



VIA ELECTRONIC MAIL

March 4, 2026

Majed Ibrahim, 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

Via Electronic Mail

REDACTED PUBLIC VERSION

Re: Charter Communications, Inc. Response to SED Southern California Central Orange County District Audit: CA2025-1422

Dear Mr. Ibrahim:

This letter is in response to your February 12, 2026 Audit Report of Charter Communications, Inc.'s ("Charter") Southern California Central Orange County District.

Enclosed are (i) the redacted PUBLIC version of this letter, (ii) a CONFIDENTIAL revised Work Orders spreadsheet; (iii) a redacted PUBLIC revised Work Order Spreadsheet; (iv) a CONFIDENTIAL Field Inspection Response spreadsheet; (v) a redacted PUBLIC Field Inspection Response spreadsheet; (vi) a CONFIDENTIAL Revised Pole Load Calculation, and (vii) a declaration supporting Charter’s request for confidential treatment of the information in this letter and the confidential spreadsheet.

I. RECORDS REVIEW

Audit Finding:

“Charter’s records indicated that during the twelve months prior to the audit, Charter completed 39 overhead and underground work orders past Charter’s due date for corrective action. Additionally, as of the audit, Charter had 434 overhead and underground open work orders that were past Charter’s scheduled due date for corrective action.”

Response to Audit Finding:

[BEGIN CONFIDENTIAL] _____

[END CONFIDENTIAL]

To avoid confusion, we have attached “10.6.25 CONFIDENTIAL Charter SoCal Central Revised Work Orders” previously submitted to Commission staff in the Pre-Audit Data workbook on tab E. The document, has been revised to reflect both Charter’s internal program and GO 95 due dates by Priority Level (“Level”). Column S (“Infraction Level”) and column G, (“CPUC Due Date Variance”) have been updated accordingly.

In light of this supplemental information, Charter respectfully objects to any characterization of Level 3 repairs as past due under GO 95. Below, we address the specific items mentioned in the Records Review.

39 Past Due-Complete

Of the 39 classified as completed past deadline, 16 are Level 3 infractions with an actual due date of 60 months from date of identification. These are now reflected as On Time-Complete on the revised Spreadsheet.

Of the remaining 23, two are Level 2 infractions with a six-month due date and are now characterized as completed On Time. Seventeen are outgoing third-party notices. These remain categorized as Past Due-Complete because we recently discovered an error code in the Spida program that prevented assignment of outgoing third-party notifications to the appropriate department for dispatch. We are currently working to correct this issue.

The remaining 4 are Spectrum drop or plant related and were Past Due-Complete. Two of these were delayed due to the fact that pole owners needed to complete repairs. We continue to research the reason for other delays.

434 Past Due-In Progress

Of these 434 marked as in progress, passed deadline, 357 are Level 3 infractions. As per our comments above, we have updated the actual due date from six to 60 months from date of identification. The characterization has been updated to In Progress but not Past Due for 314 of the 357 infractions, while 43 have been updated to Completed-On Time on the revised spreadsheet.

Forty-four of the remaining 77 are Level 1 and Level 2 infractions that require outgoing third-party notifications. These were delayed due to the previously noted Spida error code. We are in the process of addressing this error and have issued the third-party notices. These 44 infractions are now characterized as either Past Due Complete or On Time Complete.

The remaining 33 involve Charter plant- or drop-related work. One was completed but missing a completion date in Spida which now has been corrected and is reflected as On Time. Two jobs were not assigned due to error inputs; We are in the process of researching these jobs and inputting the correct information. These have been characterized as “Not In Spida.”

Of the 30 remaining, 27 have since been completed following submission of the pre-audit data on June 2, 2025. These are now Past Due - Complete. Four of the 27 were delayed due to required vegetation trimming and eight were due to a recently identified technical issue with job assignment from our Structured Patrol inspection system. We continue to research the delays for the remaining 15 jobs.

Of the remaining three, the due dates on two have been updated from 6 to 12 months based on the level of severity of their Level 2 infractions. These are now In Progress not past due. We continue to address the one remaining Past Due – In Progress infraction and the underlying cause for its delay.

