

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



January 5, 2023

CA2022-945

Ross Johnson  
AT&T Director of Regulatory Relations  
430 Bush Street, 5th Floor  
San Francisco, CA 94108

**SUBJECT:** Audit of AT&T San Luis Obispo County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya and Calvin Choi of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's San Luis Obispo County District from July 11, 2022 - July 14, 2022. The audit included a review of AT&T's inspection and maintenance records and a field inspection of AT&T communication 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 February 6, 2023, by electronic or hard copy, of all corrective measures taken by AT&T to remedy and prevent such violations.

If you have any questions concerning this audit, please contact Mily Vaidya at 213-999-8528 or [Mily.Vaidya@cpuc.ca.gov](mailto:Mily.Vaidya@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  
Mily Vaidya, Utilities Engineer, CPUC

## **AUDIT FINDINGS**

### **I. Records Review**

During the audit, my staff reviewed the following records:

- Overhead and underground detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- AT&T's Overhead Lines Maintenance Plan
- AT&T's Visual Inspections of Overhead Lines

## II. Field Inspection

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

No.	Structure ID.	Type of Structure	Location
1	P2	Pole	Paso Robles
2	In front of CERVEZO Pacifico	Pole	4 <sup>th</sup> street and 1344 Paso Robos
3	10	Pole	Paso Robles
4	24	Pole	Paso Robles
5	8 (1/2)	Pole	Paso Robles
6	8	Pole	Paso Robles
7	IN front of Reminisce Antiques	Pole	14 th st and 1344 Pine Street
8	6	Pole	Paso Robles
9	120472838	Pole	Paso Robles
10	905	Padmount	Paso Robles
11	121114048	Pole	Cambria
12	576	Pole	Cambria
13	598	Pole	Cambria
14	121114262	Pole	Cambria
15	676	Pole	Cambria
16	730	Pole	Cambria
17	In front of 766 Main St & Arlington St	Pole	Cambria
18	5401	Pole	Cambria
19	743	Pole	Cambria
20	121380851	Pole	Cambria
21	121380852	Pole	Cambria
22	121380853	Pole	Cambria
23	80	Pole	Cambria
24	110370951	Pole	Cambria
25	723	Pole	Cambria
26	Next to Pole 723	Pole	Cambria
27	2440	Pole	Cambria
28	2430	Pole	Cambria
29	2400	Pole	Cambria
30	2360	Pole	Cambria
31	In front of House 2290 Greenwood Ave	Pole	Morro Bay
32	322	Pole	Morro Bay
33	2453	Pole	Morro Bay
34	P631	Pole	Morro Bay
35	P655	Pole	Morro Bay
36	2230	Pole	Morro Bay
37	2300	Pole	Morro Bay
38	2400	Pole	Morro Bay
39	2450	Pole	Morro Bay
40	2460	Pole	Morro Bay
41	2498	Pole	Morro Bay
42	2500	Pole	Morro Bay
43	585 Paula St	Pole	Morro Bay
44	2500 Greenwood	Pole	Morro Bay
45	2515	Pole	Morro Bay
46	324	Pole	Morro Bay
47	78B2	Pole	Morro Bay
48	2478	Pole	Morro Bay

49	1832	Pole	San Luis Obispo
50	1898	Pole	San Luis Obispo
51	1910	Pole	San Luis Obispo
52	1912	Pole	San Luis Obispo
53	2000	Pole	San Luis Obispo
54	2028	Pole	San Luis Obispo
55	110362966	Pole	San Luis Obispo
56	Next to Pole 110362966	Padmount	San Luis Obispo
57	2056	Pole	Baywood-Los Osos
58	2098	Pole	Baywood-Los Osos
59	120403021	Pole	Baywood-Los Osos
60	120413023	Pole	Baywood-Los Osos
61	200237	Pole	Baywood-Los Osos
62	120413025	Pole	Baywood-Los Osos
63	1310	Pole	Baywood-Los Osos
64	120324802	Pole	Baywood-Los Osos
65	120324804	Pole	Baywood-Los Osos
66	120324817	Pole	Baywood-Los Osos
67	120324816	Pole	Baywood-Los Osos
68	120324821	Pole	Baywood-Los Osos
69	120324815	Pole	Baywood-Los Osos
70	120324814	Pole	Baywood-Los Osos
71	110528359	Pole	Baywood-Los Osos
72	120256111	Pole	Baywood-Los Osos
73	120256109	Pole	Baywood-Los Osos
74	120256108	Pole	Baywood-Los Osos
75	120256106	Pole	Baywood-Los Osos
76	120256107	Pole	Baywood-Los Osos
77	120256105	Pole	Baywood-Los Osos
78	120256104	Pole	Baywood-Los Osos
79	120256103	Pole	Baywood-Los Osos
80	120405350	Pole	Baywood-Los Osos
81	120405349	Pole	Baywood-Los Osos
82	120405347	Pole	Baywood-Los Osos
83	120406689	Pole	Baywood-Los Osos
84	120406690	Pole	Baywood-Los Osos
85	120406557	Pole	Baywood-Los Osos
86	120406556	Pole	Baywood-Los Osos
87	120406600	Pole	Baywood-Los Osos
88	120406599	Pole	Baywood-Los Osos
89	120406598	Pole	Baywood-Los Osos
90	120324676	Pole	Baywood-Los Osos
91	120324680	Pole	Baywood-Los Osos
92	120148177	Pole	Baywood-Los Osos
93	1131 Board Street	Manhole	San Luis Obispo
94	1113 Board Street	Manhole	San Luis Obispo
95	P1784	Padmount	San Luis Obispo
96	P1748	Padmount	San Luis Obispo
97	P1724	Padmount	San Luis Obispo
98	In front of house 1703 Welsh Ct	Handhole	San Luis Obispo
99	In front of house 1687 Welsh Ct	Handhole	San Luis Obispo
100	Next to Welsh and Spooner Ct	Handhole	San Luis Obispo
101	1717 Spooner and 1801 Oevaul Ct	Handhole	San Luis Obispo

