7A, Climbing Space states:

“Climbing space shall be provided on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c, 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.

The climbing space shall be maintained in the same position on the pole for minimum vertical distance of 4 feet above and below each conductor level through which it passes, excepting that where a cable is attached to a crossarm or a pole with the cable

less than 9 or 15 inches from the center line of the pole supporting conductors on line arms (no buck arm construction involved) in accordance with the provisions of Rules 84.4–D1 or 87.4–C3, the 4 foot vertical distance may be reduced to not less than 3 feet.

The position of the climbing space shall not be shifted more than 90 degrees around the pole within a vertical distance of less than 8 feet. Climbing space shall be maintained from the ground level.

The climbing space shall be kept free from obstructions excepting those obstructions permitted by Rule 84.7–A5.”

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

Table 7: GO 95, Rule 84.7A Findings

Location #	Findings
64	Vegetation impedes climbing space.
67	Vegetation impedes climbing space.
71	Vegetation impedes climbing space.

5. GO 95, Rule 84.6B, 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 findings related to the above rule are listed in

Table 8:

Table 8: GO 95, Rule 84.6B Findings

Location #	Findings
10	There was an exposed ground wire.
72	There was an exposed ground wire.

6. 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 9:

Table 9: GO 95, Rule 86.2 Findings

Location #	Findings
42	There was a loose guy wire.
60	There was a loose guy wire.
73	There was a broken guy wire.

7. 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 10:

Table 10: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
10	There was no riser cover for conductor on pole.
60	Conductor is coming out of riser cover.

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.”

ESRB’s finding related to the above rule is listed in Table 11:

Table 11: GO 128, Rule 17.1 Finding

Location #	Finding
13	Lid of the pedestal was broken and not able to be removed.

9. 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 12:

Table 12: GO 128, Rule 17.8 Findings

Location #	Findings
1	No mark of ownership on pedestal.
3	No mark of ownership on pedestal.
6	No mark of ownership on pedestal.
9	No mark of ownership on B-box.
11	No mark of ownership on B-box.
19	No mark of ownership on fiber box.
32	Missing mark of ownership on AFC box.
44	No mark of ownership on pedestal.
50	No mark of ownership on pedestal.

V. Observations

1. 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.”

ESRB’s findings related to the above rule are listed in Table 13:

Table 13: GO 95, Rule 18-A Findings

Location #	Findings
2	Pole had woodpecker damage.
23	Pole had woodpecker damage.
36	Pole had woodpecker damage.
37	Pole had a low pole step.
44	Pole was decayed and had woodpecker damage.
58	Cable TV riser was below 8 feet.
59	Cable TV riser was below 8 feet. Cable TV conductor was not attached to pole.