PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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November 06, 2026

CA2026-1531

Charlie Boening
Director of Operations
Cal-Ore Telephone
719 W. 3rd St
Dorris, CA, 96023

SUBJECT: Communication Infrastructure Provider (CIP) Audit of Cal-Ore Telephone

Mr. Boening:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Samuel Mandell of ESRB staff conducted a communication audit of Cal-Ore Telephone (Cal-Ore) from September 9, 2026 through September 10, 2026. During the audit, ESRB staff conducted field inspections of Cal-Ore's communication 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 December 09, 2026, by electronic copy of all corrective actions and preventive measures taken by Cal-Ore 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 our audit on the CPUC website. If there is any information in your response that you would like 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 Samuel Mandell at (916) 217-8294 or samuel.mandell@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Communication Audit Report for Cal-Ore

Cc:

Koko Tomassian, Director, Safety and Enforcement Division (SED)
Chihsien “Eric” Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Program and Project Supervisor, ESRB, SED, CPUC
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Samuel Mandell, Utilities Engineer, ESRB, SED, CPUC
Kristi Ung, Public Utilities Regulatory Analyst I, ESRB, SED, CPUC
Keith Nelson, OSP Engineering Manager, Cal-Ore Telephone
Curt Condit, OSP Construction & Installation Manager, Cal-Ore Telephone

CAL-ORE TELEPHONE COMMUNICATIONS AUDIT FINDINGS
September 09 – September 10, 2026

I. Records Review

Electric Safety and Reliability Branch (ESRB) staff reviewed the following standards, procedures, and records for Cal-Ore Telephone (Cal-Ore):

- Facility statistics as of August 07, 2026, including miles of overhead (OH) lines, miles of underground (UG) lines, number of poles, number of vaults, and number of pedestals.
- Map of the Audit Area
- A list of all new OH and UG construction projects completed from December 2024 to July 2026.

II. Records Violations

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

1. **General Order (GO) 95, Rule 31.2, Inspection of Lines** states in part:

> *"Lines shall be inspected frequently and thoroughly for the purpose of ensuring that they are in good condition so as to conform with these rules. Lines temporarily out of service shall be inspected and maintained in such condition as not to create a hazard."*

GO 95, Rule 80.1-A(2), Statewide Inspection Requirements states in part:

> *"Each company shall prepare, follow, and modify as necessary, procedures for conducting patrol or detailed inspections for all of its Communication Lines throughout the State. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:*
>
> - *Fire threat*
> - *Proximity to overhead power line facilities*
> - *Terrain*
> - *Accessibility*
> - *Location, including whether the Communications Lines are located in the High Fire-Threat District"*

GO 95, Rule 80.1-A(4), Record Keeping states:

> *"Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."*

GO 128, Rule 41.2 Duct Systems, Rule 42.2 Manholes and Handholes, Rule 43.2 Buried Cables and Conductors, Maintenance and Inspection states:

> *"See Rules 12.2 and 17.2."*

GO 128, Rule 17.2, Inspection states in part:

"Systems shall be inspected by the operator frequently and thoroughly for the purpose of insuring that they are in good condition and in conformance with all applicable requirements of these rules."

Cal-Ore does not possess a written inspection program that ensures compliance with GO 95, Rule 80.1-A and GO 128, Rule 17.2. Cal-Ore stated that it examines overhead and underground assets as it performs work in an area. Without a documented plan and tracked inspection locations, Cal-Ore cannot ensure that its facilities are inspected frequently and thoroughly.

2. **GO 128, Rule 12.2, Maintenance** states in part:

"Systems shall be maintained in such condition as to secure safety to workmen and the public in general. Systems and portions thereof constructed, reconstructed, or replaced on or after the effective date of these rules shall be kept in conformity with the requirement of these rules."

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."

(1) "Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below.
   a. 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."*

Cal-Ore does not possess a written and auditable maintenance program that includes the minimum requirements listed in GO 95, Rule 18-B or ensures compliance with GO 128, Rule 12.2. Cal-Ore stated that when an issue is identified it is either repaired same day, or referred back to engineering. None of those actions are logged or tracked. Without a proper maintenance program and record keeping, Cal-Ore cannot ensure that the identified deficiencies are being corrected in a timely manner for the safety of its workers and the general public.