102	In front of 1765 Spooner Ct	Handhole	San Luis Obispo
103	In front of 1797 Spooner Ct	Handhole	San Luis Obispo
104	In front of 1881 Oevaul Ct	Handhole	San Luis Obispo
105	In Front of 1945 Oevaul Ct	Handhole	San Luis Obispo
106	P1953/ Oevaul Ct	Padmount	San Luis Obispo
107	SB Huasna Rd	Manhole	Arroyo Grande
108	In front of HansenLn & Pearwood Ave	Padmount	Arroyo Grande
109	L9; 189 Colt Ln	Padmount	Nipomo
110	L7; 181 Colt Ln	Padmount	Nipomo
111	L5; 173 Colt Ln	Padmount	Nipomo
112	L3; 155 Colt Ln	Padmount	Nipomo
113	198; 210 Colt Ln	Padmount	Nipomo
114	218; 218 Colt Ln	Padmount	Nipomo
115	234 Colt Ln	Padmount	Nipomo
116	243 Colt Ln	Padmount	Nipomo
117	231 Colt Ln	Padmount	Nipomo
118	898 Pomeroy Rd	Pole	Nipomo
119	919 Calle Roble	Handhole	Nipomo
120	929 Calle Roble	Handhole	Nipomo
121	854 Via Seco	Handhole	Nipomo
122	8381; 830 Via Seco	Handhole	Nipomo
123	P983	Pole	Nipomo
124	P943	Pole	Nipomo
125	P44	Pole	Avila Beach
126	In Front of 167 Village Crest	Padmount	Avila Beach

### III. Field Inspection – Violations List

We observed the following violations during the field inspections:

**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 ground molding on Pole 324 was damaged.

**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 by:*

*b) Non-metallic conduit or rigid U-shaped moulding. Such conduit or moulding shall be of material as specified in Rule 22.8.*

The AT&T riser attached to Pole 120324814 was damaged.

**GO 95, Rule 91.3B, Location of Steps**, states in part:

*The lowest step shall be not less than 8 feet from the ground line, or any easily climbable foreign structure from which one could reach or step.*

The lowest pole step on pole 2478 was less than eight feet above the ground line.

**GO 95, Rule 38, – Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column C**, requires the minimum vertical separation between communications conductors on separate crossarms or other supports at different levels on the same pole and in adjoining midspans to be 12 inches.

On each of the following pole, the vertical separation between an AT&T communications conductor and a third-party communications conductor was less than 12 inches:

- Pole 2056: a lashing wire on a third-party communications conductor was touching an AT&T conductor.
- Pole 120324680: a lashing wire on a third-party communications conductor was touching an AT&T conductor.

**GO 95, 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.*

A permanently abandoned AT&T communications service drop is still attached to Pole 120406600.

**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.*

An unauthorized post box was attached to Pole 2400.

**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.*

AT&T's facilities on the following poles required maintenance:

- Pole 24: the visibility strip was damaged.
- Pole 120324676: the visibility strip was damaged.
- Pole 1910: the buddy pole was not removed.

An AT&T communications service drop attached to each of the following poles was not secured (such as by a zip tie) to the communications cable:

- Pole 121114262: additionally, the AT&T service drop was touching other communication conductors
- Pole 12138085
- Pole 2000
- Pole 2056: additionally, the AT&T service drop was touching a third-party lashing wire.
- Pole 2098
- Pole 120324815
- Pole 110528359: additionally, the AT&T service drop was touching a CATV conductor
- Pole 120256109
- Pole 120406598

**GO 128, Rule 17.1, Design, Construction and Maintenance**, states in part:

*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.*

An AT&T handhole near 1717 Spooner Ct & 1801 Oe Vault C was obstructed by vegetation obstruction and could not be opened.

**GO 128, Rule 32.7, Covers**, states in part:

*Manholes, handholes, and subsurface equipment enclosures 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 arrangements shall be such that a tool or appliance shall be required for their opening and cover removal.*

The following AT&T padmounted structures had unsecured covers:

- Padmount 2042: lock missing
- Padmount in front of 167 Village Crest, Avila Beach was not properly secured