

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 27, 2021

CA2020-871

Mark A. DiNunzio  
Cox Communications  
Director, Regulatory Affairs – West (AZ, CA, NV)  
1550 West Deer Valley Road  
Phoenix, AZ 85027

**SUBJECT:** Audit of Cox Communications Palos Verdes / Orange County District

Mr. DiNunzio:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Eric Ujjiye, Saimon Islam, Monica Robledo, and Kyle King of my staff conducted a CIP audit of Cox Communications' Palos Verdes / Orange County District from November 9, 2020 to November 13, 2020. The audit included a review of Cox Communications' inspection and maintenance records and a field inspection of Cox Communications' facilities.

During the audit, my staff identified violations of one or more General Orders (GOs). An itemized copy of the audit findings violations identified by Staff is enclosed along with this letter. Please advise me no later than June 28, 2021, by electronic or hard copy, of all corrective measures taken by Cox Communications to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact Eric Ujjiye at (213) 620-2598 or [eric.ujjiye@cpuc.ca.gov](mailto:eric.ujjiye@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  
Eric Ujjiye, Utilities Engineer, ESRB, CPUC

## **RECORD REVIEW 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.
- Cox Communications' Intrusive Inspection of Wood Poles
- Cox Communications' Overhead Lines Maintenance Plan
- Cox Communications' Visual Inspections of Overhead Lines

## II. Field Inspection

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

No.	Structure Identification	Type of Structure	Location
1	1575296E	Pole	Lake Forest
2	24151 Grayston Drive	Hand Hole	Lake Forest
3	1575928E	Pole	Lake Forest
4	24181 Grayston Drive	Pole	Lake Forest
5	24195 Grayston Drive	Pole	Lake Forest
6	24211 Grayston Drive	Pole	Lake Forest
7	24221 Grayston Drive	Pole	Lake Forest
8	24172 Grayston Drive	Pole	Lake Forest
9	1575946E	Pole	Lake Forest
10	23446 Duryea Drive	Pole	Lake Forest
11	1558649E	Pole	Lake Forest
12	23451 Duryea Drive	Pole	Lake Forest
13	32791 Del Obispo Drive	Pole	Dana Point
14	P220875	Pole	Dana Point
15	P21426	Pole	Dana Point
16	P220874	Pole	Dana Point
17	P21424	Pole	Dana Point
18	P21423	Pole	Dana Point
19	North of Blue Fin Drive	Pole	Dana Point
20	P21422	Pole	Dana Point
21	P21421	Pole	Dana Point
22	P123575	Pole	Dana Point
23	1303504E	Pole	Laguna Beach
24	1438401E	Pole	Laguna Beach
25	341045E	Pole	Laguna Beach
26	4173411E	Pole	Laguna Beach
27	2257552E	Pole	Laguna Beach
28	4170165E	Pole	Laguna Beach
29	4173412E	Pole	Laguna Beach
30	4868587E	Pole	Laguna Beach
31	4231988E	Pole	Lake Forest
32	2280112E	Pole	Lake Forest
33	2280113E	Pole	Lake Forest
34	2289114E	Pole	Lake Forest

35	2280115E	Pole	Lake Forest
36	2280116E	Pole	Lake Forest
37	2280117E	Pole	Lake Forest
38	2280118E	Pole	Lake Forest
39	1748298E	Pole	Lake Forest
40	STR ID 28773 Hydrangea	Hand Hole	Ladera Ranch
41	28 Scarlet Maple Drive	Pedestal	Ladera Ranch
42	20 Scarlet Maple Drive	Pedestal	Ladera Ranch
43	10 Scarlet Maple Drive	Pedestal	Ladera Ranch
44	6 Scarlet Maple Drive	Pedestal	Ladera Ranch
45	36 Scarlet Maple Drive	Pedestal	Ladera Ranch
46	Corner of Scarlet Maple Dr. and Smoke Tree Dr.	Pedestal	Ladera Ranch
47	33 Craftsbury Place	Pedestal	Ladera Ranch
48	23 Craftsbury Place	Pedestal	Ladera Ranch
49	15 Craftsbury Place	Pedestal	Ladera Ranch
50	5 Craftsbury Place	Pedestal	Ladera Ranch
51	16 Smoke Tree Drive	Pedestal	Ladera Ranch
52	8 Smoke Tree Drive	Pedestal	Ladera Ranch
53	1 Smoke Tree Drive	Pedestal	Ladera Ranch
54	STR ID 28684 Hydrangea	Cabinet, Hand Hole	Ladera Ranch
55	STR ID 28684 Hydrangea	Node Pedestal	Ladera Ranch
56	4 Sachem Way	Pedestal	Ladera Ranch
57	12 Sachem Way	Pedestal	Ladera Ranch
58	18 Sachem Way	Pedestal	Ladera Ranch
59	26 Sachem Way	Pedestal	Ladera Ranch
60	32 Sachem Way	Pedestal	Ladera Ranch
61	35 Agapanthus Street	Pedestal	Ladera Ranch
62	39 Agapanthus Street	Pedestal	Ladera Ranch
63	39 Agapanthus Street	Hand Hole	Ladera Ranch
64	4 Cleome Street	Pedestal	Ladera Ranch
65	4 Cleome Street	Hand Hole	Ladera Ranch
66	12 Cleome Street	Pedestal	Ladera Ranch
67	62 Tuberosa Street	Pedestal	Ladera Ranch
68	58 Tuberosa Street	Pedestal	Ladera Ranch
69	46 Tuberosa Street	Pedestal	Ladera Ranch
70	RM03 Sendero Way	Pole	Ladera Ranch
71	33 Vivido Street	Pole	Ladera Ranch
72	39 Vivido Street	Pole	Ladera Ranch
73	39 Vivido Street	Hand Hole	Ladera Ranch

