

PUBLIC UTILITIES COMMISSION

505 VAN NESS AVENUE
SAN FRANCISCO, CA 94102-3298



February 8, 2024

CA2023-1104

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”) SoCal North Management Area - Imperial County

Ms. Ludovici:

On behalf of the Electric Safety and Reliability Branch (ESRB) of the California Public Utilities Commission, Calvin Choi and Norvik Ohanian of my staff conducted a Communication Infrastructure Provider (CIP) audit of Spectrum’s facilities in SoCal North Management Area – Imperial County from December 4-8, 2023. The audit included a review of Spectrum’s inspection and maintenance records and a field inspection of Spectrum 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 March 8, 2024, by electronic or hard copy, of all corrective measures taken by Spectrum to remedy and prevent such violations. Please note that ESRB will be posting the audit report and your response to our audit on the CPUC website. If there is any information in your response that you would like us to consider as confidential, we request that in addition to your confidential response, you also provide us with a public or redacted version of your response that can be posted publicly on our website.

If you have any questions concerning this audit, please contact Calvin Choi at (213) 219-3034 or Calvin.Choi@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
Calvin Choi, Utilities Engineer, Electric Safety and Reliability Branch, 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.
- Spectrum's Overhead Lines Maintenance Plan
- Spectrum'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	15567TWC	Pole	Brawley
2	Next pole down from 15567TWC	Pole	Brawley
3	1977 - Pole at corner of A St and 7th St	Pole	Brawley
4	P454T	Pole	Brawley
5	11483	Pole	Brawley
6	417472H	Pole	Brawley
7	19782	Pole	Brawley
8	100266	Pole	Brawley
9	1227902D	Pole	Brawley
10	19784	Pole	Brawley
11	19793	Pole	Brawley
12	19792	Pole	Brawley
13	11071D	Pole	Brawley
14	11070D	Pole	Brawley
15	Pole on corner of A St and N 5th St	Pole	Brawley
16	19779	Pole	Brawley
17	581977H	Pole	Brawley
18	19781	Pole	Brawley
19	13357D	Pole	Brawley
20	13358D	Pole	Brawley
21	15471TWC	Pole	Brawley
22	11191	Pole	Brawley
23	11316	Pole	Brawley
24	11319	Pole	Brawley
25	11855	Pole	Brawley
26	11318	Pole	Brawley
27	13245	Pole	Brawley
28	11853	Pole	Brawley
29	100110D	Pole	Brawley
30	10138	Pole	Brawley
31	11320D	Pole	Brawley
32	11673	Pole	Brawley
33	Vault next to 811 S Brawley Ave	Vault	Brawley
34	11566D	Pole	Brawley
35	Pole next to 11566D	Pole	Brawley
36	11565	Pole	Brawley
37	7338D	Pole	Westmorland
38	7277	Pole	Westmorland
39	7276	Pole	Westmorland
40	7275	Pole	Westmorland
41	621723H	Pole	Westmorland

42	7274	Pole	Westmorland
43	7264D	Pole	Westmorland
44	7265D	Pole	Westmorland
45	72885	Pole	Westmorland
46	7266D	Pole	Westmorland
47	7267D	Pole	Westmorland
48	7268D	Pole	Westmorland
49	1079406D	Pole	Westmorland
50	499686H	Pole	Westmorland
51	71712H	Pole	Westmorland
52	71386D	Pole	Westmorland
53	100118	Pole	Brawley
54	100119	Pole	Brawley
55	100120	Pole	Brawley
56	100121	Pole	Brawley
57	100122	Pole	Brawley
58	100123	Pole	Brawley
59	100124	Pole	Brawley
60	100125	Pole	Brawley
61	100126	Pole	Brawley
62	100127	Pole	Brawley
63	100128	Pole	Brawley
64	25861D	Pole	El Centro
65	459691H	Pole	El Centro
66	459696H	Pole	El Centro
67	1216363	Pole	El Centro
68	1186365D	Pole	El Centro
69	1216366	Pole	El Centro
70	459694H	Pole	El Centro
71	Pole in front of 1182 W El Dorado Ave	Pole	El Centro
72	1033897H	Pole	El Centro
73	1085527D	Pole	El Centro
74	1085526	Pole	El Centro
75	1085525	Pole	El Centro
76	1085524	Pole	El Centro
77	1085523	Pole	El Centro
78	1085522	Pole	El Centro
79	1085521	Pole	El Centro
80	1085520	Pole	El Centro
81	1142215	Pole	El Centro
82	1142210	Pole	El Centro
83	1142211	Pole	El Centro
84	1142209	Pole	El Centro
85	827975H	Pole	El Centro
86	1142208	Pole	El Centro
87	1142207	Pole	El Centro

