

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



November 23, 2015

CA2015-009

Esther Northrup  
Regulatory Affairs Director  
Cox Communications  
350 10<sup>th</sup> Ave, Suite 600  
San Diego, CA 92101

**SUBJECT:** Audit of Cox's South San Diego County District

Dear Ms. Northrup:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), Zelalem Ewnetu of my staff conducted a Communication Infrastructure Provider (CIP) audit of Cox's South San Diego County district from October 5, 2015 to October 9, 2015. The audit included a review of Cox's maintenance records and field inspection of the South San Diego County district 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 December 30, 2015, by electronic or hard copy, of all corrective measures taken by Cox to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Zelalem Ewnetu at (213) 576-7042 or [zel@cpuc.ca.gov](mailto:zel@cpuc.ca.gov).

Sincerely,

A handwritten signature in blue ink, appearing to read "Fadi Daye".

Fadi Daye, P.E.  
Program and Project Supervisor  
Electric Safety and Reliability Branch  
Safety and Enforcement Division  
California Public Utilities Commission

Enclosure: Audit Findings

Cc: Elizaveta Malashenko, Director, Safety and Enforcement Division, CPUC  
Charlotte TerKeurst, Program Manager, Electric Safety and Reliability Branch, CPUC

## **Audit Findings**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Most recently completed pole loading records for new pole constructions and addition of facilities to existing poles.
- Third party safety hazard notifications which included those received from other companies and those sent out to third party utilities and communication companies.
- Cox's inspection intervals, inspector qualifications, and priority systems for resolving GO nonconformance and safety hazards.
- Pole intrusive inspection records for Cox-owned poles located in high fire threat zones and inspected recently.

## II. Field Inspection

The following are the facilities we inspected during the field inspection:

Structure Number (Location)	Type of Structure	City
Ave De La Cruz/Ave de la Madrid	Vault	San Ysidro
209 Ave De La Madrid	Pedestal	San Ysidro
In front of Silver Strand Elementary	Vault	San Ysidro
578750	Pole	Pine Valley
578749	Pole	Pine Valley
P578748	Pole	Pine Valley
P173187	Pole	Pine Valley
P173188	Pole	Pine Valley
P173189	Pole	Pine Valley
P372753	Pole	Pine Valley
Pole next to P372753	Pole	Pine Valley
650210H	Pole	Pine Valley
P178493	Pole	Pine Valley
P173195	Pole	Pine Valley
P246775	Pole	Pine Valley
P4767	Pole	Alpine
47821	Pole	Alpine
478022	Pole	Alpine
773951	Pole	Alpine
773952	Pole	Alpine
102969H	Pole	Alpine
P78842	Pole	Alpine
282228	Pole	San Ysidro
P183257	Pole	San Ysidro
P183256	Pole	San Ysidro
P186994	Pole	San Ysidro
P86770	Pole	San Ysidro
P86769	Pole	San Ysidro
P188916	Pole	San Ysidro
P87258	Pole	San Ysidro
P181342	Pole	San Ysidro
P181341	Pole	San Ysidro
1845 Camino De Las Sorisas	Pedestal	San Ysidro
1851 Camino De Las Sorisas	Pedestal	San Ysidro
1869 Camino De Las Sorisas	Pedestal	San Ysidro
1881 Camino De Las Sorisas	Pedestal	San Ysidro

Camino De Las Sorisas/Ave De La Madrid	Pedestal	San Ysidro
Ave De La Cruz/ Ave De La Madrid	Pedestal	San Ysidro
Ave De La Cruz/ Ave De La Madrid	Vault	San Ysidro
P76058	Pole	El Cajon
P73772J	Pole	El Cajon
970076	Pole	El Cajon
P172641	Pole	El Cajon
P572806	Pole	El Cajon
75982	Pole	El Cajon
P175794	Pole	El Cajon
P473556	Pole	El Cajon
473557	Pole	El Cajon
P473558	Pole	El Cajon
P473559	Pole	El Cajon
P473560	Pole	El Cajon
P470848	Pole	El Cajon
P470048	Pole	El Cajon
P573852	Pole	El Cajon
VJP573055	Pole	El Cajon
P573054	Pole	El Cajon
JP371647	Pole	El Cajon
P573056	Pole	El Cajon
P573057	Pole	El Cajon
P673030	Pole	El Cajon
P672056	Pole	El Cajon
P672055	Pole	El Cajon
8308115	Pole	Spring Valley
376706	Pole	Spring Valley
376705	Pole	Spring Valley
JP671064	Pole	Spring Valley
162186	Pole	Spring Valley
P76828	Pole	Spring Valley
275463	Pole	La Mesa
275462	Pole	La Mesa
P71218	Pole	La Mesa
57173(8)(0)	Pole	La Mesa
P71214	Pole	La Mesa
P71213	Pole	La Mesa
71198	Pole	La Mesa
P37321	Pole	Sunset Cliffs

P1574	Pole	Sunset Cliffs
P933743	Pole	Sunset Cliffs
P933740	Pole	Sunset Cliffs
P37216	Pole	Sunset Cliffs
P2096869216	Pole	Sunset Cliffs
P933742	Pole	Sunset Cliffs

### **III. Field Inspection – Undocumented Violations List**

We observed the following violations during the field inspection. None of the violations were documented and/or addressed by Cox during its last inspections:

#### **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.*

Cox vaults and pedestals at the following locations did not have securely closed covers:

- Ave De La Cruz/ Ave De La Madrid—San Ysidro
- In front of Silver Strand Elementary—San Ysidro
- 1851 Camino De La Sorisas—San Ysidro

#### **GO 128, Rule 12.2, Maintenance, states in part:**

*Systems shall be maintained in such condition as to secure safety to workmen and the public in general.*

The pedestal at the following location had an idle Cox coaxial cable (normally operating at 89 VDC) that was cut and/or abandoned:

- Camino De Las Sorisas/Ave De La Madrid—San Ysidro

#### **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.*

#### **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, for a distance above ground sufficient to protect against mechanical injury, but in no case shall such distance be less than 7 feet.*

The following poles supported Cox ground wires that had damaged molding:

- 86770
- 376705
- P473560

**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 Cox messenger wires with broken ground wires:

- P186994
- 376705

**GO 95, Rule 38, Table 2, Column C, Case 8,** requires the minimum vertical separation between communication conductors supported at different levels on the same pole to be 12 inches.

The following poles supported Cox and third party communications cables that had less than 12 inches of vertical separation:

- P73772J
- P172641