

## PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE  
SAN FRANCISCO, CA 94102-3298



June 12, 2023

CA2023-1034

Lisa Ludovici  
Charter Communications  
Director, Government Affairs – Central and Northern California  
270 Bridge Street  
San Luis Obispo, CA 93401

**SUBJECT:** Audit of Charter Communications' ("Spectrum") East Riverside County District

Ms. Ludovici:

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 Charter Communications' East Riverside County District from March 6, 2023 to March 10, 2023. The audit included a review of Charter Communications' inspection and maintenance records and field inspections of Charter Communications' 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 July 12, 2023, by electronic or hard copy, of all corrective measures taken by Charter Communications 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: Lee Palmer, Director, Safety and Enforcement Division, CPUC  
Nika Kjensli, Program Manager, Electric Safety and Reliability Branch, CPUC  
Kyle King, Utilities Engineer, CPUC

## AUDIT FINDINGS

### I. Records Review

During the audit, my staff reviewed the following records:

- Overhead and underground patrol and detailed inspections records
- Completed and pending corrective action work orders
- Pole loading calculations
- Charter Communications' Overhead Lines Maintenance Plan
- Charter Communications' Visual Inspections of Overhead Lines

### II. Records Review – Violations List

My staff observed the following violations during the records review portion of the audit:

**General Order (GO) 95, Rule 31.1, 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 communication or supply lines and equipment.*

**GO 95, Rule 18-A1: Resolution of Potential Violations of General Order 95 and Safety Hazards**, states in part:

*Each company (including electric utilities and communications companies) is responsible for taking appropriate corrective action to remedy potential violations of GO 95 and Safety Hazards posed by its facilities.*

Charter Communications' records indicated that from 2021 to 2023, Charter Communications completed 55 work orders past Charter Communications' due date for corrective action.

Charter Communications' records indicated that from 2021 to 2023, Charter Communications completed 2 "overhead patrol and detailed" work orders past Charter Communications' due date for corrective action.

### III. Field Inspection

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

No.	Structure Number	Type of Structure	City
1	915460 D	Pole	Indio
2	94656 D	Pole	Indio
3	919590 D	Pole	Indio
4	GT 106830	Pole	Indio
5	45782 Arabia Street	Pole	Indio
6	GT 109712	Pole	Indio
7	GT 106811	Pole	Indio
8	GT 99414	Pole	Indio
9	93480 D	Pole	Indio
10	90773 ID	Pole	Indio
11	1188667 D	Pole	Indio
12	90771 ID	Pole	Indio
13	T-8273 D	Pole	Indio
14	1239824	Pole	Indio
15	920389	Pole	Indio
16	93633ID	Pole	Indio
17	913977D	Pole	Bermuda Dunes
18	1241137	Pole	Bermuda Dunes
19	914001D	Pole	Bermuda Dunes
20	914002	Pole	Bermuda Dunes
21	79250 Spalding Drive	Pole	Bermuda Dunes
22	914003	Pole	Bermuda Dunes
23	914004D	Pole	Bermuda Dunes
24	1298398E	Pole	Cherry Valley
25	4950531E	Pole	Cherry Valley
26	1407272E	Pole	Cherry Valley
27	1407273E	Pole	Cherry Valley
28	1407274E	Pole	Cherry Valley
29	4672694E	Pole	Cherry Valley
30	324056E	Pole	Cherry Valley

