

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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August 19, 2026

CA2026-1459

Kory Borzoni, Corporate Compliance Specialist
Race Communications
961 Rocca Way
Yuba City, CA 95991

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Race Communications'
(Race) North Sacramento (RCNS) Service Area

Ms. Borzoni:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Charles Mee and Javier Reyes of ESRB Staff conducted a CIP audit of RCNS service area from June 15 to June 19, 2026. During the audit, ESRB Staff conducted field inspections of RCNS 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 detailing the violations is enclosed. Please provide a response no later than September 17, 2026, by electronic copy of all corrective actions and preventive measures taken by Race 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 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, 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 Race Communications North Sacramento Service Area

Cc:

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Carlos Alcantar, Chief Technology Officer, Race

Domenic Pacini, Chief Development Officer, Race

Ariel Pacini, VP of Outside Plant, Race

**CPUC CIP AUDIT REPORT FOR
RACE COMMUNICATIONS NORTH SACRAMENTO SERVICE AREA
JUNE 15 – 19, 2026**

I. Records Review

During the audit, ESRB Staff reviewed the following records:

- RCNS Pre-Audit Data Request CA2026-1459
- Race Telecommunications-Inspection & Maintenance Program
- Race Telecommunications-OSP Inspection Checklist, Basic Inspection (Patrol)
- Race Telecommunications-OSP Inspection Checklist, Detailed Inspection
- RCNS Facility Maps,
- RCNS Safety Hazards Received,
- RCNS-Permits (April 1, 2025-March 31, 2026)
- RCNS-Maintenance Tickets
- RCNS-Inspectors & Training Program

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. GO 95, Rule 18.A Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(1) “Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Upon completion of the corrective action, the company’s records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

(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.

(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party."

ESRB's findings related to the above rule are as follows:

- 1) Regarding Item (1) above, Race merely provided some third-party permit records but did not provide any records for its work orders correcting the deficiencies.

Race is required to establish and keep its maintenance records with enough details.

- 2) Regarding third party notifications prescribed in Item (2) - (5), Race stated that:

"During the audit period of April 1, 2025 through March 31, 2026, Race did not issue formal written Safety Hazard Notifications to third parties pursuant to GO 95 Rule 18-B. Race acknowledges that formal written notification is best practice."

Race is required to establish formal written third-party notification program for issuing notifications to other utility companies for potential violations of GO 95 and safety hazards.

2. 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:

Race did not provide its inspection records. In its response, Race stated the following:

“Race Communications (“Race”) physically observed the RCNS plant during the audit period in connection with initial attachment surveys and pre-construction assessment walkthroughs, which involved direct evaluation of infrastructure conditions in the field. These observations were not, however, captured as formal patrol or detailed inspection records under GO 95 Rule 18. Race recognizes this documentation gap and is addressing it: a formal inspection schedule for the service area is currently in development, and Race is committed to full compliance with GO 95 Rule 18 inspection and recordkeeping obligations going forward.”

Race is required to update the status of its commitment in compliance with GO 95, Rule 18, including a formal inspection schedule, detailed inspection records, and corrective action records for each service area.

3. 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:

RCNS did not provide any inspection records and did not show any prioritization records for deficiencies found through inspections.

Race is required to establish records of prioritizing the deficiencies, including but no limited to priority levels and corrective action due dates, in order to comply with GO 95, Rule 18.B.(1).a.

III. Field Inspection

During the field inspection from June 15 to 19, 2026, ESRB staff inspected Race’s Communications facilities locations listed in Table 1 below:

Table 1: Field Inspection Locations

Location #	Latitude	Longitude	Structure Type	Facility ID
1	39.156754	-121.7539299	Pole	
2	39.156768	-121.7543128	Pole	120378821
3	39.156777	-121.7545619	Pole	
4	39.156801	-121.7549863	Pole	120378754
5	39.163215	-121.7583418	Pole	120179932
6	39.163269	-121.7583612	UG Vault	
7	39.163972	-121.7583418	UG Vault	
8	39.169597	-121.7426499	Pole	121671996
9	39.169597	-121.7426499	UG Vault	
10	39.169058	-121.7426532	Pole	121671995
11	39.168512	-121.7426804	Pole	121671994
12	39.157465	-121.6781545	Pole	120338280
13	39.157465	-121.6781545	UG Vault	

