

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



August 29, 2024

CA2024-1207

Maegan Murphy
Crown Castle Communications
Utility Relations Manager for California
200 Spectrum Center Drive, Ste. 1700
Irvine, CA 92618

SUBJECT: Audit of Crown Castle Communications San Diego County North District

Ms. Murphy:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Crown Castle Communications' San Diego County North District from July 29, 2024 to August 2, 2024. The audit included a review of Crown Castle's inspection and maintenance records, and a field inspection of Crown Castle's 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 30, 2024, by electronic or hard copy, of all corrective measures taken by Crown Castle 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 Norvik Ohanian at (213) 660-5528 or Norvik.Ohanian@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
Norvik Ohanian, Utilities Engineer, Electric Safety and Reliability Branch, CPUC

AUDIT FINDINGS

I. Records Review

During the audit, my staff reviewed the following records:

- Patrol & Detailed Inspection records
- Repair Notifications

II. Field Inspection

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

No.	Structure ID	Type of Structure	Location
1	Next to pole P114315	Handhole	Poway
2	P114315	Pole	Poway
3	P203090	Pole	Poway
4	P112676	Pole	Poway
5	P517305	Pole	Poway
6	P112675	Pole	Poway
7	P410166	Pole	Poway
8	Z16486	Pole	Poway
9	P815951	Pole	Poway
10	Corner of Adrian St & Midland Rd	Handhole	Poway
11	In front of 14115 Midland Rd	Handhole	Poway
12	P94135	Pole	San Diego
13	P94133	Pole	San Diego
14	P94134	Pole	San Diego
15	P94132	Pole	San Diego
16	P94131	Pole	San Diego
17	P94137	Pole	San Diego
18	P94138	Pole	San Diego
19	P94139	Pole	San Diego
20	P94140	Pole	San Diego
21	P94141	Pole	San Diego
22	P932806	Pole	San Diego
23	P94556	Pole	San Diego
24	P94555	Pole	San Diego
25	P94554	Pole	San Diego
26	P95495	Pole	San Diego
27	P834017	Pole	San Diego
28	P834018	Pole	San Diego
29	P834019	Pole	San Diego
30	P834218	Pole	San Diego
31	P834216	Pole	San Diego
32	P834210	Pole	San Diego
33	P834219	Pole	San Diego
34	P834245	Pole	San Diego
35	P834236	Pole	San Diego
36	P834012	Pole	San Diego
37	Corner of Jade Coast Rd & Royal Ann Ave	Handhole	San Diego
38	Corner of Jade Coast Rd & Royal Ann Ave	Handhole	San Diego
39	In front of 7994 Jade Coast Rd	Handhole	San Diego
40	In front of 7962 Jade Coast Rd	Handhole	San Diego
41	In front of 7760 Jade Coast Rd	Handhole	San Diego

42	97070	Pole	San Diego
43	Z90437	Pole	San Diego
44	Z91703	Pole	San Diego
45	Z90435	Pole	San Diego
46	Z720704	Pole	San Diego
47	P247140	Pole	Encinitas
48	P247823S	Pole	Encinitas
49	P23321	Pole	Encinitas
50	P23322	Pole	Encinitas
51	Next to pole P23322	Handhole	Encinitas
52	P23323	Pole	Encinitas
53	P26625	Pole	Encinitas
54	P23324	Pole	Encinitas
55	P27599	Pole	Encinitas
56	P22526	Pole	Solana Beach
57	P24402	Pole	Solana Beach
58	P22525	Pole	Solana Beach
59	P120270J	Pole	Solana Beach
60	P22524	Pole	Solana Beach
61	P28561	Pole	Solana Beach
62	P22523	Pole	Solana Beach
63	P120269	Pole	Solana Beach
64	P22522	Pole	Solana Beach
65	Z22506	Pole	Solana Beach
66	P122806	Pole	Solana Beach
67	P127794	Pole	Solana Beach
68	P126422	Pole	Solana Beach
69	P127497	Pole	Solana Beach
70	1033778H	Pole	Solana Beach
71	P61009	Pole	Del Mar
72	P61008	Pole	Del Mar
73	P62996	Pole	Del Mar
74	P61007	Pole	Del Mar
75	831747H	Pole	Del Mar
76	P60997	Pole	Del Mar
77	P62329	Pole	Del Mar
78	P837458	Pole	Del Mar
79	P62225	Pole	Del Mar
80	P60719	Pole	Del Mar
81	P837663	Pole	Del Mar
82	P60718	Pole	Del Mar
83	P61780	Pole	Del Mar
84	P200358	Pole	Del Mar
85	Next to pole P200358	Handhole	Del Mar
86	Corner of Via Donada & Carmel Valley Rd	Handhole	Del Mar
87	Z33194	Pole	San Diego
88	Z33195	Pole	San Diego

