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

November 4, 2024 CA2024-1231

Jason Tikijian
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Kerman Telephone Company
811. S. Madera Ave. Kerman, CA 93630

SUBJECT: Communications Infrastructure Provider (CIP) Audit of Sebastian Enterprises Incorporated's Kerman and Foresthill Service Areas

Mr. Tikijian:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Thomas Roberts and Gordon Szeto of ESRB staff conducted a CIP audit of Sebastian Enterprises Incorporated's (SEI) Kerman and Foresthill Service Areas from July 29, 2024, to August 2, 2024. During the audit, ESRB staff conducted field inspections of Sebastian's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of General Order (GO) 95 and GO 128. A copy of the audit findings itemizing the violations and observations are enclosed.

Please provide a response no later than December 3, 2024, via electronic copy, of all corrective actions and preventive measures taken by SEI to correct the identified violations, prevent the recurrence of such violations, and SEI responses to ESRB observations. 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 provide us with a public version (a redacted version of your confidential response) to be posted on our website.

If you have any questions concerning this audit, please contact Thomas Roberts at (415) 971-3907 or thomas.roberts@cpuc.ca.gov.

Sincerely,

Rickey Tse, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch

Safety and Enforcement Division
California Public Utilities Commission

Enclosure: CPUC Audit Findings of Sebastian's Kerman and Foresthill Service Areas

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
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CPUC AUDIT FINDINGS OF
SEBASTIAN – KERMAN AND FORESTHILL SERVICE AREAS
JULY 29-AUGUST 2, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records obtained through Sebastian Enterprises Incorporated's (SEI) response to ESRB's data requests:[1]

- Service maps for its Kerman and Foresthill service areas, as of July 2024.
- Graphical Information System (GIS) data for equipment in these service areas.
- Sebastian's General Order (GO) 95 and GO 128 maintenance programs.
- Inspection Data containing data for the inspected facility type, facility location, inspection date, and resulting inspection findings from May 2019 through May 2024.
- Work Order List containing data of facility locations, identified deficiencies, and work completion dates from May 2019 through May 2024.
- New construction projects completed from May 2019 through May 2024.

Sebastian was not able to provide the following data in response to ESRB's data requests:

- General Order (GO) 95 and GO 128 inspector training programs: Sebastian did not provide copies of written inspector training programs or a list of training courses.
- Safety Hazard Notifications SEI Sent to Third Party Utilities from May 2019 through May 2024. Sebastian asserts that it issued no such notifications.
- Safety Hazard Notifications SEI Received from Third Party Utilities May 2019 through May 2024. Sebastian asserts that it received no such notifications.
- Safety factor calculations and pole loading calculations completed from May 2019 through May 2024. Sebastian asserts that it has not placed any new poles, and therefore, completed no pole loading calculations during this time period.
- Intrusive pole test and treat inspection records from May 2019 through May 2024. Sebastian did not provide data based on the lack of poles in Kerman and that it will remove all poles in Foresthill by the end of 2025.

[1] SEI is the parent company of five affiliates: Kerman Telephone Company (KTC), Foresthill Telephone Company (FTC), Audeamus, Barcus Family Limited Partnership, and the S&K Moran Family Limited Partnership. SEI also holds an ownership interest in CVIN, LLC, d/b/a Vast Networks, a provider of middle-mile facilities and services. A description of SEI's corporate structure, as well as organization charts, is provided in Exhibit KTC-FTC-1 dated November 1, 2022 in the General Rate Case (GRC) applications A.22-11-001 (FTC) and A.22-22-002 (KTC). Routine operations of the Kerman and Foresthill service territories involves employees of KTC, FTC, and Audeamus.

