

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 7, 2024

CA2024-1133

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

SUBJECT: Audit of Charter Communications Ventura County West District

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Jose Lastra of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications Ventura County West District from April 29-May 3, 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 September 9, 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, you can contact Jose Lastra (213) 507-1438 or jose.lastra@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: Leslie Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspection records
- Patrol records
- Completed and pending corrective action work orders
- Safety hazard notifications
- Pole-loading calculations
- Charter's documented inspection program

II. Records Review – Violations List

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

GO 95, Rule 80.1-A2, 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.

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's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 57 overhead patrol inspections of its nodes past Charter's scheduled due date. Additionally, Charter's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 179 overhead detailed inspections of its nodes past Charter's scheduled due date.

GO 128, Rule 17.2, Inspection, states:

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.

Charter's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 6 underground patrol inspections of its nodes past Charter's scheduled due date. Additionally, Charter's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 3 underground detailed inspections of its nodes past Charter's scheduled due date.

GO 95, Rule 18-B1, Maintenance Programs, states in part:

Companies shall undertake corrective actions within the time periods stated for each of the priority levels set forth below. Scheduling of corrective actions within the time periods below may be based on additional factors, including the following factors, as appropriate ...

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's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 302 overhead work orders past Charter's due date for corrective action. Additionally, as of the date of the audit, Charter had 35 open overhead work orders that were past Charter's scheduled due date for corrective action.

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's records indicated that from January 1, 2018 to January 31, 2023, Charter completed 15 underground work orders past Charter's 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	Structure Type	Location
1	1203836E	Wood Pole	Ventura/Oakview
2	4628323E	Wood Pole	Ventura/Oakview
3	4953687E	Wood Pole	Ventura/Oakview
4	4452556E	Wood Pole	Ventura/Oakview
5	4339833E	Wood Pole	Ventura/Oakview
6	4628322E	Wood Pole	Ventura/Oakview
7	729704E	Wood Pole	Ventura/Oakview
8	4625484E	Wood Pole	Ventura/Oakview
9	1203839E	Wood Pole	Ventura/Oakview
10	4628309E	Wood Pole	Ventura/Oakview
11	1138997E	Wood Pole	Ventura/Oakview
12	1203937E	Wood Pole	Ventura/Oakview
13	4628308E	Wood Pole	Ventura/Oakview
14	526713H	Wood Pole	Ventura/Oakview
15	1203938E	Wood Pole	Ventura/Oakview
16	4936800E	Wood Pole	Ventura/Oakview
17	15555TWC	Wood Pole	Ventura/Oakview
18	1311612E	Wood Pole	Ventura/Oakview
19	360444E	Wood Pole	Ventura/Oakview
20	2334652E	Wood Pole	Ventura/Oakview
21	2334651E	Wood Pole	Ventura/Oakview
22	4563170E	Wood Pole	Ventura/Oakview
23	1089204E	Wood Pole	Ventura/Oakview
24	1089203E	Wood Pole	Ventura/Oakview
25	1155901E	Wood Pole	Piru
26	2294484E	Wood Pole	Piru
27	294873E	Wood Pole	Piru
28	294872E	Wood Pole	Piru
29	294870E	Wood Pole	Piru
30	294868E	Wood Pole	Piru
31	4071104E	Wood Pole	Piru
32	4547411E	Wood Pole	Piru
33	1702969E	Wood Pole	Piru
34	15447TWC	Wood Pole	Piru
35	1658169E	Wood Pole	Piru
36	504161H	Wood Pole	Piru
37	504162H	Wood Pole	Piru
38	101325H	Wood Pole	Piru
39	101324H	Wood Pole	Piru
40	492944H	Wood Pole	Piru
41	887015E	Wood Pole	Piru
42	121267E	Wood Pole	Piru