89	Z33193	Pole	San Diego
90	Z33192	Pole	San Diego
91	Next to pole Z33192	Handhole	San Diego
92	Z33191	Pole	San Diego
93	In front of 4297 Graydon Rd	Handhole	San Diego
94	Corner of Carmel Valley Rd & Lopelia Meadows Pl	Handhole	San Diego
95	Corner of Carmel Valley Rd & Golden Cypress Pl	Handhole	San Diego
96	South-West Corner of Carmel Valley Rd & Rancho Santa Fe Farms Rd	Handhole	San Diego
97	North-West Corner of Carmel Valley Rd & Rancho Santa Fe Farms Rd	Handhole	San Diego
98	P236636	Pole	Carlsbad
99	P26532	Pole	Carlsbad
100	P26531	Pole	Carlsbad
101	P20665	Pole	Carlsbad
102	P121630	Pole	Carlsbad
103	P20664	Pole	Carlsbad
104	P26266	Pole	Carlsbad
105	Pole in front of 2793 Elmwood St	Pole	Carlsbad
106	P-21983	Pole	Carlsbad
107	P29632	Pole	Carlsbad
108	P21984	Pole	Carlsbad
109	P127384	Pole	Carlsbad
110	P252062	Pole	Carlsbad
111	P252064	Pole	Carlsbad
112	P247024	Pole	Carlsbad
113	Next to pole P247024	Handhole	Carlsbad
114	P22579J	Pole	Carlsbad
115	Next to pole P22579J	Handhole	Carlsbad
116	P107540	Pole	Carlsbad
117	P129527	Pole	Carlsbad
118	P-22581	Pole	Carlsbad
119	P294719	Pole	Carlsbad
120	P22582	Pole	Carlsbad
121	P28942	Pole	Carlsbad
122	P28943	Pole	Carlsbad
123	P167709	Pole	Carlsbad
124	In front of 3949 Park Dr	Handhole	Carlsbad
125	P112942	Pole	Vista
126	1036787H	Pole	Vista
127	1036782H	Pole	Vista
128	1036756H	Pole	Vista
129	Next to pole 1036756H	Pole	Vista
130	1006930H	Pole	Vista
131	Next to pole 1006930H	Pole	Vista
132	P119312	Pole	Vista

133	Z218324	Pole	Vista
134	Z218325	Pole	Vista
135	1036925H	Pole	Vista
136	P112941	Pole	Vista
137	P214937S	Pole	Vista
138	In front of 1504 Kelly St	Handhole	Oceanside
139	P27826	Pole	Oceanside
140	P28208	Pole	Oceanside
141	P27825	Pole	Oceanside
142	P128172	Pole	Oceanside
143	Next to pole P128172	Pole	Oceanside
144	P209988S	Pole	Oceanside
145	P131363	Pole	Oceanside
146	P28456J	Pole	Oceanside
147	570603H	Pole	Oceanside
148	P24860	Pole	Oceanside
149	P25267	Pole	Oceanside
150	P24859	Pole	Oceanside
151	P24858	Pole	Oceanside
152	P325600	Pole	Oceanside
153	P24857	Pole	Oceanside
154	P24338	Pole	Oceanside

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.

The Crown Castle communications conductor on each of the following poles was not securely attached to the pole and was instead suspended by a rope:

- P834018
- Z91703

GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C, requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

The Crown Castle communications conductor on pole P247140 was in contact with a third-party communications conductor.

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 pole P834210 was not properly fastened, resulting the ground wire partially exposed.

GO 95, Rule 56.2 - Overhead Guys, Anchor Guys and Span Wire 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 P94134 was loose and not taut.

GO 95, Rule 86.9 - Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The marker (guard) on down guy wire supporting pole number P94134 was damaged.

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 by ...

The riser attached to pole P27599 was not protected by a covering.