PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298

June 5, 2024 CA2024-1131

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush Street, 5th Floor
San Francisco, CA 94108

SUBJECT: Audit of AT&T South Orange County Construction Area

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye and Sultan Tipu of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T South Orange County Construction Area from April 22-26, 2024. The audit included a review of AT&T's South Orange County Construction Area inspection and maintenance records and a field inspection of AT&T's South Orange County Construction Area facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings of violations identified by staff is enclosed along with this letter. Please advise me no later than July 5, 2024, by electronic or hard copy, of all corrective measures taken by AT&T to remediate 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 Eric Ujiiye at (213) 620-2598 or Eric.Ujiiye@cpuc.ca.gov.

Sincerely,

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
Eric Ujiiye, Utilities Engineer, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

II. Field Inspection

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

No.	Structure ID	Structure Type	Location
1	P252293	Pole	San Juan Capistrano
2	4394122E	Pole	Silverado
3	4248411E	Pole	Silverado
4	4248412E	Pole	Silverado
5	4248413E	Pole	Silverado
6	4622165E	Pole	Silverado
7	4197463E	Pole	Silverado
8	4594208E	Pole	Silverado
9	4869792E	Pole	Silverado
10	4617663E	Pole	Silverado
11	424814E	Pole	Silverado
12	2251266E	Pole	Silverado
13	420596E	Pole	Silverado
14	4883824E	Pole	Silverado
15	4252143E	Pole	Silverado
16	4852592E	Pole	Silverado
17	1873896E	Pole	Silverado
18	4617414E	Pole	Silverado
19	1043771H	Pole	Silverado
20	4778155E	Pole	Silverado
21	27899 Silverado Canyon Rd.	Pole	Silverado
22	4778165E	Pole	Silverado
23	2333775E	Pole	Silverado

24	2030355E	Pole	Silverado
25	1326997E	Pole	Silverado
26	4926560E	Pole	Silverado
27	432968E	Pole	Silverado
28	1253599E	Pole	Silverado
29	2318800E	Pole	Silverado
30	4884045E	Pole	Silverado
31	4869761E	Pole	Silverado
32	2258546E	Pole	Silverado
33	4747489E	Pole	Silverado
34	2258547E	Pole	Silverado
35	2318781E	Pole	Silverado
36	4691602E	Pole	Silverado
37	1575093E	Pole	Silverado
38	P126828	Pole	San Clemente
39	637239H	Pole	San Clemente
40	P126996	Pole	San Clemente
41	156 Santa Margarita	Pole	San Clemente
42	637242H	Pole	San Clemente
43	P129411	Pole	San Clemente
44	Z25292	Pole	San Clemente
45	P211203	Pole	San Clemente
46	P25588	Pole	San Clemente
47	2402 Calle Monte Carlo	Handhole	San Clemente
48	2400 Calle Monte Carlo	Pedestal	San Clemente
49	2313 Calle Monaco	Pedestal	San Clemente
50	2309 Calle Monaco	Handhole	San Clemente
51	2306 Calle Monaco	Pedestal	San Clemente
52	2305 Calle Monte Cristo Ave	Pedestal	San Clemente
53	2311 Calle Monte Cristo Ave	Handhole	San Clemente
54	2313 Calle Monte Cristo Ave	Handhole	San Clemente
55	403 Avenida De La Riviera	Pedestal	San Clemente
56	502 Avenida De La Riviera	Handhole	San Clemente
57	2406 Calle Madiera	Handhole	San Clemente
58	31811 Via Belardes	Pedestal	San Juan Capistrano
59	26532 Paseo Belardes	Pedestal	San Juan Capistrano
60	26546 Paseo Belardes	Pedestal	San Juan Capistrano
61	31792 Via Belardes	Handhole	San Juan Capistrano
62	31736 Via Belardes	Pedestal	San Juan Capistrano