31	2325843E	Pole	Cherry Valley
32	1960497E	Pole	Cherry Valley
33	4241118E	Pole	Cherry Valley
34	4241117E	Pole	Cherry Valley
35	4241116E	Pole	Cherry Valley
36	4241115E	Pole	Cherry Valley
37	4088423E	Pole	Cherry Valley
38	1027042E	Pole	Cherry Valley
39	4088421E	Pole	Cherry Valley
40	4332440E	Pole	Cherry Valley
41	1407271E	Pole	Cherry Valley
42	1407270E	Pole	Cherry Valley
43	1407269E	Pole	Cherry Valley
44	1407268E	Pole	Cherry Valley
45	2099835E	Pole	Cherry Valley
46	2210502E	Pole	Cherry Valley
47	4370119E	Pole	Cherry Valley
48	2210503E	Pole	Cherry Valley
49	452108E	Pole	Cherry Valley
50	452109E	Pole	Cherry Valley
51	168870E	Pole	Cherry Valley
52	1571408E	Pole	Cherry Valley
53	169161E	Pole	Cherry Valley
54	2312245E	Pole	Cherry Valley
55	4672688E	Pole	Cherry Valley
56	2312247E	Pole	Cherry Valley
57	2312248E	Pole	Cherry Valley
58	1196216E	Pole	Cherry Valley
59	447748E	Pole	Cherry Valley
60	2312249E	Pole	Cherry Valley
61	1196217E	Pole	Cherry Valley
62	4672674E	Pole	Cherry Valley
63	860426E	Pole	Cherry Valley
64	860427E	Pole	Cherry Valley
65	GT 4167	Pole	Cherry Valley
66	GT 4168	Pole	Cherry Valley
67	GT 4169	Pole	Cherry Valley
68	1407255E	Pole	Beaumont
69	4664377E	Pole	Beaumont

70	404133E	Pole	Beaumont
71	4761561E	Pole	Beaumont
72	1298379E	Pole	Beaumont
73	4760015E	Pole	Beaumont
74	495560E	Pole	Beaumont
75	669607E	Pole	Beaumont
76	4602777E	Pole	Beaumont
77	791898E	Pole	Beaumont
78	4370132E	Pole	Beaumont
79	19489CWT	Pole	Beaumont
80	1298500E	Pole	Beaumont
81	2138113E	Pole	Beaumont
82	4656767E	Pole	Beaumont
83	4421647E	Pole	Beaumont
84	1145452E	Pole	Beaumont
85	1145451E	Pole	Beaumont
86	1112600E	Pole	Beaumont
87	1112599E	Pole	Beaumont
88	4893266E	Pole	Beaumont
89	276508E	Pole	Beaumont
90	823854E	Pole	Beaumont
91	1079810E	Pole	Beaumont
92	782274E	Pole	Beaumont
93	GT 115737	Pole	Beaumont
94	1609218E	Pole	Beaumont
95	52122 Malvasia Way	Padmount	Coachella
96	84525 Malvasia Way	Padmount	Coachella
97	52115 Malvasia Way	Padmount	Coachella
98	52139 Malvasia Way	Padmount	Coachella
99	52172 Allende Drive	Padmount	Coachella
100	52110 Solarce Street	Padmount	Coachella
101	52104 Allende Drive	Padmount	Coachella
102	52074 Allende Drive	Padmount	Coachella
103	52038 Vermouth Drive	Padmount	Coachella
104	84-576 Vermouth Drive	Padmount	Coachella
105	84566 Allende Drive	Padmount	Coachella
106	4560 Allende Drive	Padmount	Coachella
107	84548 Allende Drive	Padmount	Coachella
108	84545 Allende Drive	Padmount	Coachella
109	84525 Allende Drive	Padmount	Coachella

110	84507 Allende Drive	Padmount	Coachella
111	84-498 Allende Drive	Padmount	Coachella
112	52034 Primitivo Drive	Padmount	Coachella
113	52043 Primitivo Drive	Padmount	Coachella
114	52051 Primitivo Drive	Padmount	Coachella
115	52088 Primitivo Drive	Padmount	Coachella
116	52101 Primitivo Drive	Padmount	Coachella
117	52108 Primitivo Drive	Padmount	Coachella
118	52136 Primitivo Drive	Padmount	Coachella
119	52133 Primitivo Drive	Padmount	Coachella
120	41600 Jamaica Sands Drive	Padmount	Bermuda Dunes
121	41560 Jamaica Sands Drive	Padmount	Bermuda Dunes
122	41520 Jamaica Sands Drive	Padmount	Bermuda Dunes
123	41-480 Jamaica Sands Drive	Padmount	Bermuda Dunes
124	41440 Jamaica Sands Drive	Padmount	Bermuda Dunes
125	41380 Jamaica Sands Drive	Padmount	Bermuda Dunes
126	41280 Jamaica Sands Drive	Padmount	Bermuda Dunes
127	79192 Falmouth Drive	Padmount	Bermuda Dunes
128	79192 Bogwalk Drive	Padmount	Bermuda Dunes
129	43841 Chapelton Drive	Padmount	Bermuda Dunes
130	43801 Chapelton Drive	Padmount	Bermuda Dunes
131	922082D	Pole	Coachella
132	910583	Pole	Coachella
133	902343D	Pole	Coachella
134	1201495D	Pole	Coachella
135	902349D	Pole	Coachella
136	1201496D	Pole	Coachella
137	902350D	Pole	Coachella
138	1202265D	Pole	Coachella
139	902352D	Pole	Coachella
140	1202264D	Pole	Coachella

