PUBLIC UTILITIES COMMISSION
505 VAN NESS AVENUE
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April 12, 2024 CA2024-1168

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

SUBJECT: Audit of Charter Communications West Los Angeles County area

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujiiye and Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter Communications' West Los Angeles County Area from January 22-26, 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). An itemized copy of the audit findings of violations identified by staff is enclosed along with this letter. Please advise me no later than May 13, 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 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, ESRB, 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.
- Charter Communications' Intrusive Inspection of Wood Poles
- 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 January 1, 2023 to January 10, 2024, Charter Communications completed 2 aerial work orders past Charter Communications' due date for corrective action.

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 44.1, Installation and Reconstruction, states in part:

> *Lines and elements of lines, upon installation or reconstruction, shall provide as a minimum the safety factors specified in Table 4. The design shall consider all supply and communication facilities planned to occupy the structure. For purposes of this rule, the term "planned" applies to the facilities intended to occupy the structure that are actually known to the constructing company at the time of design.*

For the following poles, Charter Communications' pole loading record [see "Charter Pole Calc – 9-27-23 (5 poles).pdf"] contained incorrect height values:

- Pole number 9573M (1st page): Charter Communications' pole loading record incorrectly showed a 55-foot Class 3 pole with a setting depth of 6.83 feet, implying a pole height above ground of 55-6.83 = 48.17 feet. The actual pole height above ground was measured at approximately 43 feet. Additionally, the pole class tag indicated it to be a 50-foot pole.
- Pole number 9571M (12th page): Charter Communications' pole loading record incorrectly showed a 55-foot Class 3 pole with a setting depth of only 0.83 feet. The actual pole height above ground was measured at approximately 53 feet. Additionally, the pole class tag indicated it to be a 60-foot pole.

III. Field Inspection

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

No.	Structure Identification	Type of Structure	Location
1	141037E	Pole	Redondo Beach
2	1983652E	Pole	Redondo Beach
3	1803099E	Pole	Redondo Beach
4	4701474E	Pole	Redondo Beach
5	404632E	Pole	Redondo Beach
6	946030E	Pole	Redondo Beach
7	4470453E	Pole	Redondo Beach
8	2381364E	Pole	Redondo Beach
9	1983775E	Pole	Redondo Beach
10	1944369E	Pole	Redondo Beach
11	1983776E	Pole	Redondo Beach
12	4969862E	Pole	Redondo Beach
13	2141354E	Pole	Redondo Beach
14	2063904E	Pole	Redondo Beach
15	2063903E	Pole	Redondo Beach
16	2246005E	Pole	Redondo Beach
17	4940052E	Pole	Redondo Beach
18	4574100E	Pole	Redondo Beach
19	2140968E	Pole	Redondo Beach
20	4322404E	Pole	Redondo Beach
21	GT16796	Pole	Redondo Beach
22	631605E	Pole	Redondo Beach
23	4402577E	Pole	Redondo Beach
24	3008267E	Pole	Redondo Beach
25	817950H	Pole	Lomita
26	2103540E	Pole	Lomita
27	817949H	Pole	Lomita
28	817948E	Pole	Lomita
29	782047E	Pole	Lomita
30	192626E	Pole	Lomita
31	1283034E	Pole	Lomita
32	782041E	Pole	Lomita
33	4192622E	Pole	Lomita
34	4912121E	Pole	Lomita
35	817947H	Pole	Lomita
36	25534 Pennsylvania Ave	Pole	Lomita

37	817945H	Pole	Lomita
38	817944H	Pole	Lomita
39	817943H	Pole	Lomita
40	2403 255th Street	Pole	Lomita
41	890243E	Pole	Lomita
42	2064242E	Pole	Lomita
43	672104E	Pole	Torrance
44	NW 60’ of Del Amo Blvd and Van Ness Ave	Vault	Torrance
45	4268074E	Pole	Torrance
46	1752242E	Pole	Torrance
47	321375E	Pole	Torrance
48	9570M	Pole	Torrance
49	9571M	Pole	Torrance
50	9572M	Pole	Torrance
51	9573M	Pole	Torrance
52	1402291E	Pole	Torrance
53	1232503E	Pole	Torrance
54	684992E	Pole	Torrance
55	1016383H	Pole	Torrance
56	234013E	Pole	Torrance
57	30’ East Runway Rd. and Para Way	Vault	Playa Vista
58	6502 Para Way	Vault	Playa Vista
59	13041 S. Icon Circle	Vault	Playa Vista
60	13049 S. Icon Circle	Vault	Playa Vista
61	13071 W. N. Icon Circle	Vault	Playa Vista
62	6400 Seawalk Drive	Vault	Playa Vista
63	13079 W N Icon Circle	Vault	Playa Vista
64	13078 W N Icon Circle	Vault	Playa Vista
65	13076 W N Icon Circle	Vault	Playa Vista
66	13062 Discovery Creek	Vault	Playa Vista
67	13060 Discovery Creek	Vault	Playa Vista
68	13050 Discovery Creek	Vault	Playa Vista
69	13042 W N Icon Circle	Vault	Playa Vista
70	6770 ½ Seabluff Drive	Padmount Node 1	Playa Vista
71	6770 ½ Seabluff Drive	Padmount Node 2	Playa Vista
72	6770 ½ Seabluff Drive	Vault	Playa Vista
73	6400 Cresent Park	Vault	Playa Vista
74	SE of Pacific Promenade and Cresent Park East	Vault	Playa Vista

