



VIA ELECTRONIC MAIL

September 8, 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

REDACTED PUBLIC VERSION

Re: Charter Communications, Inc. San Luis Obispo District Audit Response: CA2026-1404

Dear Mr. Tse:

This letter is in response to your August 11, 2026 Audit Report of Charter Communications, Inc.'s ("Charter") San Luis Obispo District.

Enclosed are (i) a CONFIDENTIAL response; (ii) a PUBLIC response; (iii) a CONFIDENTIAL Field Inspection Response spreadsheet; (iv) a redacted PUBLIC Field Inspection Response spreadsheet; (v) a CONFIDENTIAL REVISED Work Orders spreadsheet; (vi) a PUBLIC REVISED Work Orders spreadsheet; and (vii) a declaration supporting Charter's request for confidential treatment of portions of this letter marked CONFIDENTIAL, the CONFIDENTIAL REVISED Work Orders spreadsheet and CONFIDENTIAL Field Inspection Response spreadsheet.

I. RECORDS REVIEW

Audit Finding:

- ***ESRB reviewed Charter's work order records from March 2021 through March 2026.2 ESRB's analysis of the work order records found that Charter had a total of 193 late work orders, out of 2,965 total work orders (6.5% late).***
- ***Out of the 193 late work orders, there were 14 late-open, 179 late-closed, and zero late-canceled.***
- ***Late-open 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.***

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

Audit Finding:

- ***During the field audit, ESRB inspected 61 non-HFTD locations with Charter facilities.***
- ***Of these 61 locations, 17 locations had associated GO violations (28%).***
- ***Charter's CPUC Inspection Compliance Program requires patrols for all communication lines every 20 years. This practice allows facilities to operate in service without a physical inspection for up to 20 years. GO 95, Rule 31.2 and GO 128, Rule 17.2 require the frequent and thorough inspection of communication lines to ensure they are in good condition [emphasis added].***
- ***Additionally patrols by definition do not constitute a thorough inspection. Charter's current inspection program frequency for its non-HFTD areas is insufficient for complying with GO 95, Rules 31.2 and 80.1-A(2) and GO 128, Rule 17.2, as evidenced by ESRB identifying violations at 28% of the inspected locations in non HFTD areas.***

Charter Response

Neither GO 95 nor GO 128 provide specific timelines for the inspection of locations in non-high fire threat areas. As reflected in our CPUC Program Document, Charter's inspection policy aligns with the 5 factors enshrined in the code. Further, nothing in GO 95, GO 128, applicable law, nor sound logic, permits ESRB to conclude, or even infer, whether or not Charter's program meets the requirements of the Code for non HFTD areas based on the application of an arbitrary and unspecified threshold of violations identified in a non-representative inspection of select locations. Furthermore, the ESRB's conclusion ignores ample evidence that Charter's inspection policy is effective.

[BEGIN CONFIDENTIAL]

[END CONFIDENTIAL]

Audit Findings

During the records review, ESRB found that various work order and inspection records had incorrect GPS coordinates. ESRB noted a total of 99 inaccurate GPS location records (21 work order records and 78 patrol and detailed-inspection records).⁵ See Figures 1 and 2 below for examples of the inaccurate GPS locations plotted in Google Earth, with many located outside of the San Miguel-Guadalupe service areas and others in the ocean. ESRB asserts that it is essential for Charter to correctly record accurate GPS data since inaccurate location data makes it difficult for inspectors, service techs, and contractors to locate facilities; in addition, corrective action due dates for work orders are dictated by HFTD Tier levels and incorrect location data can lead to inaccurate HFTD Tier categorization.

Charter Response

[BEGIN CONFIDENTIAL]

[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 Response SLO District Audit;" and "PUBLIC Charter SLO District Field Inspection Response."

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 Construction Manager, Field Operations

Enclosures: CONFIDENTIAL Revised Pre-Audit spreadsheet
CONFIDENTIAL Field Inspection Response spreadsheet
PUBLIC Revised Pre-Audit spreadsheet
PUBLIC Field Inspection Response spreadsheet
Declaration Seeking Confidential Treatment

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Koko Tomassian, Director, Safety and Enforcement Division, CPUC
Chih sien "Eric" Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program & Project Supervisor, ESRB, SED, CPUC
Yi "Rocky" Yang, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
Brandon Vazquez, Utilities Engineer, ESRB, SED, CPUC
Rafael Herranz, Utilities Engineer, ESRB, SED, CPUC
Yongling Sun, Public Utilities Regulatory Analyst V, ESRB, SED, CPUC
Torry R. Somers, Vice President State Regulatory Affairs, Charter
Dan Gonzalez, GVP State 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 May 12th – 22nd 2026 Safety and Enforcement Division Audit Report of San Luis Obispo 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 8th day of September, 2026 at El Segundo, CA.



Torry R. Somers