141	902353D	Pole	Coachella
142	903946D	Pole	Coachella
143	1071417D	Pole	Coachella
144	1071416D	Pole	Coachella
145	1071415D	Pole	Coachella
146	1071414D	Pole	Coachella
147	1071413D	Pole	Coachella
148	1071412D	Pole	Coachella
149	1071615D	Pole	Coachella
150	94157	Pole	Indio

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

My staff observed the following violations during the field inspections:

**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.*

A Charter Communications' down guy wire attached to each of the following poles was not taut:

- GT 106811
- 93480D
- 914004D
- 4950531E
- 4421647E
- 2172397E
- 190071E
- 4088423E
- 4421647E

**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 lashing wire of Charter Communications conductor attached to Pole number 903946D was loose.

**GO 95, Rule 54.6-B, Ground Wires**, states in part:

*That portion of the ground wires attached on the face or back of wood crossarms or on the surface of wood poles and structures shall be covered by a suitable protective covering (see Rule 22.8).*

The ground moulding attached to each of the following poles was damaged:

- 94157
- 902343D
- GT 4168
- 914004D
- 914003

**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.*

Charter Communications facilities on each of the following poles were permanently abandoned but not removed:

- 922082D
- 1112600E
- 495560E
- 4672674E
- 914003
- 93633ID

**GO 95, Rule 38, Table 2, Column C, Case 8** requires the minimum vertical separation of communications conductors (including service drops) installed at different levels on the same pole to be 12 inches.

The following Charter Communication conductors were in contact with a third-party conductor:

- GT 99414 – A Charter Communications service drop was touching a Frontier Communications service drop.
- 1239824 – A Charter Communications service drop was touching a Frontier Communications service drop.
- 823854E – A Charter Communications service drop was touching a third-party communications service drop.

**GO 95, Rule 38, Table 2, Column C, Case 9** requires the minimum vertical separation of communications conductors (including service drops) from supply conductors of 0-750 V installed at different levels on the same pole to be 48 inches.

Pole number 1112600E supported a Charter communications cable that was touching an SCE secondary conductor.

**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 Charter Communication conductor supported on Pole number 1407272E was strained by vegetation.

**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.*

The following Charter Communications underground facilities were not maintained for their intended use:

- Vegetation was blocking the entrance to the Charter Communication Padmount at 52122 Malvasia Way.
- A large amount of dirt was found inside the Charter Communication Padmount at 52172 Allende Drive.
- A large amount of dirt was found inside the Charter Communication Padmount at 52051 Primitivo Drive.
- A large amount of dirt was found inside the Charter Communication Padmount at 52136 Primitivo Drive.
- A large amount of dirt was found inside the Charter Communication Padmount at 41380 Jamaica Sands Drive.
- A large amount of dirt was found inside the Charter Communication Padmount at 79192 Falmouth Drive.
- A large amount of dirt was found inside the Charter Communication Padmount at 43841 Chapelton Drive.
- The Charter Communication Padmount at 52074 Allende Drive was damaged.
- The Charter Communication Padmount at 84-576 Vermouth Drive was damaged.
- The Charter Communication Padmount at 84566 Allende Drive was damaged.
- The Charter Communication Padmount at 84525 Allende Drive was damaged.
- The Charter Communication Padmount at 84-498 Allende Drive was damaged.
- The Charter Communication Padmount at 52088 Primitivo Drive was damaged.
- The Charter Communication Padmount at 52108 Primitivo Drive was damaged.
- The Charter Communication Padmount at 41280 Jamaica Sands Drive was damaged.
- Vegetation was obstructing the Charter Communication Padmount at 41440 Jamaica Sands Drive.
- Vegetation was obstructing the Charter Communication Padmount at 52122 Malvasia Way.
- The Charter Communication Padmount at 52043 Primitivo Drive was abandoned.