III. Field Inspection

During the field audit, ESRB inspected the following facilities:

Table 1. Locations Inspected

Location	Asset Type	Asset ID	Longitude	Latitude
1	Pole		-122.193	41.63206
2	Pole		-122.194	41.6307
3	Pole	62-44-003-285440	-122.194	41.63073
4	Pole	62-44-003-285600	-122.194	41.63236
5	Vault		-122.004	41.82767
6	Pedestal		-122.004	41.82767
7	Pedestal		-122.004	41.82764
8	Pedestal		-122.004	41.82748
9	Repeater		-121.937	41.8038
10	Pedestal	B6C1	-121.937	41.80383
11	Pedestal	B5C1	-121.948	41.80904
12	Pedestal	B5C11	-121.948	41.80904
13	Pole		-121.948	41.80903
14	Pole	62-46-001-234001	-121.948	41.80845
15	Pole	62-46-001	-121.948	41.80762
16	Pole	62-46-001-264901	-121.947	41.80686
17	Pedestal	BQ1	-121.927	41.96481
18	Pedestal	BM1	-121.926	41.96457
19	Pedestal	BM2	-121.926	41.96482
20	Pedestal	BM3	-121.926	41.96538
21	Hand Hole		-122.044	41.93225
22	Pedestal		-122.043	41.93228
23	Pole	62-47-002-125601	-122.044	41.9323
24	Pole	62-47-002-124601	-122.045	41.93239
25	Pole	62-47-002-124600	-122.046	41.93268
26	Pole	62-47-002-123701	-122.047	41.93303
27	Pole	62-47-002-123700	-122.048	41.93356

Location	Asset Type	Asset ID	Longitude	Latitude
28	Pedestal	D8A	-122.026	41.95214
29	Pedestal	D8A1	-122.027	41.95214
30	Pedestal	D8A2	-122.027	41.95196
31	Pedestal	A1C4	-121.92	41.96868
32	Pedestal	A1C3	-121.92	41.96852
33	Pedestal		-121.92	41.96823
34	Pedestal		-121.92	41.9678
35	Pedestal	A1A2	-121.92	41.96751
36	Pedestal	PG7	-121.92	41.96382
37	Pedestal		-121.92	41.96357
38	Pedestal	PG9	-121.92	41.96327
39	Pedestal	PG10	-121.92	41.96301
40	Pedestal		-121.291	41.64857
41	Pole		-121.291	41.64857
42	Pole		-121.291	41.64814
43	Pole		-121.272	41.66103
44	Pole		-121.273	41.66033
45	Pole		-121.274	41.65964
46	Pole		-121.271	41.66166
47	Pedestal	C9A1	-121.302	41.75068
48	Pole		-121.302	41.75067
49	Pole		-121.302	41.75098
50	Pole		-121.302	41.75147
51	Pole		-121.305	41.81011
52	Pedestal		-121.305	41.81015
53	Pole		-121.305	41.81003
54	Pole		-121.305	41.8104
55	Pedestal	BB1	-121.367	41.88149
56	Pedestal		-121.367	41.88156
57	Pedestal	BB2	-121.367	41.88221
58	Hand Hole		-121.367	41.88217
59	Pedestal	BB3	-121.366	41.88257
60	Hand Hole		-121.366	41.88271
61	Pedestal	BC2	-121.369	41.88484
62	Pedestal	C1K2	-121.369	41.885
63	Pedestal	BC3	-121.37	41.88514
64	Pedestal		-121.37	41.88513
65	Connection Box		-121.566	41.95364
66	Vault		-121.566	41.95366

Location	Asset Type	Asset ID	Longitude	Latitude
67	Pedestal		-121.566	41.95348
68	Pedestal		-121.566	41.95347
69	Pedestal		-121.566	41.9542
70	Pedestal		-121.521	41.95357
71	Pedestal		-121.52	41.9535
72	Pedestal	D2A4	-121.52	41.95356
73	Pedestal	DA2	-121.479	41.95356
74	Pedestal	DA2-1	-121.479	41.95308
75	Pedestal	DA2-2	-121.479	41.95272
76	Pedestal	DA2-3	-121.479	41.95184
77	Pedestal	DA2-4	-121.479	41.95132
78	Pedestal	HB2	-121.473	41.9549
79	Pedestal	HA8-2	-121.473	41.95459
80	Pedestal	HA8-1	-121.473	41.95392
81	Pedestal	AJ2-4	-121.479	41.95934
82	Pedestal		-121.479	41.95887
83	Pedestal	AJ2	-121.479	41.95846

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **GO 95, Rule 84.6 B, Vertical and Lateral Conductors, Ground Wires,** states in part:

   "Ground wires, other than lightning protection wires not attached to equipment or ground wires on grounded structures, shall be covered by metal pipe or suitable covering of wood or metal, or of plastic conduit material as specified in Rule 22.8–A, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet."