88	1142205	Pole	El Centro
89	1242632	Pole	El Centro
90	1242631	Pole	El Centro
91	1095906D	Pole	El Centro
92	1095905D	Pole	El Centro
93	1117200	Pole	El Centro
94	1095904D	Pole	El Centro
95	1095903D	Pole	El Centro
96	20612	Pole	El Centro
97	61377	Pole	El Centro
98	61378	Pole	El Centro
99	61379	Pole	El Centro
100	61380	Pole	El Centro
101	787584H	Pole	El Centro
102	60742D	Pole	El Centro
103	61518D	Pole	El Centro
104	6183D	Pole	El Centro
105	Pole in front of 218 Mary Ave	Pole	Calexico
106	834690H	Pole	Calexico
107	41371D	Pole	Calexico
108	Pole in front of 519 E 2nd St	Pole	Calexico
109	41027D	Pole	Calexico
110	T-5916	Pole	Calexico
111	41630D	Pole	Calexico
112	40670D	Pole	Calexico
113	41126D	Pole	Calexico
114	4089D	Pole	Calexico
115	42670D	Pole	Calexico
116	42586D	Pole	Calexico
117	1219722D	Pole	Calexico
118	40650D	Pole	Calexico
119	Pole in front of 210 Encinas Ave	Pole	Calexico
120	Pole in front of 1045 Heber Ave	Pole	Heber
121	Pole in front of 1047 Heber Ave	Pole	Heber
122	29241	Pole	Heber
123	1194528D	Pole	Heber
124	1209413D	Pole	Heber
125	1081227D	Pole	Heber
126	548411H	Pole	Heber
127	507643H	Pole	Heber
128	1059189H	Pole	Heber
129	Pole in front of 1083 Heber Ave	Pole	Heber
130	1006794H	Pole	Heber
131	30379	Pole	Heber
132	30297	Pole	Heber
133	30928	Pole	Heber

134	30269	Pole	Heber
135	30300	Pole	Heber
136	In front of 228 Vega St	Pedestal	Calexico
137	In front of 220 Vega St	Pedestal	Calexico
138	Across the street from 220 Vega St	Pedestal	Calexico
139	Across street from 208 Vega St	Pedestal	Calexico
140	In front of 204 Vega St	Pedestal	Calexico
141	Across street from 204 Vega St	Pedestal	Calexico
142	In front of 1840 Rockwood Ave	Pedestal	Calexico
143	Across street from 36 Rockwood Ave	Pedestal	Calexico
144	In front of 1001 Holdridge St	Pedestal	Calexico
145	In front of 1009 Holdridge St	Pedestal	Calexico
146	In front of 1224 Fiesta Ave	Pedestal	Calexico
147	In front of 1216 Fiesta Ave	Pedestal	Calexico
148	In front of 1208 Fiesta Ave	Pedestal	Calexico
149	In front of 1200 Fiesta Ave	Pedestal	Calexico
150	Rear of 1225 De Leon Ave	Pedestal	Calexico
151	In front of 1233 De Leon Ave	Pedestal	Calexico
152	In front of 1241 De Leon Ave	Pedestal	Calexico
153	In front of 1245 De Leon Ave	Pedestal	Calexico
154	In front of 1253 De Leon Ave	Pedestal	Calexico
155	In front of 1265 De Leon Ave	Pedestal	Calexico
156	In front of 1273 De Leon Ave	Pedestal	Calexico
157	In front of 1008 Harrington St	Pedestal	Calexico
158	In front of 1000 Harrington St	Pedestal	Calexico
159	In front of 1273 Rancho Frontera Ave	Pedestal	Calexico
160	In front of 1269 Rancho Frontera Ave	Pedestal	Calexico
161	In front of 1265 Rancho Frontera Ave	Pedestal	Calexico
162	In front of 1261 Rancho Frontera Ave	Pedestal	Calexico
163	In front of 1253 Rancho Frontera Ave	Pedestal	Calexico
164	In front of 1249 Rancho Frontera Ave	Pedestal	Calexico
165	In front of 1245 Rancho Frontera Ave	Pedestal	Calexico
166	In front of 866 Manzanita Dr	Pedestal	El Centro
167	In front of 902 Manzanita Dr	Pedestal	El Centro
168	In front of 950 Manzanita Dr	Pedestal	El Centro
169	In front of 1026 Manzanita Dr	Pedestal	El Centro
170	In front of 1074 Manzanita Dr	Pedestal	El Centro
171	In front of 1102 Manzanita Dr	Pedestal	El Centro
172	In front of 1150 Manzanita Dr	Pedestal	El Centro
173	In front of 1198 Manzanita Dr	Pedestal	El Centro
174	In front of 1202 Manzanita Dr	Pedestal	El Centro
175	In front of 1250 Manzanita Dr	Pedestal	El Centro
176	In front of 1264 Manzanita Dr	Pedestal	El Centro
177	In front of 1298 Manzanita Dr	Pedestal	El Centro
178	In front of 1302 Manzanita Dr	Pedestal	El Centro
179	In front of 661 Costa Azul St	Pedestal	Imperial