II. Records Violations

ESRB observed the following violations during the record review portion of the audit:

1. **GO 95, Rule 18-B, Maintenance Programs** states in part:

> *Each company (including electric utilities and communications companies) shall establish and implement an auditable maintenance program for its facilities and lines for the purpose of ensuring that they are in good condition so as to conform to these rules. Each company must describe in its auditable maintenance program the required qualifications for the company representatives who perform inspections and/or who schedule corrective actions. Companies that are subject to GO 165 may maintain procedures for conducting inspections and maintenance activities in compliance with this rule and with GO 165.*
>
> *The auditable maintenance program must include, at a minimum, records that show the date of the inspection, type of equipment/facility inspected, findings, and a timeline for corrective actions to be taken following the identification of a potential violation of GO 95 or a Safety Hazard on the company's facilities.*[2]
>
> *(1) 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:*
>
> - *Type of facility or equipment;*
> - *Location, including whether the Safety Hazard or potential violation is located in the High Fire-Threat District;*
> - *Accessibility;*
> - *Climate;*
> - *Direct or potential impact on operations, customers, electrical company workers, communications workers, and the general public.*
>
> *(a) The maximum time periods for corrective actions associated with potential violation of GO 95 or a Safety Hazard are based on the following priority levels:*
>
> *(i) Level 1 -- An immediate risk of high potential impact to safety or reliability:*
>
> - *Take corrective action immediately, either by fully repairing or by temporarily repairing and reclassifying to a lower priority.*
>
> *(ii) Level 2 -- Any other risk of at least moderate potential impact to safety or reliability:*

[2] Note that Rule 18-B includes multiple references to inspections, which indicates that inspections are an important component of equipment maintenance programs.

- *Take corrective action within specified time period (either by fully repair or by temporarily repairing and reclassifying to Level 3 priority). Time period for corrective action to be determined at the time of identification by a qualified company representative, but not to exceed: (1) six months for potential violations that create a fire risk located in Tier 3 of the High Fire-Threat District; (2) 12 months for potential violations that create a fire risk located in Tier 2 of the High Fire-Threat District; (3) 12 months for potential violations that compromise worker safety; and (4) 36 months for all other Level 2 potential violations.*

(iii) Level 3 -- Any risk of low potential impact to safety or reliability:

- *Take corrective action within 60 months […]*

2. **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.[3]

3. **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.

The entity responsible for performing the loading calculation(s) for an installation or reconstruction shall maintain records of these calculations for the service life of the pole or other structure for which a loading calculation was made and shall provide such information to authorized joint use occupants and the Commission upon request.

4. **GO 95, Rule 80.1.A(2),** Statewide Inspection Requirements states:

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. Consistent with Rule 31.2, the type, frequency and thoroughness of inspections shall be based upon the following factors:

- *Fire threat*
- *Proximity to overhead power line facilities*
- *Terrain*
- *Accessibility*

[3] This rule refers to Rule 80.1 for additional details regarding communications lines.

- *Location, including whether the Communications Lines are located in the High Fire-Threat District*

Each company that discovers a safety hazard on or near a communications facility or electric facility involving another company while performing inspections of its own facilities pursuant to this rule shall notify the other company and/or facility owner of such safety hazard in accordance with Rule 18-A3.

Each company's procedures shall describe (i) the methodology used to ensure that all Communication Lines are subject to the required inspections, and (ii) the procedures used for specifying what problems should be identified by the inspections. The procedures used for specifying what problems should be identified by the inspections shall include a checklist for patrol inspections.

5. **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.

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 [the] communication or supply lines and equipment.

6. **GO 128, Rule 17.2, Inspection of Lines** 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.

7. **GO 128, Rule 22.4-A, Defines Maintenance Program**:
A Maintenance Program means a written policy that shall include the following key elements:
(1) Inspection intervals
(2) Rejection criteria
(3) Corrective actions equipment.