Audit Finding:

The pole loading calculations provided by Charter Communications for the pole number 4702530E had a missing four feet secondary crossarm at the height of 37.5 feet.

Response to Audit Finding:

Please see attached document, “CONFIDENTIAL Revised Pole Load Calculation 4702530E.”

II. FIELD INSPECTION RESPONSE

Charter’s responses to the Field Inspection section are attached in the document titled “CONFIDENTIAL Charter Response to Field Inspection - SoCal OC Audit.”

As an initial matter, we note below, that Charter respectfully disagrees that certain aspects of pole maintenance are Charter’s responsibility.

GO 95, Rule 31.1, Design Construction and Maintenance:

The report states that several poles within the audit area have damaged visibility strips that need to be replaced and indicates that this is a violation of Rule 31.1. The report provides no indication that Charter itself violated Rule 31.1, nor could it.

Charter leases the communication spaces on the poles it attaches to and does not own any poles within the audit area. The maintenance of visibility strips is the responsibility of the pole owner, not the attacher. See, e.g., D.17-12-024, Finding of Fact Paragraph 20 (“[p]ole owners are responsible for the safety of their poles....”). While attachers may have obligations under Rule 31.1, those obligations are limited to the “facility,” which for Charter would be its attachment.

As an attacher, we do not have the authority to place or replace standard safety equipment on poles such as visibility strips. However, as a courtesy, we have added these poles to our third-party notifications and will notify the pole owners. We have noted this on our attached Field Violation report.

GO 95, Rule 34, Foreign Attachments

The report characterizes signs such as “Lost Dog,” “Cash 4 Junk Cars” and “I Buy Houses,” as “Unauthorized Foreign Attachments.” These were identified on 16 poles and are listed on the audit report as violations part of Rule 34. The report provides no indication that Charter itself violated Rule 34, nor could it.

As noted above, Charter leases the communication spaces on the poles it attaches to and does not own any poles within the audit area. There is no affirmative obligation in Rule 34 for attachers like Charter to monitor and remove any such signs.

Maintenance of poles and their appearance is conducted by the pole owner, and not the attacher. Rule 34 itself indicates that whether any such attachments could be made is subject to the “owner’s or owners’ consent” and not the attacher. Even then, in D.99-04-001, the CPUC found that Rule 34 “does not impose an affirmative obligation on utilities to actively and routinely remove all unauthorized, temporary signs and their fastenings or take legal action against persons who post them.”

Nevertheless, as a courtesy Charter has removed these signs from poles where the audit identified infractions. We have added the others to our third-party notifications and will notify the pole owners.

If you have questions regarding this response, please feel free to reach out to either Torry Somers (torry.somers@charter.com) or to myself (cory.hoyt@charter.com).

Sincerely,

/s/ Cory Hoyt

Cory Hoyt
Area Vice President

cc: Lee Palmer, Director, Safety and Enforcement Division, CPUC
Eric Wu, Program Manager, ESRB, SED, CPUC
Majed Ibrahim, Senior Utilities Engineer (Supervisor), ESRB, SED, CPUC
James Miller, Utilities Engineer, ESRB, SED, 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 November 17th – 25th 2025 Safety and Enforcement Division Audit Report of Southern California Central-Orange County District, 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 4th day of March, 2026 at El Segundo, CA.



Torry R. Somers

CPUC SED Audit - CA2025-1422 Charter So Cal Orange County Management District - Field Inspection Response

REDCATED PUBLIC VERSION

	Pole Owner Responsibility									
	Drop Repair									
	OSP Plant Repair									
Discovered During	CPUC Audit Location No.	Rule	Pole Number	PID	Street Address	City	Violation Details	Violation Owner	Repair Notes	Repair Date

<u>id_method</u>	<u>Inspection Date</u>	<u>9.22.25 Response Charter Due_date</u>	<u>10.6.2025 Revised CPUC Due Date</u>	<u>completion_date</u>	<u>9.22.25 Response Charter Due Date Variance</u>	<u>10.6.25 Revised CPUC Due Date Variance</u>	<u>Spida ID</u>	<u>infraction_level</u>	<u>drop_or_plant</u>
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