

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
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October 25, 2023

CA2023-1039

Sherri Murillo
Senior Analyst, Government Affairs
Verizon Communications
1415 L Street, Ste 1250
Sacramento CA 95814

Subject: Audit of Verizon Communications' (Verizon) Ventura County Area

Ms. Murillo:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission (CPUC), Mily Vaidya and Jose Lastra of my staff conducted a Communication Infrastructure Provider (CIP) audit of Verizon's Ventura County Area from June 26, 2023 to June 30, 2023. The audit included a review of Verizon's inspection and maintenance records and a field inspection of Verizon's 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 November 27, 2023, by electronic or hard copy, of all corrective measures taken by Verizon to remedy and prevent such violations.

If you have any questions concerning this audit, you can 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

Enclosure: Audit Findings

Cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Nika Kjensli, Program Manager, ESRB, SED, CPUC
Derek Fong, Senior Utilities Engineer, ESRB, SED, CPUC
Mily Vaidya, Utilities Engineer, ESRB, SED, CPUC
Jose Lastra, Utilities Engineer, ESRB, SED, CPUC

Audit Findings

I. Records Review

During the audit, my staff reviewed the following records:

- Overhead detailed and patrol inspection records
- Completed and pending corrective action work order records
- Pole load calculations
- Verizon Intrusive Inspection of Wood Poles
- Verizon Overhead Lines Maintenance Plan
- Verizon Visual Inspections of Overhead Lines

II. Field Inspection

My staff inspected the following facilities during the field inspection:

No.	Structure ID	Type of Structure	Location
1	4784560E	Wood Pole	Oxnard
2	1755645E	Wood Pole	Oxnard
3	4479607E	Wood Pole	Oxnard
4	4479608E	Wood Pole	Oxnard
5	1576756E	Wood Pole	Oxnard
6	1576757E	Wood Pole	Oxnard
7	1576758E	Wood Pole	Oxnard
8	1576759E	Wood Pole	Oxnard
9	1576760E	Wood Pole	Oxnard
10	1576761E	Wood Pole	Oxnard
11	1576762E	Wood Pole	Oxnard
12	1576763E	Wood Pole	Oxnard
13	728639E	Wood Pole	Oxnard
14	88871E	Wood Pole	Fillmore
15	88872E	Wood Pole	Fillmore
16	926680E	Wood Pole	Fillmore
17	West of 926680E (no tag)	Wood Pole	Fillmore
18	4953156E	Wood Pole	Fillmore
19	88870E	Wood Pole	Fillmore
20	4604608E	Wood Pole	Fillmore
21	88868E	Wood Pole	Fillmore
22	88867E	Wood Pole	Fillmore
23	4488527E	Wood Pole	Fillmore
24	88865E	Wood Pole	Fillmore
25	473597E	Wood Pole	Fillmore
26	473598E	Wood Pole	Fillmore
27	473600E	Wood Pole	Fillmore
28	4783862E	Wood Pole	Fillmore
29	2024752E	Wood Pole	Fillmore
30	1278910E	Wood Pole	Fillmore
31	1576764E	Wood Pole	Oxnard
32	1576765E	Wood Pole	Oxnard
33	4093496E	Wood Pole	Oxnard
34	4451328E	Wood Pole	Oxnard
35	1576768E	Wood Pole	Oxnard
36	1576769E	Wood Pole	Oxnard
37	1576770E	Wood Pole	Oxnard
38	1576771E	Wood Pole	Oxnard
39	1576772E	Wood Pole	Oxnard