SEI's response to ESRB's pre-audit data request question 4 for maintenance policies, procedures, and programs provided two undated documents: a two page document titled "Maintenance Procedures," and a one page document titled "Maintenance Inspection Form." These documents fail to satisfy the above maintenance and inspection requirements for the following reasons:

1. Inspector qualifications are not specified,
2. There is no timeline for corrective actions,

3. Both documents target underground equipment (e.g. pedestals (PED) and handholes (HH)) and not overhead equipment (e.g. poles, crossarms, guy wires, anchors, etc.), and the inspection data provided does not include inspections of overhead equipment,
4. Inspections are performed by SEI affiliates KTC and FTC on new construction projects completed by Audeamus, but not existing equipment,
5. The documents do not address the fire threat status of either service territory,[4]
6. Maintenance is performed by Audeamus on an ad hoc basis as time permits. This is not consistent with the "frequently" element of GO 95 Rule 31.2 or GO 128 Rule 17.2.
7. SEI did not provide records of third party safety notifications,
8. SEI did not provide pole loading calculations,
9. ESRB's field audit observed multiple safety violations of GO 95 as discussed below which indicate a lack of maintenance.

SEI indicated that it plans to remove its overhead facilities starting approximately in August 2024 and that it expects to have a fully underground system late in 2025. This proposed schedule is irrelevant to SEI's responsibility to comply with GO 95 as long as its overhead equipment is in place, even if those facilities are not active.[5]

ESRB's previous audit of Sebastian Corporation's Fresno County facilities in 2013 found a violation of GO 128 Rule 17.2 because an inspection program was not in place. In the current audit, SEI indicated that its prior "informal" inspection process was upgraded in 2023.

SEI's operation of the overhead equipment in Foresthill is in violation of GO 95 Rule 18-B and its operation of underground equipment is in violation of GO 128 Rule 17.2. SEI must develop maintenance and inspection programs compliant with CPUC general orders as noted.

III. Field Inspection

During the field inspection, ESRB inspected the following facilities:

Table 1: Field Inspection Locations

Location #	Structure Type	Copper or Fiber	Approximate Coordinates	City
1	Pedestal	Copper	36.725814,-120.059643	Kerman, City
2	Handhole	Fiber	36.726129,-120.059578	Kerman, City
3	Pedestal	Copper	36.726129,-120.059578	Kerman, City
4	Pedestal	Copper	36.725136,-120.059608	Kerman, City

[4] The Foresthill service territory consists primarily of Tier 2 and Tier 3 High Fire Threat Districts (HTFD). Testimony in FTC GRC application A.22-11-001 includes many references to the Mosquito Fire which destroyed homes and FTC equipment in the fall of 2022. GO 95 Rule 80.1.A(1) provides inspection and patrol intervals for communications equipment in Tier 2 and 3 HTFDs.
[5] GO 95 Rule 32.1.

