

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



December 18, 2020

EA2020-875

Lisa Ludovici  
Director, Government Affairs  
Charter Communications  
270 Bridge Street  
San Luis Obispo, CA 93401

Subject: Audit of Charter Communications' Santa Barbara County District

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch of the California Public Utilities Commission (CPUC), James Miller, Richard Le and Stacey Ocampo of my staff conducted a Communication Infrastructure Provider (CIP) audit of Charter's Santa Barbara County District from October 12, 2020 to October 16, 2020. The audit included a review of Charter's records and field inspections of 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 January 18, 2021, by electronic or hard copy, of all corrective measures taken by Charter to remedy and prevent such violations.

If you have any questions concerning this audit, you can contact James Miller at (213) 266-4715 or [James.Miller@cpuc.ca.gov](mailto:James.Miller@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: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kijensli, Program Manager, ESRB, SED, CPUC  
James Miller, Utilities Engineer, ESRB, SED, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

My staff reviewed the following records during the audit:

- Overhead and underground detailed inspections records.
- Completed and pending corrective action work orders.
- Pole loading calculations.
- Safety hazard notifications.
- Charter's overhead and underground inspection and maintenance procedures.

## II. Field Inspections

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

	<b>Structure No. or Location</b>	<b>Structure Type</b>	<b>Region</b>
1	120420079	Pole	Downtown San Luis Obispo
2	120420078	Pole	Downtown San Luis Obispo
3	120420077	Pole	Downtown San Luis Obispo
4	120420125	Pole	Downtown San Luis Obispo
5	120420123	Pole	Downtown San Luis Obispo
6	120420122	Pole	Downtown San Luis Obispo
7	110347490	Pole	Downtown San Luis Obispo
8	120420072	Pole	Downtown San Luis Obispo
9	120420069	Pole	Downtown San Luis Obispo
10	120420068	Pole	Downtown San Luis Obispo
11	120059084	Pole	Downtown San Luis Obispo
12	120420066	Pole	Downtown San Luis Obispo
13	120420065	Pole	Downtown San Luis Obispo
14	120420064	Pole	Downtown San Luis Obispo
15	120420063	Pole	Downtown San Luis Obispo
16	120420062	Pole	Downtown San Luis Obispo
17	120420061	Pole	Downtown San Luis Obispo
18	120420081	Pole	Downtown San Luis Obispo
19	120420082	Pole	Downtown San Luis Obispo
20	120420083	Pole	Downtown San Luis Obispo
21	120420145	Pole	Downtown San Luis Obispo
22	120477713	Pole	Downtown San Luis Obispo
23	120477714	Pole	Downtown San Luis Obispo
24	120477715	Pole	Downtown San Luis Obispo
25	120477716	Pole	Downtown San Luis Obispo
26	120477717	Pole	Downtown San Luis Obispo
27	110535635	Pole	Downtown San Luis Obispo
28	120477718	Pole	Downtown San Luis Obispo
29	120477719	Pole	Downtown San Luis Obispo
30	120477720	Pole	Downtown San Luis Obispo
31	131423	Pole	Avila Beach
32	154826	Pole	Avila Beach
33	110530674	Pole	Avila Beach
34	171	Pole	Avila Beach
35	South of Pole 171	Pole	Avila Beach
36	81	Pole	Avila Beach

37	120045054	Pole	Avila Beach
38	SM19481	Pole	Avila Beach
39	119466	Pole	Avila Beach
40	120336291	Pole	Avila Beach
41	East of 120336291	Pole	Avila Beach
42	120106322	Pole	Avila Beach
43	110327282	Pole	Avila Beach
44	110537870	Pole	Avila Beach
45	78B2	Pole	Avila Beach
46	77	Pole	Avila Beach
47	76	Pole	Avila Beach
48	75	Pole	Avila Beach
49	Avila Beach Dr. & San Luis St.	Pole	Avila Beach
50	72	Pole	Avila Beach
51	East of Pole 72	Pole	Avila Beach
52	SM23364	Pole	Avila Beach
53	110370891	Pole	Avila Beach
54	2248	Pole	Avila Beach
55	102B	Power Supply	Avila Beach
56	South of Las Praderas Dr. on Higuera St.	Pole	Avila Beach
57	120177449	Pole	Avila Beach
58	North of Tank Farm Rd. on Higuera St.	Pole	Avila Beach
59	110315610	Pole	Avila Beach
60	1412	Pole	Avila Beach
61	941	Pole	Avila Beach
62	Hind St. and Higuera St.	Pole	Avila Beach
63	North of Pole on Hind St. and Higuera St.	Pole	Avila Beach
64	1413	Pole	Avila Beach
65	North of pole 1413	Pole	Avila Beach
66	120769947	Pole	Avila Beach
67	7007 Del Rio Rd.	Pole	North Atascadero
68	6086	Pole	North Atascadero
69	120777542	Pole	North Atascadero
70	North of Pole 120777542	Pole	North Atascadero
71	Two poles north of Pole 120777542	Pole	North Atascadero
72	220350	Pole	North Atascadero
73	North of 220350	Pole	North Atascadero
74	220351	Pole	North Atascadero
75	7305	Pole	North Atascadero
76	7355	Pole	North Atascadero
77	West of Pole 7355	Pole	North Atascadero

