STATE OF CALIFORNIA GAVIN C. NEWSOM, *Governor*

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

December 9, 2024 CA2024-1249

Ross Johnson
AT&T Director of Regulatory Relations
430 Bush St. Suite #105
San Francisco, CA 94108

SUBJECT: Communication Infrastructure Provider (CIP) Audit of AT&T Plumas, Sierra, and Nevada County Region

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Emiliano Solorio and Nora Nguyen of ESRB staff conducted a CIP audit of AT&T's Plumas, Sierra, and Nevada County region from September 9 to September 13, 2024. During the audit, ESRB staff conducted field inspections of AT&T's facilities and equipment and reviewed pertinent documents and records.

As a result of the audit, ESRB staff identified violations of one or more General Orders (GOs). A copy of the audit findings itemizing the violations is enclosed. Please provide a response no later than January 13, 2025, by electronic copy of all corrective actions and preventive measures taken by AT&T to correct the identified violations and prevent the recurrence of such violations.

Please note that ESRB will be posting the audit report and your response to the audit on the CPUC website. If there is any information in your response that you want 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 Emiliano Solorio at (916) 216-0249 or Emiliano.Solorio@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 CIP Audit Report for AT&T Plumas, Sierra, & Nevada County Region

Cc: Lee Palmer, Director, Safety and Enforcement Division (SED), CPUC
Fadi Daye, Program and Project Supervisor, ESRB, SED, CPUC

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Emiliano Solorio, Utilities Engineer, ESRB, SED, CPUC
Nora Nguyen, Utilities Engineer, ESRB, SED, CPUC
Madonna Ebrahimof, Staff Services Analyst, ESRB, SED, CPUC
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CPUC AUDIT FINDINGS OF AT&T

PLUMAS, SIERRA & NEVADA COUNTY

SEPTEMBER 9 – 13, 2024

I. Records Review

During the audit, Electric Safety and Reliability Branch (ESRB) staff reviewed the following records:

- AT&T's Overhead Lines Maintenance Plan Version 5.5, August 30, 2024
- AT&T's Visual Inspections of Overhead Lines
- AT&T's Facility Statistics of Plumas, Sierra, and Nevada Counties
- AT&T's List of Facility Locations
- General Order (GO) 95 Patrol/Detailed Inspections Conducted in the Last 5 Years (July 2019 – June 2024)
- Most Recent Work Orders Conducted in the Last 5 Years (July 2019 – June 2024)
- Pole Loading Calculations Conducted in the Last 5 Years (July 2019 – June 2024)
- Safety Hazard Notifications AT&T Received and Sent to Third Parties in the Last 5 Years (July 2019 – June 2024)
- Employee statistics
- Records for Intrusive Pole Inspections Conducted in the Last 5 Years (July 2019 – June 2024)
- List of Pole Calculations Conducted in the Last 5 Years (July 2019 – June 2024)
- New Construction Projects Completed in the Last 12 Months

II. Records Violations

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

1. **GO 95, Rule 18-B1(a), Maintenance Programs** states in part:

   "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:

- *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 subject to the exception specified below."*

ESRB's review of AT&T's work orders from July 2019 through June 2024 found that AT&T had 2,106 out of 14,177 pending work orders are overdue and 406 out of 2,513 closed work orders were completed late. Late-pending work orders are pending work orders that have not been completed by their assigned due date based on their hazard level, and late-closed work orders are work orders that were completed past their assigned due date based on their hazard level. Table 1 below breaks down the 2,512 late work orders by hazard level.

Table 1: Late Work Orders

Hazard Level	Late-Pending Work Orders[1]	Late-Closed Work Orders	Total Late Work Orders
1	-	96	96
2	97	4	101
2a	1,281	68	1,349
2b	292	203	495
2c	95	35	130
3	341	-	341
Total	2,106	406	2,512

AT&T must provide ESRB with its corrective action plan to complete the 2,106 late pending work orders and its preventive measures to prevent any work orders from being addressed late in the future.

Table 2 below identifies the most overdue non-exempt work orders for each priority.

[1] As of June 1, 2024.

