

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



May 25, 2023

CA2023-1032

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

**SUBJECT:** Audit of AT&T South Orange County District

Mr. Johnson:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Kyle King of my staff conducted a Communication Infrastructure Provider (CIP) audit of AT&T's South Orange County District from May 1, 2023, to May 5, 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 Kyle King at (213) 222-3260 or [Kyle.King@cpuc.ca.gov](mailto:Kyle.King@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  
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC  
Kyle King, 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 Intrusive Inspection of Wood Poles
- 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	720304E	Pole	Tustin
2	7203034	Pole	Tustin
3	1372 SE Skyline Drive	Pole	Tustin
4	1342 SE Skyline Drive	Pole	Tustin
5	1282 SE Skyline Drive	Pole	Tustin
6	1262 SE Skyline Drive	Pole	Tustin
7	1242 SE Skyline Drive	Pole	Tustin
8	4855017E	Pole	Tustin
9	101026H	Pole	Tustin
10	4829677E	Pole	Tustin
11	1142 SE Skyline Drive	Pole	Tustin
12	1112 SE Skyline Drive	Pole	Tustin
13	804910H	Pole	Tustin
14	1014286H	Pole	Tustin
15	101034H	Pole	Tustin
16	12252 SE Skyline Drive	Pole	Tustin
17	1176769E	Pole	Tustin
18	1176770E	Pole	Tustin
19	1176771E	Pole	Tustin
20	1150388E	Pole	Tustin
21	813050E	Pole	Tustin
22	707867E	Pole	Tustin
23	2018460E	Pole	Tustin
24	4405289E	Pole	Tustin
25	4855028E	Pole	Tustin
26	1420207E	Pole	Tustin
27	2319939E	Pole	Tustin
28	576865H	Pole	Tustin
29	1379496E	Pole	Tustin
30	11911 Red Hill Ave.	Pole	Tustin
31	4852736E	Pole	Tustin
32	1535253E	Pole	Tustin
33	82551419	Pole	Tustin
34	1535252E	Pole	Tustin
35	136194E	Pole	Tustin
36	813261H	Pole	Tustin
37	2083349E	Pole	Tustin
38	136196E	Pole	Tustin
39	846926E	Pole	Tustin
40	1334983E	Pole	Tustin

41	20 Nutcracker Lane	Pedestal	Aliso Viejo
42	26 Nutcracker Lane	Pedestal	Aliso Viejo
43	8 Nutcracker Lane	Pedestal	Aliso Viejo
44	6 Bobwhite Lane	Pedestal	Aliso Viejo
45	5 Bobwhite Lane	Pedestal	Aliso Viejo
46	9 Bobwhite Lane	Pedestal	Aliso Viejo
47	10 Pinyon Jay Lane	Pedestal	Aliso Viejo
48	6 Wigeon Lane	Pedestal	Aliso Viejo
49	41 Cuervo Ave.	Pedestal	Aliso Viejo
50	31 Cuervo Ave.	Pedestal	Aliso Viejo
51	22 Cuervo Ave.	Pedestal	Aliso Viejo
52	10 Cuervo Ave.	Pedestal	Aliso Viejo
53	2 Cuervo Ave.	Pedestal	Aliso Viejo
54	24484 Cardinal Ave.	Pedestal	Aliso Viejo
55	24474 Cardinal Ave.	Pedestal	Aliso Viejo
56	1 Bluebird Lane	Pedestal	Aliso Viejo
57	7 Bluebird Lane	Pedestal	Aliso Viejo
58	17 Bluebird Lane	Pedestal	Aliso Viejo
59	25 Bluebird Lane	Pedestal	Aliso Viejo
60	27 Bluebird Lane	Pedestal	Aliso Viejo
61	37 Bluebird Lane	Pedestal	Aliso Viejo
62	47 Bluebird Lane	Pedestal	Aliso Viejo
63	51 Bluebird Lane	Pedestal	Aliso Viejo
64	22 Cardinal Ave.	Pedestal	Aliso Viejo
65	17 Cardinal Ave.	Pedestal	Aliso Viejo
66	5 Cardinal Ave.	Pedestal	Aliso Viejo
67	3 Skygate Ave.	Pedestal	Aliso Viejo
68	2 Skygate Ave.	Pedestal	Aliso Viejo
69	15 Skygate Ave.	Pedestal	Aliso Viejo
70	23 Skygate Ave.	Pedestal	Aliso Viejo
71	29 Skygate Ave.	Pedestal	Aliso Viejo
72	33 Skygate Ave.	Pedestal	Aliso Viejo
73	6 Meadowpoint	Pedestal	Aliso Viejo
74	12 Meadowpoint	Pedestal	Aliso Viejo
75	24 Diamond Gate	Pedestal	Aliso Viejo
76	13 Crystalglen	Pedestal	Aliso Viejo
77	5 Crystalglen	Pedestal	Aliso Viejo
78	44 Diamond Gate	Pedestal	Aliso Viejo
79	3 Diamond Gate	Pedestal	Aliso Viejo
80	15 Diamond Gate	Pedestal	Aliso Viejo
81	29 Diamond Gate	Pedestal	Aliso Viejo
82	28822 Drakes Bay	Pedestal	Laguna Niguel
83	28802 Drakes Bay	Pedestal	Laguna Niguel
84	28772 Drakes Bay	Pedestal	Laguna Niguel
85	128732 Drakes Bay	Pedestal	Laguna Niguel