40	1576773E	Wood Pole	Oxnard
41	4256344E	Wood Pole	Oxnard
42	4256341E	Wood Pole	Oxnard
43	1278910E	Wood Pole	Moorpark
44	1278909E	Wood Pole	Moorpark
45	4198550E	Wood Pole	Moorpark
46	1585165E	Wood Pole	Moorpark
47	1585166E	Wood Pole	Moorpark
48	1278906E	Wood Pole	Moorpark
49	4263810E	Wood Pole	Moorpark
50	1956015E	Wood Pole	Moorpark
51	1956016E	Wood Pole	Moorpark
52	1956017E	Wood Pole	Moorpark
53	1956018E	Wood Pole	Moorpark
54	2214840E	Wood Pole	Moorpark
55	2214841E	Wood Pole	Moorpark
56	4261763E	Wood Pole	Oxnard
57	2085390E	Wood Pole	Oxnard
58	2143657E	Wood Pole	Oxnard
59	1444009E	Wood Pole	Oxnard
60	1444008E	Wood Pole	Oxnard
61	4743265E	Wood Pole	Oxnard
62	GT126393	Wood Pole	Oxnard
63	2151699E	Wood Pole	Oxnard
64	4400239E	Wood Pole	Oxnard
65	4239895E	Wood Pole	Oxnard
66	4375486E	Wood Pole	Oxnard
67	4476726E	Wood Pole	Oxnard
68	4476740E	Wood Pole	Oxnard
69	4476745E	Wood Pole	Oxnard
70	4400289E	Wood Pole	Oxnard
71	4400290E	Wood Pole	Oxnard
72	792815E	Wood Pole	Oxnard
73	792816E	Wood Pole	Oxnard
74	1 Pole South of 792816E	Wood Pole	Oxnard
75	792818E	Wood Pole	Oxnard
76	792819E	Wood Pole	Oxnard
77	792820E	Wood Pole	Oxnard
78	792821E	Wood Pole	Oxnard
79	792822E	Wood Pole	Oxnard
80	792823E	Wood Pole	Oxnard
81	#0015	Vault	Moorpark
82	#0008	Vault	Moorpark
83	#0012	Vault	Moorpark
84	1090476E	Wood Pole	Closest to Malibu (PCH)

85	805630E	Wood Pole	Closest to Malibu (PCH)
86	805631E	Wood Pole	Closest to Malibu (PCH)
87	#0273	Vault	Closest to Malibu (PCH)

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.

Verizon’s facilities on the following poles required maintenance:

- Pole 728639E – A Verizon lashing wire was broken.
- Pole West of 926680E – The pole was missing a structure identification tag.
- Pole 4953156E – The “eye” of the shared Verizon down guy anchor attached to the pole was buried.
- Pole 473600E – The “eye” of the Verizon down guy anchor attached to the pole was buried.
- Pole GT126393 – A Verizon down guy wire attached to the pole was broken.
- Pole 4400239E – A Verizon crossarm was damaged.
- Pole 4400290E – A “buddy pole” was not yet removed and left approximately a foot away from the pole.
- Pole 792815E – A “buddy pole” was not yet removed and left approximately a foot away from the pole.
- Pole 792816E – A Verizon lashing wire was broken.
- Pole 792820E – A Verizon lashing 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).

The Verizon communications cable supported on Pole 88865E was strained by vegetation.

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.

The separation between a Verizon communications conductor and a third-party communications conductor on each of the following poles had less than 12 inches of vertical separation:

- Pole 4784560E – Verizon’s conductor was touching another communication conductor.
- Pole 926680E – Verizon’s conductor was touching another communication conductor.
- Pole 1576771E – Verizon’s conductor was touching another communication conductor.
- Pole 4256341E – Verizon’s conductor was touching another communication conductor.
- Pole 1278909E – Verizon’s conductor had less than 12 inches of vertical separation from another communication conductor.
- Pole 1956015E – Verizon’s conductor was touching another communication conductor.
- Pole 1444009E – Verizon’s conductor was touching another communication conductor.
- Pole 4743265E – Verizon’s conductor was touching another communication conductor.
- Pole 4400239E – Verizon’s conductor was touching another communication conductor.
- Pole 4239895E – Verizon’s conductor was touching another communication conductor.
- Pole 792821E – Verizon’s conductor was touching another communication conductor.
- Pole 792823E – Verizon’s conductor was touching another communication conductor.
- Pole 805631E – Verizon’s conductor was touching another communication conductor.

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 Pole 1755645E was damaged.

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.

The Verizon down guy wire supporting Pole 2151699E was not taut.