78	741	Pole	North Atascadero
79	220352	Pole	North Atascadero
80	110449129	Pole	North Atascadero
81	West of Pole 110449129	Pole	North Atascadero
82	7695	Pole	North Atascadero
83	Across from 7505 Del Rio Rd.	Pole	North Atascadero
84	7705	Pole	North Atascadero
85	7780	Pole	North Atascadero
86	780	Pole	North Atascadero
87	7855	Pole	North Atascadero
88	120116711	Pole	North Atascadero
89	West of 2015 Alturas St.	Pole	North Atascadero
90	West of 2019 Alturas St.	Pole	North Atascadero
91	110197784	Pole	North Atascadero
92	4514 Buena Vista Rd.	Vault	Guadalupe
93	4548 Buena Vista Rd.	Vault	Guadalupe
94	4578 Buena Vista Rd.	Vault	Guadalupe
95	107 Las Flores Dr.	Amplifier	Guadalupe
96	109 Las Flores Dr.	Vault	Guadalupe
97	113 Las Flores Dr.	Vault	Guadalupe
98	4580 Castillo Dr.	Vault	Guadalupe
99	4574 Castillo Dr.	Vault	Guadalupe
100	4568 Castillo Dr.	Vault	Guadalupe
101	Professional Pkwy. & Via Concha Rd.	Amplifier	Southern Nipomo
102	1801 Louis Ln.	Vault	Southern Nipomo
103	1804 Louis Ln.	Vault	Southern Nipomo
104	1817 Louis Ln.	Vault	Southern Nipomo
105	1820 Louis Ln.	Vault	Southern Nipomo
106	1780 Louis Ln.	Vault	Southern Nipomo
107	1775 Louis Ln.	Amplifier	Southern Nipomo
108	1772 Louis Ln.	Junction Box	Southern Nipomo
109	2135 Callender Rd.	Amplifier	Arroyo Grande
110	515 Raptor St.	Amplifier	Arroyo Grande
111	2525 Laurie Way	Pedestal	Arroyo Grande
112	2540 Laurie Way	Pedestal	Arroyo Grande
113	2555 Laurie Way	Pedestal	Arroyo Grande
114	2560 Laurie Way	Amplifier	Arroyo Grande
115	585 Monadella St.	Pedestal	Arroyo Grande
116	Monadella St. & Luke Way	Coupler	Arroyo Grande
117	Hodges Rd. & Equestrian Way	Block Splice	Arroyo Grande
118	Equestrian Way & James Way	Node	Arroyo Grande

119	1005 Acorn Dr.	Amplifier	Arroyo Grande
120	1009 Acorn Dr.	Vault	Arroyo Grande
121	1011 Acorn Dr.	Vault	Arroyo Grande
122	11th St. & N St.	Vault	San Miguel
123	1070 N St.	Vault	San Miguel
124	518 Tema St.	Vault	San Miguel
125	540 Tema St.	Vault	San Miguel
126	562 Tema St.	Vault	San Miguel
127	1055 Wimer Way	Vault	San Miguel
128	1051 Wimer Way	Vault	San Miguel
129	987 Makewe Ave.	Vault	San Miguel
130	977 Makewe Ave.	Vault	San Miguel
131	973 Makewe Ave.	Vault	San Miguel
132	1170 Cortez Cir.	Vault	San Miguel
133	1172 Cortez Cir.	Vault	San Miguel
134	1190 Cortez Cir.	Vault	San Miguel
135	1194 Cortez Cir.	Amplifier	San Miguel
136	Cortez Cir. & Velarde Cir.	Vault	San Miguel
137	250 Wesley Avenue	Pole	Arroyo Grande
138	1297 Royal Oak Place	Pole	Arroyo Grande
139	1291 Mesa View Dr.	Pole	Arroyo Grande
140	North end of Wesley Avenue	Pole	Arroyo Grande
141	4755 Garrett St.	Pedestal	Guadalupe
142	415 Degasparis Ln.	Pedestal	Guadalupe
143	363 Tognazzini Ave.	Pole	Guadalupe
144	323 Tognazzini Ave.	Pole	Guadalupe
145	323 Tognazzini Ave.	Pole	Guadalupe
146	120507742	Pole	Guadalupe
147	120507792	Pole	Guadalupe
148	120507794	Pole	Guadalupe
149	R2883Y	Pole	Guadalupe
150	120055323	Pole	Guadalupe
151	120055324	Pole	Guadalupe
152	120055321	Pole	Guadalupe
153	120055320	Pole	Guadalupe
154	120199201	Pole	Oceano
155	120199202	Pole	Oceano
156	1485 Paso Robles St.	Pole	Oceano
157	Paso Robles St. & 15th St.	Pole	Oceano
158	1517 Paso Robles St.	Pole	Oceano
159	1525 Paso Robles St.	Pole	Oceano