43	1055038E	Wood Pole	Piru
44	1055039E	Wood Pole	Piru
45	1130723E	Wood Pole	Piru
46	1130724E	Wood Pole	Piru
47	2096850E	Wood Pole	Piru
48	1130725E	Wood Pole	Piru
49	1561537E	Wood Pole	Santa Paula
50	1561536E	Wood Pole	Santa Paula
51	1561535E	Wood Pole	Santa Paula
52	1561534E	Wood Pole	Santa Paula
53	1281831E	Wood Pole	Santa Paula
54	1281830E	Wood Pole	Santa Paula
55	1281832E	Wood Pole	Santa Paula
56	4651163E	Wood Pole	Santa Paula
57	4638781E	Wood Pole	Santa Paula
58	1281834E	Wood Pole	Santa Paula
59	Across the street from 1281834E	Wood Pole	Santa Paula
60	1490018E	Wood Pole	Santa Paula
61	1281836E	Wood Pole	Santa Paula
62	1518624E	Wood Pole	Santa Paula
63	1526335E	Wood Pole	Santa Paula
64	15390TWC	Wood Pole	Santa Paula
65	1204036E	Wood Pole	Santa Paula
66	4672284E	Wood Pole	Santa Paula
67	4625966E	Wood Pole	Santa Paula
68	360874E	Wood Pole	Santa Paula
69	1204027E	Wood Pole	Santa Paula
70	No pole tag, 1 pole east from 1204027E	Wood Pole	Santa Paula
71	4335964E	Wood Pole	Santa Paula
72	4734132E	Wood Pole	Santa Paula
73	1204026E	Wood Pole	Santa Paula
74	1204025E	Wood Pole	Santa Paula
75	1204028E	Wood Pole	Santa Paula
76	1204029E	Wood Pole	Santa Paula
77	1204030E	Wood Pole	Santa Paula
78	4611967E	Wood Pole	Santa Paula
79	4464776E	Wood Pole	Somis
80	1633696E	Wood Pole	Somis
81	9781	Wood Pole	Somis
82	983284E	Wood Pole	Somis
83	983283E	Wood Pole	Somis
84	983282E	Wood Pole	Somis
85	893281E	Wood Pole	Somis
86	983280E	Wood Pole	Somis
87	983279E	Wood Pole	Somis

88	983278E	Wood Pole	Somis
89	1856397E	Wood Pole	Camarillo
90	1856398E	Wood Pole	Camarillo
91	1856399E	Wood Pole	Camarillo
92	1856400E	Wood Pole	Camarillo
93	1856301E	Wood Pole	Camarillo
94	1856302E	Wood Pole	Camarillo
95	1856303E	Wood Pole	Camarillo
96	1856304E	Wood Pole	Camarillo
97	4661284E	Wood Pole	Camarillo
98	1856306E	Wood Pole	Camarillo
99	CM 52 197 1-2 Ridgeview St	Pedestal	Camarillo
100	184 Appletree Ave	Vault	Camarillo
101	168 Appletree Ave	Vault	Camarillo
102	156 Appletree Ave	Vault	Camarillo
103	140 Appletree Ave	Vault	Camarillo
104	120 Appletree Ave	Pedestal	Camarillo
105	107 Appletree Ave	Vault	Camarillo
106	2416 Twin Oak Dr	Vault	Oxnard
107	2414 Twin Oak Dr	Pedestal	Oxnard
108	2410 Twin Oak Dr	Vault	Oxnard
109	2404 Twin Oak Dr	Vault	Oxnard
110	2405 Twin Oak Dr	Pedestal	Oxnard
111	2421 Northbrook Dr	Vault	Oxnard
112	2451 Northbrook Dr	Vault	Oxnard
113	852 Sapphire Ave	Vault	Ventura
114	873 Sapphire Ave	Vault	Ventura
115	859 Sapphire Ave	Vault	Ventura
116	817 Sapphire Ave	Vault	Ventura
117	799 Sapphire Ave	Pedestal	Ventura
118	761 Sapphire Ave	Pedestal	Ventura
119	716 Sapphire Ave	Vault	Ventura

IV. Field Inspection – Violations List

My staff observed the following violations during the field inspection portion of the audit:

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

- 729704E – the eye portion of the down guy anchor supporting a Charter down guy wire was buried.
- 15555TWC – the Charter down guy wire was cutting through a nearby tree; additionally, the eye portion of the down guy anchor was buried.
- 4547411E – at midspan, a Charter conductor was contacting a flagpole
- 15447TWC – the Charter conduit riser on the pole was damaged, exposing the communications conductor
- 1561535E – a Charter riser conduit was not properly secured to the pole.
- 1204036E – the eye portion of the down guy anchor supporting a Charter down guy wire was buried.

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.

A Charter communications cable attached to each of the following poles was permanently abandoned and not removed:

- 4452556E – a Charter service drop was hanging from the conductor
- 4339833E – a Charter service drop was hanging from the conductor span
- 1204025E – a Charter communications conductor was cut and left hanging

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.