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

Table 2: GO 95, Rule 84.6-B Findings

Location	Findings
41	Missing ground molding
45	Missing ground molding

2. **GO 95, Rule 86.2 Guys, Use** states in part:

   "Guys shall be attached to structures as nearly as practicable at the center of load. They shall be maintained taut and of such strength as to meet the safety factors of Rule 44."

   ESRB's findings related to the above rule are listed in **Error! Reference source not found.**3:

Table 3: GO 95, Rule 86.2 Findings

Location	Findings
2	Guy wire is slack
16	Guy wire is slack
41	Guy wire being deflected by tree

3. **GO 95, Rule 86.9 Guys, Guy Marker** states:

   "A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker."

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

Table 4: GO 95, Rule 86.9 Findings

Location	Findings
2	Missing guy marker
41	Missing guy marker

4. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

   "Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:

   a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or

   b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8"

   ESRB's finding related to the above rule is listed in **Error! Reference source not found.**5:

Table 5: GO 95, Rule 87.7-D(1) Finding

Location	Finding
23	Riser guard is missing at the base of the pole

5. **GO 95, Rule 92.4-C(2)(c) Grounding, Ground rods** states:

   "Ground rods shall be driven into the ground so that one end of the ground rod is at a minimum depth of 8 feet below the surface of the ground. The top end of the ground rod shall not be less than 1 foot below the surface of the ground."

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

Table 6: GO 95, Rule 92.4-C(2)(c) Findings

Location	Findings
2	Exposed ground rod
45	Exposed ground rod

6. **GO128, Rule 17.1, 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 [the] communication or supply lines and equipment."

   ESRB's findings related to the above rule are listed in Table 7:

Table 7: GO 128, Rule 17.1 Findings

Location	Findings
22	Pedestal is damaged and needs repair
52	Pedestal knocked over, needs repair
61	Internal ground is broken and not attached

Location	Findings
62	Active bee/wasp nest inside pedestal
67	Pedestal is buried and inaccessible
71	Pedestal is buried and inaccessible

7. **GO 128, Rule 17.8, Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

   "Manholes, handholes, subsurface and self-contained surface mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity."

ESRB's findings related to the above rule are listed in Table 8:

Table 8: GO 128, Rule 17.8 Findings

Location	Findings
8	Needs ownership label
17	Needs ownership label
18	Needs ownership label
19	Needs ownership label
20	Needs ownership label
21	Needs ownership label
22	Needs ownership label
28	Needs ownership label
31	Needs ownership label
32	Needs ownership label
33	Needs ownership label
34	Needs ownership label
35	Needs ownership label
36	Needs ownership label
37	Needs ownership label

Location	Findings
38	Needs ownership label
39	Needs ownership label
47	Needs ownership label
55	Needs ownership label
56	Needs ownership label
57	Needs ownership label
58	Needs ownership label
59	Needs ownership label
60	Needs ownership label
61	Needs ownership label
62	Needs ownership label
63	Needs ownership label
64	Needs ownership label
65	Needs ownership label
66	Needs ownership label
68	Needs ownership label
70	Needs ownership label
72	Needs ownership label
73	Needs ownership label
74	Needs ownership label
75	Needs ownership label
76	Needs ownership label
78	Needs ownership label
79	Needs ownership label
80	Needs ownership label
81	Needs ownership label

Location	Findings
82	Needs ownership label
83	Needs ownership label

V. Observations

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

   "For purposes of this rule, "Safety Hazard" means a condition that poses a significant threat to human life or property..."

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

   "(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."

During the field inspection, ESRB noted the third-party safety concerns listed in Table 9.

Table 9: Third-Party Observations

Location	Utility	Violation Description
3	PacifiCorp	Slack guy wire
16	PacifiCorp	Damaged ground molding

45	Hunter Communication	Hunter’s communication line is contacting the Cal-Ore line below it.