

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



June 11, 2024

CA2024-1134

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

SUBJECT: Audit of AT&T East Kern County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Kyle King and Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's East Kern County District from May 6-10, 2024. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T's communication 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 July 11, 2024, by electronic or hard copy, of all corrective measures taken by AT&T 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 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: 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
Kyle King, Utilities Engineer, 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.
- AT&T's Intrusive Inspection of Wood Poles
- AT&T's Overhead Lines Maintenance Plan
- AT&T's 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 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.

GO 95 Rule 18, Resolution of Potential Violations of General Order 95 and Safety Hazards, 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.

AT&T's records indicated that from 2018 to 2024, AT&T completed 5 overhead work orders past AT&T's 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	R2772	Padmount	Mojave
2	1183955E	Pole	Mojave
3	1183954E	Pole	Mojave
4	1183956E	Pole	Mojave
5	1183957E	Pole	Mojave
6	1183958E	Pole	Mojave
7	20843T	Pole	Mojave
8	9823T	Pole	Mojave
9	1184800E	Pole	Mojave
10	1184799E	Pole	Mojave
11	1184798E	Pole	Mojave
12	1184797E	Pole	Mojave
13	1184796E	Pole	Mojave
14	1184795E	Pole	Mojave
15	2338877E	Pole	Mojave
16	2038116E	Pole	Mojave
17	487270E	Pole	Mojave
18	294429E	Pole	Mojave
19	1162514E	Pole	Mojave
20	1162515E	Pole	Mojave
21	1433958E	Pole	Mojave
22	549658E	Pole	Mojave
23	4418287E	Pole	Mojave
24	549660E	Pole	Mojave
25	549661E	Pole	Mojave
26	568114E	Pole	Mojave
27	1595 Lincoln Street	Pedestal	Rosamond
28	3050 Lincoln Street	Pole	Rosamond
29	20918T	Pole	Rosamond
30	1354897E	Pole	Rosamond
31	20919T	Pole	Rosamond
32	1595 Lincoln Street	Pole	Rosamond
33	20920T	Pole	Rosamond
34	1594 Monte Vista Ave.	Pole	Rosamond
35	4632701E	Pole	Rosamond
36	1589 Monte Vista Ave.	Pole	Rosamond
37	5591T	Pole	Rosamond
38	5592T	Pole	Rosamond
39	5593T	Pole	Rosamond
40	3316 15 th Street West	Pedestal	Rosamond
41	3300 15 th Street West	Pedestal	Rosamond
42	1474 Richfield Ave.	Pedestal	Rosamond

43	4205762E	Pole	Rosamond
44	4260730E	Pole	Rosamond
45	3100 15 th Street	Pole	Rosamond
46	4202824E	Pole	Rosamond
47	4145322E	Pole	Rosamond
48	5576T	Pole	Rosamond
49	5575T.	Pole	Rosamond
50	5574T	Pole	Rosamond
51	5573T	Pole	Rosamond
52	5572T	Pole	Rosamond
53	5962 Margaritha Lane	Pedestal	Rosamond
54	1103078E	Pole	Rosamond
55	1103078E	Pedestal	Rosamond
56	1070631E	Pole	Rosamond
57	4412973E	Pole	Rosamond
58	4651098E	Pole	Rosamond
59	1070634E	Pole	Rosamond
60	4628755E	Pole	Rosamond
61	1070636E	Pole	Rosamond
62	1070637E	Pole	Rosamond
63	1190543E	Pole	Rosamond
64	1190542E	Pole	Rosamond
65	1190544E	Pole	Rosamond
66	1190545E	Pole	Rosamond
67	4777964E	Pole	Rosamond
68	1190547E	Pole	Rosamond
69	2334152E	Pole	Rosamond
70	2334153E	Pole	Rosamond
71	2334154E	Pole	Rosamond
72	1201 Hook Ave.	Pedestal	Rosamond
73	1125 Oakwood Lane	Pedestal	Rosamond
74	1041 Oakwood Lane	Pedestal	Rosamond
75	1025 Oakwood Lane	Pedestal	Rosamond
76	1101 Oakwood Lane	Pedestal	Rosamond
77	3657 Fernwood Street	Pedestal	Rosamond
78	1100 Sequoia Lane	Pedestal	Rosamond
79	3708 Cornelius Center	Pedestal	Rosamond
80	1040 Wedgewood Ave.	Pedestal	Rosamond
81	3749 Fernwood Ave.	Pedestal	Rosamond
82	3740 United Street	Pedestal	Rosamond
83	3832 United Street	Pedestal	Rosamond
84	1049 Armstrong Ave.	Pedestal	Rosamond
85	3825 Fernwood Street	Pedestal	Rosamond
86	1049 Barrington Ave.	Pedestal	Rosamond
87	1033 Barrington Ave.	Pedestal	Rosamond
88	1017 Barrington Ave.	Pedestal	Rosamond

