

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



April 22, 2024

CA2024-1121

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”) East Ventura County Area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Stacey Ocampo and Sultan Tipu of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications’ East Ventura County Area from February 26, 2024 to March 1, 2024. The audit included a review of Charter Communications’ inspection and maintenance records and a field inspection 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 May 22, 2024, by electronic or hard copy, of all corrective measures taken by Charter Communications to remedy and prevent 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 also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Stacey Ocampo at (213) 266-4712 or Stacey.Ocampo@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
Stacey Ocampo, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground 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:

General Order (GO) 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 April 2023 to January 2024, Charter Communications completed 8 overhead work orders past Charter Communications' due date for corrective action. Additionally, as of the date of the audit, Charter Communications had 1 open overhead work order that was past Charter Communications' scheduled due date for corrective action.

III. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	1332062E	Pole	Newbury Park
2	1332061E	Pole	Newbury Park
3	1332060E	Pole	Newbury Park
4	1332059E	Pole	Newbury Park
5	1332058E	Pole	Newbury Park
6	1414597E	Pole	Newbury Park
7	1414596E	Pole	Newbury Park
8	1414598E	Pole	Newbury Park
9	1414599E	Pole	Newbury Park
10	1414600E	Pole	Newbury Park
11	1414901E	Pole	Newbury Park
12	3308Y	Pole	Newbury Park
13	1754058E	Pole	Thousand Oaks
14	1754057E	Pole	Thousand Oaks
15	3006434E	Pole	Thousand Oaks
16	GT129148	Pole	Thousand Oaks
17	3005002E	Pole	Thousand Oaks
18	4495301E	Pole	Thousand Oaks
19	1976730E	Pole	Thousand Oaks
20	2102463E	Pole	Thousand Oaks
21	1940404E	Pole	Thousand Oaks
22	1940403E	Pole	Thousand Oaks
23	1940402E	Pole	Thousand Oaks
24	1940401E	Pole	Thousand Oaks
25	1514595E	Pole	Thousand Oaks
26	4836002E	Pole	Thousand Oaks
27	4197930E	Pole	Thousand Oaks
28	1621118E	Pole	Thousand Oaks
29	4295474E	Pole	Thousand Oaks
30	1754151E	Pole	Thousand Oaks
31	1754152E	Pole	Thousand Oaks
32	4124927E	Pole	Thousand Oaks
33	4557105E	Pole	Moorpark
34	4557104E	Pole	Moorpark
35	4557106E	Pole	Moorpark
36	4557107E	Pole	Moorpark
37	4557108E	Pole	Moorpark
38	4557113E	Pole	Moorpark
39	4458389E	Pole	Moorpark
40	4557109E	Pole	Moorpark
41	4557464E	Pole	Moorpark

42	2239739E	Pole	Moorpark
43	2116409E	Pole	Moorpark
44	2116410E	Pole	Moorpark
45	2116411E	Pole	Moorpark
46	2116412E	Pole	Moorpark
47	2116413E	Pole	Moorpark
48	2116415E	Pole	Moorpark
49	2116416E	Pole	Moorpark
50	2116406E	Pole	Moorpark
51	1585579E	Pole	Simi Valley
52	1585580E	Pole	Simi Valley
53	1831493E	Pole	Simi Valley
54	1831494E	Pole	Simi Valley
55	4758981E	Pole	Simi Valley
56	1585598E	Pole	Simi Valley
57	1538969E	Pole	Simi Valley
58	1585512E	Pole	Simi Valley
59	1515845E	Pole	Simi Valley
60	4592434E	Pole	Simi Valley
61	1515842E	Pole	Simi Valley
62	4592433E	Pole	Simi Valley
63	1540557E	Pole	Simi Valley
64	1540558E	Pole	Simi Valley
65	1540559E	Pole	Simi Valley
66	1540560E	Pole	Simi Valley
67	1514836E	Pole	Simi Valley
68	1514837E	Pole	Simi Valley
69	1514838E	Pole	Simi Valley
70	1514839E	Pole	Simi Valley
71	2015738E	Pole	Simi Valley
72	1540556E	Pole	Simi Valley
73	1540555E	Pole	Simi Valley
74	1540553E	Pole	Simi Valley
75	1540552E	Pole	Simi Valley
76	1540551E	Pole	Simi Valley
77	4656969E	Pole	Simi Valley
78	4467644E	Pole	Simi Valley
79	1515407E	Pole	Simi Valley
80	1515408E	Pole	Simi Valley
81	2116405E	Pole	Moorpark
82	296092E	Pole	Moorpark
83	1856008E	Pole	Simi Valley
84	3002754E	Pole	Simi Valley
85	50 S. Ventu Park Road #204	Vault	Newbury Park
86	50 S. Ventu Park Road #208	Vault	Newbury Park