63	31726 Via Belardes	Handhole	San Juan Capistrano
64	31761 Via Belardes	Pedestal	San Juan Capistrano
65	26461 Calle Rio Vista	Pedestal	San Juan Capistrano
66	26451 Calle Rio Vista	Pedestal	San Juan Capistrano
67	26452 Calle Rio Vista	Pedestal	San Juan Capistrano
68	26452 Calle Rio Vista	Handhole	San Juan Capistrano
69	33131 Via La Pluma	SAI Box	San Juan Capistrano
70	33141 Via La Pluma	Pedestal	San Juan Capistrano
71	33112 Via La Pluma	Pedestal	San Juan Capistrano
72	25612 Mariner Drive	Pedestal	San Juan Capistrano
73	33055 Sea Breeze Court	Pedestal	San Juan Capistrano
74	33051 Sea Breeze Court	Pedestal	San Juan Capistrano
75	33035 Sea Breeze Court	Pedestal	San Juan Capistrano
76	SD 25612	SAI Box	San Juan Capistrano
77	Left SD25612	Pedestal	San Juan Capistrano
78	Right SD25612	Pedestal	San Juan Capistrano
79	4338525E	Pole	Santa Ana
80	1192179E	Pole	Santa Ana
81	2243564E	Pole	Santa Ana
82	4255768E	Pole	Santa Ana
83	2165886E	Pole	Santa Ana
84	4298995E	Pole	Santa Ana
85	1150301E	Pole	Santa Ana
86	1150246E	Pole	Santa Ana
87	970232E	Pole	Santa Ana
88	1253207E	Pole	Santa Ana
89	4801332E	Pole	Santa Ana
90	4299071E	Pole	Santa Ana
91	1253211E	Pole	Santa Ana
92	4801318E	Pole	Santa Ana
93	716134H	Pole	Santa Ana
94	716131H	Pole	Santa Ana
95	716132H	Pole	Santa Ana
96	761133H	Pole	Santa Ana
97	2256021E	Pole	Santa Ana
98	1270137E	Pole	Santa Ana
99	1252822E	Pole	Santa Ana
100	4009099E	Pole	Santa Ana
101	4299000E	Pole	Santa Ana

102	1175956E	Pole	Santa Ana
103	1150306E	Pole	Santa Ana
104	225936E	Pole	Santa Ana
105	225940E	Pole	Santa Ana
106	637131H	Pole	Santa Ana
107	225942E	Pole	Santa Ana
108	2341108E	Pole	Santa Ana
109	207825E	Pole	Santa Ana
110	2286239E	Pole	Santa Ana

III. Field Inspection - Violations List

My staff observed the following violations during the field inspections:

GO 95, Rule 18-A3, Resolution of Potential Violations of General Order 95 and Safety Hazards, states:

> *(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 10 business days after the discovery.*

An overbuilt third-party communications conductor span, supported on Pole 2030355E, was sagging and contacting the AT&T conductor. AT&T did not document and report this safety hazard to the responsible third-party during AT&T's latest inspection.

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 AT&T facilities required maintenance:

- Pole in front of 27899 Silverado Canyon Rd: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole 4778165E: the lashing wire on a conductor span was broken.
- Pole 4778165E: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole 2030355E: a communications cable was dangling from the communications level to the ground, approximately one foot away from the surface of the pole (instead of being secured to the pole).
- Pole 432968E: a communications cable was dangling from the communications level to the ground, with a portion of the cable lying on the ground.
- Pole P129411: a traffic visibility strip was partially detached from the pole.
- Pole Z25292: a riser cover bracket near the base of the pole was partially detached.
- Pole Z25292: the attachment point between the down guy anchor and down guy wire supporting AT&T facilities was buried beneath the surface.
- Pole P211203: two traffic visibility strips were damaged and protruding from the surface of the pole.
- Pole 761133H (or 716133H located at 3117 Kilson Drive): a pole step supported at the public level was damaged.
- Pole 1252822E: a junction box supported at the communications level of the pole was open, exposing the wires and internal connections.

- Pole 225936E: AT&T did not transfer its facilities from the previous pole to the new pole, creating the issue of detached risers and an abandoned down guy anchor.
- Pole 207825E: a wound-up section of conductor supported on the pole was attached by temporary rope and left to hang 10 feet above the ground.

