



VIA ELECTRONIC MAIL

June 12, 2026

Majed Ibrahim, 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

Re: Charter Communications, Inc. Response to SED San Bernardino County Metro District Audit: CA2026-1346

Dear Mr. Ibrahim:

This letter is in response to the Records Review Section of your May 5, 2026 Audit Report of Charter Communications, Inc.'s ("Charter") San Bernardino County Metro District.

Enclosed are (i) a CONFIDENTIAL Revised 6.12.26 SB Metro Pre-Audit Work Orders spreadsheet; (ii) a redacted PUBLIC Revised 6.12.26 SB Metro Pre-Audit Work Orders spreadsheet; and (iii) a declaration supporting Charter's request for confidential treatment of the CONFIDENTIAL spreadsheet.

I. RECORDS REVIEW

Audit Finding:

Charter's records indicated that during the twelve months prior to the audit, Charter completed 22 work orders past Charter's due date for corrective action. Additionally, as of the audit, Charter had 96 open work orders that were past Charter's scheduled due date for corrective action.

Charter Response:

Please see the attached "CONFIDENTIAL Revised 6.12.26 SB Metro Pre-Audit Work Orders" document. Charter has deleted all additional tabs and filtered the rows to reflect the past due and open work orders referenced in the Audit report.

In reviewing these work orders, we found several discrepancies that have been corrected.

- a. Completion dates for 100 work orders on the pre-audit data spreadsheet were missing although the work had been completed. The attached spreadsheet provides completion dates for the applicable records.**
- b. Many of the open Work Orders, including the 22 past due repairs identified in the audit, were Priority Level 3 infractions. Charter's maintenance and repair program as well as GO 95, do not require repair for Priority Level 3 infractions until 60 months after identification. However, Charter's SPIDA Work Order system auto-populates a six-month repair timeline for all GO 95 Priority 2 and Priority 3 deficiencies. Charter makes every attempt to meet this 6-month timeline; however, completion may be delayed due to reasonable circumstances, such as the need for vegetation trimming or access constraint to private property or pole location.**
- c. There was one Priority Level 2 deficiency that was not completed within a 6-month period. This was due to an internal routing error that has been addressed.**

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.whaley@charter.com).

Sincerely,

/s/ Ryan Whaley

Ryan Whaley
Area Vice President, Field Operations

Enclosures: CONFIDENTIAL Revised 6.12.26 SB Metro Pre-Audit Work Orders spreadsheet
PUBLIC Revised 6.12.26 SB Metro Pre-Audit Work Orders spreadsheet
Declaration Seeking Confidential Treatment

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
James Miller, Utilities Engineer, 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 San Bernardino County Metro 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 12th day of June, 2026 at El Segundo, CA.



Torry R. Somers