

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



December 23, 2025

CA2025-1402

Ms. Lisa Ludovici, Director, Government Affairs
Charter Communications
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Charter Communications' (Charter) Alturas Region

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Javier Reyes ESRB staff conducted a CIP audit of the Alturas region from September 15 to September 19, 2025. During the audit, ESRB staff conducted field inspections of Charter'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 January 23, 2026 by electronic copy of all corrective actions and preventive measures taken by Charter 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 Charles Mee at (415) 730-7012 or Charles.Mee@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink.

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 Charter's Alturas Region

Cc: Lee Palmer, Deputy Executive Director, Safety and Enforcement Division (SED), Safety Policy Division, Water Division, CPUC
Eric Wu, Program Manager, Safety and Enforcement Division, ESRB, SED, CPUC
Yi "Rocky" Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
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Javier Reyes, Utilities Engineer, ESRB, SED, CPUC
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CPUC AUDIT FINDINGS OF CHARTER ALTURAS REGION

SEPTEMBER 15 – 19, 2025

I. Records Review

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

- Charter Alturas service map.
- Charter's CPUC Inspection Compliance Program
- GO 95 Presentation for Communication Aerial Facilities and Service Drops
- Statistics for the Alturas Region
- GO 95 Inspections Conducted in the Last 5 Years (April 2020 – March 2025)
- Work Orders Conducted in the Last 5 Years (April 2020 – March 2025)
- 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:

Reviewing Charter's inspection records in the last 5 Years (April 2020 – March 2025), ESRB found that Charter's inspection records only showed the following information:

- Facility Identification or Unique Asset Number,
- Facility Type,
- Facility Location Latitude,
- Facility Location Longitude,
- High Fire Threat District (HFTD) Tier,
- Wired or Wireless,
- OH or UG,
- Inspection Type (Patrol or Detailed Inspection),
- Inspection Date,

Charter's inspection records did not show any findings of potential violations of GO 95 or GO 128. The inspection records also did not show any timelines for Charter to correct any possible findings. The inspection records should show deficiencies identified, and due date for correcting the deficiencies.

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:

Reviewing Charter's work order records from April 2020 through March 2025, ESRB found that:

1. Charter did not specify how the work orders were created such as through routine inspections, learned from customers, or third-party notifications.
2. Charter also did not assign priority levels to each deficiency to be corrected by the work orders.

III. Field Inspection

During the field inspection from September 15 to 19, 2025, ESRB staff inspected Charter's Communications facilities at locations listed in Table 1.

Table 1: Field Inspection Locations

Location #	Latitude	Longitude	Structure
1	41.4850215	-120.5406997	Pole
2	41.4848668	-120.5406990	Pole
3	41.4850112	-120.5413421	Pole
4	41.4850130	-120.5419409	Pole
5	41.4852918	-120.5419395	Pole
6	41.4847016	-120.5419355	Pole
7	41.4844893	-120.5419298	Pole
8	41.4844946	-120.5419342	Pole
9	41.4841844	-120.5419295	Pole
10	41.4860212	-120.5545915	Pole
11	41.4863758	-120.5545909	Pole
12	41.4868907	-120.5545966	Pole
13	41.4872260	-120.5546046	Pole
14	41.4872338	-120.5552946	Pole
15	41.4872363	-120.5560094	Pole
16	41.4872092	-120.5566213	Pole
17	41.4872177	-120.5574749	Pole
18	41.4872277	-120.5582078	Pole
19	41.4872363	-120.5589310	Pole
20	41.4872315	-120.5591965	Pole