Location #	Structure Type	Copper or Fiber	Approximate Coordinates	City
5	Handhole	Fiber	36.725136,-120.059608	Kerman, City
6	Handhole	Copper	36.726282,-120.055217	Kerman, City
7	Handhole	Copper	36.725918,-120.055214	Kerman, City
8	Pedestal	Copper	36.7264,-120.055763	Kerman, City
9	Handhole	Fiber	36.7264,-120.055763	Kerman, City
10	Pedestal	Copper	36.725948,-120.05589	Kerman, City
11	Handhole	Fiber	36.725948,-120.05589	Kerman, City
12	Pedestal	Copper	36.679014,-120.167159	Kerman, Rural
13	Pedestal	Copper	36.679938,-120.166975	Kerman, Rural
14	Pedestal	Copper	36.681233,-120.167097	Kerman, Rural
15	Remote	Both	36.676645,-120.151316	Kerman, Rural
16	Vault	Copper	36.676336,-120.151274	Kerman, Rural
17	Vault	Fiber	36.676572,-120.151264	Kerman, Rural
18	Pedestal	Copper	36.679967,-120.151264	Kerman, Rural
19	Pedestal	Copper	36.678221,-120.151323	Kerman, Rural
20	Pedestal	Copper	36.678035,-120.151494	Kerman, Rural
21	Pedestal	Copper	36.678495,-120.151511	Kerman, Rural
22	Handhole	Fiber	36.662071,-120.083811	Kerman, Rural
23	Pedestal	Copper	36.66186,-120.083678	Kerman, Rural
24	Remote	Both	36.661951,-120.061356	Kerman, Rural
25	Pedestal	Copper	36.661951,-120.061356	Kerman, Rural
26	Pedestal	Copper	36.662114,-120.060894	Kerman, Rural
27	Pedestal	Copper	36.661729,-120.061218	Kerman, Rural
28	Handhole	Fiber	36.725508,-120.072387	Kerman, City
29	Pedestal	Copper	36.725508,-120.072387	Kerman, City
30	Handhole	Both	36.725893,-120.072976	Kerman, City
31	Handhole	Both	36.726038,-120.072867	Kerman, City
32	Vault	Both	36.735464,-120.061747	Kerman, City
33	Vault	Both	36.735439,-120.062298	Kerman, City
34	Handhole	Fiber	36.735227,-120.063458	Kerman, City
35	Handhole	Fiber	36.735812,-120.063392	Kerman, City
36	Pedestal	Copper	36.73419,-120.060916	Kerman, City
37	Handhole	Fiber	36.734085,-120.060966	Kerman, City
38	Handhole	Fiber	36.733539,-120.06095	Kerman, City
39	Pedestal	Copper	36.75041,-120.087012	Kerman, Rural
40	Pedestal	Copper	36.761537,-120.087209	Kerman, Rural
41	Pedestal	Copper	36.762764,-120.087229	Kerman, Rural
42	Pedestal	Copper	36.763982,-120.086999	Kerman, Rural
43	Pedestal	Copper	36.764024,-120.088119	Kerman, Rural

Location #	Structure Type	Copper or Fiber	Approximate Coordinates	City
44	Pedestal	Copper	36.778262,-120.096267	Kerman, Rural
45	Pedestal	Copper	36.778812,-120.096228	Kerman, Rural
46	Handhole	Fiber	36.778682,-120.096453	Kerman, Rural
47	Pedestal	Copper	36.789574,-120.060491	Kerman, Rural
48	Pedestal	Copper	36.79111,-120.060428	Kerman, Rural
49	Pedestal	Copper	36.791783,-120.06045	Kerman, Rural
50	Pedestal	Copper	36.791746,-120.060248	Kerman, Rural
51	Pedestal	Copper	36.793279,-120.060069	Kerman, Rural
52	Pedestal	Copper	36.793317,-120.060444	Kerman, Rural
53	Pedestal	Copper	36.787392,-120.033504	Kerman, Rural
54	Pedestal	Copper	36.791872,-120.033536	Kerman, Rural
55	Pedestal	Copper	36.793279,-120.033465	Kerman, Rural
56	Pedestal	Copper	36.795232,-120.033553	Kerman, Rural
57	Handhole	Fiber	36.815089,-120.042862	Kerman, Rural
58	Pedestal	Copper	36.814939,-120.057968	Kerman, Rural
59	Handhole	Copper	36.806304,-120.020955	Biola
60	Handhole	Copper	36.806867,-120.020692	Biola
61	Handhole	Copper	36.806914,-120.020051	Biola
62	Pedestal	Copper	36.802518,-120.021467	Biola
63	Vault	Both	36.802566,-120.021347	Biola
64	Remote	Both	36.802552,-120.020228	Biola
65	Pedestal	Copper	36.802604,-120.020506	Biola
66	Pedestal	Copper	36.802607,-120.020883	Biola
67	Pedestal	Copper	36.820271,-119.987999	Kerman, Rural
68	Pedestal	Copper	36.815297,-119.988368	Kerman, Rural
69	Pedestal	Copper	36.814918,-119.988299	Kerman, Rural
70	Pedestal	Copper	36.814934,-119.989006	Kerman, Rural
71	Pole	Both	39.005753,-120.903307	Foresthill, Rural
72	Pole	Both	39.005975,-120.902022	Foresthill, Rural
73	Pole	Both	39.006308,-120.899992	Foresthill, Rural
74	Pole	Both	39.006684,-120.899819	Foresthill, Rural
75	Tree	Both	39.010455,-120.89351	Foresthill, Rural
76	Tree	Both	39.01066,-120.892918	Foresthill, Rural
77	Pedestal	Fiber	39.01066,-120.892918	Foresthill, Rural
78	Pedestal	Copper	39.012941,-120.886957	Foresthill, Rural
79	Pedestal	Fiber	39.012941,-120.886957	Foresthill, Rural
80	Pole	Both	39.012941,-120.886957	Foresthill, Rural
81	Tree	Both	39.013046,-120.886449	Foresthill, Rural
82	Pole	Both	39.017421,-120.878507	Foresthill, Rural