Table 2: Most Overdue Work Orders

Priority Code	Most Overdue Work Orders (WO#s)	Number of Days Past Assigned Due Date
1	1022416	84
2	493933	757
2a	445022	1,419
2b	504565	1,565
2c	493413	1,493
3	493565	32

AT&T identified work order #1022416 on January 14, 2022, to repair a riser cover with a required end date of January 17, 2022. AT&T did not complete the work until April 11, 2022.

AT&T identified work order #493933 on October 26, 2019, for a pole safety inspection with a required end date of May 6, 2022. AT&T has not yet completed the work.

AT&T identified work order #445022 on May 21, 2019, to pole load calculate a leaning pole with a required end date of July 13, 2020. AT&T has not yet completed the work.

AT&T identified work order #504565 on November 9, 2019, to repair a down guy with a required end date of February 18, 2020. AT&T has not yet completed the work.

AT&T identified work order #493413 on October 26, 2019, for a pole transfer with impairments with a required end date of April 30, 2020. AT&T has not yet completed the work.

AT&T identified work order #493565 on October 26, 2019, to transfer facilities to a new pole with a required end date of April 30, 2024. AT&T has not yet completed the work.

2. **GO 95, Rule 80.1.A.(4) – Record Keeping** states:

   "Each company shall maintain records for at least ten (10) years that provide the following information for each facility subject to this rule: The location of the facility, the date of each inspection of the facility, the results of each inspection, the personnel who performed each inspection, the date and description of each corrective action, and the personnel who performed each correction action. Commission staff shall be permitted to inspect records consistent with Public Utilities Code Section 314 (a)."

   AT&T's inspection spreadsheets are missing the personnel who performed each inspection, and the personnel who performed each corrective action.

III. Field Inspection

During the field inspection from September 9 – September 13, 2024, ESRB staff inspected AT&T's communication facilities in the locations listed in Table 3.

Table 3: Field Inspection Locations

Location #	Address/GPS Location	Structure Type	Structure #
1	550 Ivy St. Grass Valley, CA	Pole	200095
2	536 Ivy St. Grass Valley, CA	Pole	299
3	11082 Rough and Ready Hwy. Grass Valley, CA	Pole	120182185
4	1043 Westhill Rd. Grass Valley, CA	Pole	121415472
5	1043 Westhill Rd. Grass Valley, CA	Pole	74118
6	13003 Park View Dr. Grass Valley, CA	Pole	120182350
7	13038 Park View Dr. Grass Valley, CA	Pole	N/A
8	13023 Park View Dr. Grass Valley, CA	Pole	121302398
9	115 Joerschke Dr. Grass Valley, CA	Pole	121777995
10	115 Joerschke Dr. Grass Valley, CA	Pole	121777997
11	131 Joerschke Dr. Grass Valley, CA	Pole	121778000
12	10409 Banner Lava Cap Dr. Grass Valley, CA	Pole	120763462
13	10409 Banner Lava Cap Dr. Grass Valley, CA	Pole	120759701
14	10085 Banner Lava Cap Dr. Grass Valley, CA	Pole	N/A
15	10085 Banner Lava Cap Dr. Grass Valley, CA	Pole	120758661
16	76687 Parkside Ln. Portola, CA	Pole	250093
17	(39.8165010, -120.4520524)	Pole	15
18	76690 Parkside Ln. Portola, CA	Pole	250092
19	678 Sagebrush St. Portola, CA	Pole	160298

