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December 13, 2024

Public Utilities Commission

Dear Rickey Tse,

In response to the letter we received dated November 4, 2024 for the audit of Sebastian facilities for General Order violations. Sebastian has reviewed the items listed and specifies its response as follows:

Sebastian will have in place a comprehensive GO 128 inspection and maintenance program by the end of March 2025. This program will include a comprehensive inspection of all facilities on a rotating basis. All pedestals, manholes, vaults, covers, etc. will be inspected for compliance with the general order on a rotating basis ensuring each facility is inspected at least once every 5 years. Inspection records will be kept which will include inspectors' qualifications, identification of fire threat level, proper securement, GIS accuracy, ground rod placement, proper labeling, and all other requirements of GO 128. The maintenance of facilities will take place on the same schedule.

Item 1 Grounding Rods: Safety Impact Low. All identified missing grounding rods will be put in place within a 60 month interval and all uninspected facilities will also have ground rods within a 60 month interval.

Item 1 GIS Data: Safety Impact Low. Sebastian's GIS data is relatively new within the company. Ongoing efforts are in place to improve the accuracy of Sebastian's GIS data. Sebastian has budgeted for additional personnel in 2025 to bolster its ability to improve the accuracy of its GIS data.

Item 2: Identification of Manholes etc.: Safety Impact Low. All issues identified and those unidentified will be addressed with the inspection and maintenance program mentioned above.

Item 3: Excessive bending, Safety Impact Low. Location 116 is a case used for copper cable that is no longer in use. The locations that previously used this cable have been converted to fiber. Even though the facility is not in use we have corrected this issue by



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cleaning out the case and placing the cable back into it with a wider bend radius. With our ongoing efforts to improve the accuracy of our GIS data we will be identifying no longer in use “retired in place” facilities in our GIS data in the future.

Item 4: Handhole Security, Safety Impact Low. All issues identified and those unidentified will be addressed with the inspection and maintenance program mentioned above.

Item 5: Abandoned Lines, Safety Impact Low. All identified abandoned aerial service drops will be removed by the end of March 2025. Any additional abandoned aerial lines will be removed when/if discovered.

Item 6: Minimum Clearances of Wires, Safety Impact High. For locations 80, 85-86, the clearance height of the wires was not measured, they were approximated visually by the ESRB staff during the field visit. We have gone back through and have found clearances for all these locations to be 12 ft or more. The letter mentions GO 95 Rule 37 Table 1, Case 4.B which states the minimum clearance should be 15 ft.

These locations are service drops on private property over private driveways. For this reason we look to GO 95 Rule 54.8 B.(2)b which states:

B. Clearances above Ground, Buildings, Etc.

The vertical clearances of supply service drops above ground, buildings, etc., shall be not less than the minimum clearances specified in Rule 37, Table 1, Column B, with the following modifications:

...

(2) Above Private Thoroughfares and Other Private Property:

...

b) Residential Premises: *Over private driveways or lanes or other private property areas accessible to vehicles on premise used for residential purposes only, service drops shall have a vertical clearance not less than 12 feet.*

For these reasons we do not believe that the locations are in violation of GO 95 and the findings in the letter are inaccurate.



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Item 7: Strength of Polls, Safety Impact Moderate. All identified and unidentified issues with be repaired or resolved within 12 months.

Item 8: Vertical Ground Molding Missing, Safety Impact Moderate. All identified and unidentified issues with be repaired or resolved within 12 months.

Item 9: Riser Covers, Safety Impact Low. All identified and unidentified issues with be repaired or resolved within 12 months.

Item 10: Missing Ground Wire, Safety Impact Moderate. All identified and unidentified issues with be repaired or resolved within 12 months.

Third Party Observations: Third parties will be notified of the observations within 30 days.

If you have additional concerns or questions regarding this information, please contact me at 559-846-4893.

Sincerely,

Jason Tikijian
Regulatory Manager