Location #	Structure Type	Copper or Fiber	Approximate Coordinates	City
83	Pole	Copper	39.017467,-120.878021	Foresthill, Rural
84	Tree	Copper	39.017568,-120.877629	Foresthill, Rural
85	Tree	Copper	39.017762,-120.877491	Foresthill, Rural
86	Tree	Copper	39.017781,-120.876816	Foresthill, Rural
87	Pedestal	Copper	39.017781,-120.876816	Foresthill, Rural
88	Pedestal	Fiber	39.026409,-120.862948	Foresthill, Rural
89	Pedestal	Fiber	39.027465,-120.859504	Foresthill, Rural
90	Pedestal	Copper	39.027465,-120.859504	Foresthill, Rural
91	Pedestal	Fiber	39.019212,-120.817719	Foresthill, City
92	Handhole	Copper	39.019212,-120.817719	Foresthill, City
93	Handhole	Fiber	39.019288,-120.817363	Foresthill, City
94	Pedestal	Fiber	39.019323,-120.817128	Foresthill, City
95	Vault	Both	39.011896,-120.840633	Foresthill, City
96	Pedestal	Copper	39.012167,-120.840164	Foresthill, City
97	Pedestal	Copper	39.012098,-120.839918	Foresthill, City
98	Remote	Both	39.053779,-120.763725	Foresthill, Rural
99	Pedestal	Copper	39.053808,-120.763664	Foresthill, Rural
100	Handhole	Both	39.053808,-120.763664	Foresthill, Rural
101	Handhole	Copper	39.063771,-120.75257	Foresthill, Rural
102	Handhole	Fiber	39.063976,-120.752402	Foresthill, Rural
103	Pedestal	Copper	39.063976,-120.752402	Foresthill, Rural
104	Pedestal	Copper	39.064117,-120.752631	Foresthill, Rural
105	Pedestal	Copper	39.069503,-120.744878	Foresthill, Rural
106	Pedestal	Copper	39.117357,-120.81078	Foresthill, Rural
107	Pedestal	Copper	39.114629,-120.817402	Foresthill, Rural
108	Pedestal	Copper	39.124839,-120.826604	Foresthill, Rural
109	Remote	Both	39.111362,-120.851652	Foresthill, Rural
110	Pedestal	Fiber	39.008631,-120.851924	Foresthill, Rural
111	Pedestal	Copper	39.008631,-120.851924	Foresthill, Rural
112	Pedestal	Copper	39.008776,-120.851949	Foresthill, Rural
113	Pedestal	Copper	39.008045,-120.858407	Foresthill, Rural
114	Vault	Fiber	39.005487,-120.85749	Foresthill, Rural
115	Remote	Both	39.005487,-120.85749	Foresthill, Rural
116	Handhole	Copper	38.999538,-120.900952	Foresthill, Rural
117	Pedestal	Fiber	38.999538,-120.900952	Foresthill, Rural
118	Pedestal	Copper	38.999538,-120.900952	Foresthill, Rural
119	Handhole	Copper	38.999264,-120.900361	Foresthill, Rural
120	Pedestal	Fiber	38.980615,-120.889135	Foresthill, Rural
121	Handhole	Copper	38.980624,-120.888979	Foresthill, Rural