75	NE of Pacific Promenade and Cresent Park East	Vault	Playa Vista
76	13215 ½ Cresent Park East	Vault	Playa Vista
77	5710 Cresent Park East	Vault	Playa Vista
78	5625 Cresent Park West	Vault	Playa Vista
79	5721 Cresent Park West	Vault	Playa Vista
80	6565 Cresent Park West	Vault	Playa Vista
81	12500 Osprey Lane	Vault	Los Angeles
82	12476 Osprey Lane	Vault	Los Angeles
83	12452 Osprey Lane	Vault	Los Angeles
84	5698 Goldeneye Court	Vault	Los Angeles

IV. Field Inspection - Violations List

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

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.*

During its latest inspection, Charter Communications did not document and report the following safety hazard to the responsible third party.

- Pole 1983652E: A third-party communications company service drop was touching a Charter Communication's service drop at the property being serviced.
- Pole 4701474E: A third-party communications company service drop was taped to a Charter Communications' service drop.
- Pole 4470453E: A third-party communications company messenger guy wire was damaged and not supporting the conductor span.
- Pole 2063904E: A third-party communication company riser was not attached to the surface of the pole.
- Pole 1232503E: Multiple cables were attached to a down guy wire and entering an AT&T service cabinet.

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 poles supported Charter Communications facilities that required maintenance:

- Pole 4470453E: A conduit riser bracket was damaged and no longer supporting the conduit riser to the pole.
- Pole 2141354E: A section of riser was not secured to the surface of the pole 8-feet above ground level.
- Pole 3008267E: The conductor span had damaged lashing wire.
- Pole 817950E: A riser conduit attachment bracket was damaged and detached 3-feet above ground level.

- Pole 817948E: The down guy wire attached at Charter Communications' level had a damaged down guy marker.
- Pole 4912121E: A 8-foot section of communications cable was not properly secured to the messenger guy wire.
- Pole 817947H: The conductor span had damaged lashing wire.
- Pole 321375E: The attachment point of the down guy wire to the down guy anchor was buried in 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 down guy wire attached to Pole number 321375E was permanently abandoned and should be removed.

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

The following poles supported Charter Communications conductors that had less than the minimum required vertical clearance of 12 inches from a third-party communications cable.

- Pole 404632E: A communications cable span was touching a third-party communications cable span that is supported on the same crossarm.
- Pole 946030E: A communications cable span, multiple service drops, and an amplifier were touching a lower third-party communications cable span that is supported on the same crossarm.
- Pole 1983775E: A service drop was touching a lower third-party communications cable span.
- Pole 4699862E: A communications cable was attached to the same location on the crossarm as a third-party communications cable.
- Pole GT16796: A service drop was utilizing the same conduit riser as a third-party communications cable.
- Pole 3008267E: A communications cable span was touching an underbuilt third-party communications cable span.
- Pole 817950H: A service drop was touching a third-party communications service drop.
- Pole 817947H: A service drop was touching a third-party communications service drop.

- Pole 890243E: A service drop was touching multiple third-party communications service drops supported on the lower level of the pole.
- Pole 2064242E: A service drop was wrapped around an underbuilt third-party communications cable span.

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)" and "Guys and span wires passing conductors supported on the same poles" to be 3 inches.

A Charter Communications' service drop, supported on a pole located 10 feet west from the northwest corner of 255th Street and Pennsylvania Avenue, was touching an SCE primary down guy wire.

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…*

The ground moulding attached to each of the following poles was damaged:

- Pole 817948E: A 3-foot section of ground moulding was missing at 2 feet above ground.
- An untagged pole located in front of 25534 Pennsylvania supported damaged ground moulding that exposed the ground wire near the base of 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 risers attached to each of the following poles was not protected from ground level to 8 feet above the ground:

- Pole 2103540E: The conduit covering the riser was broken near the base of the pole, exposing the riser cable.
- Pole 782047E: The 8-feet section of riser was not protected above the ground.

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 Charter Communications underground facilities required maintenance:

- A pedestal located at 6502 Para Way was missing the locking hardware to properly secure the cover.
- A pedestal located at 13041 South Icon Circle had an unlocked cover and damaged rack.
- A handhole located near 13050 Discovery Creek had a damaged ground wire.
- A handhole located at 12500 Osprey Lane containing a node was missing a grounding rod and ground wire.
- A handhole located at 12452 Osprey Lane containing a node was missing a grounding rod and ground wire.
- A handhole located at 5698 Goldeneye Court containing a node was missing a grounding rod and ground wire.

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.*

A Charter Communications' handhole located at 13049 South Icon Circle had a damaged box and could not be securely closed.