

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 26, 2023

CA2023-1036

Lisa Ludovici
Charter Communications
Director, Government Affairs – Central and Northern California
270 Bridge Street
San Luis Obispo, CA 93401

SUBJECT: Audit of Charter Communications' ("Spectrum") Kern County East District

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Kyle King of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications' Kern County East District from April 17, 2023 to April 21, 2023. The audit included a review of Charter Communications' inspection and maintenance records and field inspections of Charter Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please advise me no later than June 26, 2023, by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Kyle King at (213) 222-3260 or Kyle.King@cpuc.ca.gov.

Sincerely,

A handwritten signature in blue ink that reads "Fadi Daye".

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

Enclosures: CPUC Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Kyle King, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground patrol and detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Charter Communications' Overhead Lines Maintenance Plan
- Charter Communications' Visual Inspections of Overhead Lines

II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

GO (General Order) 95, Rule 18-A: Resolution of Safety Hazards and General Order 95 Nonconformances, states in part:

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.

GO 95, Rule 31.1, Design, Construction and Maintenance, states in part:

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.

Charter Communications' records indicated that from 2021 to 2023, Charter completed 49 overhead work orders past Charter's required due date for corrective action.

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.

Charter Communications' records indicated that from 2021 to 2023, Charter completed 36 overhead detailed inspections past Charter's scheduled due date.

GO 128, 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.

Charter Communications' records indicated that from 2021 to 2023, Charter completed 3 underground work orders past Charter's required due date for corrective actions.

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 these rules.

Charter Communications' records indicated that from 2021 to 2023, Charter completed 3 underground detailed inspections past Charter's scheduled due date.

III. Field Inspection

My staff inspected the following structures during the field inspection portion of the audit:

No.	Structure Number	Type of Structure	City
1	4096584E	Pole	Rosamond
2	4096585E	Pole	Rosamond
3	4129941E	Pole	Rosamond
4	4129942E	Pole	Rosamond
5	4129943E	Pole	Rosamond
6	4601872E	Pole	Rosamond
7	4722895E	Pole	Rosamond
8	4090063E	Pole	Rosamond
9	2135 20 th Street West	Pole	Rosamond
10	1201454E	Pole	Rosamond
11	1200598E	Pole	Rosamond
12	1200599E	Pole	Rosamond
13	1200600E	Pole	Rosamond
14	1200651E	Pole	Rosamond
15	541895E	Pole	Rosamond
16	1354709E	Pole	Rosamond
17	1201462E	Pole	Rosamond
18	1218384E	Pole	Rosamond
19	1218385E	Pole	Rosamond
20	1218386E	Pole	Rosamond
21	1218387E	Pole	Rosamond
22	1218388E	Pole	Rosamond
23	1218389E	Pole	Rosamond
24	4280130E	Pole	Rosamond
25	167914E	Pole	Rosamond
26	1122442E	Pole	Rosamond
27	1122443E	Pole	Rosamond
28	525413	Pole	Boron
29	4739168E	Pole	Boron
30	4838644E	Pole	Boron
31	19000775E	Pole	Boron
32	525404	Pole	Boron
33	51455CTC	Pole	Boron
34	525405S	Pole	Boron
35	525406	Pole	Boron

36	425741	Pole	Boron
37	425553	Pole	Boron
38	23625CIT	Pole	Boron
39	4838632E	Pole	Boron
40	4972190E	Pole	Boron
41	4838634E	Pole	Boron
42	525407S	Pole	Boron
43	4838636E	Pole	Boron
44	525449	Pole	Boron
45	525450S	Pole	Boron
46	525408	Pole	Boron
47	525409S	Pole	Boron
48	1702290E	Pole	Boron
49	46554	Pole	Boron
50	4972194E	Pole	Boron
51	46552S	Pole	Boron
52	46551	Pole	Boron
53	4857294E	Pole	Boron
54	52541	Pole	Boron
55	4867036E	Pole	Boron
56	525467S	Pole	Boron
57	2172352E	Pole	California City
58	2172351E	Pole	California City
59	4028725E	Pole	California City
60	525955	Pole	California City
61	525594	Pole	California City
62	525593	Pole	California City
63	2110449E	Pole	California City
64	46041	Pole	California City
65	4705989E	Pole	California City
66	246044S	Pole	California City
67	4830000E	Pole	California City
68	46142S	Pole	California City
69	2179567E	Pole	California City
70	1899960E	Pole	California City
71	4177744E	Pole	California City
72	4177745E	Pole	California City
73	4177746E	Pole	California City
74	4177747E	Pole	California City
75	1572891E	Pole	California City

