



January 23, 2026

VIA ELECTRONIC MAIL

Rickey Tse, P.E.
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: Charter Communications, Inc. Response to Report *Communications Infrastructure Provider (CIP) Audit of Charter Communications (Charter) Alturas Region*

Dear Mr. Tse:

This letter is submitted in response to the Safety and Enforcement Division’s Electric Safety and Reliability Branch (“ESRB”) December 23, 2025 report on *Communications Infrastructure Provider (CIP) Audit of Charter’s Alturas Region* (“Audit Report”). Charter Communications, Inc., on behalf of its pole attachor affiliate (“Charter”) has reviewed the Audit Report and the issues raised in the report and, as of the time of this filing, has made all repairs or notified third parties where issue owner is a third party, in response to the “Field Inspection” and “Observation” portions of the Audit Report. A confidential spreadsheet is attached which summarizes each field issue and indicates the repairs made, if needed for compliance, and the date completed. See **Confidential Attachment 3**. Further, this letter addresses issues raised in the “Records” section of the Audit Report. The redacted public version of this letter and attachment are also attached.

The Audit Report features confidential information and Charter requests that the Commission not disclose the confidential unredacted Audit Report given that such confidential information was provided with a declaration supporting a request for confidential treatment, and General Order 66-D and Public Utilities Code Section 583 dictates that such information cannot be disclosed without a Commission order. Please note that both this letter and the attached documents are also confidential. Enclosed is a declaration supporting Charter’s request for confidential treatment of both the information in this letter as well as the attached confidential documents.

Charter would welcome the opportunity to discuss with you to clarify our responses prior to any subsequent report or reply related to this audit. If you have questions regarding this response, please reach out to me (ryan.lindsay@charter.com) and Torry Somers (torry.somers@charter.com).

Sincerely,

/s/ Ryan Lindsay

Ryan Lindsay
Senior Manager, Construction

Enclosures

- Confidential Attachment 1 –06 – *CONFIDENTIAL REVISED Inspections*
- Confidential Attachment 2 – 07 – *CONFIDENTIAL REVISED Work Orders*
- Confidential Attachment 3 – *CONFIDENTIAL Charter Alturas Field Inspection Response*

Cc: Lee Palmer, Director, Safety and Enforcement Division
Eric Wu, Program Manager, Safety and Enforcement Division, ESRB
Yi (Rocky) Yang, Senior Utilities Engineer (Supervisor), ESRB
Stephen Lee, Senior Utilities Engineer (Supervisor), ESRB
Charles Mee, Senior Utilities Engineer (Specialist), ESRB
Javier Reyes, Utilities Engineer, ESRB
Madonna Ebraimof, Staff Services Analyst, ESRB
Torry Somers, Charter
Lisa Ludovici, Charter

(Response to Audit Report Begins on Next Page)

RESPONSES TO AUDIT REPORT

I. Records Review

A. **ESRB Finding:** *Reviewing Charter's inspection records in the last 5 Years (April 2020 – March 2025), ESRB found that Charter's inspection records only showed the following information:*

- *Facility Identification or Unique Asset Number,*
- *Facility Type,*
- *Facility Location Latitude,*
- *Facility Location Longitude,*
- *High Fire Threat District (HFTD) Tier,*
- *Wired or Wireless,*
- *OH or UG,*
- *Inspection Type (Patrol or Detailed Inspection),*
- *Inspection Date,*

Charter's inspection records did not show any findings of potential violations of GO 95 or GO 128. The inspection records also did not show any timelines for Charter to correct any possible findings. The inspection records should show deficiencies identified, and due date for correcting the deficiencies.

CHARTER RESPONSE:

As an initial matter, Charter conducts patrol (and detailed) inspections in accordance with Charter's inspection program, which ESRB has reviewed in numerous prior audits (along with patrol inspection data) and not previously identified any violations. Regarding the inspection records, Charter has corrected the identified records, attached here as **Confidential Attachment 1**. Charter has relatively few facilities in the Alturas region and this system was recently completely rebuilt therefore there are few potential violations.

For future inspections, [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] This will standardize recordkeeping for inspections in the Alturas region and across all Charter service territories. Charter continually evaluates its auditable maintenance program technical inspection record-keeping practices and will further evaluate its practices in light of the recommendations made in this Audit Report.

B. **ESRB Finding:** *Reviewing Charter's work order records from April 2020 through March 2025, ESRB found that:*

- *Charter did not specify how the work orders were created such as through routine inspections, learned from customers, or third-party notifications.*
- *Charter also did not assign priority levels to each deficiency to be corrected by the work orders.*

CHARTER RESPONSE:

Charter has corrected the identified records, attached here as **Confidential Attachment 2**.

Regarding work orders, as noted in its September 11, 2025 supplemental response, work orders are identified through a variety of means and routed to maintenance technicians as appropriate.

Regarding priority levels, Charter's system allows technicians to tag an immediate risk (i.e., Safety Hazard or a Level 1 condition) ; however, all 13 identified deficiencies were Level 3 and were resolved on the same day as identification.

Moving forward, Charter has improved its recordkeeping practices, **[BEGIN CONFIDENTIAL]**

[END CONFIDENTIAL]

Charter continually evaluates its inspection program practices and will further evaluate its practices in light of the recommendations made in this Audit Report to further improve public safety.

II. Field Inspection Review

Please see **Confidential Attachment 3**, which summarizes each "Field Inspection" location and issue identified in the Audit Report. This attachment also indicates repairs and/or third-party communications made, if needed, and the date completed.

**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 Safety and Enforcement Division Audit Report of the Alturas Region, with this request for confidential treatment made pursuant to Section 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 believe 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. Employee Information: The Response contains sensitive personal information regarding Charter’s employees, and I am informed and believe that such information is protected from disclosure under California Government Code § 7927.700.
8. 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 23rd day of January, 2026 at El Segundo, California.

/s/ Torry R. Somers

Torry R. Somers

06 PUBLIC REVISED - Inspections - Charter Alturas

**Facility Identification or Unique
Asset Number**

Facility Type

Facility Location Latitude

Facility Location Longitude

**High Fire Threat District (HFTD)
Tier**

Wired or Wireless

OH or UG

**Inspection Type (Patrol or
Detailed Inspection)**

Infraction/Deficiency Found

Infraction Level (1-3)

Inspection Date

Repair Due Date

Date Corrected

07 PUBLIC REVISED Work Orders - Charter Alturas

**Facility Identification or
Unique Asset Number**

Facility Type

Facility Location Latitude

**Facility Location
Longitude**

Wired or Wireless

OH or UG

Identification Method

**Corrective Action
Description**

Infraction level

**Deficiency Identification
Date**

**Corrective Action Due
Date**

**Corrective Action
Completion Date**

CPUC SED Audit - CA2025-1402 Spectrum Communications Alturas- Field Inspection Response

Confidential Information in grey highlight

Discovered During	CPUC Audit Location No.	CPUC Rule Number	Pole Number	Street Address	City	Violation Details	Violation Owner	Repair details
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