180	In front of 677 Costa Azul St	Pedestal	Imperial
181	In front of 679 Costa Azul St	Pedestal	Imperial
182	In front of 679 Costa Azul St	Pedestal	Imperial
183	In front of 687 Costa Azul St	Pedestal	Imperial
184	Across street from 2583 Valle Verde Ln	Pedestal	Imperial
185	In front of 2583 Valle Verde Ln	Pedestal	Imperial
186	In front of 687 Bahia St	Pedestal	Imperial
187	In front of 683 Bahia St	Pedestal	Imperial
188	In front of 679 Bahia St	Pedestal	Imperial
189	In front of 675 Bahia St	Pedestal	Imperial
190	In front of 671 Bahia St	Pedestal	Imperial
191	In front of 665 Bahia St	Pedestal	Imperial
192	In front of 661 Bahia St	Pedestal	Imperial

III. Field Inspection – Violations List

We 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.

Spectrum facilities on each of the following poles were not maintained for their intended use:

- 11565: a Spectrum down guy wire anchor near this pole was completely buried.
- 25861D: a Spectrum down guy wire was encased by a tree above the strain insulator.
- 13357D: a Spectrum conductor was abraded at midspan by a pole it wasn't supported on.
- 7267D: a Spectrum conductor was abraded at midspan on a pole it wasn't supported on.

Spectrum facilities on each of the following buddy poles need to be transferred to the new poles:

- 1242632
- 1242631

The Spectrum ground wires attached on each of the following poles was damaged or missing:

- 19792
- 13357D
- 11318
- 11565
- 7276
- 7275
- 1085524
- 1085523
- 1095904D
- 1095903D
- 4089D
- 40650D
- 1081227D
- 548411H

GO 95, Rule 86.2, 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 Spectrum down guy wire supporting each of the following poles was not taut:

- 19782
- 11320D

GO 95, Rule 86.9, Guy Marker (Guy Guard), states in part:

A substantial marker of suitable material, including but not limited to metal or plastic, not less than 8 feet in length, shall be securely attached to all anchor guys. Where more than one guy is attached to an anchor rod, only the outermost guy is required to have a marker.

The Spectrum down guy wire supporting Pole number 100118 did not have a guy marker on the outermost down guy.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 19, Column C requires the minimum radial separation between communication cables and guy wires to be 3 inches.

The radial separation between Spectrum communications conductors and an IID down guy wire on Pole number 19782 was less than 3 inches.

General Order 95, Rule 38, Minimum Clearances of Wires from Other Wires, Table 2, Case 8, Column D requires the minimum vertical separation between communication cables and secondary electric conductors to be 48 inches.

The vertical separation between Spectrum communications conductors and an IID electric secondary conductor supported on Pole number 1227902D was less than 48 inches.

GO 95, Rule 84.8-C3b: Above Ground in Areas Accessible to Pedestrians Only, states in part:

Residential Premises: Over areas accessible to pedestrians only, the vertical clearance shall not be less than 10 feet. EXCEPTION: If the building served does not permit an attachment which will provide this 10-foot clearance without the installation of a structure on the building, the clearance shall be as great as possible but in no case less than 8 feet 6 inches.

A Spectrum service drop supported on each of the following poles have an above ground clearance of less than 8 feet 6 inches over areas accessible to pedestrians only:

- 499686H
- 459696H
- 1216363
- 1142209

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 each of the following poles was damaged:

- 15567TWC
- 19779
- 7264D
- 459691H
- 60742D
- 6183D
- 507643H

GO 95, Rule 87.7-D1, Covered from Ground Level to 8 Feet above the Ground:

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 conduit for Spectrum risers attached to each of the following poles was missing or not properly secured:

- 11565
- 459694H

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.

Spectrum service drops attached to each of the following poles were cut, permanently abandoned, and should be removed:

- 459694H
- 1142207
- 41630D
- 30269

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.

Each of the following pedestals housing Spectrum facilities were damaged or could not be properly secured:

- Across street from 208 Vega St.
- Across street from 204 Vega St.
- In front of 1224 Fiesta Ave.
- In front of 1216 Fiesta Ave.
- Rear of 1225 De Leon Ave.
- In front of 1008 Harrington St.
- In front of 1000 Harrington St.
- In front of 866 Manzanita Dr.
- In front of 902 Manzanita Dr.
- In front of 1074 Manzanita Dr.
- In front of 1302 Manzanita Dr.
- In front of 661 Costa Azul St.
- In front of 679 Costa Azul St.
- In front of 675 Bahia St.

The ground wires in each of the following Spectrum pedestals were not properly attached to equipment:

- In front of 1253 Rancho Frontera Ave.
- In front of 1245 Rancho Frontera Ave.