74	11 Vivido Street	Hand Hole	Ladera Ranch
75	5 Vivido Street	Hand Hole	Ladera Ranch
76	23 Vivido Street	Hand Hole	Ladera Ranch
77	Danza St. and Vivido St.	Hand Hole	Ladera Ranch
78	20 Corazon Street	Hand Hole	Ladera Ranch
79	6 Corazon Street	Hand Hole	Ladera Ranch
80	36 Corazon Street	Hand Hole	Ladera Ranch
81	46 Corazon Street	Hand Hole	Ladera Ranch
82	Rollizo St. and Fronda St.	Pedestal	Ladera Ranch
83	9 Rollizo Street	Hand Hole	Ladera Ranch
84	3 Rollizo Street	Hand Hole	Ladera Ranch
85	27 Rollizo Street	Pedestal	Ladera Ranch
86	40 Rollizo Street	Hand Hole	Ladera Ranch
87	41 Rollizo Street	Hand Hole / Pedestal	Ladera Ranch
88	9 Maduro Street	Hand Hole	Ladera Ranch
89	11 Maduro Street	Hand Hole	Ladera Ranch
90	19 Maduro Street	Hand Hole	Ladera Ranch
91	27 Maduro Street	Hand Hole	Ladera Ranch
92	2 Lavanda Street	Hand Hole	Ladera Ranch
93	1318533E	Pole	Palos Verdes
94	1318532E	Pole	Palos Verdes
95	1318531E	Pole	Palos Verdes
96	1318530E	Pole	Palos Verdes
97	1318529E	Pole	Palos Verdes
98	1318528E	Pole	Palos Verdes
99	1318527E	Pole	Palos Verdes
100	1318526E	Pole	Palos Verdes
101	1318525E	Pole	Palos Verdes
102	1319761E	Pole	Palos Verdes
103	1319760E	Pole	Palos Verdes
104	1319759E	Pole	Palos Verdes
105	1319758E	Pole	Palos Verdes
106	4787921E	Pole	Palos Verdes
107	4192367E	Pole	Palos Verdes
108	545685E	Pole	Palos Verdes
109	4431503E	Pole	Palos Verdes

### III. Field Inspection - Violations List

#### **GO 95, Rule 18-A3, Maintenance Programs and Resolution of Potential Violations of General Order 95 and Safety Hazards, 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 10 business days after the discovery.*

Safety hazards on the following poles were not documented and reported to the responsible third-parties during Cox's latest inspections:

- An SCE ground moulding attached to pole 1575928E had a 4" gap, exposing the ground wire at the public level.
- An SCE ground moulding attached to the pole located at the rear pole of 24172 Grayston Drive, Lake Forest was bowed out, exposing the ground wire at the public level.
- A Verizon ground moulding attached to pole P21423 was damaged, exposing the ground wire at the public level.
- A third-party communications conductor was attached by means of a rope to pole 2280112E.
- An SCE ground moulding attached to pole 1318533E was damaged, exposing a section of the ground wire at the communication level.
- A third-party communication service drop attached to pole 1318528E had a ground clearance of 7 feet above an area accessible to pedestrians, which is less than the minimum required clearance of 10 feet.
- A third-party communications service drop attached to Pole 545685E was abandoned.