Location #	Latitude	Longitude	Structure
21	41.4872177	-120.5594282	Pole
22	41.4876833	-120.5594135	Pole
23	41.4881445	-120.5594447	Pole
24	41.4884494	-120.5594440	Pole
25	41.4889275	-120.5594316	Pole
26	41.5072137	-120.5400808	Pole
27	41.5067914	-120.5400768	Pole
28	41.5063407	-120.5400664	Pole
29	41.5058875	-120.5400587	Pole
30	41.5054426	-120.5400486	Pole
31	41.5048960	-120.5400610	Pole
32	41.5044402	-120.5400546	Pole
33	41.5027079	-120.5400566	Pedestal box
34	41.5018301	-120.5400483	Pole
35	41.5017005	-120.5399235	Pole
36	41.5017887	-120.5406796	Pole
37	41.5017806	-120.5419147	Pole
38	41.5018100	-120.5432575	Pole
39	41.5018140	-120.5446244	Pole
40	41.4945021	-120.5401914	Pole
41	41.4940209	-120.5401592	Pole
42	41.4936397	-120.5401441	Pole
43	41.4933833	-120.5401569	Pole
44	41.4928971	-120.5401388	Pole
45	41.4926801	-120.5401334	Pole
46	41.4923835	-120.5401294	Pole
47	41.4920405	-120.5401274	Pole
48	41.4916962	-120.5401234	Pole
49	41.4913576	-120.5401331	Pole
50	41.4913385	-120.5399718	Pole
51	41.4986569	-120.5387873	box
52	41.4989002	-120.5387581	box

Location #	Latitude	Longitude	Structure
53	41.4988967	-120.5385824	box
54	41.4994084	-120.5387611	Pole
55	41.4998702	-120.5387729	Pole
56	41.4995538	-120.5381120	Pole
57	41.4996919	-120.5381238	pedestal
58	41.4996149	-120.5376205	pedestal
59	41.4997025	-120.5370452	Pole
60	41.4998695	-120.5367931	pedestal
61	41.5001434	-120.5363109	pedestal
62	41.4996369	-120.5358543	pedestal
63	41.4991438	-120.5364269	pedestal
64	41.4990275	-120.5363270	pedestal
65	41.4990197	-120.5370385	pedestal
66	41.4988889	-120.5368142	pedestal
67	41.4988090	-120.5374354	Pole
68	41.4988899	-120.5378740	pedestal
69	41.4987093	-120.5381322	Pole
70	41.4942216	-120.5640403	Pole
71	41.4942168	-120.5631575	Pole
72	41.4942196	-120.5625738	Pole
73	41.4942203	-120.5620015	Pole
74	41.4942098	-120.5614784	Pole
75	41.4942015	-120.5610017	Pole
76	41.4944639	-120.5609219	Pole

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 Error! Reference source not found.2:

Table 2: GO 95, Rule 31.1 Findings

Location #	Findings
4	Guy wire anchor not installed properly

2. GO 95, Rule 38, Minimum Clearances of Wires from Other Wires states in part:

"The minimum vertical, horizontal or radial clearances of wires from other wires shall not be less than the values given in Table 2 and are based on a temperature of 60° F and no wind."

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

Table 3: GO 95, Rule 38 Findings

Location #	Findings
1	Clearance issue with the Frontier service drop

Location #	Findings
5	Clearance issue between roof and guy wires
12	Clearance issue with guy wire and communications messenger
21	Clearance issue
71	Clearance issue
75	Clearance issue

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 Error! Reference source not found.4:

Table 4: GO 95, Rule 18.A Findings

Location #	Findings
13	TPN to Frontier broken guy wire marker
14	TPN for incomplete transfer for body pole
15	TPN to PacifiCorp for exposed ground and pole removal; for frontier for incomplete transfer and clearance issue
16	TPN to Frontier for incomplete transfer
20	TPN to Frontier for incomplete transfer
22	TPN to PacifiCorp for exposed ground; incomplete transfer, abandoned service drops, and body pole
23	TPN for exposed ground and ground rod above ground
25	TPN to Frontier for incomplete transfer and exposed ground rod
35	TPN to SVEC for broken ground molding
36	TPN to SVEC for ground molding broken
39	TPN to SVEC for missing ground molding
41	TPN for broken lashing wire
43	TPN to Frontier for their cables into guys, clearance issue
44	TPN to Frontier for incomplete transfer
59	TPN to Frontier for open box, which is a tripping hazard
70	TPN to Frontier, very low wires
72	TPN to Frontier for abandoned wires that are also very low
76	TPN for ground molding that is not installed properly

4. 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 5:

Table 5: GO 128, Rule 34.3 Findings

Location #	Findings
53	Unlocked box
63	Unlocked pedestal