Location #	Latitude	Longitude	Structure Type	Facility ID
14	39.15768	-121.6788706	Pole	120338279
15	39.157729	-121.6790111	Pole	120338277
16	39.157874	-121.6795234	Pole	RC013601
17	39.158015	-121.680033	Pole	RC013600
18	39.15822	-121.6807532	Pole	120338273
19	39.158365	-121.6812347	Pole	120338268
20	39.157285	-121.6775225	Pole	RC013648
21	39.134731	-121.6054549	Pole	120352372
22	39.134479	-121.605304	Pole	120352373
23	39.135803	-121.6073572	Pole	120361760
24	39.136303	-121.608753	Pole	120352540
25	39.13655	-121.608069	Pole	120352542
26	39.136732	-121.6075718	Pole	120352543
27	39.269078	-121.0574112	Pole	
28	39.269078	-121.0574112	UG Vault	
29	39.269229	-121.057204	UG Vault	
30	39.269229	-121.057204	Pole	RC013128
31	39.268818	-121.056696	Pole	
32	39.269151	-121.0559497	Pole	
33	39.269204	-121.0552359	Pole	
34	39.268749	-121.0543313	Pole	
35	39.268764	-121.0507352	Pole	
36	39.269088	-121.0500998	Pole	16662
37	39.269148	-121.0496777	Pole	16645
38	39.221452	-121.0116507	Pole	12549B2
39	39.221184	-121.0106814	Pole	120041231
40	39.22124	-121.0097279	Pole	PG&E061192
41	39.221244	-121.0087703	Pole	LC41614
42	39.221276	-121.0079184	Pole	35047
43	39.221276	-121.007854	Pole	127xx
44	39.221113	-121.0126696	Pole	LC41674
45	39.219642	-121.0126428	Pole	PG&E061178
46	39.219051	-121.0126196	Pole	120183747
47	39.219105	-121.0122884	Pole	12165
48	39.219087	-121.0120185	Pole	
49	39.219146	-121.0112829	Pole	12251
50	39.219187	-121.0104551	Pole	12279
51	39.206125	-122.0140324	Pole	121130996

Location #	Latitude	Longitude	Structure Type	Facility ID
52	39.206188	-122.0140029	Pole	121130995
53	39.205887	-122.0141491	Pole	120009958
54	39.206024	-122.0135342	Pole	RC012480
55	39.205978	-122.013271	Pole	CPN1421
56	39.205903	-122.0130172	Pole	
57	39.206495	-122.0153836	Pole	121130993
58	39.206455	-122.0154114	Pole	RC013842
59	39.206523	-122.0156625	Pole	
60	39.206667	-122.016371	Pole	RC012465
61	39.206797	-122.0169165	Pole	RC012464
62	39.206888	-122.0173352	Pole	121130990
63	39.206162	-122.0155267	Pole	RC013843
64	39.205617	-122.0157178	Pole	RC013844
65	39.205258	-122.0158436	Pole	121131561
66	39.205173	-122.0158784	Pole	121131562
67	39.21779	-122.1141046	Pole	120980440
68	39.217768	-122.1165947	Pole	121104814
69	39.217725	-122.1164063	Pole	121104815
70	39.217782	-122.1159775	Pole	120980438
71	39.218173	-122.1529055	Pole	
72	39.21819	-122.1530905	Pole	10170-140576342
73	39.218189	-122.1538328	Pole	
74	39.158462	-122.1508633	Pole	CPU631
75	39.158543	-122.1507711	Pole	FTR750693
76	39.158259	-122.1506001	Pole	CPU629
77	39.158025	-122.1504134	Pole	CPU628
78	39.157627	-122.1501575	Pole	CPU627
79	39.157153	-122.1498347	Pole	CPU626
80	39.156649	-122.1494642	Pole	CPU894/T560
81	39.129254	-121.6070813	Pole	120443851
82	39.129115	-121.6071886	Pole	120443852
83	39.128713	-121.6074488	Pole	120443853
84	39.128333	-121.6077056	Pole	RC012566
85	39.129596	-121.6071926	Pole	120837932
86	39.1296	-121.6076107	Pole	120337697
87	39.129598	-121.6080295	Pole	120337698
88	39.129598	-121.6084563	Pole	120337699
89	39.129637	-121.6068369	Pole	120443989

Location #	Latitude	Longitude	Structure Type	Facility ID
90	39.129905	-121.6066421	Pole	120443988

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. GO 95, Rule 18, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(1) “Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.

Upon completion of the corrective action, the company’s records shall show, with sufficient detail, the nature of the work, the date, and the identity of persons performing the work. These records shall be preserved by the company for at least ten (10) years.

(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.