Location #	Structure Type	Copper or Fiber	Approximate Coordinates	City
122	Handhole	Fiber	38.980624,-120.888979	Foresthill, Rural
123	Pedestal	Copper	38.984715,-120.886196	Foresthill, Rural
124	Handhole	Fiber	38.984715,-120.886196	Foresthill, Rural
125	Pedestal	Copper	38.983967,-120.886075	Foresthill, Rural
126	Pedestal	Fiber	38.983967,-120.886075	Foresthill, Rural
127	Pedestal	Copper	38.990755,-120.874838	Foresthill, Rural
128	Handhole	Copper	38.990043,-120.875407	Foresthill, Rural
129	Handhole	Copper	38.990248,-120.874988	Foresthill, Rural
130	Pedestal	Copper	38.990248,-120.874988	Foresthill, Rural
131	Pedestal	Copper	38.989755,-120.882683	Foresthill, Rural
132	Handhole	Fiber	38.989755,-120.882683	Foresthill, Rural
133	Pedestal	Fiber	38.989755,-120.882683	Foresthill, Rural

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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.*
>
> *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 [the] communication or supply lines and equipment.*

SEI indicated that it follows RUS [USDA Rural Utilities Service] Bulletin 1753F-401, Section 7 for grounding new and existing outside plant, which states in part:[6]

> *7.5.3 For copper and fiber optic cable plant, all cable shields, all metallic strength members, and all metallic hardware shall be:*
>
> *7.5.3.1 Grounded at each splice location to a driven grounding electrode (ground rod) of:*

[6] SEI's response to ESRB post-audit data request questions 4 and 5 state that SEI uses RUS Bulletin 1753F-401 to ensure consistently safe and reliable grounding. In addition, SEI's Maintenance Inspection Form, provided as an attachment to SEI's response to ESRB pre-audit data request question 4, includes "Ground Rods Installed" as one of the inspection items.

a. At least 1.5 meters (5 feet) in length where the local frost level is normally less than 0.30 meters (1 foot) deep; or

b. At least 2.44 meters (8 feet) in length where the local frost level is normally 0.30 meters (1 foot) or deeper;

Ground rods could not be located in the following audit locations: 3, 4, 6, 7, 10, 13, 16, 17, 19, 20, 22, 23, 25, 26, 27, 28, 30, 32, 33, 35, 36, 39, 41, 42, 45, 47, 48, 49, 50, 51, 52, 53, 54, 55, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69, 70, 73, 77, 78, 86, 88, 89, 90, 91, 92, 94, 95, 96, 97, 100, 101, 103, 104, 111, 116, 117, 119, 121, 122, 123, 124, 125, 126, 127, 128, 129, 131, 132.

SEI provided Geographic Information System (GIS) data for equipment in Kerman and Foresthill service territories as part of its pre-audit data request response. This data was mapped by ESRB and compared to actual equipment found in the field. Table 2 lists discrepancies with the GIS data and additional Rule 17.1 findings. SEI should develop a consistent procedure for updating and disseminating updated GIS maps when field work alters the location of equipment. If SEI transitioned to GIS recently, it should vet the original GIS data to ensure it is accurate.[7]

Table 2: GO 128, Rule 17.1 Findings

Location #	Observation
12	Ground rod is above grade at service connection to customer.
14	Pedestal not secured.
18	Pedestal not secured.
20	Pedestal is on the opposite side of street relative to GIS data.
27	Pedestal not secured.
36	Pedestal is located in car wash stall, not in the location shown in GIS data.
43	Pedestal is damaged.
44	Pedestal is not shown in GIS data; Pedestal not secured.
46	ESRB targeted this handhole based on SEI workorder 24-1024, but the handhole could not be found at the location in GIS.