A Charter communications conductor supported on each of the following poles had less than 12 inches of vertical clearance from a third-party communications conductor supported on the same pole:

- Pole 4936800E: a Charter service drop was contacting a third-party communications service drop.
- Pole 1089204E: a Charter communications conductor was contacting a third-party communications conductor at midspan.
- Pole 4651163E: a Charter communications conductor was contacting a third-party communications conductor at midspan.
- Pole 4625966E: a Charter service drop was entangled with a third-party communications conductor.
- Pole 1204026E: a Charter service drop was contacting a third-party communications service drop.
- Pole 1204025E: a Charter service drop was contacting a third-party communications service drop.
- Pole 983284E: a Charter communications conductor was contacting a third-party communications service drop and conductor.
- Pole 983282E: a Charter communications conductor was contacting a third-party communications service drop.
- Pole 983280E: a Charter service drop was entangled with a third-party communications conductor.
- Pole 983279E: a Charter service drop was contacting a third-party communications conductor.
- Pole 983278E: a Charter communications conductor and service drop were contacting a third-party communications conductor and service drop.
- Pole 1856400E: a Charter communications conductor was contacting a third-party communications conductor.

GO 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 19 requires the minimum radial clearance between guys and span wires passing communication conductors supported on the same poles to be three inches.

A down guy wire supporting Pole 1204025E was contacting a Charter communications conductor supported on the same pole.

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 Charter communications conductor span supported on Pole 1203938E was contacting a third-party communications conductor span not supported on the same pole.

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:

- 4628309E
- 101324H
- Pole across street from Pole 1281834E
- 1518624E
- 1856400E

GO 95, Rule 84.4 –D4(a) Clearances, From Poles and Crossarms, From Nonclimbable Street Lighting or Traffic Signal Poles or Standards states in part:

When passing street lighting, traffic signal poles or standards (including mastarms, brackets and lighting fixtures) a clearance of 12 inches, as specified in Table 1, Case 10, Column B, may be reduced when suitable insulation for the highest voltage of open wire involved and mechanical protection from abrasion is provided where necessary. Such mechanical protection shall extend not less than 15 inches in each direction from centerline of pole, standard, attaching mastarm or fixture, whether passing above, below or alongside. There shall be no interference with light distribution from lighting fixtures and workers shall not be hampered or endangered in the performance of their duties.

At midspan, a Charter communications conductor supported on Pole 15447TWC was touching a streetlight.

GO 95, Rule 84.8-C3(b), Service Drops, Clearances above Ground and Buildings, Above Ground in Areas Accessible to Pedestrians Only, Residential Premises states in part:

Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10 foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.

The following Charter communications service drops had less than the minimum required above ground vertical clearance:

- Pole 983284E: A Charter communications service drop servicing a home across the street had an above ground vertical clearance of less than 8 feet, 6 inches.
- Pole 983283E: A Charter communications service drop servicing a nearby home had an above ground vertical clearance of less than 8 feet, 6 inches.

GO 95, Rule 84.8-C4, Service Drops, Clearances above Ground and Buildings, From Buildings and Structures states in part:

Service drops are not required to clear the roofs of buildings on the premises served any specified vertical distance. The vertical clearance above buildings on premises other than the one being served shall not be less than 8 feet, except that a reduction to not less than 2 feet is permitted under either of the following conditions.

The Charter service drop from Pole 1130724E was contacting the roof of the home it was not servicing.

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.

The Charter down guy wire attached to each the following poles was not taut:

- 1518624E
- 1633696E

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 following facilities required maintenance:

- The pedestal in front of 120 Appletree Ave in Camarillo, CA had an unsecured cover.
- The pedestal in front of 2414 Twin Oak Dr in Oxnard, CA had an unsecured cover.
- The pedestal in front of 2405 Twin Oak Dr in Oxnard, CA had a disconnected ground wire.
- The vault in front of 2451 Northbrook Dr in Oxnard, CA had a corroded ground rod.

GO 128, Rule 45.4, Private Communication Circuits, Other Private Communication Cables and Conductors, states in part:

Private communication cables and conductors, other than those treated in Rule 45.3 may, with permission of the structure owner, occupy the same duct system and manholes or other underground structures with communication systems for public use provided that they comply with all these rules applying to communication systems for public use.

The vault in front of 2410 Twin Oak Dr in Oxnard, CA had a third-party communication conductor which entered the structure from a side wall, without permission of Charter.