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 following AT&T facilities were permanently abandoned and should be removed:

- Pole P126996: two abandoned service drops were wrapped around the pole.
- Pole 4255768E: one abandoned service drop was supported on the pole.
- Pole 2165886E: one abandoned service drop was wrapped around the pole.
- Pole 4298995E: multiple abandoned service drops were hanging from the conductor span near the pole.
- Pole 637131H: one abandoned service drop was wrapped around the pole.

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 evidence abrasions 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 conductor span supported on Pole 4778165E was strained and deflected by a tree growing midspan next to the conductor.

GO 95, Rule 37: Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc. Table 1, Column B, Case 3 requires the minimum vertical clearance of "Communication Conductors (Including Open Wire, Cables and Service Drops)" that are "Crossing or along thoroughfares in urban districts or crossing thoroughfares in rural districts," to be 18 feet.

The communications conductor span supported on Pole 4252143E had a vertical clearance of 15 feet, 8 inches above Modjeska Canyon Road near the intersection with Santiago Cyn Road, which is less than the minimum requirement of 18 feet.

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 3 requires the minimum vertical clearance of "Communication Conductors (Including

Open Wire, Cables and Service Drops)" from "Communication Conductors and Supply Drops" not supported on the same pole to be 24 inches.

The communications conductor span supported on Pole Z25292 was touching a lower communications conductor span not supported on the same pole.

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8 requires the minimum vertical clearance of "Communication Conductors (Including Open Wire, Cables and Service Drops)" from "Communication Conductors and Supply Drops" supported on the same pole to be 12 inches.

An AT&T service drop on Pole 637239H was wrapped around a third-party communications service drop at the property in which the service drop was servicing.

GO 95, Rule 38: Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum vertical clearance of "Communication Conductors (Including Open Wire, Cables and Service Drops)" from "Guys and span wires passing conductors on the same pole" to be 3 inches.

A service drop on Pole 2333775E was touching a span guy wire (at mid-span) supported on the same pole.

GO 95, Rule 86.2, 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 Pole P252293 that is supporting AT&T facilities on the pole was not taut.

GO 95, Rule 84.6-B, 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...*

On the pole located in front of 27899 Silverado Canyon Rd., the ground moulding was not covering a 2-foot section of ground wire at the public level (approximately four feet above the ground).

GO 95, Rule 84.6-F, Protective covering, states in part:

> *Protective covering shall be attached to poles, crossarms and structures by means of corrosion–resistant straps, lags or staples which are adequate to maintain such covering in a fixed position.*

The riser cover on each of the following poles was not adequately attached to maintain the covering in a fixed position:

- Pole 4852592E: the portion of the riser cover closest to the ground was not secured to the surface of the pole.
- Pole 1253207E: a riser cover was missing a fastener on the portion of the riser cover near the base of the pole.
- Pole 1253207E: a riser cover bracket near the base of the pole was partially detached, therefore not securely fastening the riser to the pole.

GO 95, Rule 87.7-D.1, Covered from Ground Level to 8 Feet above the Ground, states in part**:**

> *Risers shall be protected from the ground level to a level not less than 8 feet above the ground…*

The riser attached to each of the following poles was not protected from ground level to 8 feet above the ground:

- Pole 4852592E: the conduit containing the riser was damaged near the base of the pole, exposing the riser cable.
- Pole 2030355E: the riser installed on to the pole was not covered from the ground level to 8-feet above the ground.

GO 128, Rule 42.7, Covers, states in part:

> *Manholes and handholes, while not being worked in shall be securely closed by covers of sufficient strength to sustain such loads as may reasonably be imposed upon them, and arrangement shall be such that a tool or appliance shall be required for their opening and cover removal.*

The following handholes were not securely closed:

- Handhole located near 2309 Calle Monaco: the handhole cover was fractured through the middle of the composite fiberglass cover.
- Pedestal 26461 Calle Rio Vista: the cover for the pedestal was missing the locking screw, allowing the cover to be removed without a tool.

- Pedestal 33131 Via La Pluma: the cover for the pedestal was not locked, allowing the cover to be removed without a tool.
- Pedestal 33055 Sea Breeze Court: the cover for the pedestal was missing the locking screw, allowing the cover to be removed without a tool.

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.*

The Handhole located at 26452 Calle Rio Vista was no longer in use, being filled with dirt and containing no facilities.