[7] SEI's 2024 GRC requested a new staff position for a mapping specialist, but this request does not necessarily mean that SEI didn't utilize GIS mapping before this request. See Exhibit KTC-FTC-1 in Application A.22-11-001 dated 11/1/2022, pages 13-14.

Location #	Observation
59	ESRB targeted a vault in this area based on SEI work order 24-0017, but the vault could not be found at the location in GIS. A different handhole was inspected for this location.
60	Pedestal location is different than GIS data.
63	Vault is in different position relative to GIS.
65	GIS shows this PED one pole to west of GIS location.
66	GIS shows this PED one pole to west of GIS location.
91	Pedestal not secured.
92	Handhole is filled with dirt.
93	Handhole is filled with dirt.
96	Pedestal not secured.
84	Tree that supports cable is not in GIS.
85	Tree that supports cable is not in GIS.
88	GIS shows a handhole for this pedestal location.
112	Couldn't find handhole shown in GIS adjacent to this pedestal location; pedestal damaged; Pedestal not secured.
117	This pedestal is not shown in GIS.

2. **GO 128, Rule 17.8 Identification of Manholes, Handholes, Subsurface and Self-contained Surface-mounted Equipment Enclosures** states:

> *Manholes, handholes, subsurface and self-contained surface-mounted equipment enclosures shall be marked as to ownership to facilitate identification by persons authorized to work therein and by other persons performing work in their vicinity.*

Per Table 1 above, ESRB inspected 39 subsurface enclosures, either handholes or vaults, and 75 pedestals during the field audit. The following locations were not identified with ownership, e.g. Sebastian, KTC or FTC:[8] 1-21, 23, 25-29, 31, 32, 34-45, 47-60, 62-70, 85, 86, 89-101, 103, 105-114, 116-132. Additional equipment identification findings are listed in Table 3:

Table 3: GO 128, Rule 17.8 Findings

[8] This list includes locations identified as communications equipment by not ownership, and those without identification.

Location #	Findings
32	The frame for the SEI vault is labeled "AT&T."
63	The manhole cover for the SEI vault is labeled "Sewer."

3. **GO 128, Rule 42.4, Size and Shape [of Manholes and handholes]** states in part:

   Handholes shall be of sufficient size to house safely the required cables, splices, connectors and associated apparatus. Cables shall be arranged so that they can be safely installed and maintained.

   For location 116, ESRB found that the small size of the handhole required excessive bending of the splice cover and cables.

4. **GO 128, Rule 42.7, Covers** states:

   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 (Also See Rule 17.8 and Appendix B, Figure 9).

   Per Table 1 above, ESRB inspected 39 subsurface enclosures, either handholes or vaults. Of these, ESRB noted that three handholes and two vaults were secured with bolts. Some of the other covers were heavy or large enough to be difficult to remove without a hook, but covers at the following locations were small and light enough to remove by hand and need to be secured: 6, 7, 33, 59, 60, 61, 92, 93, 101, 116, 119, 121, 128, 132.

5. **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.

   ESRB's findings are listed in Table 4:

Table 4: GO 95, Rule 31.6 Findings

Location #	Findings
4	An abandoned aerial service drop cable that originated in a pedestal is attached to an adjacent pole without a riser.
14	An abandoned aerial service drop cable is attached to fence.
77	An abandoned aerial service drop cable is attached to tree.
83	An abandoned aerial service drop cable is attached to tree.

6. **GO 95, Rule 37, Minimum Clearances of Wires above Railroads, Thoroughfares, Buildings, Etc., Table 1, Case 4.B** requires the following:

   Communication conductors above ground along thoroughfares in rural districts or across other areas capable of being traversed by vehicles or agricultural equipment requires a minimum clearance of 15 ft

   ESRB's findings are listed in Table 5:

Table 5: GO 95, Rule 37 Findings

Location #	Findings
80	The SEI communication span along the thoroughfare was approximately 11-12 feet above the ground.
85-86	The SEI communication span along the thoroughfare was approximately 11 feet above the ground.