#### **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.*

A Cox communications cable attached to Pole 545685E had a damaged lashing wire.

#### **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.*

A portion of a Cox service drop attached to pole 4431503E was left abandoned.

**GO 95, Rule 34, Foreign Attachments**, states in part:

*Nothing in these rules shall be construed as permitting the unauthorized attachment, to supply, streetlight or communication poles or structures, of antennas, signs, posters, banners, decorations, wires, lighting fixtures, guys, ropes and any other such equipment foreign to the purposes of overhead electric line construction.*

The pole located at the rear of a house at 24172 Grayston Drive had a surfboard attached to the surface of the pole.

**GO 95, Rule 37, Table 1, Column B, Case 5**, requires the minimum above-ground clearance of “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 – 750 Volts” in areas accessible to pedestrians only to be 10 feet.

A Cox service drop attached to a pole located on the side of the property at 23446 Duryea Drive had an above-ground clearance of less than 10 feet, and was contacting a fence in an area accessible to pedestrians.

**GO 95, Rule 37, Table 1, Column B, Case 10**, requires “Communication Conductors (Including Open Wire, Cables and Service Drops), Supply Service Drops of 0 – 750 Volts” and “Radial centerline clearance of conductor or cable (unattached) from non-climbable street lighting or traffic signal poles or standards, including mast arms, brackets and lighting fixtures, and from antennas that are not part of the overhead line system.” to have a minimum of 1 foot of radial clearance.

A Cox communications cable attached to pole P21422J was contacting a signal light support arm at the intersection of Blue Fin Drive and Del Obispo Street.

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

Cox communications cables attached to the following poles were contacting an underbuilt span of communications cables at midspan:

- 4173411E
- 4231988E
- 2289114E
- 2280119E
- 1318533E

**GO Rule 84.8 – D4, Service Drops, Clearances Between Service Drops**, states:

*Above or below Supply Service Drops: 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.*

The Cox service drops attached to the following poles were contacting a supply service drop attached to the same pole:

- 1318529E
- 1318526E

**GO 95, Rule 84.7-A, Climbing Space**, states in part:

*Climbing space shall be maintained on one side or quadrant of all poles or structures supporting communications conductors excepting at the level of the one pair of conductors attached to the pole below the lowest crossarm (Rules 84.4–C1c , 84.4–D1 and 87.4–C3) and the top 3 feet of poles carrying communication conductors only which are attached directly to pole in accordance with the provisions of Rule 84.4–C1c.*

The following poles had obstructions in the climbing space:

- 1575296E: a Cox communications cable was obstructing the climbing space.
- The climbing space on the pole located in rear of 24195 Grayston Drive, Lake Forest was obstructed by vegetation at the communication level.

**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 Cox ground wire attached to each of the following poles lacked suitable covering:

- 1575296E
- 1536044E
- P21421
- 1303504E

**GO 95, Rule 86.2, Uses (Guy Wires),** 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 Cox down guy wire attached to Pole 1318531E was not maintained taut.

**GO 95, Rule 87.7-D1, 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 Cox riser casing attached to each of the following poles was damaged or missing, exposing the conductor:

- P123575
- 1303504E
- 2257552E
- 2280113E

**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.*

The handhole located at each of the following locations was not locked or fastened; therefore, no tool was required to access the structures:

- Near pole 1575296E
- 39 Agapanthus Street in Mission Viejo
- 4 Cleome Street in Ladera Ranch
- 39 Vivido Street in Ladera Ranch
- 9 Corrizo Street in Ladera Ranch
- 3 Corrizo Street in Ladera Ranch
- Near Pole 1319758E

The handhole located at each of the following locations had a damaged lid, creating a public safety hazard:

- 23 Vivido Street in Ladera Ranch
- 30 Corazon Street in Ladera Ranch
- 39 Agapanthus Street in Ladera Ranch
- 19 Maduro Street in Ladera Ranch

**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 lock securing the pedestal cover at each of the following locations was inoperable:

- 32791 Del Obispo Drive in Dana Point
- 10 Scarlet Maple Drive in Mission Viejo
- Intersection of Scarlet Maple Drive and Smoke Tree Drive
- 23 Craftsbury Place in Ladera Ranch
- 12 Cleome Street in Ladera Ranch
- 62 Tuberose Street in Ladera Ranch
- 58 Tuberose Street in Ladera Ranch