76	4787967E	Pole	California City
77	1572892E	Pole	California City
78	1849172E	Pole	California City
79	1572893E	Pole	California City
80	1572894E	Pole	California City
81	4029394E	Pole	California City
82	1572895E	Pole	California City
83	4739727E	Pole	California City
84	4937769E	Pole	California City
85	1572896E	Pole	California City
86	4101864E	Pole	California City
87	4101865E	Pole	California City
88	1572897E	Pole	California City
89	3030 Erica Avenue	Vault	Rosamond
90	3039 Erica Avenue	Vault	Rosamond
91	3117 Erica Avenue	Vault	Rosamond
92	3125 Erica Avenue	Vault	Rosamond
93	3133 Erica Avenue	Vault	Rosamond
94	3213 Erica Avenue	Vault	Rosamond
95	3225 Erica Avenue	Vault	Rosamond
96	3222 Erica Avenue	Vault	Rosamond
97	2330 Haymarket Street	Vault	Rosamond
98	2308 Haymarket Street	Vault	Rosamond
99	2278 Haymarket Street	Vault	Rosamond
100	2266 Haymarket Street	Vault	Rosamond
101	3106 Janine Avenue	Vault	Rosamond
102	3126 Janine Avenue	Vault	Rosamond
103	2264 Buss Court	Vault	Rosamond
104	2268 Buss Court	Vault	Rosamond
105	2272 Buss Court	Vault	Rosamond
106	3146 Janine Avenue	Vault	Rosamond
107	3208 Janine Avenue	Vault	Rosamond
108	3216 Janine Avenue	Vault	Rosamond
109	2259 Dwight Court	Vault	Rosamond
110	2267 Dwight Court	Vault	Rosamond
111	2274 Dwight Court	Vault	Rosamond
112	3256 Brabham Avenue	Vault	Rosamond
113	3309 Brabham Avenue	Vault	Rosamond
114	3317 Brabham Avenue	Vault	Rosamond

115	3356 Brabham Avenue	Vault	Rosamond
116	3411 Brabham Avenue	Vault	Rosamond
117	15309TWC	Pole	North Edwards
118	15306TWC	Pole	North Edwards
119	15307TWC	Pole	North Edwards
120	15308TWC	Pole	North Edwards
121	15310TWC	Pole	North Edwards

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspections:

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.

The following Charter Communications facilities required maintenance:

- 1218384E – the Charter Communication cable guard was damaged.
- 2172352E – a riser attached to the pole was damaged.
- 2172351E – a riser attached to the pole was damaged.

GO 95, Rule 56.2, Overhead Guys, Anchor Guys and Span Wire 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.

The down guy wire attached to each of the following poles was loose:

- 1122442E
- 246044S
- 46142S
- 4177745E

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

That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).

The ground moulding on each of the following poles was damaged:

- 541895E
- 1218388E
- 1702290E
- 2172352E
- 2172351E
- 46142S

GO 95, Rule 31.6, Abandoned Lines, states:

Lines or portions of lines permanently abandoned shall be removed by their owners so that such lines shall not become a public nuisance or a hazard to life or property. For the purposes of this rule, lines that are permanently abandoned shall be defined as those lines that are determined by their owner to have no foreseeable future use.

The Charter facilities on the following poles were permanently abandoned but not removed:

- 4129943E
- 46554

GO 95, Rule 37, Table 1, Case 5, Column B, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., requires communications service drops to have a minimum above ground clearance of 10 feet in areas accessible to pedestrians only.

The Charter Communication service drop supported on Pole number 4090063E had less than the minimum required 10 feet above ground clearance in an area accessible to pedestrians only.