86	28702 Sea Bay Ave.	Pedestal	Laguna Niguel
87	28642 Sea Bay Ave.	Pedestal	Laguna Niguel
88	28602 Sea Bay Ave.	Pedestal	Laguna Niguel
89	28586 Sea Bay Ave.	Pedestal	Laguna Niguel
90	28702 Point Loma	Pedestal	Laguna Niguel
91	28672 Point Loma	Pedestal	Laguna Niguel
92	28632 Point Loma	Pedestal	Laguna Niguel
93	28792 Drakes Bay	Pedestal	Laguna Niguel
94	388 University Drive	Pole	Costa Mesa
95	4408177E	Pole	Costa Mesa
96	993105E	Pole	Costa Mesa
97	4578489E	Pole	Costa Mesa
98	546827H	Pole	Costa Mesa
99	822432E	Pole	Costa Mesa
100	668003H	Pole	Costa Mesa
101	593688H	Pole	Costa Mesa
102	739675H	Pole	Costa Mesa
103	4909097E	Pole	Costa Mesa
104	749929H	Pole	Costa Mesa
105	2142255E	Pole	Costa Mesa
106	993216E	Pole	Costa Mesa
107	743050E	Pole	Costa Mesa
108	1460559E	Pole	Costa Mesa
109	1460559E	Pole	Costa Mesa
110	2193587E	Pole	Costa Mesa
111	912038E	Pole	Costa Mesa
112	836215H	Pole	Dana Point
113	P221366	Pole	Dana Point
114	P39060	Pole	Dana Point
115	P120636	Pole	Dana Point

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

My 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.*

The AT&T facilities on each of the following poles were not maintained for their intended use:

- 1334983E – the AT&T service drop was damaged.
- 1420207E – damaged pole riser
- 82551419 – damaged pole riser
- 1334983E – damaged pole riser

**GO 95, Rule 56.2, 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 AT&T down guy wire attached to Pole number 1176769E was not taut.

**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 moulding attached to Pole number 1420207E was damaged.

**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).*

The AT&T communications conductor on Pole number 1379496E was strained by vegetation.

**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 pedestal at each of the following locations was damaged:

- The pedestal located at 20 Nutcracker Lane
- The pedestal located at 12 Meadowpoint
- The pedestal located at 5 Cardinal Avenue

Vegetation was obstructing the AT&T pedestal at the following locations:

- The pedestal located at 28586 Sea Bay Avenue
- The pedestal located at 28792 Drakes Bay Drive
- The pedestal located at 28642 Sea Bay Avenue