7. **GO 95, Rule 49.1, Strength of Poles, Towers, and other Structures** states in part**:**

   Wood poles shall be of sound timber.

   ESRB's findings are listed in Table 6:

Table 6: GO 95, Rule 49.1 Findings

Location #	Findings
71	Wood pole has extensive woodpecker damage, cracks, and is leaning approximately 8 degrees.
73	Wood pole has woodpecker damage.
80	Wood pole is split at the top.
82	Wood pole has woodpecker damage.

8. **GO 95, Rule 84.6.B, Ground Wires** states:

> *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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet. Such covering may be omitted providing the ground wire in this 7 foot section has a mechanical strength at least equal to the strength of No. 6 AWG medium–hard–drawn copper.*
>
> *Portions of ground wires which are on the surface of wood poles and within 6 feet vertically of unprotected supply conductors supported on the same pole, shall be covered with a suitable protective covering (see Rule 22.8).*

ESRB's finding is listed in Table 7:

Table 7: GO 95, Rule 84.6 Finding

Location #	Finding
71	The vertical ground molding is missing.

9. **GO 95, Rule 87.7-D(1), Risers, Covered from Ground Level to 8 Feet above the Ground** states:

> *Risers shall be protected from the ground level to a level not less than 8 feet above the ground by:*
>
> > *a) Securely or effectively grounded iron or steel pipe (or other covering at least of equal strength). When metallic sheathed cable rising from underground non-metallic conduit is protected by metallic pipe or moulding, such pipe or moulding shall be effectively grounded as specified in Rule 21.4-A, or*
> >
> > *b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8*

ESRB's findings are listed in Table 8:

Table 8: GO 95, Rule 87.7 Findings

Location #	Findings
71	The riser cover is loose and covers less than 8 feet above the ground line.
76	The riser cable cover is not secured to tree.
86	The riser cables are missing a protective cover.

10. GO 95, Rule 87.9/92.4.D(1), Grounding states in part:

Rule 87.9 Grounding (see Rule 92.4)

Rule 92.4.D(1) Location of Grounds on Exposed Cables with Metallic Shields, Sheaths, or messengers; and on Exposed Guys

(1) Exposed Cables and Messengers: the exposed communication cables and messengers shall be grounded: at all deadend poles and at intervals not greater than every one-quarter of a mile (1320 feet).

ESRB's finding is listed in Table 9:

Table 9: GO 95, Rule 87.9/92.4.D(1) Finding

Location #	Finding
86	Dead-end pole is missing a ground wire.

V. Observations

1. GO 95, Rule 18-A, Resolution of Potential Violations of General Order 95 and Safety Hazards states in part:

(2) Where a communications company's or an electric utility's (Company A's) actions result in potential violations of GO 95 for another entity (Company B), that entity's (Company B's) remedial action will be to transmit a single documented notice of identified potential violations to the communications company or electric utility (Company A) within a reasonable amount of time not to exceed 180 days after the entity discovers the potential violations of GO 95. If the potential violation

constitutes a Safety Hazard, such notice shall be transmitted within ten (10) business days after the entity discovers the Safety Hazard.

(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 ten (10) business days after the discovery.

(4) To the extent a company that has a notification requirement under (2) or (3) above cannot determine the facility owner/operator, it shall contact the pole owner(s) within ten (10) business days if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days after discovery. The notified pole owner(s) shall be responsible for promptly (normally not to exceed five business days) notifying the company owning/operating the facility if the subject of the notification is a Safety Hazard, or otherwise within a reasonable amount of time not to exceed 180 days, after being notified of the potential violation of GO95.

Table 10 includes all non-SEI (third party) findings that ESRB observed during the audit. Sebastian must create outgoing third-party notifications to the respective companies for the following observations:

Table 10: Third Party Observations

Location #	Findings
8	Disconnected guy wire and anchor on adjacent pole at the communications level.
19	Exposed ground rod on adjacent pole is above grade and poses a tripping hazard.