87	50 S. Ventu Park Road #210	Vault	Newbury Park
88	50 S. Ventu Park Road #244	Vault	Newbury Park
89	50 S. Ventu Park Road #221	Pedestal	Newbury Park
90	3911 Clearford Court	Vault	Westlake Village
91	3905 S Clearford Court	Vault	Westlake Village
92	3906 S Clearford Court	Vault	Westlake Village
93	3923 S Clearford Court	Vault	Westlake Village
94	31801 Village Brook Road	Pedestal	Westlake Village
95	948 Deerhill Road	Vault	Oak Park
96	962 Deerhill Road	Pedestal	Oak Park
97	6089 Alexander Court	Vault	Oak Park
98	969 Alexander Court	Vault	Oak Park
99	7193 Shakespear Place	Vault	Moorpark
100	7173 Shakespear Place	Pedestal	Moorpark
101	7125 Shakespear Place	Pedestal	Moorpark
102	15492 Dorris Court	Pedestal	Moorpark
103	15516 Dorris Court	Pedestal	Moorpark
104	1153 Catlin Street	Vault	Simi Valley
105	1193 Catlin Street	Pedestal	Simi Valley
106	1135 Catlin Circle	Vault	Simi Valley
107	1121 Catlin Circle	Vault	Simi Valley
108	1145 Waltham Road	Pedestal	Simi Valley
109	1134 Waltham Circle	Vault	Simi Valley
110	1158 Waltham Circle	Vault	Simi Valley

III. Field Inspection – Violations List

We 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.

Charter Communications' facilities on each of the following poles were not maintained for their intended use:

- Pole No. 4758981E - the riser cover attached to the pole was damaged.
- Pole number 3308Y – pole number was illegible.

Service drops were observed loose and not secured on each of the following poles:

- 1414597E
- 1414598E
- 1976730E

GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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 supporting pole 296092E was not taut.

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 attached to each of the following poles was damaged:

- 1414600E
- 4592434E
- 1540556E
- 1540560E
- 1514839E

GO 95, Rule 18.B, Reporting and Resolution of Safety Hazards Discovered by Utilities, Notifications of Safety Hazards, states in part:

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 company and/or facility owner of such safety hazard(s) no later than 10 business days after the discovery.

Charter Communications did not report the following third-party safety hazard:

- Pole 1940404E - A tree was straining a third-party down guy wire causing the guy wire to deflect.

GO 95, Rule 34, Foreign Attachments, states in part:

Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, street light or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.

Pole No. 1754151E supported an unauthorized “Crossing” sign.

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.

Abandoned service drops were observed on the following poles:

- 1540552E
- 1414596E
- 1414598E

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

When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s).

A Charter communications' conductor attached to each of the following poles was strained by vegetation:

- 1414901E
- 4592433E

GO 128, Rule 17.1, 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 [the] communication or supply lines and equipment.

The lid and locking mechanism of the pedestal located at 31801 Village Brook Rd were damaged and/or broken.