160	1561 Paso Robles St.	Pole	Oceano
161	1661 Paso Robles St.	Pole	Oceano
162	NW corner of Paso Robles St. & 17th St.	Pole	Oceano
163	SW corner of Paso Robles St. & 17th St.	Pole	Oceano
164	179	Pole	Oceano
165	1829	Pole	Oceano
166	1750	Pole	Oceano
167	1798	Pole	Oceano
168	NW corner of 17th St. & 17th St.	Pole	Oceano
169	1812	Pole	Oceano
170	19th St. & Beach St.	Pole	Oceano
171	SE corner of 19th St. & Beach St.	Pole	Oceano
172	1920 19th St.	Pole	Oceano
173	189	Pole	Oceano
174	1744 17th St.	Pole	Oceano
175	120086102	Pole	Oceano
176	Alley E/O 1700 15th St.	Pole	Oceano
177	1501B	Pole	Oceano
178	1659 15th St.	Pole	Oceano
179	SE of 1640 14th St.	Pole	Oceano
180	1599	Pole	Oceano

### III. Field Inspection Violations List

My staff observed the following violations during the field inspection portion of the audit:

**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.*

- The jacket covering on a Spectrum conductor on pole 7305 was peeling off.
- A guy anchor on pole 6086 was buried.
- The ground wire on Pole 1599 was damaged.
- The guy guard on Pole number 7355 was damaged.

The riser on the following poles was outside of its riser cover:

- Pole 12042005
- Pole 1812

The ground wire on the following poles was not attached to its respective grounding rods:

- Pole 120507792
- Pole 120507794
- The pole at Paso Robles Street & 15<sup>th</sup> Street

**GO95, Rule 31.6, Abandoned Lines**, states in part:

*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.*

The following equipment was no longer in use but had not yet been removed:

- A service drop on Pole 120336291
- A riser tube on Pole 7705
- A riser on Pole 120199201

**GO95, Rule 54.6, Vertical and Lateral Conductors**, states in part:

*Risers from underground cables or other conductors shall be encased from the ground level to a level not less than 8 feet above the ground*

Risers on the following poles did not have riser covers:

- Pole 81
- Pole west of Pole 110449129
- Pole located at 1744 17<sup>th</sup> Street

**GO 95, Rule 56.2 Overhead Guys, Anchor Guys and Span Wires, 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.*

An overhead guy wire attached to Pole 171 was not taut.

**GO 95, Rule 38 - Minimum Clearances of Wires from Other Wires, Table 2, Column C, Case 8** requires the minimum radial clearance between communication conductors and/or supply drops on the same pole to be twelve inches.

- A Spectrum conductor between poles numbered 120106322 and 110327282 was in contact with another communications conductor.
- A Spectrum service drop on the pole south of Pole 171 was in contact with another communications conductor.
- A Spectrum service drop on the pole across the street from 7505 Del Rio Rd. was in contact with an AT&T service drop.
- A Spectrum service drop on the pole located between Pole 120507742 and 301 Tognazzini Avenue was in contact with another communications conductor.

**GO 95, Rule 56.4, Clearances**, states in part:

*The radial clearances between guys and conductors supported by or attached to the same poles or crossarms shall not be less than as specified in Table 2, Case 19.*

**Table 2, Column C, Case 19** requires guy wires and service drops supported on the same pole to maintain a clearance of three inches.

A guy wire was in contact with a service drop on Pole 110197784.

**GO95, Rule 84.4, Clearances(A)(6), Across or Along Public Thoroughfares,** states in part:

*Communication conductors over or across public thoroughfares shall have a clearance of 18 feet above ground.*

- The above ground clearance over a public thoroughfare of a Spectrum conductor between poles numbered 110370891 and 2248 was approximately 14 feet.
- The above ground clearance over a public thoroughfare of a Spectrum conductor between poles numbered 780 and 7855 was less than 18 feet.
- The above ground clearance over a public thoroughfare of a Spectrum conductor on pole 120199202 was approximately 11 feet.

**GO95, Rule 84.6, Vertical and Lateral Conductors, (D), Vertical Runs,** states in part:

*Runs of bridled conductors, attached to surface of pole, need not be covered provided such runs are below the guard arm in the same quadrant as the longitudinal cable, or where such runs are below and on the same side of pole with a cable arm and are not in the climbing space, or are connected to service drops which are placed in accordance with the provisions of Rule 84.8-B2b. Where bridled runs are not required to be covered by these rules, they shall be supported by bridle hooks or rings spaced at intervals of not more than 24 inches.*

Communications risers on the following poles were not attached to the poles by bridle hooks or rings:

- Pole 120420064
- The pole located on 1744 17<sup>th</sup> Street

**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 climbing space on the pole located on the northwest corner of 17<sup>th</sup> Street and 17<sup>th</sup> Street in Oceano was insufficient. The climbing space was blocked on three quadrants of the pole by numerous communications conductors, and the remaining quadrant contained a communications service drop.

**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.*

The ground wire on the following underground structures was not attached to its respective ground rod:

- The amplifier at 1005 Acorn Drive
- The vault at 987 Makewe Ave
- The vault at 977 Makewe Ave