Location #	Address/GPS Location	Structure Type	Structure #
20	640 Sagebrush St. Portola, CA	Pole	160297
21	715 Sagebrush St. Portola, CA	Pole	G497
22	(39.8201477, -120.4607266)	Pole	160295
23	510 E. Magnolia Ave. Portola, CA	Pole	66239
24	509 E. Magnolia Ave. Portola, CA	Pole	66238
25	448 E. Magnolia Ave. Portola, CA	Pole	66237
26	355 Joy Way Portola, CA	Pole	P130
27	97 East Sierra Ave. Portola, CA	Pole	225790
28	(39.8112802, -120.4687920)	Pole	186112
29	(39.8112170, -120.4691383)	Pole	193574
30	7735 CA-89 Graeagle, CA	Tree Attachment	N/A
31	(39.7713871, -120.6197990)	Pole	007139
32	7701 CA-89 Graeagle, CA	Pole	007140
33	7701 CA-89 Graeagle, CA	Pole	007141
34	12 Chinook Trail Graeagle, CA	Pole	007103
35	16 Chinook Trail Graeagle, CA	Pole	007104
36	20 Chinook Trail Graeagle, CA	Pole	007105
37	13 Korominu Trail Graeagle, CA	Pole	009981
38	11 Korominu Trail Graeagle, CA	Pole	009980
39	10420 Regency Cir. Truckee, CA	Pole	151390
40	10433 Regency Cir. Truckee, CA	Pole	151391
41	10363 Regency Cir. Truckee, CA	Pole	151389
42	10399 Becket Pl. Truckee, CA	Pole	188345

Location #	Address/GPS Location	Structure Type	Structure #
43	10419 Becket Pl. Truckee, CA	Pole	189344
44	16075 Canterbury Ln. Truckee, CA	Pole	167860
45	16135 Canterbury Ln. Truckee, CA	Pole	167861
46	10144 Wiltshire Ln. Truckee, CA	Pole	180746
47	10260 Laburnham Cir. Truckee, CA	Pole	176739
48	10228 Laburnham Cir. Truckee, CA	Pole	176738
49	10196 Laburnham Cir. Truckee, CA	Pole	178737
50	11901 Stallion Way Truckee, CA	Pole	201347
51	12134 Stallion Way Truckee, CA	Pole	201348
52	(39.3782433, -120.0797866)	Pole	281517
53	11692 Highland Ave. Truckee, CA	Pole	34033715
54	11662 Highland Ave. Truckee, CA	Pole	32403705
55	10309 Columbine Rd. Truckee, CA	Pole	09136997
56	10328 Columbine Rd. Truckee, CA	Pole	07826942
57	10346 Columbine Rd. Truckee, CA	Pole	07236878
58	10037 S. River St. Truckee, CA	Pole	5499606
59	10050 S. River St. Truckee, CA	Pole	53509727
60	10091 S. River St. Truckee, CA	Pole	51959649
61	14323 Glacier View Dr. Truckee, CA	Pole	84450313
62	14352 Glacier View Dr. Truckee, CA	Pole	83070354
63	11789 Bennett Flat Rd. Truckee, CA	Pole	72447431
64	11761 Bennett Flat Rd. Truckee, CA	Pole	73747482

Location #	Address/GPS Location	Structure Type	Structure #
65	12179 Bernese Ln Truckee, CA	Pole	65264749
66	12155 Bernese Ln. Truckee, CA	Pole	64084735
67	12127 Bernese Ln. Truckee, CA	Pole	62834694
68	104 Berriman Loop Grass Valley, CA	Pedestal	N/A
69	126 Berriman Loop Grass Valley, CA	Pedestal	N/A
70	134 Berriman Loop Grass Valley, CA	Pedestal	N/A
71	158 Berriman Loop Grass Valley, CA	Pedestal	N/A
72	166 Berriman Loop Grass Valley, CA	Pedestal	N/A
73	182 Berriman Loop Grass Valley, CA	Pedestal	N/A
74	815 S. Auburn St. Grass Valley, CA	UG Splice Box	N/A
75	815 S. Auburn St. Grass Valley, CA	Pole	T40598611
76	(39.2012998, -121.0591576)	Pole	B25/561
77	808 S. Auburn St. Grass Valley, CA	Pole	N/A
78	13072 Somerset Dr. Grass Valley, CA	Pedestal	N/A
79	13068 Somerset Dr. Grass Valley, CA	Pedestal	N/A
80	13044 Somerset Dr. Grass Valley, CA	Pedestal	N/A
81	142 W. Towle Rd. Alta, CA	Pole	121704811
82	(39.2067939, -120.8078752)	Pole	063014
83	34004 Alta School St. Alta, CA	Pole	120859718
84	167 W. Towle Rd. Alta, CA	Pole	120859754
85	(39.2168592, -120.8205336)	Pole	121458986
86	(39.2167514, -120.8211920)	Pole	120824221
87	(39.1468378, -120.9023537)	Pole	121369786
88	215 Alpine Dr.	Pole	121369784