89	3549 Fernwood Street	Pedestal	Rosamond
90	1132 Heatherfield Ave.	Pedestal	Rosamond
91	1049 Heatherfield Ave.	Pedestal	Rosamond
92	1025 Heatherfield Ave.	Pedestal	Rosamond
93	1024 Holloway Ave.	Pedestal	Rosamond
94	1116 Holloway Ave.	Pedestal	Rosamond
95	1108 Clover Dale Court	Pedestal	Rosamond
96	1040 Clover Dale Court	Pedestal	Rosamond
97	3412 Stetson Ave.	Pedestal	Rosamond
98	3400 Sundance Ave.	Pedestal	Rosamond
99	3224 Campbell Street	Pedestal	Rosamond
100	3300 Campbell Street	Pedestal	Rosamond
101	3330 Sundance Ave.	Pedestal	Rosamond
102	3312 Sundance Ave.	Pedestal	Rosamond
103	3230 Mesa Street	Pedestal	Rosamond
104	3306 Mesa Street	Pedestal	Rosamond
105	3300 Sundance Ave.	Pedestal	Rosamond
106	3237 Marble Street	Pedestal	Rosamond
107	3311 Marble Street	Pedestal	Rosamond
108	3325 Cactus Circle Ave.	Pedestal	Rosamond
109	1014680E	Pole	Rosamond
110	4248174E	Pole	Rosamond
111	1014683E	Pole	Rosamond
112	LOC.1 P.1758	Pole	Rosamond
113	LOC.B P.1802	Pole	Rosamond
114	LOC.A P.2995	Pole	Rosamond
115	LOC.9 P.2957	Pole	Rosamond
116	LOC.8 P.2949	Pole	Rosamond
117	LOC.7 P.2919	Pole	Rosamond
118	LOC.6 P.2901	Pole	Rosamond
119	LOC.5 P.2885	Pole	Rosamond
120	LOC.4 P.2875	Pole	Rosamond
121	LOC.2 P.2809	Pole	Rosamond
122	LOC.D P.2753	Pole	Rosamond

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 AT&T facilities on each of the following poles were not maintained for their intended use:

- 2334154E – AT&T had a damaged down guy.
- 1354897E – AT&T had a damaged lashing wire.

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.

The following AT&T poles had unauthorized attachments:

- 4248174E
- 9823T
- 20919T
- 1190547E
- 1190543E

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.

AT&T service drops attached to each of the following poles were cut, permanently abandoned, and should be removed:

- 4777964E
- 1184798E
- 549658E
- 1354897E

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.

The AT&T facilities on the following poles had less than 12 inches of vertical clearance from a communications conductor supported on the same pole:

- Pole 5572T: an AT&T service drop was touching a third-party communications service drop.
- Pole 549661E: an AT&T communications conductor was touching a third-party communications conductor.
- Pole 1162515E: an AT&T service drop was touching 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 number 1070636E was touching an AT&T communications conductor supported on the same pole.

GO 95, Rule 92.3, Vertical Runs, Risers, Ground Wires and Hardware, states in part:

Vertical runs, risers, ground wires and hardware of supply lines shall have a clearance of not less than 1 1/2 inches from similar equipment of communication lines and from similar equipment of supply lines of different ownership.

On the surface of Pole number 294429E, an SCE ground wire was touching an AT&T ground wire.

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 pedestal at each of the following locations was damaged:

- The pedestal located at 1125 Oakwood Lane in Rosamond, CA
- The pedestal located at 3749 Fernwood Ave. in Rosamond, CA
- The pedestal located at 1017 Barrington Ave. in Rosamond, CA
- The pedestal located at 3306 Mesa Street in Rosamond, CA
- The pedestal located at 3311 Marble Street in Rosamond, CA