

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



May 23, 2023

CA2023-1030

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

SUBJECT: Audit of AT&T South Region and East San Bernardino County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Mily Vaidya of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's South Region and East San Bernardino County District from March 20, 2023-March 24, 2023. 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 June 26, 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.

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: Leslie 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 order.
- 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	Near Pole 1962092E	Pedestal	Baker
2	Unknown	Pole	In Front of Arne's Royal Hawaiian Motel
3	4293324E	Pole	Baker
4	4830821E	Pole	Baker
5	4293250E	Pole	Baker
6	329059	Pole	Baker
7	4288729E	Pole	Baker
8	329060	Pole	Baker
9	329061	Pole	Baker
10	4659676E	Pole	Baker
11	Near Pole 4659676E	Pedestal	Baker
12	2151212E	Pole	Baker
13	4873586E	Pole	Baker
14	750434	SAI/ Junction Box	Baker
15	4874375E	Pole	Baker
16	750433H	Pole	Baker
17	2444	Pole	Baker
18	750712H	Pole	Baker
19	4792298E	Pole	Baker
20	11	Pedestal	Next to Pole 4792298E/ Baker
21	100026H	Pole	Baker
22	4873576E	Pole	Baker
23	4874373E	Pole	Baker
24	Near Pole 4874373E	Pedestal	Baker
25	4841409E	Pole	Baker
26	1962093E	Pole	Baker
27	Near 1962093E	Pedestal	Baker
28	230669S	Pole	Baker
29	West of Pole 230669S	Pole	Baker
30	230668S	Pole	Baker
31	750442H	Pole	Baker
32	230667	Pole	Baker
33	737275H	Pole	Baker
34	230666	Pole	Baker
35	750441H	Pole	Baker
36	230664	Pole	Baker
37	752452H	Pole	Baker
38	230665	Pole	Baker
39	750453	Pole	Baker
40	2199069E	Pole	Baker

41	752453	Pole	Baker
42	2199069E	Pole	Baker
43	752454H	Pole	Baker
44	4842081E	Pole	Baker
45	752456H	Pole	Baker
46	4846852E	Pole	Baker
47	4846801E	Pole	Baker
48	4245889E	Pole	Baker
49	4282732E	Pole	Baker
50	428308	Pole	Baker
51	4282733E	Pole	Baker
52	4169410E	Pole	Baker
53	4267935E	Pole	Baker
54	4267936E	Pole	Baker
55	4661015E	Pole	Baker
56	230670S	Pole	Baker
57	5379	Pole	Arrowhead
58	5378	Pole	Arrowhead
59	5377	Pole	Arrowhead
60	5370	Pole	Arrowhead
61	East of Pole 5370	Pole	Arrowhead
62	1032291-1	Pole	Arrowhead
63	35.4729601,-115.5442234	Pole	Mountain Pass
64	35.4734631,-115.5466401	Pole	Mountain Pass
65	35.4738669,-115.5471041	Pole	Mountain Pass
66	1044328H	Pole	Mountain Pass
67	Next to 1044328H	Pole	Mountain Pass
68	27	Pole	Mountain Pass
69	35.4750683,-115.5480727	Pole	Mountain Pass
70	25	Pole	Mountain Pass
71	R/1	Pole	Mountain Pass
72	23	Pole	Mountain Pass
73	35.4766330,-115.5494648	Pole	Mountain Pass
74	35.4771898,-115.5498436	Pole	Mountain Pass
75	East of Pole 7263	Pole	Mountain Pass
76	7263	Pole	Mountain Pass
77	West of Pole 7263	Pole	Mountain Pass
78	Two Pole West of Pole 7263	Pole	Mountain Pass
79	Three Pole West of Pole 7263	Pole	Mountain Pass
80	7259	Pole	Mountain Pass
81	West of Pole 7259	Pole	Mountain Pass
82	Two Pole west of Pole 7259	Pole	Mountain Pass
83	7256	Pole	Mountain Pass
84	KA-51	Pole	Mountain Pass
85	West of Pole KA-51	Pole	Mountain Pass

86	7252	Pole	Mountain Pass
87	West of Pole 7252	Pole	Mountain Pass
88	KA-49	Pole	Mountain Pass
89	7249	Pole	Mountain Pass
90	West of Pole 7249	Pole	Mountain Pass
91	Two Pole West of Pole 7249	Pole	Mountain Pass
92	21	Pole	Mountain Pass
93	20	Pole	Mountain Pass
94	19	Pole	Mountain Pass
95	18	Pole	Mountain Pass
96	17	Pole	Mountain Pass
97	16	Pole	Mountain Pass
98	15	Pole	Mountain Pass
99	14	Pole	Mountain Pass
100	13	Pole	Mountain Pass
101	12	Pole	Mountain Pass

III. Field Inspection – Violations List

M staff observed the following violations during the field inspections:

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 4659676E: the location where the down guy wire was attached to the down guy anchor was buried.
- Pole 750712H: there was a damaged lashing wire.
- Pole 4792298E: there was a damaged lashing wire; additionally, the location where the down guy wire was attached to the down guy anchor was buried.
- Pole 4874373E: a communications conductor was entangled in a third-party service drop.
- Pole 230668: a communications conductor was not properly secured on the pole.
- Pole 20 in Mountain Pass: a service drop was not properly secured and was tangling.

GO 95, Rule 86.2, Guys, 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 .

The down guy wires attached to each of the following poles was not maintained taut:

- Pole 329060 – the down guy wire was loose.
- Pole 750422H – the down guy wire was loose.
- Pole 5377 – the down guy wire was loose.
- Pole 30495 – the down guy wire was broken.

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

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).

AT&T facilities on Pole number 750712H were strained by vegetation.

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.

AT&T's facilities on each of the following poles have permanently abandoned service drop that were not removed:

- Pole 329061
- Pole 2444
- Pole 230667
- Pole 4169410E

GO 95, Rule 38, Table 2, Case 19, Column C requires the radial separation between down guy wires and communications conductors supported on the same pole to be 3 inches.

An AT&T communications service drop attached to Pole number 4661015E was touching a third party down guy wire.