Location #	Address/GPS Location	Structure Type	Structure #
	Colfax, CA		
89	210 Alpine Dr. Colfax, CA	Pole	121313782
90	18938 Saint Paul Rd. Grass Valley, CA	Pole	120801034
91	(39.1469015, -120.9657641)	Pole	N/A
92	(39.1469095, -120.9664789)	Pole	N/A
93	16176 Colfax Hwy. Grass Valley, CA	Pole	121166180
94	16176 Colfax Hwy. Grass Valley, CA	Pole	122094722
95	14521 Dalmatian Dr. Grass Valley, CA	Pole	8
96	14656 Dalmatian Dr. Grass Valley, CA	Pole	N/A
97	14655 Dalmatian Dr. Grass Valley, CA	Pole	121698605
98	14703 Dalmatian Dr. Grass Valley, CA	Pole	121698604
99	12388 McCourtney Rd. Grass Valley, CA	Pole	120241395
100	(39.2004326, -121.0920291)	Pole	N/A
101	13334 La Barr Meadows Rd. Grass Valley, CA	Pole	110525966
102	13360 La Barr Meadows Rd. Grass Valley, CA	Pole	7913
103	13320 La Barr Meadows Rd. Grass Valley, CA	Pole	78
104	11589 Myna Dr. Grass Valley, CA	Pole	120181916
105	11613 Myrna Dr. Grass Valley, CA	Pole	N/A
106	11352 Michael Way Grass Valley, CA	Pole	120180566
107	11314 Michael Way Grass Valley, CA	Pole	121833346
108	16183 Langley Pl. Grass Valley, CA	Pole	120859939
109	16141 Langley Pl. Alta Sierra, CA	Pole	121613991
110	17962 Norlene Way Grass Valley, CA	Pole	121416472

Location #	Address/GPS Location	Structure Type	Structure #
111	17940 Norlene Way Grass Valley, CA	Pole	121416471

IV. Field Inspection Violations

ESRB identified the following violations during the field inspection:

1. **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.*
>
> *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.*
>
> *A supply or communications company is in compliance with this rule if it designs, constructs, and maintains a facility in accordance with the particulars specified in General Order 95, except that if an intended use or known local conditions require a higher standard than the particulars specified in General Order 95 to enable the furnishing of safe, proper, and adequate service, the company shall follow the higher standard…"*

ESRB's findings related to the above rule are listed in Table 4:

Table 4: GO 95, Rule 31.1 Findings

Location #	Findings
4	Terminal box was open.
12	Facilities need to be transferred to new pole.
25	The guy anchor was buried below grade.
26	Facilities need to be transferred to new pole.
27	Riser is separated from pole.
38	There was an abandoned buddy pole.
39	Facilities need to be transferred to new pole.

Location #	Findings
42	The guy anchor was buried below grade.
43	Cable was not securely attached to pole.
52	Facilities need to be transferred to new pole.
58	Cable was not securely attached to pole.
59	Cable was not securely attached to pole.
63	There was a damaged terminal.
65	Cable was not securely attached to pole.
76	Cable was not securely attached to pole.
83	Facilities need to be transferred to new pole.
86	Facilities need to be transferred to new pole.
92	Terminal box was open. Cable was not securely attached to pole.
93	Facilities need to be transferred to new pole.
97	Cable was not securely attached to pole.
104	Facilities need to be transferred to new pole.
106	Facilities need to be transferred to new pole.
110	Cable was not securely attached to pole.

2. 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 finding related to the above rule is listed in Table 5:

Table 5: GO 95, Rule 31.6 Finding

Location #	Finding
61	There was an abandoned AT&T service drop.

