



VIA ELECTRONIC MAIL

January 20, 2026

Fadi Daye, P.E.
Program and Project Supervisor
Electric Safety and Reliability Branch
Safety and Enforcement Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102-3298

PUBLIC VERSION

Re: CA2025-1338 Charter Communications, Inc. Response to North L.A. Technical Audit

Dear Mr. Daye:

This letter responds to SED's December 17, 2025 letter and Audit Report concerning Charter Communications, Inc.'s ("Charter") Los Angeles North Management Area.

Enclosed please find Charter's responses to the issues identified during the Records Review and Field Inspection. Charter is submitting both (1) a CONFIDENTIAL version with supporting attachments and (2) a redacted public version for the record. o.

Also enclosed is a declaration in support of Charter's request for confidential treatment of the confidential information contained in the response letter and the associated CONFIDENTIAL attachments.

II. RECORDS REVIEW RESPONSES

My staff discovered the following discrepancies between Charter Communications' pole loading records and conditions in the field:

- *The loading calculations by Charter Communications for Pole No. 268720M were missing a 4-foot crossarm at an above ground clearance of 26.5 feet.*

RESPONSE: Charter reviewed the pole loading calculation records previously submitted with the Pre-Audit data and confirmed that the 4-foot crossarm was included in the initial calculation. If SED can provide any additional detail on the basis for the observation, Charter will promptly reconcile the record with SED's findings.

Charter Communications' records indicated that from September 2024 to September 2025, Charter completed 30 overhead work orders past Charter Communications' scheduled due date for corrective action.

RESPONSE: Charter's detailed responses to the 30 work orders are provided in the attached "CONFIDENTIAL 2025 North LA County Charter Audit Data – Audit response" document. Charter filtered tabs "F.1. 2024-2025 Plant Repair WO" and "F.2. 2024-2025 Drop Repair WO" to the 30 late work orders referenced in the Audit report and provided work-order specific comments in Column F.

[BEGIN CONFIDENTIAL]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[END CONFIDENTIAL]

I. FIELD INSPECTION RESPONSE

Charter's responses to the Field Inspection items are provided in the attached document titled "CONFIDENTIAL Charter Response to Field Inspection North Los Angeles 2025-1338."

If SED has questions or would like to discuss any item in this response, please contact either Torry Somers (torry.somers@charter.com) or to myself, howard.pointer@charter.com.

Sincerely,

/s/ Howard Pointer

Howard Pointer
Area Vice President

Enclosures:

CONFIDENTIAL Charter Response to SED North L.A. Technical Audit-CA2025-1338
PUBLIC Charter Response to SED Los Angeles North Technical Audit-CA2025-1338
CONFIDENTIAL 2025 North LA County Charter Audit Data –Audit Response
PUBLIC 2025 North LA County Charter Audit Data – Audit response
CONFIDENTIAL Charter Response to Field Inspection North Los Angeles 2025-1338
PUBLIC Charter Response to Field Inspection North Los Angeles 2025-1338
DECLARATION OF CONFIDENTIALITY – CONFIDENTIAL Charter Response to SED North
L.A. Technical Audit-CA2025-1338

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, CPUC
Majed Ibrahim, Sr. Utilities Engineer Supervisor, ESRB, CPUC
Stacey Ocampo, Utilities Engineer, ESRB, SED, CPUC
SM Arafat Kamal, Utilities Engineer, ESRB, CPUC
Torry R. Somers, Vice President Regulatory Affairs, Charter
Lisa Ludovici, Director Government Affairs, Charter

**DECLARATION OF TORRY R. SOMERS
SEEKING CONFIDENTIAL TREATMENT**

I, Torry R. Somers, declare as follows:

1. I am Vice President, State Regulatory Affairs, of Charter Communications, Inc. (“Charter”) and am authorized to make this declaration.
2. Charter is submitting its spreadsheet response (“Response”) to the Oct. 20 – 24th, 2025 Safety and Enforcement Division Audit Report of Los Angeles North Management Area, with this request for confidential treatment made pursuant to Sections 3.2 of General Order (“GO”) 66-D.
3. *Audit Information:* I am informed and believe that the Public Records Act, including but not limited to California Government Code §§ 7923.600, 7929.215, and 7930.100 protects against disclosure of investigatory information, which includes the type of audit information set forth in the attached.
4. *Critical Infrastructure Information:* The Response contains sensitive information regarding Charter’s network infrastructure. I am informed and believe that the California Public Records Act protects against disclosure of confidential “utility systems development” data, like the data contained herein. California Government Code § 7927.300. Moreover, I am informed and believe that state law protects against disclosure that is prohibited under federal law—federal law protects against the disclosure of information regarding critical infrastructure (6 U.S.C. § 673), which has been found to include communications network information like the information being submitted here. The information is not customarily in the public domain and is not solely related to the location of a particular physical structure that is visible with the naked eye. The enclosed infrastructure information is critical to our nation’s communications networks, and disclosure of these records could harm public safety and network reliability by exposing to attack specific locations, operations, and functionalities of communications and utility infrastructure.
5. *Trade Secret:* The Response contains confidential network and operational information that is not disclosed to the public. This Response contains information that reveals unique planning, design and implementation efforts used to provide safe, reliable and competitive service to consumers in these areas. I am informed and believe that this information has significant value to Charter. This information would, if disclosed, provide access to information that would harm the private economic interests of Charter and could jeopardize the security of its network. I am informed, and on this basis declare that the information provided constitutes a trade secret as defined by California Civil Code § 3426.1 and California Evidence Code Section 1061 — California Government Code §§ 7927.605 and 7930.105 exempts from public disclosure competitively sensitive information that constitutes a trade secret.

6. *Public Interest Not to Disclose*: The Response contains competitively sensitive material, and critical information not available to the public, that would be harmful to Charter if publicly disclosed, which weighs in favor of non-disclosure under California Government Code § 7922.000. In contrast to the direct harm that Charter would suffer from disclosure — by losing its competitive advantage with respect to operations and network design and management and jeopardizing the safety of its network — there would be no apparent benefit to the public from disclosure of the responses. Further, a failure to preserve the confidentiality of the records would discourage compliance with disclosure requirements and undermine the Commission’s ability to perform its duties.
7. To the extent that there is a need to make contact regarding potential release of information, such contact should be made to Torry Somers, torry.somers@charter.com or Charter’s counsel, zzankel@jenner.com.

I affirm and declare under penalty of perjury under the laws of the State of California, including Rule 1.1 of the CPUC’s Rules of Practice and Procedure, that, to the best of my knowledge, all of the statements and representations made in this declaration are true and correct.

Executed on this 20th day of January 2026 at El Segundo, CA.



Torry R. Somers

Pole Number	Pole Location	City
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Lat / Long	Documentation
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Audit Response

Spida ID

Creation Date

Due Date

Completion Date

Variance

Resolution Comment - Reasoning

City

Address

Lat

Long

Fire Zone? Pole Number

Node

ID Method

GO95/GO128

Priority Level

Responsible Party Primary Plant Infraction

Secondary Plant Infraction

Comments

Prism# Resolution Code

Completion Comments

Spida ID

Creation Date Due Date

Completion Date

Resolution Comment - Reasoning

City

Address

Lat

Long

Fire Zone? Pole Number

Node

ID Method

Priority Level

Responsible Party Primary Drop Infraction

Secondary Drop Infraction

Comments

Resolution Code

Completion Comments

Work Order#

Work Order Schedule Date

CPUC SED Audit - CA2025-1338 Spectrum Communications Northern Los Angeles County Area - Field Inspection Response

Confidential Information in grey highlight

Discovered During	CPUC Rule Number	Pole Number	Address	City	Violation Details	Violation Owner	Repair details	Repair Date
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