



VIA ELECTRONIC MAIL

June 17, 2026

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

Via Electronic Mail

PUBLIC VERSION

**Re: Charter Communications, Inc. Response to SED Merced County District Audit:
CA2026-1325**

Dear Mr. Tse:

This letter is in response to your May 19, 2026 Audit Report of Charter Communications, Inc.'s ("Charter") Merced County District.

Enclosed are (i) a CONFIDENTIAL version with supporting documents; (ii) a redacted PUBLIC version with supporting documents; and (iii) a declaration supporting Charter's request for confidential treatment of the CONFIDENTIAL versions.

I. RECORDS REVIEW

Audit Finding:

1) General Order (GO) 95, Rule 80.1-A(4), Record Keeping

a) The Patrol & Detailed Records do not identify the personnel involved with the inspection of facilities.

Charter Response

Please see attached "CONFIDENTIAL Revised Charter Response to Merced County Pre-Audit Data Request." Charter does not in the normal course of business reveal personal information regarding its employees; however, we have revised this spreadsheet to include identifying technician numbers for the inspectors involved.

b) The Patrol & Detailed Records incorrectly identify the location of facilities inspected. The street address and the latitude and longitude do not agree for at least 146 records.

Charter Response

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]
[END CONFIDENTIAL]

c) The 2021-2025 Plant Repair WO incorrectly identifies the location of facilities repaired. The street address and the latitude and longitude do not agree for at least 4 entries

Charter Response

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]
[END CONFIDENTIAL]

Audit Finding:

2) GO 95, Rule 80.1.A.(2) Statewide Inspections Requirements

Patrol inspections require a checklist that specifies problems that inspectors should identify.

Charter Response

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]
[END CONFIDENTIAL]

Audit Finding:

3) GO 95, Rule 31.1, Design, Construction and Maintenance; GO 95, Rule 18-A1: Resolution of Potential Violations of General Order 95 and Safety Hazards

ESRB's review of Charter's Merced Region work orders from January 2020 through December 2025 found 46 work orders (9.2% of all work orders) Charter either closed late or were late and pending completion.

Charter Response

[BEGIN CONFIDENTIAL] [REDACTED]
[REDACTED]
[REDACTED]

[END CONFIDENTIAL]

II. FIELD INSPECTION RESPONSE

Charter's responses to the Field Inspection section are attached in the documents titled "CONFIDENTIAL Charter Response to Field Inspection Merced County Audit;" and "PUBLIC Charter Response to Field Inspection Merced County Audit."

If you have questions regarding this response, please feel free to reach out to either Torry Somers (torry.somers@charter.com) or to myself (ryan.lindsay@charter.com).

Sincerely,

/s/ Ryan Lindsay

Ryan Lindsay
Senior Manager, Construction
Sierra Nevada Management Area
Charter Communications

Enclosures: PUBLIC Charter Merced County Audit Response CA2026-1325
CONFIDENTIAL Charter Merced County Field Inspection Response
PUBLIC Charter Merced County Field Inspection Response
CONFIDENTIAL Revised Charter Merced County Pre-Audit Data Response
PUBLIC Revised Charter Merced County Pre-Audit Data Response
Declaration Seeking Confidential Treatment

cc: Lee Palmer, Deputy Executive Director, Safety and Enforcement Division (SED), Safety Policy Division (SPD), Water Division, CPUC
Chih sien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program and Project Supervisor, ESRB, SED, CPUC
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Joe Murphy, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC
Torry R. Somers, Vice President Regulatory Affairs, Charter
Lisa Ludovici, Director Government Affairs, Charter

**DECLARATION OF TORRY R. SOMERS
SEEKING CONFIDENTIAL TREATMENT**

I, Torry R. Somers, declare as follows:

1. I am Vice President, State Regulatory Affairs, of Charter Communications, Inc. (“Charter”) and am authorized to make this declaration.
2. Charter is submitting its spreadsheet response (“Response”) to the March 9th – 13th 2026 Safety and Enforcement Division Audit Report of Merced County District, with this request for confidential treatment made pursuant to Sections 3.2 of General Order (“GO”) 66-D.
3. *Audit Information:* I am informed and believe that the Public Records Act, including but not limited to California Government Code §§ 7923.600, 7929.215, and 7930.100 protects against disclosure of investigatory information, which includes the type of audit information set forth in the attached.
4. *Critical Infrastructure Information:* The Response contains sensitive information regarding Charter’s network infrastructure. I am informed and believe that the California Public Records Act protects against disclosure of confidential “utility systems development” data, like the data contained herein. California Government Code § 7927.300. Moreover, I am informed and believe that state law protects against disclosure that is prohibited under federal law—federal law protects against the disclosure of information regarding critical infrastructure (6 U.S.C. § 673), which has been found to include communications network information like the information being submitted here. The information is not customarily in the public domain and is not solely related to the location of a particular physical structure that is visible with the naked eye. The enclosed infrastructure information is critical to our nation’s communications networks, and disclosure of these records could harm public safety and network reliability by exposing to attack specific locations, operations, and functionalities of communications and utility infrastructure.
5. *Trade Secret:* The Response contains confidential network and operational information that is not disclosed to the public. This Response contains information that reveals unique planning, design and implementation efforts used to provide safe, reliable and competitive service to consumers in these areas. I am informed and believe that this information has significant value to Charter. This information would, if disclosed, provide access to information that would harm the private economic interests of Charter and could jeopardize the security of its network. I am informed and on this basis declare that the information provided constitutes a trade secret as defined by

California Civil Code § 3426.1 and California Evidence Code Section 1061 — California Government Code §§ 7927.605 and 7930.105 exempts from public disclosure competitively sensitive information that constitutes a trade secret.

6. *Public Interest Not to Disclose*: The Response contains competitively sensitive material, and critical information not available to the public, that would be harmful to Charter if publicly disclosed, which weighs in favor of non-disclosure under California Government Code § 7922.000. In contrast to the direct harm that Charter would suffer from disclosure — by losing its competitive advantage with respect to operations and network design and management and jeopardizing the safety of its network — there would be no apparent benefit to the public from disclosure of the responses. Further, a failure to preserve the confidentiality of the records would discourage compliance with disclosure requirements and undermine the Commission’s ability to perform its duties.
7. To the extent that there is a need to make contact regarding potential release of information, such contact should be made to Torry Somers, torry.somers@charter.com or Charter’s counsel, zzankel@jenner.com.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the CPUC’s Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this declaration are true and correct.

Executed on this 17th day of June, 2026 at El Segundo, CA.



Torry R. Somers

CA2026-1325 Spectrum Communications Merced County Audit Field Inspection Response

REDACTED PUBLIC

Discovered During	CPUC Audit Location No.	CPUC Rule Number	Pole Number	Coordinates	City	Violation Details	Violation Owner	Repair details	Repair Date
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