3. GO 95, Rule 35, Vegetation Management states in part:

> *"Communication and electric supply circuits, energized at 750 volts or less, including their service drops, should be kept clear of vegetation in new construction and when circuits are reconstructed or repaired, whenever practicable. When a supply or communication company has actual knowledge, obtained either through normal operating practices or notification to the company, that its circuit energized at 750 volts or less shows strain or evidences abrasion from vegetation contact, the condition shall be corrected by reducing conductor tension, rearranging or replacing the conductor, pruning the vegetation, or placing mechanical protection on the conductor(s). For the purpose of this rule, abrasion is defined as damage to the insulation resulting from the friction between the vegetation and conductor. Scuffing or polishing of the insulation or covering is not considered abrasion. Strain on a conductor is present when vegetation contact significantly compromises the structural integrity of supply or communication facilities. Contact between vegetation and conductors, in and of itself, does not constitute a nonconformance with the rule."*

ESRB's finding related to the above rule is listed in Table 6:

Table 6: GO 95, Rule 35 Finding

Location #	Finding
6	There was tree strain on the cable.

4. **GO 95, Rule 84.8D(4) – Above or below Supply Service Drops** states:

"The radial clearance between communication service drop conductors and supply service drop conductors may be less than 48 inches as specified in Table 2, Column C, Cases 4 and 9: Column D, Cases 3 and 8, but shall be not less than 24 inches. Where within 15 feet of the point of attachment of either service drop on a building, this clearance may be further reduced but shall be not less than 12 inches."

ESRB's finding related to above rule is listed in Table 7:

Table 7: GO 95, Rule 84.8D(4) Finding

Location #	Finding
104	AT&T service drop was in contact with electrical service drop.

5. **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 related to the above rule are listed in Table 8:

Table 8: GO 95, Rule 87.7-D(1) Findings

Location #	Findings
1	Riser was below 8 feet.
10	Riser was missing for cable along pole.
17	Unsecured cable along pole. Riser was missing for cable along pole.

Location #	Findings
34	Riser was below 8 feet.
35	Riser was missing for cable along pole.
40	Riser was below 8 feet.
51	Riser was below 8 feet.
57	Riser was below 8 feet.
58	Riser was broken.
60	Riser was below 8 feet.
81	Riser was missing for cable along pole.
85	Riser was missing for cable along pole.
95	Riser was uncovered at base of pole.
98	Riser was missing for cable along pole.
107	Riser was missing for cable along pole.
110	Riser was below 8 feet.

6. **GO 128, Rule 17.1, Design, Construction and Maintenance** states:

"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."

ESRB's finding related to above rule is listed in Table 9:

Table 9: GO 128, Rule 17.1 Finding

Location #	Finding
74	Vault lid was broken.

7. **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."*

ESRB's findings related to the above rule are listed in Table 10:

Table 10: GO 128, Rule 17.8 Findings

Location #	Findings
74	No mark of ownership on vault lid.
80	No mark of ownership on pedestal.

V. Observations

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

   "(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 GO 95."

ESRB's findings related to the above Rule are listed in Table 11:

Table 11: GO 95, Rule 18-A Findings

Location #	Findings
19	Electrical ground wire was exposed. Electrical ground rod was exposed.
19	Cable TV conductor not securely attached to pole.
22	Cable TV conductor not securely attached to pole. Riser was missing.
25	Electrical guy guard was missing on guy wire.
27	Pole does not meet clearance from building.
28	Cable TV service drop was low.
31	Communications guy guard was missing on guy wire. Electrical guy guard was missing on guy wire.
34	There was an abandoned communications service drop.

34	Electrical ground wire was exposed. Electrical ground rod was exposed.
35	Electrical ground wire was exposed.
36	Electrical ground rod was exposed.
37	Electrical ground wire was exposed.
40	Cable TV drop was not securely attached to pole. Cable TV riser was below 8 feet.
50	Electrical ground wire was exposed. Electrical ground rod was exposed.
56	There was an abandoned cable TV service drop.
57	Cable TV riser was below 8 feet.
60	Cable TV riser was below 8 feet.
88	Electrical secondary does not meet clearance with communications cable.
105	Communications service drop was in contact with guy wire.
106	Electrical high voltage sign was missing.