(5) A company receiving a notification under (2), (3), or (4) above shall take appropriate corrective action consistent with the provisions of this rule. For at least ten (10) years, the documentation of the notice shall be maintained by both the notifying and receiving parties and documentation of the correction shall be maintained by the receiving party.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.2:

Table 2: GO 95, Rule 18 Findings

Location #	Finding
1	TPN to Comcast for ground missing cover and not attached Missing Facility Identification
3	Missing Facility Identification
6	Missing Facility Identification
7	Missing Facility Identification
9	Missing Facility Identification
10	TPN to AT&T for clearance issue TPN to PG&E for slack secondary wire and slack guy wire
13	Missing Facility Identification
14	TPN to PGE for leaning pole
15	TPN to PGE for leaning pole and missing visibility strip on pole
18	TPN for Comcast for abandoned drop
19	TPN to AT&T for Abandoned service and loose raisers
21	TPN to PGE vegetation touching guy wires with no insulator TPN to Comcast for loose risers
22	TPN to AT&T for abandoned wire
23	TPN to PGE for leaning pole TPN to Comcast for riser covers unattached
24	TPN to Comcast for loose and uncovered ground and abandoned service wire touching Race wire
25	TPN to AT&T for telephone service drop too low
26	TPN to PGE for broken ground cover
27	Missing Facility Identification
28	Missing Facility Identification
29	Missing Facility Identification
31	Missing Facility Identification
32	Missing Facility Identification
33	Missing Facility Identification
34	Missing Facility Identification
35	TPN to AT&T for unattached riser and missing riser cover

Location #	Finding
35	Missing Facility Identification
44	TPN to PGE for its guywire touching AT&T cable
46	TPN to AT&T for incomplete pole transfer
47	TPN to AT&T for leaning pole and missing visibility strips
48	TPN to AT&T for loose cable riser
48	Missing Facility Identification
56	Missing Facility Identification
57	TPN to Comcast for broken ground molding and vegetation touching guy wire TPN to AT&T for vegetation touching guy wire above insulation bob TPN to PGE for leaning pole
59	Missing Facility Identification
71	Missing Facility Identification
73	Missing Facility Identification
77	TPN to Frontier for pole test or replacement
78	TPN to Frontier for vegetation management to mitigate abrasion
79	TPN to Frontier for pole foot damage
80	TPN to Frontier for damaged case and slack guy wire
82	TPN to Comcast for damaged ground cover
83	TPN to Comcast for missing riser cover and riser unattached TPN to AT&T for unattached riser cover
85	TPN to AT&T for riser unattached
88	TPN to Comcast from broken ground cover
89	TPN to Comcast for clearance issue at the north span
90	TPN to Comcast for unattached riser that obstructs power switch

2. 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.3:

Table 3: GO 95, Rule 31.1 Findings

Location #	Finding
16	Visibility strips faded
17	Visibility strips faded
34	Guy wire installation not completed
44	Needs to transfer its guywire to its own anchor
45	Splice case not attached to messenger
59	Visibility strips missing one
60	Visibility strips falling
63	Visibility strips faded
64	Visibility strips faded, Service drop hanging
75	Service drop loose, third party attachment

3. GO 95, Rule 35 Vegetation Management states in part:

“Where overhead conductors traverse trees and vegetation, safety and reliability of service demand that certain vegetation management activities be performed in order to establish necessary and reasonable clearances, the minimum clearances set forth in Table 1, Cases 13 and 14, measured between line conductors and vegetation under normal conditions shall be maintained. (Also see Appendix E for tree trimming guidelines.) These requirements apply to all overhead electrical supply and communication facilities that are covered by this General Order, including facilities on lands owned and maintained by California state and local agencies.”

ESRB’s findings related to the above rule are listed in Error! Reference source not found.4:

Table 4: GO 95, Rule 35 Findings

Location #	Finding
21	Guy wire strained by tree branch

4. 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 Error! Reference source not found.5:

Table 5: GO 95, Rule 38 Findings

Location #	Finding
41	Guy wire clearance issue
43	Service span clearance issue
46	South side span clearance issue
49	Service drop clearance issue
59	Service drop clearance issue
80	Service drop clearance issue

5. GO 95, Rule 54.6.B Ground Wires states in part:

ESRB’s findings related to the above rule are listed in Error! Reference source not found.6:

Table 6: GO 95, Rule 54.6.B Findings

Location #	Finding
4	Ground wires exposed
12	Ground wires exposed

6. GO 95, Rule 54.6-I Attachment of Protective Covering states in part:

“Protective covering shall be attached to poles, structures, crossarms, and other supports by means of corrosion-resistant materials (straps, plumbers tape, lags, nails, staples, screws, bolts, etc.) which are adequate to maintain such covering in a fixed position.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.7:

Table 7: GO 95, Rule 54.6-I Findings

Location #	Finding
14	Riser unattached from pole

7. GO 95, Rule 91.3.B Stepping states in part:

“Where installed, the lowest step shall not be less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.”

ESRB's findings related to the above rule are listed in Error! Reference source not found.8:

Table 8: GO 95, Rule 91.3.B Findings

Location #	Finding
2	Pole step lower than 8 feet
3	Pole step lower than 8 feet